

# MARITIME LABOUR CONVENTION, 2006 WORK IN FISHING CONVENTION, 2007 (ILO No. 188) Medical Certification

## Medical Examination System: Appointment of Approved Doctors and Medical and Eyesight Standards

**Notice to all shipowners, ship operators and ship managers; fishing vessel owners and managers, employers of seafarers and fishermen; masters, officers and seafarers and fishermen on sea-going ships ordinarily engaged in commercial operations** *This notice should be read in conjunction with the Merchant Shipping (Maritime Labour Convention) (Medical Certification) Regulations 2010 as amended and the Merchant Shipping (Work in Fishing Convention) (Medical Certification) Regulations 201\* and replaces MSN 1839(M).*

### Summary

This Notice contains

- the mandatory fitness standards specified by the Secretary of State under the Merchant Shipping (Maritime Labour Convention)(Medical Certification) Regulations 2010, as amended (“the 2010 Regulations”) and the Merchant Shipping (Work in Fishing) (Medical Certification) Regulations 20xx (“the 20xx Regulations”).
- the qualifications required by a medical practitioner as defined in regulation 2 of both the 2010 and 20xx Regulations
- guidance on forms to be used by medical practitioners and medical referees in keeping records and making returns.

The medical fitness and eyesight standards are consistent with STCW 78 including the Manila amendments and the ILO/IMO Guidelines on the medical examinations of seafarers. The requirements do not apply to those working on pleasure vessels (not used commercially).

#### Relationship with the Merchant Shipping (Maritime Labour Convention) (Medical Certification) Regulations 2010, as amended

- The 2010 Regulations need to be read in conjunction with this Merchant Shipping Notice, as it sets out some of the key details which supplement the legal obligations in those Regulations. Failure to comply with those obligations may be a criminal offence under the Regulations.
- In order to assist with this Paragraph 14 contains an index which clearly sets out and/or identifies the provisions in this Notice which relate to the relevant provision in the Regulations.

Relationship with the Merchant Shipping (Work in Fishing Convention) (Medical Certification) Regulations 2018

- The 2018 Regulations need to be read in conjunction with this Merchant Shipping Notice, as it sets out some of the key details which supplement the legal obligations in those Regulations. Failure to comply with those obligations may be a criminal offence under the Regulations.
- In order to assist with this Paragraph 14 contains an index which clearly sets out and/or identifies the provisions in this Notice which relate to the relevant provision in the Regulations.

## 1. Introduction

- 1.1 The Merchant Shipping (Maritime Labour Convention)(Medical Certification) Regulations 2010, (referred to in this Notice as “the 2010 Regulations”) and the Merchant Shipping (Work in Fishing) (Medical Certification) Regulations 2018 (“the 2018 Regulations”) implement in the UK the medical certification provisions of the Maritime Labour Convention 2006 and the ILO Work in Fishing Convention (No. 188).
- 1.2 They also implement, for merchant seafarers, the requirements of clause 13 of the Social Partners’ Agreement set out in the Annex to Council Directive 1999/63/EC of 21 June 1999 (the Seafarers’ Working Time Directive)<sup>1</sup>.
- 1.3 [The provisions set out in this notice also comply with Regulation I/9 and Standard A.I/9 of the IMO’s International Convention on Standards of Training, Certification and Watchkeeping (STCW), to which the UK is a signatory and the International Convention on Standards of Training, Certification and Watchkeeping for Fishing Vessel Personnel (STCW(F), which the UK has not yet ratified.]

## 2. Application - General

- 2.1 The 2010 Regulations and the 2018 Regulation together require persons working on sea-going UK ships and all UK fishing vessels wherever they may be, to hold a medical fitness certificate. For the purposes of Port State Control, the requirement to hold a valid medical certificate applies to seafarers on non-UK ships [other than fishing vessels] when in a UK port or UK waters.

