

THE SIU MLC SYSTEM MANUAL

This document is intended to describe the policies and procedures implemented by the SIU in order to comply with the requirements of the Maritime Labor Convention 2006 and applicable Flag State requirements.

Policies and Procedures



MARITIME LABOR CONVENTION

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Corrective Action Request (CAR)
Executive Board Review Form
MLC Internal Audit Checklist & Report
Strategic Audit Plan



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1.0 INTRODUCTION

1.1 Description of Organization

The Seafarers International Union, Atlantic, Gulf Lakes and Inland Waters, AFL-CIO or SIU is a labor organization of mariners, fishermen and boatmen working aboard vessels flagged in the United States and Marshall Islands. The SIU represents mariners and boatmen who sail aboard vessels in deep sea, Great Lakes, and inland waterways. Membership includes workers in the deck, engine and steward departments. SIU members are represented aboard a wide variety of vessels, including: military support, commercial trade, tugboats, dredges, passenger ships, barges, and gaming vessels.

1.2 Basic Premise and Scope of MLC Manual

The Seafarers International Union, Atlantic, Gulf Lakes and Inland Waters, AFL-CIO (referred herein as the SIU, Organization or simply Union) has developed and implemented policies and procedures in order to satisfy the requirements of the Maritime Labor Convention 2006, as amended, and ensure that its members (customers) are effectively served and protected by the organization. This manual and its policies, procedures and referenced documents constitute our “management system” as required by the MLC and may be called the MLC Manual or MLC System.

1.3 Applicability of the MLC Manual

This Manual describes our key processes with respect to the requirements of the MLC and applies to our hiring halls, Manpower office, headquarters and branch offices as they relate to the functions of recruiting and placement of our members in North America.

1.4 MLC Manual Layout

The MLC Manual is the basic document for our MLC compliance system. The SIU Constitution describes Union business, organization, duties and election requirements among other important topics and is the foundational document of our Union. The contents of the SIU Constitution as they relate to MLC requirements are not duplicated within this manual but rather, those provisions are referenced herein, as applicable.

The Quality Policy, as required by the MLC, is included within this Manual and is available to all officials, patrolmen and Union employees and staff as they relate to functions of this MLC system.

This Manual is divided into four- (4) sections (and Appendices) and includes each requirement of the MLC Convention.

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1.5 Approval and Distribution

This MLC Manual is approved by the Executive Board of the Union and may be issued as either a controlled or uncontrolled document. Controlled copies are generally distributed electronically to copyholders. Uncontrolled copies are marked as such. Refer to Document Control Procedures for details.



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2.0 QUALITY POLICY & OBJECTIVES

2.1 Leadership Responsibility

The Leadership of the SIU is committed to satisfying customer (members and contracted employers) needs and expectations, achieving excellence in our internal processes through the implementation and continuous improvement of our processes and demonstrating those principles visibly and complying with applicable rules, regulations and conventions.

This is done by:

- a) Ensuring that our officials, representatives and staff become familiar with member requirements and expectations through direct communications with them and through internal communications in our organization,
- b) Ensuring that any legal or regulatory requirement is known and considered during the process of serving our members and in conducting union business,
- c) Establishing a Quality Policy and Quality Objectives and ensuring that the Organization understands and is motivated towards compliance,
- d) Establishing a yearly routine of reviewing the key aspects of our MLC compliance system during Executive Board Reviews to ensure that it is accurately reflective of our processes and continues to be suitable to our Quality Policy and Objectives, and
- e) Providing adequate resources and work environment to ensure that our personnel can fulfill assigned tasks effectively and efficiently.

2.2 Quality Policy

The Leadership of the SIU has established and promulgates the following Quality Policy in accordance with MLC requirements and such as is appropriate to ensuring that our processes and activities meet the needs of our membership and employers on a continuing basis.

SIU QUALITY POLICY

The Seafarers International Union of North America-Atlantic, Gulf, Lakes and Inland Waters, is wholly committed to providing superior service to our members, providing them with excellent job and career opportunities at a fair wage, and protecting their interests in accordance with the requirements of collective bargaining agreements, our Constitution, Shipping Rules and the provisions of the Maritime Labor Convention. We are also committed to providing credentialed and trained crews in accordance with regulatory and employer requirements in a timely and professional manner.

