



भारत सरकार / GOVERNMENT OF INDIA
पोत परिवहन मंत्रालय / MINISTRY OF SHIPPING

नौवहन महानिदेशालय, मुंबई
DIRECTORATE GENERAL OF SHIPPING, MUMBAI

3-TR(18)/98-PSCRB-Pt - 74

Dated 20.09.2019

SHOW CAUSE NOTICE

Background

The Directorate had accorded approval to the MTI “**Marine Officers’ Training Academy (MOTA), Puducherry**” (MTI No. 402014), No. 1, Anbu Nagar, Thuthipet, Puducherry – 605502 for conducting pre-sea and post-sea courses. The MTI belongs to the Trust **M/s MOTA Educational Trust** located at No. 7, Main Road, Koothapakkam, Cuddalore district. The Trustees of the said Trust are Mr. Govindan Munuswamy (S/o Shri P. Munuswamy), Smt. K. Saraswathi (W/o Shri P. Munuswamy) and Ms. J. Sivaranjini (D/o J. Janarthanan). Several complaints were received at the Directorate against the subject Maritime Training Institute (MTI). An overview of the deficiencies noted are listed below.

1. Noted deficiencies

MMD Chennai carried out an unscheduled inspection of the MTI “**Marine Officers’ Training Academy**” (MOTA) on 01 / 05 / 2019. The inspection team, in its reports has pointed out several lapses and violations from the part of the institute management, against the applicable DGS guidelines, many of

which fall within the meaning "Major Deficiency" as per respective DGS Orders/ Guidelines. In addition, the MMD inspection report was reviewed at the Directorate and additional deficiencies were noted. These deficiencies were mainly related to the following.

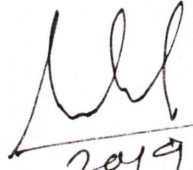
- 1.1. Admitting candidates excess of approved intake capacity,
- 1.2. Inadequacy of faculty,
- 1.3. Issuance of course certificates without attendance,
- 1.4. Serious lapses in infrastructure,
- 1.5. Serious lapses in Quality System,
- 1.6. Non-availability of video records of practical training,
- 1.7. Irregularities in attendance of faculty,
- 1.8. Conduct of number of batches in excess of approval,
- 1.9. Issuance of course certificates to seafarers sailing onboard,
- 1.10. Permanent faculty working in multiple institutes,
- 1.11. Course certificates being issued from non-approved premises,
- 1.12. Other deficiencies.

The details of the complaints and the deficiencies noted are mentioned in Annexure – 1 and Annexure – 2.

2. In view of the above serious major non-conformities, the Maritime Training Institute "**Marine Officers' Training Academy (MOTA), Puducherry**" (MTI No. 402014), is called upon to show cause as to why the following disciplinary action as given below should not be initiated against the MTI.
 - 2.1. Withdrawal of all approvals granted to the MTI.
 - 2.2. Disciplinary action against the Trust "**M/s MOTA Educational Trust**", and the trustees of the Trust Mr. Govindan Munuswamy (S/o Shri P. Munuswamy), Smt. K. Saraswathi (W/o Shri P. Munuswamy) and Ms. J. Sivaranjini (D/o J. Janarthanan) for issuing course certificates to candidates

without imparting training, submitting incorrect data on e-governance and blacklisting the Trust and trustees from being associated with any kind of business related to the Directorate General of Shipping for a period of minimum 5 years.

3. Your reply to this Show Cause Notice may be submitted to this Directorate within 15 days from the date of issuance of this Show Cause Notice failing which the actions mentioned above shall be initiated.
4. This Show Cause Notice is issued with the approval of the Director General of Shipping and Additional Secretary to the Government of India in exercise of the powers conferred under the Merchant Shipping Act, 1958 as amended.


2019/09/27
(Ashish Wankhede)

Deputy Director General of Shipping.

To

The Marine Officers Training Academy, No.1, Anbu Nagar, Thuthipet,
Pondicherry, Puducherry - 605 502.