### ***Application to all ships other than fishing vessels (2010 Regulations reg 6)***

- 2.2 For vessels other than fishing vessels, the regulations apply to seafarers working on sea-going vessels.

---

<sup>1</sup> **As amended by Council Directive 2009/13/EC.** The requirements of the remaining clauses of that Agreement, relating to hours of work, are implemented separately in the new Merchant Shipping (Hours of Work) Regulations 2002.

**2.3** Guidance is given on MCA's interpretation of the term "seafarer" for the purpose of these Regulations in Marine Guidance Note MGN 471(M). The meaning of "sea-going ship" is given in section 2.4 below.

## **2.4 Sea-going ship**

**2.4.1** For the purposes of these Regulations, "sea-going" in relation to a United Kingdom ship means

- (a) a ship which operates outside the waters specified as Category A, B, C and D waters in Merchant Shipping Notice 1837(M), or
- (b) a ship to which the Merchant Shipping (Survey and Certification) Regulations 1995 (as amended) apply and in respect of which no exemption under regulation 2(2) of those Regulations applies;
- (c) a ship to which regulation 4 of the Merchant Shipping (Vessels in Commercial Use for Sport or Pleasure) Regulations 1998 (as amended) applies, and which falls within the description given in paragraph (3) of that regulation; or
- (d) a high speed craft in respect of which a permit to operate outside waters of Categories A, B, C or D has been issued in accordance with regulation 8 of the Merchant Shipping (High Speed Craft) Regulations 2004 (as amended).

## **2.5 Exclusions**

- 2.5.1** The requirements of these Regulations do not apply to pleasure vessels or to offshore installations whilst on their working stations.
- 2.5.2** The Regulations do not apply to those working on vessels operating solely in inland waterways (waters of categories A, B, C or D) – although the master of an inland waterway vessel will need to demonstrate medical fitness in order to obtain their master's qualification.
- 2.5.3** Government ships such as those operated by the MOD Fleet which are not ordinarily engaged in commercial maritime operations are not covered by the Regulations, although it is expected that they will generally comply with the Standards.

## ***Fishing Vessels (2018 Regulations reg 5)***

**2.6** In respect of fishing vessels ONLY, the regulations apply to all those working on -

- (a) Vessels of over 24m in length; and
- (b) Vessels which remain at sea for more than 3 days.

**2.7** "Normally remain at sea for more than 3 days" means not returning to port within a 72 hour period.

**2.8** From 18 November 2019 onwards, they apply to all those working on all fishing vessels.

**2.9** "fisherman" means every person including the skipper employed or engaged in any capacity on board any fishing vessel, but does not include a person solely engaged as a pilot for the vessel.

**2.10** In respect of fishing vessels, the regulations apply to those operating in inland waterways as well as sea-going vessels.

## Terminology

2.11 In this notice,

2.11.1 the fisherman or seafarer being examined or in respect of whom a decision is made about their fitness to work at sea is referred to as “the candidate”;

2.11.2 “Ship” includes “fishing vessel”.

2.11.3 “Master” includes skipper.

### 3. Statutory Standards of medical fitness (2010 Regulations reg 8; 2018 Regulations reg 6)

3.1 Approved Doctors are required to determine a candidate’s fitness by reference to the statutory medical and eyesight Standards set out in Annex A to this Notice (Note for consultation draft: once finalised, the MSN will be available to download from the Government site <https://www.gov.uk/topic/ships-cargoes/m-notices>). The Standards provide for flexibility to reflect relative risk; this enables doctors to take some account of particular circumstances, such as distance from medical care, and normal duties and requirements for crew members.

#### 3.2 Medical fitness Standards

3.2.1 It is clearly not possible to cover every medical condition within the specified Standards. As a general principle the Approved Doctor should be satisfied in each case that no disease or defect is present which could either be aggravated by working at sea, or represent an unacceptable health risk to the candidate, other crew members or the safety of the ship.

