Interim Scheme for IMCA Approval of Data Platforms for Work and Skills

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IMCA's mission is to improve performance in the marine contracting industry. Our value proposition is to influence our industry in key technical, contractual, policy and regulatory matters that are in the collective best interest of the marine contracting industry.

For over 25 years IMCA has maintained an important body of knowledge to assist our industry in the form of published guidance documents promoting good practice across a wide range of technical and professional disciplines. Documents have a self-explanatory title and are catalogued using a code containing letters and numbers. The letter indicates the discipline, and the number is simply sequential within that discipline.

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IMCA G011 Rev. 0.1

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Feedback – If you have any comments on this document, please email us: feedback@imca-int.com

Version History

Date	Reason	Revision
June 2024	Expansion of evidence portfolio requirements (11) and minor updates for consistency with other IMCA assessment procedures	Rev. 0.1
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1 Introduction

Based on the initial publication of IMCA C019 *Principles for Data Platforms for Work and Skills (Digital Logbooks)*, IMCA is offering an initial scheme for approval of such platforms.

It is envisaged that the detail of the requirements set out below will be expanded as that document is updated to Revision 1 (Rev. 1), and that a full scheme will be implemented at that time. Arrangements for upgrading of interim approvals will be set out within any such full scheme.

Requirements for this scheme and its assessors are defined by the IMCA Competence & Training Committee. The Chair of this committee is the designated point of appeal (see Section 5.5).

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2 Eligibility

Data platform approval is only available to IMCA members. Data platform approval may be suspended or withdrawn in the event of non-payment of membership fees or resignation from membership.

Organisations may apply for data platform approval whilst applying for IMCA membership, but neither will be granted until both are approved. Consideration of the membership application will be held at the desktop assessment stage until the data platform assessment has been completed.

For more information on membership procedures, please visit www.imca-int.com/membership.

3 Scope of Approvals

Under this scheme, IMCA approval is offered for specific data platforms for work and skills only and does not extend to platform providers and their services more widely.

Limitations on the approval may be defined at time of approval or via a variation (see Section 7). These might include, but are not limited to:

- Industry sector(s) and/or job roles – platforms might only offer a subset of roles covered by IMCA guidance, or may cover roles outside of that set.
- Feature set – the platform submitted for approval might offer only a subset of functionality covered by this guidance, or additional functionality outside the scope of IMCA guidance.

Platform approval under this interim scheme is for a period of one year from the date of the final satisfactory assessment and is subject to the provider maintaining compliance with the requirements of this document, including membership. Variations to approvals (see Section 7) may be temporary in nature or included up to the expiry date of the current approval. Approval may be extended in accordance with the revalidation requirements set out in Section 8. Approval may also be suspended or withdrawn as set out in Section 9.

A directory of currently approved data platforms will be maintained on the IMCA website, accessible via www.imca-int.com/dataplatforms.

Data platform approval certificates will be issued to eligible providers (subject to membership process completion) setting out the details of the approval and any limitations that have been set. Where variations are approved, updated certificates will be issued (see Section 7).

In the event that an approval is suspended or withdrawn, use of approval certificates and of related statements by providers must cease immediately, including removal from the provider's website and platform documentation.

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4 Fees

Fees for assessment, audit and revalidation are described below and are set out in the scheme terms and conditions, available at www.imca-int.com/legal-notices.

In addition, a licence fee (charged per user or as a minimum fixed fee) may be required for use of IMCA's intellectual property, such as role-specific data recording requirements found in IMCA's physical logbooks and for reuse of IMCA's guidance on competence assurance and assessment.

A further fee may be chargeable should the provider seek initial or ongoing IMCA technical assistance in relation to use and development of IMCA's intellectual property or otherwise as an industry expert.

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5 Application and Assessment Procedure

The basic application and assessment process for course approval is set out in the sub-sections below.

Fees are applicable for certain stages, as noted below.

A full assessment of data platform applications can be a somewhat complex process which will, on occasions, take an extended period of time to complete. IMCA will endeavour to ensure that platform assessments are completed in an acceptable timeframe. Precise timescales will vary depending on the IMCA secretariat's workload at the time that applications and fee payments are received. This is normally a period of two to three months, but IMCA will advise the applicant of expected response times as appropriate.

