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Research Article

Evaluation of the Implementation of Shipping Safety Policy Based on the ISM Code on KM Dorolonda

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Abstract: *This study aims to evaluate the implementation of maritime safety policies based on the International Safety Management (ISM) Code and the implementation of the Safety Management System (SMS) on the KM Dorolonda, specifically regarding compliance with standard operating procedures (SOPs), the implementation of safety activities, inhibiting factors, and the role of the captain's leadership in building a safety culture. The study used a descriptive qualitative approach with field study and documentation methods. Data were collected through observations of ship operational activities, review of safety documents, and in-depth interviews with the captain, ship officers, crew members (ABK), and Designated Person Ashore (DPA) of PT PELNI. The results showed that the implementation of the ISM Code and SMS on the KM Dorolonda has generally run well, as demonstrated by the implementation of emergency drills (safety drills), safety meetings, periodic inspections, and the implementation of operational safety procedures. However, the implementation still faces obstacles, particularly crew fatigue, low discipline in the use of Personal Protective Equipment (PPE), and suboptimal supervision of compliance with safety procedures. These findings indicate that the effectiveness of a safety management system is not only determined by the availability of written regulations and procedures, but also by crew competence, consistency of supervision, and commitment to safety. In this case, the captain's leadership plays an important role in strengthening discipline, compliance, and a safety culture through communication, assertiveness, and consistent supervision.*

Keywords: Shipping Safety, KM Dorolonda, Safety Management System, Captain's Leadership, Safety Culture.

1. Introduction

Shipping safety is one of the most crucial aspects of national maritime transportation. As the world's largest archipelagic nation, Indonesia relies heavily on inter-island connectivity for its population mobility and distribution of goods. The high frequency of ship operations demands stringent safety guarantees to prevent potential maritime accidents that could result in loss of life, material loss, and damage to the marine environment. In response to this need, the International Maritime Organization (IMO) has regulated the International Safety Management (ISM) Code as the international standard for ship operational safety management and pollution prevention. Through this scheme, every shipping company is required to implement a Safety Management System (SMS) that encompasses operational procedures, authority allocation, training, emergency preparedness, and periodic evaluations.

Maritime safety studies encompass the multidimensional interaction between international regulations, company management, ship operational leadership, and human behavioral factors (human element). Detailed maritime legal regulations refer to international regulations. Fofid and Handoko (2020) emphasized the importance of complying with the 2010 STCW standards and IMO regulations in maritime transport and port governance. Company management's commitment to consistently implementing the ISM Code has a fundamental impact on smooth operations and reliable fleet maintenance (Ginting, 2023). Regular emergency simulations, safety meetings, and equipment inspections effectively foster crew mental preparedness and resilience in the face of danger (Marlina, 2023). This preparedness is achieved when shipboard operations are guided by solid leadership, where the level of officer discipline and operational efficiency on board are significantly influenced by the leadership style implemented by the captain (Pratama, 2022). Despite the implementation of

regulations and leadership, the main obstacles to establishing a maritime safety culture are crew fatigue and non-compliance with PPE usage, thus ensuring continuous, strict supervision by ship officers (Rizki, 2026). This is in line with the findings of Indriyati and Sofa (2020), who stated that the main issues with maritime safety include a lack of crew awareness, suboptimal implementation of the ISM Code, and suboptimal maintenance of ship facilities. Basic aspects of OHS culture and hazard risk management in the maritime work environment serve as the main guidelines in creating a safe work environment (Larispa, 2019). Strengthening the competency of maritime human resources and structured shipping company management are key to ensuring the safety of the national shipping fleet (Thamrin, 2023).

KM Dorolonda, as the main passenger ship operated by PT Pelayaran Nasional Indonesia (PELNI), plays a strategic role in connecting national shipping routes with significant passenger volumes. Although various safety procedures have been implemented, field dynamics often face operational challenges. Based on the background and theoretical mapping, the main problem in this study focuses on how the shipping safety policy is implemented based on the ISM Code on KM Dorolonda, how the Safety Management System (SMS) is implemented on board, and what efforts are made to improve the effectiveness of the implementation of the safety management system. In line with the problem formulation, this study aims to analyze the level of compliance and implementation of ISM Code instruments on KM Dorolonda, evaluate the operational implementation of the Safety Management System (SMS) in the ship's daily activities, and formulate strategic steps to overcome human resource and operational obstacles to improve the culture of shipping safety.