We affirm that there shall be no charges to the seafarer for recruitment and placement services and that no means, mechanisms or lists intended to prevent or deter our members from gaining employment for which they are qualified will be used by our Union. Our goal is to be known as a World-Class provider of excellent jobs for our members and for highly qualified seafarers by our contracted employers. We will abide by applicable rules, regulations and conventions and seek to continuously improve our internal processes to achieve these stated goals.



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2.3 Quality Objectives

The Organization's objectives are broadly defined as follows:

- Provide well-paying jobs and competitive benefits for all of our members as is consistent with their needs, wants and expectations in order to ensure their livelihood;
- Provide error-free, timely and professional dispatching of crews to contracted employer vessels and as consistent with their requirements;
- Ensure that Union resources are structured and provided so that we may fully represent our members and be available to them to meet their needs as are consistent with the CBAs, Constitution and our Shipping Rules.

2.4 Costs

All costs which our members will be expected to bear appear in our Constitution, Article V, which has been duly ratified and is available to all members. There shall be no hidden costs nor fees incurred or expected by the members other than those associated with Union Membership (dues) for the purposes of funding Union business and representing the members. There are no fees charged to the seafarer for recruitment or placement. There shall be no costs to the seafarer other than obtaining national statutory medical certificate and / or Seafarers Clinic Card (if Seafarer is not eligible for a free physical from the Seafarers Health Plan), Merchant Mariner Credential, TWIC and passport, which may be borne by the seafarer (such fees are, however, paid to the relevant government agencies and not to the SIU). Travel visas, if applicable, shall be borne by the ship-owner / operator.

2.5 MLC Management System

This MLC Manual is intended to describe the SIU's system of managing the processes by which we do business in accordance with the MLC requirements. The scope of certification for this management system includes our Headquarters, Manpower Office and hiring halls which do business in North America and the processes by which we recruit and dispatch our members to contracted employers vessels on seas, lakes and inland waters.

2.6 Document Control

Documents, which relate to our MLC System, are controlled in accordance with this procedure. Control consists of ensuring that relevant documents are:

- Approved for adequacy prior to use;
- Reviewed, updated and re-approved as necessary;



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- Identified as to issue/revision date or current status of any changes;
- Available at points of use;
- Legible and readily identifiable;
- Identified and controlled if of extern origin and necessary to our System; and
- Prevented from being used unintentionally if obsolete (the official manual will be considered that which is available in electronic format and the printed Master copy: all other printed copies will be assumed to be for reference only).

2.6.1 Method to Control Manual and Forms

The following paragraphs describe how this Manual and its associated forms are to be controlled in accordance with the requirements in the paragraph above.

- a) This MLC Manual, its procedures and forms are to be maintained in present form – note information on header with respect to title, logo, pagination, and approval information.
- b) The Executive Board reviews and approves this document for adequacy and all revisions and re-issuances prior to use are approved with such approval designated on the documents.
- c) Typically, minor edits for clarity or for grammatical reasons can be made and pages replaced without recording on the Record of Revisions page.
- d) This manual is considered a single document (excluding the Appendices which bear their own revision dates) and edits to the content will require a new issue date in the header, which shall also be noted on the Record of Revisions Page. Minor grammatical changes need not be recorded.
- e) The Document Controller is responsible for maintaining and controlling the electronic Manual and its distribution (whether emailed or on an access controlled website). The initials of the President and Document Controller (DC) on the header shall signify that the document is “controlled” and in force.
- f) The DC is responsible to ensure all applicable users have access to the manual. The DC shall retain an electronic master copy of the manual and a hard copy of same.
- g) The DC may retain other hard copies as working copies or uncontrolled copies as he determines is appropriate, but these shall be for “reference only” and the fact that manual is in printed form will be the only factor required to identify it as uncontrolled (except for his/her master hard copy).

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2.6.2 Control of Quality Policy and Objectives

The Quality Policy contained in this Manual is construed to be promulgated by its inclusion in this Manual. Separate copies may be posted (hard copy or electronically) but must be signed and dated by the Secretary Treasurer as the representative of the Executive Board and consistent with the version in this MLC Manual.