3.2.2 Apart from the purely medical aspects, the occupational circumstances which apply at sea should be fully considered, especially in any borderline case. Particular factors which should be taken into account are:

- a) the potentially hazardous nature of working at sea and fishing, which call for a high standard of health and continuing fitness;
- b) the restricted medical facilities likely to be available at sea. Few ships carry doctors, medical supplies are limited and unless a ship is in port there will be delay before full medical treatment is available;
- c) the possible difficulty of providing/ replacing required medication. As a rule, a candidate should not be accepted for service if the loss of a necessary medicine could precipitate the rapid deterioration of a medical condition;
- d) the confined nature of life on board ship and the need to be able to live and work in a closed community;
- e) the limited crew complements which mean that illness of one crew member may place a burden on others or impair the safe and efficient working of the ship;
- f) the potential need for crew members to play a role in an emergency or emergency drill, which may involve strenuous activity in adverse conditions;
- g) since many [candidates] will need to join and leave ships by air, they should be free from any condition which precludes air travel or could be seriously affected by it, such as pneumothorax or conditions which predispose to barotraumas.

3.2.3 The Approved Doctor should be satisfied that no condition is present which is likely to lead to problems during the voyage and no treatment is being followed which might cause adverse side effects. It would be unsafe practice to allow a candidate to go to sea with any known medical condition where there was the possibility of serious exacerbation requiring expert treatment. Where medication is acceptable for working at sea, the

individual should arrange for a reserve stock of the prescribed drugs to be held in a safe place, with the agreement of the ship's master.

### 3.3 Eyesight Standards

- 3.3.1 The Approved Doctor must also ensure that the candidate meets the visual acuity and colour vision Standards. The UK's Standards for visual acuity are based on the international standards laid down in the IMO Convention on the Standards of Training, Certification and Watchkeeping (STCW 78 as amended). Candidates will be tested for each eye separately and must meet both the high standard required with visual aids (where needed), and a minimum standard without visual aids, in order to ensure that in an emergency they have adequate vision to carry out emergency procedures safely. For colour vision, candidates are screened using Ishihara plates. It is essential that candidates applying for Certificates of Competency as deck or dual career (merchant/fishing) officers have full colour vision.
- 3.3.2 [A deck applicant who fails the Ishihara test may arrange for their colour vision to be re-tested free of charge using an MCA approved lantern at one of the MCA Marine Offices that offer lantern tests (listed at Annex B).] *Note for consultation draft: MCA is currently making arrangements to replace the lantern test – details to follow.* Failure in this test will mean that a medical certificate cannot be issued to a deck cadet or candidate for a certificate of competency for a fishing vessel as this would preclude them from completing training for their certificate of competency which includes keeping a proper lookout at night. Other candidates may be issued with a restriction precluding lookout duties.
- 3.3.3 Applicants intending to work as engineer or radio officers must also meet colour vision requirements and those who fail the Ishihara test may be re-tested by any registered optometrist using the Farnsworth D15 or City University tests. Failure in these tests will mean that a certificate will only be issued with a restriction precluding work with colour-coded cables and equipment.
- 3.3.4 In view of the importance of meeting the eyesight Standards, anyone considering a sea-going career is strongly advised to have a full sight test by an optometrist before beginning training to ensure that they meet the Standards.

### 3.4 Categories of medical fitness

- 3.4.1 The following categories are applied in assessing whether or not a candidate is fit in terms of the medical and eyesight Standards:

**Category 1 :** Fit for sea service, with no restrictions

**Category 2 :** Fit for sea service **but with restrictions**

**Category 3 :** **Temporarily unfit** for sea service. The Approved Doctor must specify the duration of the period of unfitness.

**Category 4 :** **Permanently unfit** for sea service. This category will normally be considered to last for a minimum of five years and may only be changed at a later date if an Approved Doctor is presented with medical evidence of the reversal of the original medical condition. Review by a Medical Referee may also be required.