Copy to:

1. The Principal Officer, MMD. Mumbai/ Kolkata/Chennai / Kochi/
Kandla
2. The Shipping Master, Mumbai/Kolkata/Chennai
3. INDos cell
4. All MTIs
5. E-governance Cell
6. Guard File

Annexure – 1

1. The Complaint and deficiencies noted

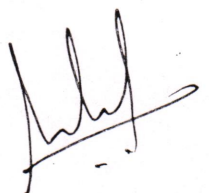
- 1.1. MMD Kochi forwarded a complaint vide letter No. CON / 2005 / 248 dated 19 / 03 / 2019. The complainant alleged that M/s.Hi-Light Marine Kochi, located at Pallathil building, Ravipuram, Near Cochin Shipyard, (Opposite Ravi beverages outlet), Ernakulam, Kerala has been issuing certificates for “Basic Safety Training” courses to candidates on behalf of the Maritime Training Institute (MTI) **“Marine Officers’ Training Academy” (MOTA), Puducherry (MTI No. 402014)** and the MTI **“GKM Institute of Marine Science and Technology” (MTI No. 402009)**, located at Alappakkam, Mappedu Road, GKM Nagar, New Perungalathur, Chennai – 600063 without imparting training and without attending classes in the MTI.
- 1.2. Inspector of Police, Town south Police station, Ernakulam filed a “First Information Report” (FIR) against “Marine Officers’ Training Academy” (MOTA), Puducherry. The complainant alleged that the MTI has issued certificates for STSDSD and PSSR courses to Mr. AnanduKodamattathil Madhu through M/s. Hi-Light Maritime Consultancy, Kurusupalli Road, Ravipuram, Ernakulam, Kerala.
- 1.3. One candidate reported to the Directorate that he did not attend the PSCRB course at the MTI. He got his certificate from a shop by the name **“Maritime Training Institute” located at third floor of a shopping complex on right side of the Metro station of Sector 18, Noida.** He further shared the contact number of the person (8700663617) but could not recollect his name. The mentioned shop and its activities need to be investigated.



- 1.4. It has also come to the notice of the Directorate that the MTI has an office M/s. **“Maritime Institutions Information Centre – VII”** located at **Women’s college Road, adjacent to Suryamahal, upstairs of Andhra bank women’s branch, Srikakulam – 532001**. It is alleged that the MTI issues maritime course certificates from this office and even the biometric attendance of the candidates is done at this location. The authenticity of this allegation needs to be investigated.
- 1.5. Four candidates informed the Directorate that they received their “Basic STCW Safety Training” course and “Security Training for Seafarers Designated with Security Duties (STSDSD) course certificates by courier without attending the courses. These certificates were from the MTI “Marine Officers Training Academy”, (MTI No. 402014), No. 1, Anbunagar, Thuthipet, Pondicherry - 605502. The candidates paid the fees for these certificates to the MTI “Aryavart Maritime Institute” (MTI No. 103024), at their office at S. C. O. 318, Level 1, Sector 38 D, Chandigarh – 160036. These candidates submitted their certificates to the Directorate for cancellation. The Directorate sent emails to the MTI requesting the MTI to verify the certificates. In its reply, the MTI stated that they have some issues with their IT system and shall revert. The MTI never responded after that.
- 1.6. One candidate informed the Directorate that as per the Master checker and his CDC records, he was onboard a ship. The MTI records show that the MTI had issued a certificate for a course during that period. The candidate claims that he has not paid any fees to the MTI and was unaware how the MTI had updated his records for having done the course while he was onboard.
- 1.7. Some of the candidates submitted certificates issued by the MTI “Marine Officers’ Training Academy (MOTA), Puducherry” (MTI No. 402014) to the Directorate informing that they received the certificates through courier and

they never attended the college. On scrutiny, it was observed that signatures of the Principal and Course In-charge were scanned / printed and not physically signed, the signature of the candidate was noticed to be physically signed.

- 1.8. The MTI "Marine Officers' Training Academy (MOTA), Puducherry" (MTI No. 402014), was accorded approval by the Directorate for increase in intake capacity for Pre-sea Training – GP rating course from 120 to 200 vide Approval No. TR / A / 109 / 2017 dated 11 / 07 / 2017. The subject approval was accorded subject to the condition that the Institute shall submit sponsorship letter for individual trainees within 30 days of the commencement of the batch. In addition, the approval was granted for initial period of 12 months and was subjected to recommendation of the Committee after making presentation and actual placement. However, there is no objective evidence to prove that the MTI had submitted sponsorship letters and provided placement to candidates for onboard training. The MTI went on admitting more than 120 candidates.
- 1.9. As per Item 2 of DGS Training Circular No. 07 of 2018, all the existing pre-sea MTI must have a swimming pool within their campus latest by 31 / 08 / 2018. In case they do not have a swimming pool, they must construct a swimming pool by that date. Till the construction is complete, they may have a tie-up arrangement for use of swimming pool with other MTI having the approved swimming pool. The MTI did not have a swimming pool but had tie-up arrangement with "Pondicherry Swimming Center" located at No. 211, Villiyanur Road, Murunga Pakkam, Pudducherry – 605004 which is a private swimming pool and not acceptable as per DGS Guidelines.
- 1.10. The MTI was approved for STSDSD course for total intake capacity of 24 batches / year at a frequency of 192 batches / year thus totaling to 4608

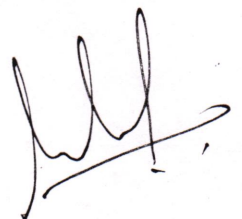


candidates / year. However, the MTI had issued STSDSD course certificates to 6987 candidates in the year 2018 which clearly indicates that the MTI has exceeded the approved intake capacity.