The Quality Objectives noted in this manual are reviewed during Executive Board Meetings and may be amended as determined necessary.

2.6.3 Control of Other Internal Documents

Other internal documents shall also be controlled by noting dates and other relevant notations to establish control. These documents shall be issued where needed and shall remain in force unless superseded or rendered obsolete, and if so, shall be identified as such. Those documents include but are not limited to the following:

- National Constitution
- Policy and/or Personnel Manuals
- Port Procedure Manual
- Official Memoranda
- Shipping Rules
- Other internal documents as needed by the organization.

2.7 Control of Records

2.7.1 General Procedure

Records generated as a result of our operational processes and compliance with the MLC requirements. These records are controlled by this procedure. Our operational records shall be:

- Legible,
- Readily identifiable,
- Retrievable,
- Properly stored,
- Protected, and

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- Retained or disposed of according to rules, regulations or internal/external needs as deemed appropriate by SIU Leadership.

The Document Controller is responsible to verify that all records relating to the MLC system are maintained as per this procedure. Union records may be retained in microfiche, hardcopy, electronically originated or scanned.

2.7.2 Records to be Controlled

The following table depicts the records that are controlled as required by Union business and the MLC.



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Control of Records Table

RECORD	RESPONSIBILITY	STORAGE	PROTECTION	RETENTION & DISPOSITION	RETRIEVAL
Contracts/ Associated Documents	V.P in Charge of Contracts	File Room	Office Locked after hours, backup copies	At least five years and then may be discarded	Contact person in responsibility column
Applicant Files / Applications	Secretary Treasurer	Archives/SMIS	Office Locked after hours, backup copies	At least five years and then may be discarded	Contact person in responsibility column
Shipping Lists	Director of Manpower	File/SMIS	Office Locked after hours, backup copies	At least five years and then may be discarded	Contact person in responsibility column
Job Orders	Director of Manpower	File/SMIS	Office Locked after hours, backup copies	At least five years and then may be discarded	Contact person in responsibility column
Grievance Files	V.P in Charge of Contracts	File Room/Archives/ SMIS	Office Locked after hours, backup copies	At least five years and then may be discarded	Contact person in responsibility column
Corrective & Preventive Actions	Secretary Treasurer	File Cabinets	Office Locked after hours, backup copies	At least five years and then may be discarded	Contact person in responsibility column
Executive Board Minutes	Secretary Treasurer	File Cabinet	Office Locked after hours, backup copies	At least five years and then may be discarded	Contact person in responsibility column
Member Files	Secretary Treasurer	Archives/SMIS	Office Locked after hours, backup copies	At least five years and then may be discarded	Contact person in responsibility column
Patrolman/Safety Reports	V.P in Charge of Contracts	File Room/Archives/ SMIS	Office Locked after hours, backup copies	At least five years and then may be discarded	Contact person in responsibility column
Member Complaints	Contracts VP, Sec Treas	File Room/Archives/ SMIS	Office Locked after hours, backup copies	At least five years and then may be discarded	Contact person in responsibility column
All Audits (internal & certification)	Secretary Treasurer	File Cabinet	Office Locked after hours, backup copies	At least five years and then may be discarded	Contact person in responsibility column
Education, Training, Skill & Exp.	Dir. Of Manpower/ SMIS	File Cabinet/SMIS	Office Locked after hours, backup copies	At least five years and then may be discarded	Contact person in responsibility column
Membership Meeting Minutes	Secretary Treasurer	File Cabinet	Office Locked after hours, backup copies	At least five years and then may be discarded	
Register of Vessels and Emergency Contact Info	Dir. Of Manpower/SMIS	SMIS	Office Locked after hours, backup copies	At least five years and then may be discarded	Contact person in responsibility column

2.8 National and Other Legal Requirements

As noted in our Quality Policy and elsewhere in this Manual, the SIU is committed to identifying and faithfully adhering to all applicable national and other rules, regulations, codes, conventions and guidelines. Our Executive Board through advice of General Council and its liaisons with governmental organizations determines applicability of these rules and determines measures to comply. Those measures may be contained within this MLC Manual or elsewhere in our Union documents.