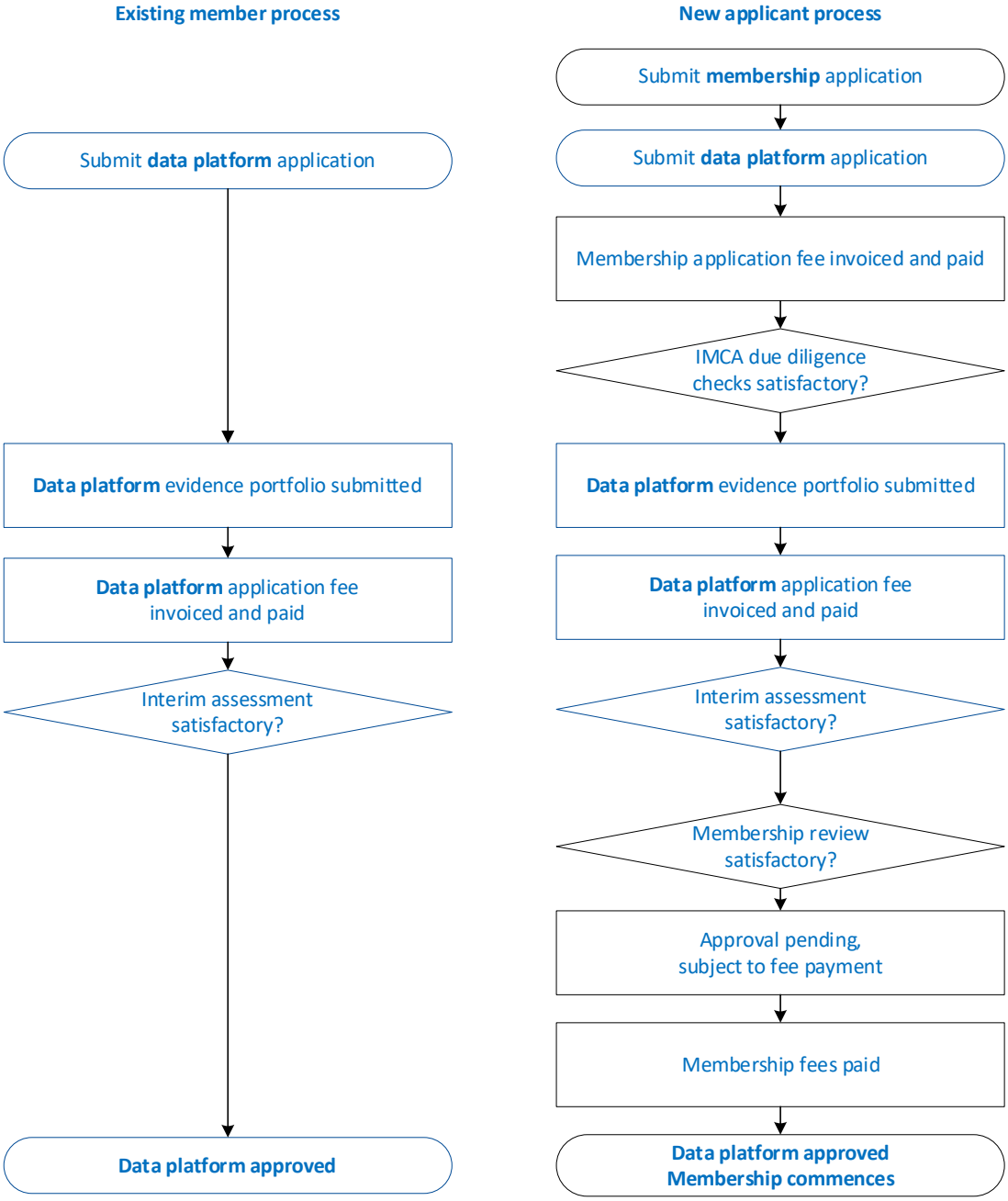

Figure 1 – Membership application and assessment process

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5.1 Initial Application

Data platform approval is only available to IMCA members. Therefore, non-member organisations seeking approval of their data platform will also need to apply for IMCA membership at the same time as they apply for data platform approval (see Section 5.1).

Organisations seeking approval of their data platform will be required to complete a form provided by IMCA, to accept the scheme terms and conditions and to submit a portfolio of evidence as set out in Section 11.

Payment of a non-refundable application fee and a standard due diligence review is required on the initial application for membership before any assessment of this submission can commence. This will be in addition to any membership application fee.

5.2 Desktop Assessment

The IMCA assessment team will undertake a review of the application form and evidence portfolio to assess its compliance with the requirements set out in this document.