- 1.11. The Time-table uploaded by the MTI for the month of April 2019 shows they plan to conduct only batch 4 of STSDSD course which is of two days duration. Only one permanent faculty and one instructor is designated to conduct the course only for three hours. Whereas, the MTI in the month of April 2019, issued STSDSD course certificates to 420 candidates. In the month of April 2019, the MTI uploaded batch details for 924 candidates and issued 764 certificates. The MTI had withdrawn 160 candidates in that month and out of which 45 candidates were withdrawn on 01 / 05 / 2019, the day of unscheduled inspection by MMD Chennai.
- 1.12. One of the permanent faculty Mr. Vijayan Veliyathodukayil (INDoS No. 99EL0647, CDC No. A76383, CoC No. 95W1556) employed in the MTI "Marine Officer Training Academy (MOTA), Puducherry" (MTI No. 402014), found employed as Permanent faculty on contractual basis in the MTI "Euro Tech Maritime Academy (MTI No. 401005) and also as a visiting faculty in the MTI "School of Seamanship and Nautical Technology". One of the visiting faculty Mr. Dayanidhi Sethi (INDoS No. 00EL1037, CDC No. BY54964, CoC No. 95W0394) employed in the MTI "Marine Officer Training Academy (MOTA), Puducherry" (MTI No. 402014), found employed as Permanent faculty on contractual basis in the MTI "Marine Training Academy (MTI No. 204020) which is at Mumbai.
- 1.13. As per records submitted by the MTI, only Mr. B. K. Mahalik and Mr. M. Govindan are the authorized signatories. However, Mr. Sahasrakhya Nanda, Mr. M. Madeshwaran and Capt. Dinker Karunakar found signing the course certificates.



- 1.14. The MTI has not updated their website with the list of all the faculty engaged by them, conducting all courses, including their age, qualification and exemption if any as required by Item 1.4 of DGS Order No. 05 of 2013 dated 15 / 03 / 2013.
- 1.15. The MTI had undertaken its last Comprehensive Inspection Programme (CIP) on 08 / 06 / 2017 whereas the MTI is required to undertake annual CIP inspection.
- 1.16. The MTI was found uploading incorrect data on e-governance and submitting incorrect and incomplete documents to the Directorate.

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ANNEXURE - 2

Inspection of Marine Officers Training Academy (MOTA), Pondicherry was conducted on 01.05.2019. The inspection team comprised of Capt. S.I. A.K. Azad Dy.NA and Mr. Shrish Kumar, E&SS, MMD Chennai. Following shortcomings were observed during the inspection:

Major deficiencies:

- 1) Eligibility criteria for admitting candidates in various courses not verified by the institute. Also, record of certificates issued to the candidates not available for STCW and modular courses.
- 2) Batch details of Refresher course of AFF indicate that 11 candidates attended the course on 27.04.2019. However, details of candidates enrollment form with supporting documents were not available with the institute. There is no evidence available with the institute to show that these candidates had attended the training.
- 3) Batch details of PSCRB course conducted for 15.04.2019 to 20.04.2019 indicates that 40 candidates were issued with certificates on 20.04.2019, which is more than the sanctioned capacity of 24. Also, institute could not produce any evidence to confirm that the candidates had attended the training.
- 4) Video recording of practical training of PSCRB/FPFF/RPSCRB/RAFF/AFF were not available.
- 5) Institute has conducted 196 batches of basic safety training and issued 4690 certificates in six-month period against the sanction capacity of 96 batches per year. However, institute could not produce evidence of conduct of training.
- 6) Institute has conducted 283 batches of STSDSD course and issued 6750 certificates which is much more than the sanctioned capacity of 186 batches with maximum



in take of 4704. However, institute could not produce evidence of conduct of training.

