



# Shipboard Climate Compliance Team Sea Year Eligibility Requirements

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*Version 2 approved as of December 19, 2017*

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- The Maritime Administration (MARAD) has formed a Shipboard Climate Compliance Team (SCCT) to determine if companies meet the Sea Year Eligibility (SYE) requirements for Midshipmen to be assigned to their ships.
- The four requirements leverage Federal, State and City mandated policies and processes already in place for public-owned vessels.
- When practical, the Academy ATRs and/or other MARAD designated staff, will visit ships carrying USMMA cadets to verify that these requirements are implemented onboard.
- The SCCT will continue to work with stakeholders to improve “best practices” in training and other areas.
- The requirements will be reviewed annually.

## I. Onboarding Process for Cadets

There must be an onboarding process for Cadets to include:

1. Cadets being provided the name and contact information of shore-side personnel responsible for the Cadet assignment
2. Identifying an officer onboard, designated as a supervisor/mentor, who the Cadet may approach with any SASH related issues. The officer must not have outstanding sexual harassment complaints or prior sexual assault violations.
3. The officer certifying to the company that he/she does not have any pending complaints or history of violations of any other company’s SASH policies. Mentors will be of good character; and knows, supports and advocates the company’s SASH policies.

## II. Affirmation of SASH Prevention Training for crew

- a. The annual SASH prevention training should:
  1. Define and provide examples of sexual assault and sexual harassment consistent with applicable USMMA definitions (attached)
  2. Make a clear statement that SASH and any retaliation based upon SASH is unlawful
  3. Describe the negative impact of SASH and retaliation on the victim, aggressor, witnesses, company and vessel crew; and the importance of prevention
  4. Explain the importance of reporting SASH violations and prohibiting retaliation
  5. Describe the responsibility of supervisors and employees, witnesses, and “bystanders” who observe SASH

6. Explain that each company has a responsibility to investigate SASH complaints and enforce its SASH policies
- b. Training participants should record or certify their attendance and date of training.
- c. The owner or operator, or the seafarer union will maintain records of sexual assault training for the crew and passengers of any vessels hosting USMMA cadets (FY2018 NDAA Section 3516).

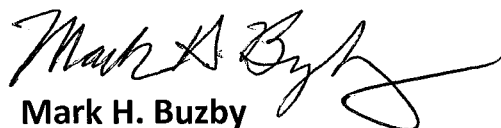
### **III. Zero-Tolerance Policy Regarding Romantic or Sexual Relationships Between Cadet and Crew Members**

- a. USMMA to provide Sea Year Conduct policy for Midshipmen (see attached)
- b. Companies agree to report known cadet violations to USMMA

### **IV. Company Submission of All Relevant Policies to SCCT and Certifying Compliance with Federal Requirements**

Documents to submit include:

1. Company-wide message from senior leadership stressing zero-tolerance for sexual harassment
2. Letter signed by CEO, General Counsel, or other senior executive verifying that the company's current policies address all discriminations prohibited by Federal law and state law when applicable.
3. SASH prevention policies and procedures:
  - Reporting procedure
    - i. Description of company's complaint reporting process and procedures, including the identity (or title) of individuals onboard and ashore designated to receive complaints
  - Anti-retaliation policy
    - i. Company's policies related to confidentiality, safety of individuals who report complaints, and anti-retaliation statement
  - Investigation procedure
  - Enforcement policy
4. Affirm that SASH prevention policies including EEO posters are available onboard the vessel
5. Affirm that those vessels required to comply with the International Safety of Life at Sea, 1974 (32 UST 47) are also in compliance with 46 U.S.C § 8106 (Riding Gangs) in accordance with FY2018 NDAA Section 3516.

  
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