- 3.4.2 **Restrictions:** The Approved Doctor may issue a “Fit” certificate with restrictions on the geographical locations or duties in which the candidate is medically fit to work at sea – for example, the restriction “not fit for lookout duties” where the candidate has a colour vision deficiency. This restriction will be written on the face of the ENG 1 certificate, and is a notification to any employer, the master, and to the issuing authority for any Certificate of Competency issued. There are a small number of restrictions which may preclude the issue of certain certificates of competency. MCA will advise.
- 3.4.3 **Conditions:** The Regulations also provide for the Approved Doctor to set conditions for the issue of a medical fitness certificate. A condition is a formal notification from the Approved Doctor to the candidate of measures that must be taken in order for their medical fitness to be maintained. This should be put in writing, but should not be written on the ENG 1 certificate since it should be confidential between the doctor and the candidate. It will however, on occasion, be necessary for the candidate to make their employer or master aware of the condition agreed, for example where the candidate is required to take regular medication which must be carried on board.

### **3.5 Issue of ENG1 medical certificate (2010 Regulations reg 8, 2018 Regulations reg 6)**

- 3.5.1 If the Approved Doctor considers the candidate is fit to perform the duties they are to carry out at sea and meets the medical and eyesight Standards, the Approved Doctor will issue a medical fitness certificate (form MSF 4104 known as the ENG 1) under Category 1 or 2.
- 3.5.2 If the Approved Doctor considers the candidate is temporarily unfit for a period of more than three months (Category 3) or permanently unfit (Category 4) or issues any certificate subject to a restriction (Category 2), they must issue the fisherman with a Notice of Failure/Restriction (form MSF 4106, known as the ENG 3), which the candidate can use to apply for a review of the Approved Doctor’s decision (“appeal”). The period of unfitness may range from a few weeks (e.g. to allow simple investigations to be undertaken) to a year or more (e.g. pending treatment). Candidates considered temporarily unfit (Category 3) for a period of 3 months or less do not have a right of review.
- 3.5.3 The Approved Doctor should normally disclose to the candidate the medical reasons for the refusal of a certificate or the inclusion of a restriction, as this will help the candidate to understand whether to appeal. (The exception would be if the Approved Doctor considers that such disclosure would be harmful to the candidate’s health.)

#### **Replacement certificates (2010 Regulations reg 14/2018 Regulations reg 13)**

- 3.5.4 Once issued, the ENG 1 certificate is the property of the candidate. If a certificate is lost or damaged, the Approved Doctor who issued the original certificate may be asked, at their discretion, to issue a replacement certificate. The replacement certificate will be valid for the remaining validity of the original certificate.
- 3.5.5 The Approved Doctor may make an administrative charge for a replacement certificate. They will notify MCA of the candidate’s name, date of birth and the serial number of the original ENG 1 and the new certificate issued.
- 3.5.6 However, if a significant period of time has passed since the medical examination was carried out, the Approved Doctor may consider that a new examination is

required so that they can issue a new certificate, which may be valid for up to two years, in which case the full statutory fee for a medical examination will be payable.

- 3.5.7 Only the Approved Doctor who issued the original certificate can issue a replacement without conducting a full examination.

### **3.6 Validity of ENG1 (Regulation 7)**

- 3.6.1 The medical fitness certificate will specify the date that the medical examination was carried out and the expiry date of the certificate. Under the Regulations, the maximum validity period for any person over 18 is 2 years, and for candidates under 18 years old, 1 year. If there is a medical reason, an Approved Doctor may issue a certificate valid for a period of less than 2 years.

## **4. Suspension and cancellation of a certificate (Regulation 10)**

- 4.1 If an Approved Doctor has reasonable grounds for believing that:

- (a) there has been significant change in the medical fitness of a person while holding a valid certificate; or that
  - (b) the person is not complying with the terms of a condition of issue of the certificate; or that
  - (c) they did not have full details of the person's condition at the time of examination, and if they had done so he could not reasonably have considered that the seafarer met the required standards; or that
  - (d) the medical fitness certificate was not issued in accordance with the Regulations;
- the Approved Doctor may suspend or cancel the certificate.