The assessment team will advise the applicant of any deficiencies and request any necessary clarifications or additional evidence to be provided. Such feedback will set out areas for improvement but will be limited to evidence-based statements rather than guidance, as IMCA does not provide technical consultancy on platform development.

Any follow-up information must be provided within four weeks of IMCA's request. If this information is not provided within this period, the application will be marked as incomplete and may be rejected (see Section 5.4).

5.3 Technical Assessment

A requirement for a remote technical assessment, including access to the provider's IT systems, may be deemed necessary by IMCA.

In the event that a visit to the facilities of the applicant is deemed necessary, reimbursement of auditor travel, accommodation and related expenses is also required, which may be subject to an administration levy as set out in the scheme terms and conditions. Payment must be received before the application can proceed for final consideration (see Section 5.4).

5.4 Outcome of Assessments

Once the desktop and technical assessment stages have been completed, as required, and once all payments have been received by IMCA, the application will be considered for final approval.

If an application is successful, the platform provider will be notified. If the provider is a new applicant for membership, they will proceed through the remainder of the membership application process. Only when this is completed and payment has been received for membership will the course provider be issued with an approval certificate and added to the IMCA approved data platform directory.

If an application is not successful but is considered capable of addressing those aspects found to be inadequate during the assessments, IMCA will advise the applicant of these deficiencies and both how and when they must be addressed (this will normally be within four weeks of

IMCA's notification to the applicant). While this platform approval remains pending, any membership application will also remain on hold.

If an application is rejected outright, including if the application is rejected as incomplete (see Section 5.2), no re-application for platform approval will be accepted for a period of six months from the date on which the applicant was informed of their failure to meet the acceptance criteria. This period will allow sufficient time for the rejected applicant to prepare a new application, and will also allow IMCA to progress, in a timely manner, other applications from providers who have focused on the quality and completeness of their application.

5.5 Appeals

If a data platform provider has concerns about any aspects of an assessment or regarding the approval or non-approval of its platform, that provider should write directly to the point of appeal as set out in Section 1.

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6 Platform Audits

6.1 IMCA Assessment Team

For each data platform approval application, the IMCA secretariat will identify an assessor or team of assessors as required. While ISO 45001 lead auditor certification is desirable, technical knowledge and experience relevant to the platform being audited are of primary importance.

The assessor(s) must ensure (and be seen to ensure) that any audit is carried out in a fair and equitable fashion. Each audit should be of approximately similar duration and cover the same specific areas, although there may be occasions where more time is needed and this will be at the assessor(s)'s discretion.

Before an audit the assessor(s) will brief the provider on how they intend to conduct the audit and on any areas on which they specifically wish to concentrate.

The assessor(s) must ensure that the platform being audited is designed and operated in accordance with IMCA requirements, as set out in Section 10.

At the end of any audit, the assessor(s) will normally discuss their findings with the platform director, providing an opportunity to discuss any identified shortcomings and how the platform provider might address these.

The IMCA secretariat may contract an external third party to provide additional expertise during the technical assessment. Selection of the third party, which would have no working history with the applicant, would be at IMCA's sole discretion and they would be contracted on a confidential basis.

6.2 Audit Templates and Checklists

IMCA will maintain standard templates and checklists for conducting data platform assessments, to ensure consistency in how the requirements are applied.

IMCA reserves the right to commission independent penetration testing of the applicant's systems, with the applicant required to provide full assistance to the testers.

6.3 Additional Technical Audits

IMCA reserves the right to undertake audits of approved data platforms at any time. These may be remote or on-site assessments. Where such audits are triggered by negative feedback either from users, IMCA members or other stakeholders, platform providers will be required to meet the cost of any re-auditing prior to a final assessment of re-approval being made.

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7 Variation of Approvals

Providers of approved data platforms must keep IMCA advised of any significant changes to approved platforms, such as the range of data collected, or the scope of industry sectors and job roles covered. Providers must provide evidence that the platform with these variations in place will be operated to the same standard initially approved.

7.1 Minor Variations

Where a provider wishes to vary approval, it must apply to IMCA no later than 42 days prior to the proposed changes being made live.

For the following variations, a separate assessment fee may be charged, which must be paid by the platform provider before assessment by IMCA can commence:

- data collection elements
- industry sectors and/or job roles covered.