- 7) Institute uploaded batch details of PSCRB and AFF course for the period from 22.04.2019 to 27.04.2019 in the e-governance module and issued certificates to 12 and 7 candidates respectively. However, institute could not produce any evidence such as application form, attendance record, assessment record, feedback form etc., to confirm that the candidates attended the training program.
- 8) Out of 12 faculties, only three faculties (including principal) were present during the inspection.
- 9) Biometric attendance record of all the faculties was not available except one faculty Mr. Nanda.
- 10) Out of 27 instructors, only nine instructors were present during inspection.
- 11) Biometric attendance record of all instructors was not available during the inspection. Only seven instructors found registered in biometric system.
- 12) Institute could not produce any record of payment to the faculty to confirm their attendance and continual employment.
- 13) Timetable and other records indicate that instructors took most of the theory classes. On the day of inspection four batches of GP rating course was being conducted. Only three faculties were present.
- 14) One of the GP rating class was having a strength of 44 students against the limitation of 40.
- 15) Test papers collected at the end of the course found not corrected and certificate has been issued.
- 16) Blank course certificates were maintained with the signature of course in charge and principal.
- 17) Register and copy of issued certificates not maintained.
- 18) The inspection team contacted few candidates over phone who have obtained the certificates from this institute recently. Mr. Shrikant CDC NO MUM 364258, Mr. Arun Kumar Indos no: 05XL0874 and Mr.



K.baskaran, INDoS No: 05ZL 7016, confirmed that they received certificates without attending the training. Further, they confirmed that they visited an office of MOTA near Pondicherry Bus stand and got the certificate and they do not know the actual location of the institute which is 17 km away from the city.

- 19) E-mail correspondence between the institute and other entities and candidates confirms that candidate details are being sent by email from many sources (agents) for preparation of certificates.
- 20) Deficiencies mentioned herein above clearly confirm that the institute has been issuing certificates to the candidates without conducting the courses.
- 21) Number of faculties and instructors present during the inspection are far less than the required number of faculties as per the DGS guidelines for the sanctioned capacity of courses.

Other observations

1. Lease deed indicates more than 10 acres of land containing small patches in several survey numbers. However, available area of the institute appears much less than the requirement. Survey sketch of the leased land with measurement and area to be provided for verification.
2. Mr. Madeshwara, instructor has been shown as course in charge for STSDSDS course.
3. Institute had uploaded the batch details of 18 candidates for the PSCRB course commencing from 29.04.2019. Also, institute had uploaded batch details of 6 candidates for the AFF course commencing from 29.04.2019. However, it was found that these batch details were withdrawn on 01.05.2019 as soon as they became aware of the inspection.



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4. Institute had already conducted 83 batches of basic safety training with in the first four month of 2019, though the sanctioned capacity is 96 batches in a year.
5. Record of fees receipt not available with the institute for STCW courses and modular courses.
6. Window period for ISO external audit found expired.
7. Lifeboat and rescue boats in the boat jetty for PSCRB course could not be hoisted from water level due to low voltage electric supply.
8. Lifeboat engine found not operational. Both batteries found discharged.
9. Power back up arrangement not provided at the boat jetty site.
10. Smoke Generator not available in fire mockup.
11. Fire hoses found leaking.
12. Indos no of course in charge and principal found not mentioned on the certificates issued by the institute.
13. Rooms are available only for three faculties against the twelve faculties.

Remark:

- a) Inspection team could not inspect the entire infrastructure and facilities required for conduct of GP rating course due to paucity of time. Same to be inspected thoroughly during next visit.
- b) These deficiencies should not be considered as exhaustive, since many areas could not be inspected due to paucity of time and non-availability of records and personnel.

Conclusion and Recommendation:

- a) In view of serious nature of deficiencies and the number of major observations noticed during the inspection, it is confirmed that the institute is functioning in total violation of DGS guidelines.



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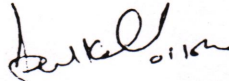
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b) Therefore, in accordance with Para 6.5 of the Training Manual, it is recommended that the institute shall not admit candidates to any of the modular courses and basic safety training without the approval of the Principal Officer and the Directorate General of Shipping.

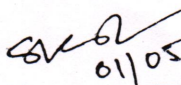
c) The user id of the institute shall be blocked immediately to prevent uploading of batch details of STCW basic safety training and modular courses till the matter is resolved.

Name and Signature of inspecting team:

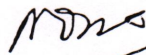
Capt.A.k.Azad
Dy.NA, MMD Chennai



Mr. Shrish Kumar, E&SS
MMD Chennai


01/05/19

Comments of the institute, if any:


None



Name and Signature of the Principal:
Chief Engineer Mr. B.K. Mahalik