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3.0 PROVISIONS for RECRUITMENT and PLACEMENT SERVICES

3.1 Registers

The Union maintains an up-to-date Register of vessels, including emergency contact information (accessible by seafarer at all hours), for which our Hiring Hall services have been provided. It is incumbent upon our dispatching function to ensure that this information is current and available in our SMIS database. The data shall include seafarers recruited and placed, including relevant personal data but in such a manner as to ensure confidentiality.

3.2 Seafarer Information

The SMIS system is populated with a list of our members who are eligible for placement and the information contained therein includes but is not limited to the following:

- Seafarer's qualifications and training records (MMC, Endorsements, training, etc.)
- Record of previous employment
- Personal data relative to employment (which shall be protected from unauthorized access)
- Medical data relative to employment (fitness status, restrictions, etc.)

The Dispatchers and/or Director of Manpower shall verify the accuracy of the data, confer with members on the validity of information and make amendments to the SMIS records as required.

3.3 Records Verification and Dispatching

- a) All members dispatched shall have appropriate credentials for the position they will fill including grade and type of license/MMC rating, basic safety as prescribed by STCW and other ship or company-specific requirements.
- b) Through the Union's affiliated training facility in Piney Point, MD, approved by USCG and meeting all requirements of other flags that contract SIU seafarers, members receive training to augment or maintain skills and credentials required by the employers and applicable regulations. Training includes testing and an evaluation protocol that ensures that training provided is effective.
- c) When registering and dispatching seafarers, dispatchers shall ensure that certificates and other credentials submitted for eligibility for employment and dispatch are verified as valid to the extent practicable.
- d) Applicable law provides that credentialed seafarers must be at least 18 years of age to secure relevant shipboard employment.



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- e) SIU shall to the extent practicable, verify previous employment claims of members and applicants, insofar as this data is related to obtaining current employment where such employment is contingent upon that experience.
- f) SIU shall ensure that seafarers are advised of particular conditions applicable to the job for which they are to be engaged and of relevant ship owner policies relating to their employment such as work conditions, overtime pay, ship trade route if known, personnel policies and information contained in the CBA.
- g) SIU personnel shall endeavor to provide all requests for information or advice requested by the families of members who are at sea, shall be provided in a timely fashion and without cost or other consideration.
- h) SIU shall keep members informed about the Constitution, Shipping Rules and CBA restrictions and provisions to prevent them from being exploited through joining advances or unethical financial transactions. In addition, in accordance with applicable US Labor Laws, there shall be no financial consideration between the SIU and employers that would unduly benefit another party at the seafarer's expense.
- i) It is SIU policy that there shall be no charges for applicants and members nor means or mechanisms, lists or other measures by which members will be deterred or prevented from gaining employment for which they are otherwise qualified. Dues are for the purpose of providing for Union operations and funding processes required by the members (Constitution Article V).
- j) Prior to beginning work on a ship, the Union shall verify that seafarer holds a valid medical certificate attesting that they are medically fit to perform required duties. The certificate shall be issued by one of its duly authorized medical clinics, or, in the case of a certificate solely concerning eyesight, by a person recognized by the competent authority as qualified to issue same. Practitioners should have independence in judgment when undertaking exams.

3.4 Review of Union Service Requirements

The Union periodically reviews the requirements related to the expectations our members have of our services to ensure that:

- Recruitment and dispatching service requirements are defined in our shipping rules.
- Costs associated with the seafarer employment continue to be clearly defined in the Constitution and other documents and that it is clear to our members which costs are to be borne by them.
- SIU has procedures in place to ensure that both our members' requirements are fulfilled and also, those of our contracted employers to whom we assign our members. These requirements are fulfilled through our dispatching procedure as detailed in this Manual.



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- SIU strives to maintain internal agility to ensure that changes to recruitment or dispatching requirements are reflected in our processes and related documents, including the procedures in this MLC Manual. These changes, when promulgated, shall be made know to the users and those affected through our communications processes, our website and the SMIS system, as appropriate.
- The review of these processes is accomplished by a subcommittee of the Executive Board and a subcommittee of the contracted employers through the Seafarers Appeals Board, the details, of which is described in Section 4 of this Manual.
- The Review records are maintained as the Minutes of the Executive Board Meeting.