2. Literature Review

Policy Implementation

Policy implementation is a crucial stage in the public policy process because it involves translating established decisions and provisions into concrete actions. Successful implementation is determined not only by policy clarity but also by the organization's ability to provide resources, establish communication, assign responsibilities, and consistently implement oversight. In the context of maritime safety, policy implementation can be understood as the process of applying safety provisions to ship operations to minimize the risk of accidents and ensure the safety of crew, passengers, and the marine environment.

According to Edwards III (1980), there are four main variables that influence the success of policy implementation: communication, resources, disposition, and bureaucratic structure. These four variables are interrelated factors in determining the effectiveness of policy implementation.

First, communication relates to the process of conveying information and clarifying instructions to policy implementers. In maritime safety, communication is reflected through the socialization of safety policies, the delivery of standard operating procedures (SOPs), pre-work briefings, and the implementation of safety meetings. Second, resources include the availability of competent personnel, safety facilities, equipment, and operational support. Third, disposition relates to the crew's attitude, commitment, discipline, and compliance in implementing safety regulations. Fourth, bureaucratic structure encompasses the division of responsibilities, coordination mechanisms, standard operating procedures, and oversight systems.

These four variables are relevant for evaluating the implementation of shipping safety policies because they can explain the suitability between the policies set by the company and the practices of implementing them on board the ship (Edwards III, 1980).

International Safety Management (ISM) Code

The International Safety Management (ISM) Code is an international standard developed by the International Maritime Organization (IMO) to ensure the operational safety of ships and prevent pollution of the marine environment. The ISM Code was adopted by IMO Resolution A.741(18) on 4 November 1993 and later became part of the mandatory provisions through Chapter IX of SOLAS (IMO, 1993; IMO, nd).

The ISM Code emphasizes the importance of implementing a structured, documented, and consistently implemented safety management system by shipping companies and crews. This standard covers safety and environmental protection policies, company responsibilities and authorities, the appointment of a Designated Person Ashore (DPA), the Master's responsibilities, resources and personnel, emergency preparedness, non-conformity reporting, ship maintenance, and the evaluation and audit of the safety management system.

The IMO (1993) emphasizes that successful implementation of the ISM Code requires commitment from company management and the involvement of all personnel responsible for safety. Therefore, implementation of the ISM Code cannot be solely assessed based on the availability of documentation or certification, but must also be assessed by the consistency of safety procedures implemented in ship operations.

In this study, the ISM Code is used as a normative standard to evaluate the suitability between the safety provisions that should be implemented and operational practices on the KM Dorolonda.

Safety Management System (SMS)

A Safety Management System (SMS) is a management system implemented by shipping companies to ensure that ship operations are carried out according to established safety standards. The SMS serves as an operational instrument for translating the principles and provisions of the ISM Code into procedures, division of responsibilities, and safety risk control mechanisms (IMO, 1993).

The effectiveness of SMS implementation can be seen through several aspects, namely the availability and implementation of SOPs, implementation of emergency drills (safety drills), holding safety meetings, inspection and maintenance of safety equipment, reporting of incidents or non-conformities, and implementation of periodic evaluations and supervision.

Effective SMS implementation requires the involvement of all elements of the organization, from company management, the Ship's Supervisory Agency (DPA), the Master, officers, and the Crew (ABK). This aligns with the principles of the ISM Code, which places safety as a shared responsibility between company management and ship personnel. Therefore, SMS is understood not only as an administration and documentation system, but also as a risk control mechanism integrated into all ship operational activities (IMO, 1993).

Captain's Leadership in Shipping Safety

The captain is the highest-ranking officer on board a ship and has crucial responsibilities for ensuring safe navigation, protecting the marine environment, and ensuring the smooth operation of the ship. In implementing the ISM Code, the captain's responsibilities include implementing company safety policies, providing instructions to the crew, fostering motivation, and overseeing all personnel's compliance with safety procedures.

The ISM Code specifically addresses the master's responsibilities and authorities in ensuring the implementation of safety policies, motivating the crew, providing clear instructions, verifying compliance with safety requirements, and evaluating the implementation of the SMS. The master also has primary authority in making decisions related to safety and pollution prevention and seeking company support when necessary (IMO, 1993).

In practice, the effectiveness of a captain's leadership can be reflected in communication skills, firmness in enforcing rules, consistent supervision, motivation, and exemplary behavior in implementing safety behaviors. Effective leadership can encourage increased crew awareness of occupational risks, discipline in the use of personal protective equipment (PPE), and adherence to standard operating procedures (SOPs).

The master's leadership is a crucial element in linking company safety policies with the actual behavior of the crew. Successful implementation of the ISM Code depends not only on the existence of written procedures but also on the master's ability to build a collective commitment to maritime safety.