- 4.2 The certificate may be suspended until the person holding it has undergone a further medical certificate, or for a specified period, or permanently cancelled, depending on circumstances. The Approved Doctor has the right under the Regulations to require the holder to surrender their medical certificate, and if it is not returned may inform the MCA's Medical Administration Team, who will take appropriate action.

- 4.3 A person whose medical fitness certificate is suspended for more than three months or cancelled has a right of review of that suspension or cancellation – see section 5.

## **5. Application for a review (“appeal” – 2010 Regulations reg 14; 2018 Regulations reg 11)**

- 5.1 Any candidate (including any person applying for their first ENG1) found permanently unfit (Category 4), or fit only for restricted service (Category 2), or whose certificate is cancelled or suspended for more than 3 months by an Approved Doctor, has a right of review (appeal) by an independent Medical Referee appointed by the Secretary of State for the Department for Transport.

- 5.2 There is no right of appeal against a condition notified by an Approved Doctor (see paragraph 5.2.3) or against a decision of temporary unfitness for 3 months or less.

- 5.3 If the candidate wishes to apply for a review, they should be advised to complete the application form which forms part of the Notice of Failure/ Restriction (ENG 3) which will be issued by the Approved Doctor, and send it to the MCA's Medical Administration Team at the address at the end of this Notice. The application should be made within

**one month** of the date of the Notice. The MCA will then arrange for the appeal to be considered by a Medical Referee.

**5.4** In signing the application for review, the candidate is also giving consent for the Approved Doctor to release his or her report to the Medical Referee. If the candidate wishes to submit additional medical evidence in support of their application they should arrange for this to be sent to the Medical Referee before the appointment date.

**5.5** Before appealing, the candidate may wish to seek independent medical advice from their General Practitioner (GP), or perhaps from their trade union or employer. The cost of the review, and of any additional specialist reports required by the Medical Referee in order to make their decision, is met by MCA. The candidate is responsible for their travel costs to their appointment, and if having agreed the appointment time with the referee they fail to attend without giving due notice, may be required to cover the cost of the missed appointment.

**5.6** The role of the Medical Referees, who work to the same medical and eyesight Standards as the Approved Doctor, is :

- to ensure that the diagnosis has been established beyond reasonable doubt, in accordance with the medical evidence on which the Approved Doctor reached their decision and, if necessary with the assistance of a report from a Consultant in the appropriate speciality,
- to determine whether the medical and eyesight Standards, especially those with a discretionary element, have been properly interpreted; and
- to consider the possibility of a person previously declared permanently unfit returning to sea in some capacity.

**5.7** Where a Medical Referee has determined that a candidate is permanently unfit to go to sea, MCA will not normally allow a further application for review from that person within five years of that determination.

**5.8** In cases not specifically covered by the statutory medical and eyesight Standards, or in cases where the Approved Doctor has assessed the candidate as “permanently unfit” and exceptional medical considerations apply, the Medical Referee may decide an appropriate fitness category after obtaining relevant information from the Approved Doctor who made that assessment and any further evidence presented to them.

**5.9** The Medical Referee should reach a decision within 2 months of the date on which the review was lodged with the MCA. If there is a reason for the decision to take longer, this must be agreed with the MCA.

## **6. MCA Approved Doctors**

**6.1** Medical practitioners approved by the MCA to carry out statutory medicals for seafarers and fishermen must meet the following minimum criteria:

6.1.1 if based in the United Kingdom, be fully registered with the General Medical Council of Great Britain and hold a valid Licence to Practice;

6.1.2 If based outside the United Kingdom,

(a) be qualified from one of the medical schools listed in the Avicenna Directory (see <http://www.who.int/hrh/wdms/en/>);

- (b) be entitled to practise in the country or territory in which that practitioner is based;
- (c) satisfy the MCA that they are subject to a programme that ensures maintenance of their medical skills;
- (d) have a good command of the English language.