3.5 Employment Agreement Procedure

- a) The Union shall ensure that each member has access to the employment agreement / contract for the vessel / company to which he or she works under. The seafarer shall have access to the following information that forms his/her employment agreement:
- Seafarer's full name, DOB and birthplace
 - Ship-owner / operator name and address
 - Place and date where employment is entered into
 - Capacity in which seafarer is engaged
 - Amount of wages or formula for calculation of same
 - Amount of paid annual leave (if applicable) or formula for calculation of same
 - Termination of employment and conditions thereof, including
 - If indefinite term, conditions entitling either party to terminate and required notice period, which shall not be less for seafarer than ship operator
 - If finite term, the date fixed for termination
 - If for voyage term, the port of destination and time period of discharge after completion
 - Health and social security protection benefits to be provided
 - Seafarer's entitlement to repatriation
 - Reference to CBA, if applicable
 - Any other particulars which national law may require
- b) SIU members are informed of their rights and duties through:



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- Having access to the applicable contract provisions, Shipping Rules, and
 - Being members of the SIU in which duly elected officers act on their behalf in negotiating contracts and by being polled on contract provisions and in some instances taking part in contract negotiations through a provision by which rank and file members are selected for this purpose.
- c) Members are advised, as applicable, should there be any concerns when signing aboard any vessel registered by a Flag State that has not ratified the MLC. This may be done collectively through the SIU website or Union meetings or by other means. Since most SIU members are employed aboard US Flag vessels, the US MLC status is known.
- d) The President and Executive Board ensure that all Collective Bargaining Agreements (CBA) meet national laws and regulations.
- e) The CBAs and other measures employed by the Union ensure that members are protected or compensated for monetary loss incurred as a result of any employer failure to fulfill its obligations. This may include utilizing the grievance procedure described the Constitution and/or CBAs.
- f) The Union through provisions in the applicable CBAs ensures that contracted employers take responsibility for members' welfare during the validity of the Agreement.
- g) The SIU, through exercising due diligence in entertaining and drafting CBAs with reputable contracted employers, ensures that provisions and resources are such that members will not be stranded in foreign ports. Shipping companies will be required to have insurance to cover repatriation. For U. S. flagged vessels, the US Government provides repatriation should a company not be able to meet this requirement.

3.5.1 Prevention of Exploitation

The Union ensures, through its Constitutional processes, the Shipping Rules and CBA administration that seafarers cannot be exploited with regard to the offer of engagement on a particular ship or by particular companies. Also, these procedures ensure against exploitation by prohibiting joining advances or any other unlawful financial transactions between ship-owner / operator and the Union's member seafarers.



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3.6 Competence, Training and Awareness

The Union Leadership (Executive Board):

- a) Determines the qualifications that are required by Union Staff and employees and any associated credentials, ensure these qualifications are checked, verified prior to engaging and also ensures any continuing education as may be deemed suitable is applied;
- b) Determines that seafarers which are recruited and/or dispatched, have the necessary qualifications and credentials for the job as required by Flag State and the Employer through the use of SMIS system, in accordance with the Dispatching procedure, documented in this Manual;
- c) Where applicable, provides training (usually on-the-job) or other actions to satisfy these needs for staff or, in the case of Seafarers, refers them to the Union's affiliated School in Piney Point, MD to undertake such training as is required;
- d) For staff and employees of the SIU, evaluates the effectiveness of training or action taken and deems the action suitable or recommends additional training, and in the case of seafarers, the Piney Point School provides records of successful execution of training and credentialing per USCG and other requirements;
- e) Ensures that personnel are aware of the relevance and importance of their activities and how they contribute to the achievement of the Quality Objectives, through this Manual, meetings, routine communications and other means;
- f) Maintains appropriate records of education, training, skills and experience (normally certificates or records of attendance of formal training).

Members elected as officials within the organization are deemed "qualified" by virtue of Constitutional provisions.