Safety Culture (Safety Culture)

Safety culture is the values, beliefs, attitudes, and behavioral patterns that develop within an organization and shape how individuals understand and implement safety in their work activities. In the shipping environment, safety culture is reflected in crew members' awareness of potential hazards, adherence to procedures, disciplined use of personal protective equipment (PPE), involvement in safety activities, and willingness to report conditions that could potentially lead to accidents.

Teperi et al. (2019) explain that the implementation of safety management based on the ISM Code is linked to the development of a safety culture in the maritime industry. However, the implementation of a safety management system also requires the involvement of operational personnel so that safety is not merely an administrative requirement but truly integrated into work practices.

Furthermore, Andrei et al. (2021) demonstrated that safety culture in the maritime industry is related to job demands, seafarer fatigue, crew well-being, and safety compliance behavior. This demonstrates that the human factor is a crucial aspect that needs to be considered in implementing a safety management system.

A strong safety culture is not formed solely through formal regulations and instructions; it requires commitment from all elements of the organization. Safety drills, safety meetings, safety inspections, and evaluations of unsafe incidents and conditions are all part of the process of building a safety culture on board a ship. In this study, safety culture was used to understand the extent to which the policies and procedures established through the ISM Code have been internalized in the work behavior of the crew of the KM Dorolonda.

3. Method

This study uses a qualitative approach with a descriptive design to evaluate the implementation of maritime safety policies based on the International Safety Management (ISM) Code on the KM Dorolonda. The qualitative approach was chosen because it allows researchers to gain a deeper understanding of the policy implementation process, the behavior of implementers, and various factors influencing the effectiveness of the safety management system within the ship's operational environment. According to Creswell and Poth (2018), qualitative research is used to explore and understand the meanings individuals or groups attach to a social problem.

The research was conducted through a field study with the object of study being the implementation of the ISM Code and the application of the Safety Management System (SMS) on the KM Dorolonda. Research informants were determined purposively based on their involvement and

knowledge of the implementation of shipping safety policies, which included the Captain, ship's officers, crew members (ABK), and the Designated Person Ashore (DPA) of PT PELNI.

Data collection was conducted through three techniques. First, observation, which directly observed ship operational activities, the implementation of safety procedures, the use of Personal Protective Equipment (PPE), and safety drills and safety meetings. Second, in-depth interviews were conducted to obtain information regarding understanding, experience, compliance, and obstacles encountered in implementing the ISM Code. Third, documentation was conducted through reviewing SOPs, SMS documents, inspection records, safety activity reports, and other documents relevant to the research object.

Data analysis was conducted qualitatively through the stages of data condensation, data presentation, and drawing conclusions and verification as proposed by Miles, Huberman, and Saldaña (2014). The data obtained were grouped based on the research focus, then presented systematically to identify the conformity between the provisions of the ISM Code and safety practices in the field. Furthermore, conclusions were drawn by interpreting the research findings based on the Edwards III (1980) policy implementation model, which includes communication, resources, disposition, and bureaucratic structure.

To ensure data validity, the study employed triangulation of sources and techniques by comparing information from interviews, observations, and documentation. Through these stages, the study is expected to produce a comprehensive evaluation of the implementation of the ISM Code, inhibiting factors, and efforts to improve the effectiveness of the safety management system on the KM Dorolonda.

4. Results and Discussion

Implementation of the ISM Code and Implementation of the Safety Management System (SMS) on the KM Dorolonda

The implementation of the International Safety Management (ISM) Code on the KM Dorolonda is not merely a paper form of administrative compliance, but has been transformed into an operational routine through PT PELNI's Safety Management System (SMS). Fulfillment of key elements—such as a clear ship organizational structure, the appointment of a Designated Person Ashore (DPA), and the availability of a safety manual—is the main foundation of fleet safety governance (Puspita, 2022). Onboard, this compliance is demonstrated through regular safety drills, including fire drills, man overboard rescues, and abandon ship procedures.



Image: Abandon Ship Exercise

The success of these simulations and routine exercises has proven effective in building mental preparedness and resilience among the crew when facing potential critical situations (Marlina, 2023). This experience aligns with the assertion of the Captain of the KM Dorolonda, who views SMS as the lifeblood of every activity on board:

"*The ISM Code and Safety Management System (SMS) play a crucial role in ensuring the operational safety of ships. The ISM Code serves as a guideline for implementing a safety management system, while the SMS is the system used to implement these guidelines in daily operational activities... The success of the ISM Code implementation is determined not only by the completeness of the documents, but also by the discipline and awareness of all crew members in carrying out safety procedures.*" *(Interview with the Captain of KM Dorolonda, 2026)*