7.2 Change in Provider Ownership

Data platform approval is non transferrable. Any change in ownership or control of the provider will require a new application for platform approval, which will incur all relevant fees. Similarly, IMCA membership would be required, and so a separate membership application might be required.

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8 Maintenance of Approval and Revalidation Requirements

As set out in Section 3, interim platform approval is normally for a period of one year, subject to the provider maintaining the platform elements as initially assessed, or gaining approval for any variations as set out in Section 7.

Platform providers will normally be invited to apply for revalidation of approval three months in advance of the expiry.

A revalidation fee will be payable, which will be set out with the terms and conditions displayed on the IMCA website at www.imca-int.com/legal-notices. This may be incorporated into the annual membership fee.

The revalidation process will include submission of:

- a statement from the provider confirming that the platform elements continue to be as previously assessed (including any variations previously accepted by IMCA, as set out in Section 7)
- identification of any new variations that the provider wishes to be considered
- confirmation of how any changes to IMCA's guidance document have been reflected in the platform.

As set out in Section 6.3, IMCA reserves the right to undertake audits of approved platforms at any time. A full desktop or technical assessment may be required as part of the revalidation process. In such cases, providers will be required to meet the cost of any re-auditing prior to a final assessment for revalidation of approval being made.

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9 Suspension and Withdrawal of Approval

Failure to maintain an appropriate level of quality in the delivery of IMCA-approved data platforms may result in suspension or withdrawal of approval at any time. This may also affect the membership status of the provider.

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10 Assessment Criteria

For this interim scheme, the assessment criteria are the principles set out in IMCA C019.

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11 Evidence Portfolio

The application form will seek background information on the applicant company and an overview of the data platform for which approval is sought.

The following set of information must then be provided as evidence of alignment with the IMCA principles for data platforms set out in IMCA C019. Any assertions of compliance must be fully supported by descriptive text, including process/policy documentation extracts and any relevant system screenshots as appropriate.

Section 1 – Data collection	
1.1	♦ Details on data collection, including examples of user interfaces, setting out for each element (if included in the system) what is collected and how: – personal details – entry criteria – training course history – working experience record – competence assurance and assessment – company and operational data.
1.2	♦ Describe how data collection requirements , such as elements of work history or competence assessments, are updated in light of experience, feedback and any changes to regulation and industry guidance.
1.3	♦ A brief summary of any additional data collection and system functionality outside of the scope of this application.
Section 2 – Identity and trust	
2.1	♦ An explanation of the workings of identity and verification systems. This should include individuals, companies and training/certification data and cover both data recorded initially in the system and any uploaded or imported prior evidence.
2.2	♦ An explanation of individual user account recovery processes.
Section 3 – Interoperability and data portability	
3.1	♦ A description of interoperability features, such as APIs, together with any standard or proprietary data formats in use.
3.2	♦ A description of how non-users would interact with the platform.
3.3	♦ A description of data export and/or backup features that ensure the future availability and integrity of data outside the platform.
Section 4 – Data storage and availability	
4.1	♦ A description of data storage arrangements, including any user-managed backup facility.
4.2	♦ Backup/restore, disaster recovery and contingency plans for system withdrawal, platform or provider failure, including evidence of recovery drills being undertaken. ♦ If development is outsourced, details on security and resilience aspects of supplier selection, including system hosting and development repository control and access.

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Section 5 – Security, privacy and data protection	
5.1	♦ Details on ISO 27001 accreditation or equivalent status. If ISO 27001 accreditation is not held, the submission must include details on the applicant's information security management system, such as lists and examples of policies and procedures, including: – Information security policy – Asset management – Access controls (physical, operational and network/communications-based) – Supplier selection and management – Resilience and business continuity planning – Incident response plan.
5.2	♦ Copies of privacy and data protection policies and related procedures.
5.3	♦ Copies of latest penetration testing report summaries and any records of follow-up actions.
Section 6 – Data ownership and analysis	
6.1	♦ Extract(s) from terms and conditions regarding data ownership and use.
6.2	♦ A brief summary of any plans for analysis, reuse or sharing of data, such as aggregated industry activity reports or contributing to industry incident analysis.

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12 Feedback and Complaints Process

The provider must inform users of the IMCA approval of the platform and of their right to complain directly to IMCA if they have any concerns regarding the platform.

The standard IMCA complaints procedure, referred to in the scheme terms and conditions, is also available where required.

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13 References

- IMCA C019 *Principles for Data Platforms for Work and Skills (Digital Logbooks)*