3.7 New Hire Training Requirements

New SIU employees / staff are provided relevant orientation and training, which may include as appropriate to their position, but is not limited to the following:

- Specific job requirements [including the importance of the work as it relates to the MLC System, customer satisfaction and our Quality Objectives],
- The SIU Constitution,
- The Shipping Rules,
- Port Procedural Manual,
- Expense authorization threshold policies,
- Continuing on-the-job training as required, and



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- Other training as may be deemed necessary to the function.

The orientation process for new hires (SIU staff or employees) or those that may be transferred to different functions internally does not preclude the need for personnel to continue their education and to remain current in procedures, processes and techniques as they are developed.

On-the-job training for new employees/elected officials should be recorded. The immediate supervisor will assess competence and apply any additional training as may be required. SIU employees/staff who attend specialized training such as in Labor Relations or other technical or business training shall do so with approval of the President or his designee. Certificates provided for completed training should be retained in the office files as verification of attendance and satisfactory completion.

3.8 Seafarer Complaint Procedure

3.8.1 Receiving Complaints

Should an SIU employee or staff member receive a complaint from a seafarer relative to union business or his/her employment aboard contracted vessels, he/she is required to report this to a union elected official or patrolman. The official or patrolman shall determine the validity of the complaint and ensure that it is processed according to procedures. Such procedures are contained in the applicable collective bargaining agreement if the issue pertains to shipboard employment or are in Article XV of the Constitution if the issue pertains to an internal union matter.

3.8.2 Processing Complaints

Complaints, as noted above, shall be recorded on Corrective Action Request or other appropriate record form by a Union Official and the appropriate process applied to its resolution such as grievance process as described in CBA or the process provided for in the SIU Constitution for internal matters. If the complaint involves a regulatory violation, the appropriate authorities shall be notified. Unresolved complaints shall be reported to the Flag State.

3.8.3 Records

Records of the complaint, its processing and resolution shall be maintained according to the control of records procedure and associated table included in this MLC manual.



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4.0 MEASUREMENT, PLANNING and IMPROVEMENT

4.1 Customer Satisfaction and Communications

4.1.1 Customer Requirements

The Union has determined:

- a) Requirements specified by the customers for both the provision of the service and after the service has been delivered, such as
 - Competitive employment provisions contained in the collective bargaining agreements for a variety of ships for Members;
 - Providing qualified maritime personnel to contracted employer vessels; and
 - Service by officials and patrolmen to Members after being dispatched.
- b) Requirements not specifically stated by the Stakeholder but necessary in order to provide a complete and satisfactory service, which include:
 - Officials and Patrolmen who are readily accessible, knowledgeable and helpful; and
 - Office spaces and parking conducive to member visits to Union Halls and facilities.
- c) Statutory and regulatory requirements, applicable to our service, such as:
 - Department of Labor requirements;
 - Maritime Labor Convention;
 - US Coast Guard regulations, and
 - Applicable Labor Laws.
- d) Any additional requirements considered necessary by the SIU such as:
 - Number of patrolmen and staff suitable to adequately serve the Membership;
 - Where and how documents/files are routed and stored; and
 - Where port offices are located and how they are staffed.

The requirements relating to providing our services are communicated as necessary either verbally or in document form.

4.1.2 Customer Perception

The Union monitors the execution of the above services for both sets of customers – its members and the contracted employers for which they provide crews as follows:

- *Members*: through union meetings, patrolman visits to vessels, discussions with members by phone or mail.



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- *Employers:* Employer conferences, formal and informal meetings and correspondence and unsolicited feedback.

Noteworthy issues from the above are discussed and may be acted upon by Leadership as they deem appropriate.

4.1.3 Customer Communication

The Union has determined and implemented effective arrangements for communicating with customers in relation to its services by various means including phone, fax, email, the Seafarers LOG the seafarers.org website, regular mail and courier. Communications include processes for addressing the following:

- Services provided and their effectiveness;
- Inquiries regarding SIU practices, membership, job prospects, contract provisions, etc.;
- Contracts and dispatching information are provided to both members and employers to facilitate contract development, negotiations, execution and enforcement;
- Feedback regarding any services provided by the SIU.

Records of such communications are maintained according to the records control procedure in this Manual.