6.2 For further information about approved doctors, see Annex B to this notice.

## **7. Records to be kept by the approved doctor**

7.1 The Approved Doctor is required to keep full clinical notes of any detailed medical examination, and records including a completed medical report form (ENG 2) must be retained for 10 years. Any records relating to health surveillance under the terms of the Merchant Shipping (Health and Safety at Work) Regulations 1997, and related legislation must be retained for up to 40 years. Approved Doctors are also required to send statistical returns to the MCA on examinations carried out. Form MSF 4103 must be used for this purpose. MCA will supply the form when requesting the return. These records may be subject to clinical and administrative audit by the MCA to ensure that Approved Doctors are following MCA medical Standards and procedures correctly.

## **8. References to this Notice in the Merchant Shipping (Maritime Labour Convention) (Medical Certification) Regulations 2010 (as amended)**

Regulation 2: The qualifications required by a medical practitioner, as defined in regulation 2, to apply to be approved to conduct seafarer medical examinations are specified in section 5.

Regulation 8(1)(d), regulation 12(3) and regulation 13(1)(c) : The medical standards specified by the Secretary of State to which a medical practitioner must have regard when examining a seafarer in accordance with the Regulations are those set out in Annex A. Guidance on the application of those standards is given in Section 3 of this notice.

Regulation 14(5), (6) and (7) : The medical standards specified by the Secretary of State to which a medical referee must have regard when examining a seafarer in accordance with the Regulations are those set out in Annex A. The form of a medical fitness certificate is specified in paragraph 6.1.

Regulation 16(2) : The forms to be used by medical practitioners and medical referees in keeping records and making returns required by regulation 16(1) (in respect of medical examinations and reviews) are specified in paragraph 6.

## **9. References to this Notice in the Merchant Shipping (Work in Fishing Vessels) (Medical Certification) Regulations 20xx**

Regulation 2: The qualifications required by a medical practitioner, as defined in regulation 2, to apply to be approved to conduct medical examinations are specified in section 5.

Regulation 8(1)(d), regulation 12(3) and regulation 13(1)(c) : The medical standards specified by the Secretary of State to which a medical practitioner must have regard when examining a person in accordance with the Regulations are those set out in Annex A. Guidance on the application of those standards is given in Section 3 of this notice.

Regulation 14(5), (6) and (7) : The medical standards specified by the Secretary of State to which a medical referee must have regard when examining a person in accordance with the Regulations are those set out in Annex A. The form of a medical fitness certificate is specified in paragraph 6.1.

Regulation 16(2) : The forms to be used by medical practitioners and medical referees in keeping records and making returns required by regulation 16(1) (in respect of medical examinations and reviews) are specified in paragraph 6.