The captain's view reinforces Utamo's (2018) argument that SMS effectiveness only occurs when regulations are successfully integrated into a maritime safety culture. Technically, emergency drills are conducted in strict accordance with Safety of Life at Sea (SOLAS) standards and STCW 2010 regulations (Fofid & Handoko, 2020). This was described in detail by the ship's officer:

"*In fire drills, crew members are trained to respond to fire situations, sound the alarm, use fire extinguishers, wear firefighting equipment, and carry out tasks according to the emergency squad division. Meanwhile, in abandon ship drills, crew members are trained to recognize abandon ship signals, use life jackets, go to the muster station, and prepare lifeboats according to procedures... Based on SOLAS provisions, abandon ship and fire drills are generally carried out every month.*" *(Interview with KM Dorolonda Officer, 2026)*

This repeated practice reflex forms the crew's instinctive response to potential maritime hazards. As one crew member explained, understanding emergency instructions provides a sense of calm and clarity of role when critical situations arise:

"*I understand basic work safety procedures, such as using PPE according to the type of work, following the officer's instructions, knowing the evacuation route, and recognizing emergency alarms... when an emergency occurs, every crew member must remain calm, follow the instructions of the captain or officer on duty, and carry out their duties according to the division of responsibilities.*" *(Interview with crew member of KM Dorolonda, 2026)*

The Role of Captain Leadership and Operational Management Synergy

The dynamics of navigational safety on passenger ships like the KM Dorolonda are heavily influenced by leadership patterns on the bridge. Responsive captain leadership is a key liaison between international regulations and daily operational compliance (Pratama, 2022). In practice, the KM Dorolonda captain prioritized two-way communication and direct supervision, both in navigation activities and engine room maintenance. The precise application of flat navigation rules (Iskandar, 2020), an understanding of maritime law and maritime environmental protection (Supriyanto, 2021), and efficient commercial operations (Wibowo, 2022) are pillars supporting the safety of the ship's route.

The captain of KM Dorolonda emphasized that a leader's exemplary behavior is the main key in building discipline among the ship's crew:

"*In leading the crew, I apply a firm, disciplined approach, but remain open to communication and input from all crew members. I believe a leader must be able to set an example in complying with safety regulations before demanding the crew do the same... In emergency situations, communication must be done quickly, clearly, and according to the chain of command. Meanwhile, in daily operations, I prioritize a persuasive approach and joint evaluation.*" *(Interview with the Captain of KM Dorolonda, 2026)*

The impact of this humanistic and persuasive leadership approach was directly felt by the crew members. The presence of an embracing leader helped diminish the crew members' fear of communicating and reporting potential dangers:

"The role of the captain and officers is crucial in fostering discipline among crew members regarding occupational safety. Leaders need to provide guidance, remind them to use personal protective equipment (PPE), ensure safety procedures are followed, and model safe work behavior. Supervision and reprimands from leaders can help raise awareness among crew members about workplace hazards." (Interview with crew members of KM Dorolonda, 2026)

On the other hand, the reliability of ship safety facilities is inseparable from the strong coordination between the ship's crew and onshore management through PT PELNI's Designated Person Ashore (DPA). The company's management commitment fundamentally impacts the smooth operation and technical improvements of the fleet (Ginting, 2023). The captain emphasized the importance of rapid communication channels and responsive logistical support from shore:

"Coordination between the ship and shore management, particularly PT PELNI's Designated Person Ashore (DPA), is a crucial part of implementing a safety management system... Support from shore management is essential, particularly in terms of budget approval, spare parts provision, repair scheduling, and monitoring report completion. However, for conditions that could endanger safety, safety measures should not wait for the administrative process to be completed." (Interview with the Captain of KM Dorolonda, 2026)

This commitment was also emphasized by representatives of DPA/PT PELNI Management, who explained that supervision and allocation of the safety budget were carried out in a planned manner to maintain the seaworthiness of the fleet (Thamrin, 2023):

"Oversight mechanisms can be implemented through inspections of safety documents, emergency drill reports, safety equipment inspection records, accident or near-miss reports... The company's commitment to ship safety is demonstrated through budget planning for the maintenance and repair of safety equipment, fulfillment of ship certification requirements, and provision of safety facilities for the ship's crew." (Interview with DPA PT PELNI, 2026)

Field Reality: Work Fatigue, Compliance Behavior, and PPE Supervision

Despite comprehensive safety systems, the greatest challenges in shipping operations still stem from the human factor. Hectic work schedules, tight sailing schedules, and passenger loading and unloading processes often lead to physical and mental fatigue among crew members. Fatigue and compliance with Personal Protective Equipment (PPE) are real challenges that require ongoing management (Rizki, 2026; Nurhayati, 2021). These conditions have the potential to impact crew members' concentration and safety performance on board (Handayani, 2020; Indriyati & Sofa, 2020).