4.2 Internal Auditing

The Union conducts internal audits to determine whether the MLC System and our Services and Processes:

- Conform to what we have planned,
- Conform to the MLC requirements,
- Are implemented, effective and maintained.

The audit process is planned in advance for each calendar year taking into consideration the importance of the processes and areas to be audited as well as the results of previous audits. Generally, only the HQ and the manpower office are subject to internal audits.



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4.2.1 Audit Procedure

The Internal Audit shall be conducted as follows:

- a) Internal Audits are planned by the Secretary/Treasurer. SIU officials and staff shall be notified in advance via announcement, email, memo, or any appropriate means.
- b) The Audit shall normally be conducted by an official or contracted auditor with the provision that one may not audit his own function or areas of responsibility. In other words, the auditor shall be assigned on the basis of impartiality and objectivity of the process.
- c) Internal Audits shall be conducted at no less frequently than 12 month intervals and should cover all pertinent areas of the MLC system.
- d) Auditors shall review results and follow up activities from previous audit(s) – internal and external may be used for prioritization in the conduct of the audit.
- e) The method of audits includes obtaining “objective evidence”, in other words, “fact finding” not “fault finding”, by employing the following:
 1. Reviewing process documents for conformance to requirements: procedures, documents used by Union personnel in the performance of their duties,
 2. Interviewing personnel to determine their knowledge of their work, documents, customer interactions, policies, procedures, objectives, etc.,
 3. Reviewing records, and
 4. Examining the processes of our services to ensure that they are effective and conducted as per the MLC Manual.
- f) Audit results are recorded. Nonconformities (findings or deficiencies) shall be identified on the Corrective Action Request (CAR) found in the Appendix of this Manual.
- g) The Internal Audit Plan & Record Form is used to summarize the audit and guide auditor through the process.
- h) Audit results shall be communicated to person(s) responsible for the area, who shall take corrective action.
- i) Corrective action shall be within a reasonable time frame and a “target date” assigned and documented (usually not longer than 90 days) to eliminate the cause(s) of the deficiency (nonconformity).
- j) Follow-up activities shall include the verification of the actions taken and the reporting of the efficacy of such action.
- k) Records of the Internal Audit (Internal Audit Plan & Record and CARs) shall be maintained according to the Control of Records Procedure.



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4.3 Control of Service Deficiencies

SIU processes are intended to result in effective organizational operations and services to Members and Contracted Employers that are consistent with their requirements and within the framework of our Constitution, Contracts, Shipping Rules and the requirements of our ethics and compliance policies and applicable laws and regulations. Occasionally, during normal operations non-conformity arises. These “deficiencies” (also called non-conformities) may include but are not limited to the following examples:

- Mistake in dispatching (incorrect qualifications, etc.),
- Errors on paperwork or missing or incomplete documents,
- Untimely information or processing,
- Customer complaint or negative feedback,
- Improper handling of grievance (not per Constitutional requirements, missing timing requirements),
- Mistake on registration information or dates,
- Error in Contract,
- Other errors, omissions that could negatively impact our internal processes and customers.

When an error or deficiency is identified it shall be “controlled” so as to mitigate or prevent customer impact.

Records of these deficiencies and actions taken to address them including any concessions made to the customer shall be maintained. This would be done on the Corrective Action Request, or CAR (see Appendix).

Any SIU official, patrolman or staff member who detects the deficiency shall report it to the office/area official. It is the responsibility of the local Official to ensure that a CAR form is completed as required. Completed CAR forms shall be copied to the Secretary/Treasurer for processing.

4.4 Corrective Action

The Organization takes action to eliminate the “cause” of deficiencies whether deemed to be internal or those with impact to customers in order to prevent their recurrence. Corrective actions should always be appropriate to the magnitude and severity of the deficiency.

Deficiencies also include customer complaints. In other words, a deficiency is generally defined as any service, process or requirement that has not conformed to that which was specified or intended. Corrective actions to nonconformities shall be addressed as follows:



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- a) Deficiencies meeting the criteria in Section 4.3, when detected by Union officials, patrolmen or employees shall be reported to the Secretary / Treasurer (verbally, email, etc.).
- b) The deficiency shall be reviewed by the Secretary / Treasurer for applicability.
- c) The deficiency shall be documented (Corrective Action Request).
- d) The underlying or root cause shall be determined and noted.
- e) An evaluation shall be made as to what action should be taken to prevent recurrence.
- f) The corrective action shall be determined and executed.
- g) Records of the actions taken shall be made (this is also generally noted on the CAR form).
- h) The corrective action taken shall be evaluated and verified to be effective – if not another action should be taken. Add pages to the CAR form as necessary to accommodate this.