**Annex A** – medical fitness and eyesights standards – see separate document

DRAFT

## WORKING WITH MCA APPROVED DOCTORS

### General

1. All approved doctors (ADs) are individually appointed by the Secretary of State to conduct seafarer medical examination. In conducting the statutory medical examination, ADs are acting as independent appointees of the Secretary of State, and they are bound to observe the statutory standards and issue certificates of fitness based on them. They are also bound by requirements for confidentiality about details of medical conditions.
2. In the interest of fair and open competition, and for administrative and quality assurance reasons, ADs are only approved to carry out medical examinations at the address to which they are appointed. The appointment is not transferable to any other location or practice without the approval of the MCA. The appointment is also not transferable to any other doctors in an AD's practice either on a temporary or long-term basis without approval from the MCA.
3. The majority of ADs are approved to conduct an ENG1 examination for any person on payment of the statutory fee. These are known as "General List" ADs.
4. Whilst the number of ADs is not finite, appointments are kept under review and are restricted to areas where a need has been demonstrated i.e. normally a requirement for at least 50 medicals a year.
5. The MCA's AD system is established to provide a service essentially for UK seafarers and fishermen, i.e. those holding UK Certificates of Competency, and/or those working on UK vessels. This means that most ADs are based in the UK. However where the need can be specifically demonstrated to support UK maritime interests, the MCA may consider approval of nominated doctors overseas in countries whose certificates are not recognised as equivalent. However, for ease of administration and communication, and for audit and quality assurance reasons, the appointment of ADs abroad is strictly limited.
6. When a need has been identified, for example as a result of an existing AD retiring or moving away, or due to increased demand in an area, the normal practice is for the MCA to advertise the vacancy. In the UK, this will be through local NHS structures amongst all GPs in the locality. In addition, where any applicant has approached the MCA, their details will be kept on file, and they will be notified when a vacancy in their area is being advertised. All applicants are considered by the Chief Medical Adviser and the MCA in relation to their training, qualifications, experience, facilities and availability and the successful applicant is appointed for one year at a time.

### Company responsibilities

7. Under the Merchant Shipping and Fishing Vessels (Health and Safety at Work) Regulations 1997, as amended, ship/fishing vessel owners and employers have a duty to ensure, so far as is reasonably practicable, the health and safety of seafarers and fishermen.
8. In terms of health, this general duty of care includes a responsibility for providing information on factors relating to the seafarer's or fisherman's health. This includes

ensuring that, before a person is employed, they have received the appropriate advice on immunisations and preventative treatment (such as treatment for malaria), according to where the ship will be operating. Fitness to fly may also be a factor which the employer may need to take into account.

9. It also includes a requirement for employers to provide health surveillance as appropriate, taking account of the findings of risk assessment as required by the Regulations. Further guidance on health surveillance is included in the Code of Safe Working Practices for Merchant Seafarers, Chapter 7.

### **Company arrangements**

10. A shipping company requiring a small number of seafarer medical examinations per year may arrange these with a particular AD on a fee-for-item-of-service basis, or by contracting with the AD for a certain allocation of time.
11. Companies employing larger numbers may consider it preferable to employ their own specialist adviser to conduct medicals for their own employees only. Where a company or organisation which has vessels registered with the UK flag and is employing UK seafarers or UK Certificate of Competency holders has a requirement for a comprehensive medical service as well as the performance of statutory medical examinations, they may approach the MCA for approval of a doctor they employ or have selected. The advantage of such an arrangement is that the company medical advisers will be able to provide comprehensive support, for example advising on healthy working conditions on board ship and providing any additional medical services the company may require, such as advice on fitness between medicals. A company may have criteria for employment in addition to the statutory medical standards e.g. policies on drug and alcohol abuse. The company medical adviser can assist with their development and implementation.
12. Company appointments may be made both within the UK and overseas, depending on the company requirements. The Company will be required to provide a reliable channel of communication with the Doctor and undertake quality control and monitoring on MCA's behalf through their own quality management system. MCA may request the result of any company audit of the Approved Doctor. The company may also be required to meet the cost of any MCA monitoring or audit visit.
13. In either case, there are important advantages in using the same AD on a regular basis: they will become familiar with the particular type of business (such as ferries) and any special health risks that might arise;
  - they will have previous medical records available;
  - they can provide consistent follow-up for candidates with health conditions;
  - they can assist with return to work after illness;
  - the likelihood of non-disclosure of illness and fraud will be reduced.

*[Note for consultation draft: The MCA has in the past approved Commercial Healthcare Providers which can provide a comprehensive health support service under a long-term contract for one or more maritime employers. This type of arrangement is under review and so has not been included in this notice.]*

### **Further information**

14. Any suitably qualified medical practitioner who would like to be considered for a vacancy if and when one arises should review the information on the MCA pages of [www.gov.uk](http://www.gov.uk) which also include a link to the application form for prospective ADs.

<https://www.gov.uk/guidance/how-to-become-an-mca-approved-doctor>

DRAFT