The captain of KM Dorolonda explained the complexity of managing the balance between the operational demands of the ship and the rest needs of the crew:

"A significant challenge is balancing the ship's operational demands with the crew's rest needs. Sailing activities, departure and arrival schedules, passenger loading and unloading, and additional work can impact work patterns... The risk of fatigue requires serious attention because it can reduce concentration, slow response times, and increase the likelihood of errors at work." (Interview with the Captain of the KM Dorolonda, 2026)

The reality of this feeling of fatigue was honestly confirmed by crew members who directly felt its impact on their alertness while on duty:

"During the course of duty on board a ship, boredom and fatigue can occur due to work routines, working hours, environmental conditions, and the length of sailing time. When fatigue occurs, concentration and accuracy in work can decrease, potentially increasing the risk of errors and work accidents." (Interview with crew members of KM Dorolonda, 2026)

Besides fatigue, disciplined PPE use is often hampered by reluctance or work habits that underestimate the risks. In response, ship officers implemented a phased, humane yet firm coaching approach:

"If I find a crew member not wearing PPE while on duty, the first step I take is to give a direct warning and ask the crew member to temporarily stop work if the condition endangers their safety... If the violation occurs repeatedly, I provide further guidance, record the incident, and report it to superiors. The goal is not merely to impose sanctions, but to raise awareness among the crew." (Interview with KM Dorolonda Officer, 2026)

These findings confirm the views of Kurniawan (2022) and Sutrisno (2023) that strengthening maritime safety and health culture is not sufficient with just stern warnings or formal sanctions. It requires an educational approach, consistent supervision, the application of safety and health principles (Larispa, 2019), and attention to the physical and mental well-being of crew members so that safety principles can be internalized independently by each individual on board.

To address these operational constraints, three strategic improvement measures are projected: First, optimizing crew work and rest hours to reduce fatigue. Second, increasing regular internal oversight and providing rewards/punishments for compliance with PPE use. Third, strengthening ongoing training programs based on STCW 2010 and refreshing understanding of SMS for all crew members. These strategic measures align with the maritime safety audit framework (Puspita, 2022) and the strategy for improving the quality of shipping human resources (Hidayat, 2019).

5. Conclusion

Based on the research and discussion, it can be concluded that the implementation of the ISM Code policy on the KM Dorolonda has generally been carried out in accordance with applicable shipping safety provisions and standards, both at the national and international levels. This is reflected in the availability of the Safety Management System (SMS) document as a guideline for ship operations and the implementation of routine safety drills such as fire drills and abandon ship drills. The existence of this SMS document and regular training demonstrates a systematic effort to improve crew preparedness for emergency situations.

The implementation of the Safety Management System (SMS) on the KM Dorolonda was generally supported by the Captain's firm, communicative, and safety-oriented leadership. The Captain's role was crucial in directing, supervising, and raising crew awareness of the importance of SOP compliance. However, the effectiveness of its implementation still encountered obstacles stemming from human factors, such as the risk of fatigue due to the high operational load of the voyage and the level of individual compliance in the use of Personal Protective Equipment (PPE) that was not entirely consistent.

Improving the effectiveness of SMS implementation requires consistent, tiered supervision, humane management of work and rest hours, and a continuous commitment between shore management (DPA PT PELNI) and ship operational leaders. Synergy between budget allocation for equipment maintenance, direct officer supervision, and personal awareness of crew members is key to realizing a sustainable maritime safety culture.

Suggestions for PT PELNI Management: It is expected to continue to improve the quality of supervision of SMS implementation through the role of Designated Person Ashore (DPA) as well as allocating an adequate budget for technical improvements, maintenance of safety equipment, and the implementation of K3 training programs on an ongoing basis.

Recommendations for Captains and Ship Officers: They are expected to maintain a communicative, firm, and consistent leadership style in enforcing SOPs. Direct supervision of high-risk work and enforcement of PPE use should be tightened through regular coaching and corrective actions.

Suggestions for Crew Members (ABK): It is hoped that personal awareness and individual responsibility in complying with K3 procedures will increase, discipline in using appropriate PPE, and actively report potential dangers or physical conditions that are too tired in order to maintain collective safety.

Suggestions for Further Researchers: It is recommended to develop the study of ISM Code implementation by expanding the sample coverage to several types of passenger ships or other cargo

ships to conduct comparative studies related to the effectiveness of SMS in different maritime operational environments..

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