The Secretary / Treasurer is responsible for requesting corrective action and for coordinating and processing corrective actions with the persons responsible for the area or function in question and for ensuring that CARs are closed out subsequent to the verification that corrective actions taken were effective.

4.5 Preventive Action

The Union takes action to eliminate the causes of “potential deficiencies” in order to prevent their occurrence. As with corrective actions, preventive actions shall be appropriate to the magnitude and severity of the issue. Preventive actions to potential deficiencies shall be addressed according to the Corrective Action procedure. Preventive actions may also take place without documenting the issue on the CAR form. However, the results of the actions taken shall still be recorded, for instance, on the Executive Board Review form.

Some examples of preventive actions may include but are not limited to:

- Liaising with customers (employer conferences & Membership meetings) to discuss our service and areas for improvement – this can also be an opportunity to ask “survey questions” to gauge their perception of our performance,
- Implementing new hardware/software systems to improve our effectiveness,
- Improving internal processes in advance of any perceived problems,
- Providing some additional training to personnel prior to difficulties arising,
- Other actions that could pre-empt problems with the quality of our service.

Opportunities for improvement may also be considered in the context of preventive action. All SIU Officials, Patrolmen and employees are requested to provide input for preventive actions/improvements. These requests shall be made through the Secretary / Treasurer to



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ensure adequate record keeping. Whether CAR forms are used, records of meetings or in the Executive Board Review, records of actions taken shall be maintained according to the Control of Records Procedure.

4.6 Executive Board Review of MLC System

The Executive Board Review is a strategic, planned evaluation of our MLC System and its processes to verify that it continues to suit our needs and the needs of our customers and is adequate and effective in assisting our Organization in achieving its Quality Objectives.

The Executive Board reviews the MLC System at least once per year (not exceeding 12 months), normally in conjunction with one of the twice per year regular meetings. The review includes assessing opportunities for improvement and the need for changes to the MLC System, including the Quality Policy and Quality Objectives.

4.6.1 Review Input

The Executive Board Review is normally conducted by using the Executive Review Form (Appendix B) but may be documented as minutes. In either case the required elements are addressed and provide a record of the decisions and action plans. The agenda items are as follows:

- a) Results of audits, internal and external,
- b) Customer feedback (both unsolicited and solicited through meetings or surveys),
- c) Performance of internal Union processes (recruiting, registration, dispatch, etc.),
- d) Status of preventive and corrective actions,
- e) Follow up actions of earlier Reviews,
- f) Performance relative to our Quality Objectives and suitability of Quality Policy,
- g) Other issues relevant to Union business as may be appropriate.

4.6.2 Review Output

Outputs from the Executive Board Review include but are not limited to, any decisions and actions related to:

- a) Improvement and the effectiveness of our MLC System and its processes,
- b) Improvement of our services related to customer needs and requirements,
- c) Decisions relative to resource needs to accomplish the above.

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Corrective actions identified from these reviews are communicated to the relevant persons or functions responsible. Timely implementation is required.

Records of these Reviews are maintained in accordance with the Control of Records Procedures. The Secretary / Treasurer is responsible for coordinating the review, following up on corrective actions and filing the record appropriately.

4.7 Continual Improvement

The SIU utilizes the methods and measures included in this manual to continually improve the effectiveness of the MLC system. This includes data analysis and metrics relating to member registrations, recruitment efforts, members shipped, members per job and other data that contribute to the overall effectiveness of our business and the MLC system.



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APPENDIX

MLC SYSTEM FORMS

Corrective Action Request (CAR) *Rev 01 Oct 14*
Executive Board Review Form *Rev 01 Oct 14*
MLC Internal Audit Checklist & Report *Rev 01 Oct 14*
Strategic Audit Plan *Rev 01 Oct 14*