



STAFF TRAINING AND COMPETENCE PROCEDURE

Staff Training and Competence Procedure



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1. PURPOSE

This procedure establishes the process for managing training and competence for all employed staff within Seagull Maritime. It covers the identification of training requirements for new starters, the delivery and tracking of ongoing training for existing staff, and the process for identifying and responding to new training requirements arising from changes to the management system, standards, or operations.

This procedure complements SM/INT/PRO/010 (Training and Competence Management) which covers PCASP-specific training requirements. Where a requirement applies to both staff and PCASP, SM/INT/PRO/010 takes precedence for PCASP personnel.

2. SCOPE

This procedure applies to:

- All shore-based employed staff across all Seagull Maritime entities
- Management and compliance personnel
- Operations staff (non-PCASP)
- Commercial, administrative, and support staff

This procedure does not apply to PCASP or security operatives (see SM/INT/PRO/010).

3. REFERENCES

- SM/INT/REG/008 – Training and Competence Matrix
- SM/INT/PRO/010 – Training and Competence Management (PCASP)
- SM/INT/PRO/011 – Staff Recruitment Procedure
- SM/INT/FORM/002 – New Starter Checklist
- SM/INT/REG/006 – Company Objectives Register
- SM/INT/PRO/001 – Non-Conformance, OFI and Corrective Action Management
- SM/INT/PRO/003 – Internal Audit Procedure

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4. DEFINITIONS

Mandatory Training: Courses designated as M (Mandatory) in SM/INT/REG/008 for the staff member role category. Must be completed by the specified deadline.

Recommended Training: Courses designated as R (Recommended) in SM/INT/REG/008. Should be completed where relevant to the role but not a compliance requirement.

Role Category: The classification of personnel for training purposes: Management and Compliance, Operations (Staff), or Support (Staff). Defined in SM/INT/REG/008.

LMS: The company online training platform (learn.seagullmaritime.com) used for course delivery, assessment, and certificate generation.

Competence: The demonstrated ability to apply knowledge and skills to achieve intended results, as defined by ISO 9001:2015 Clause 7.2.

Change-Driven Training: Training triggered by a change to the management system, a new standard requirement, a new procedure, or a significant operational change.

5. ROLES AND RESPONSIBILITIES

5.1 Group Compliance Director

- Owns this procedure and the Training and Competence Matrix (SM/INT/REG/008)
- Identifies mandatory training requirements for each role category
- Creates, uploads, and maintains training courses on the LMS
- Monitors training completion rates and reports to management review
- Delivers the introductory compliance briefing to all new staff
- Identifies new training requirements arising from management system changes, audit findings, or standard updates
- Issues overdue training notices and escalates persistent non-completion

5.2 Department Manager

- Identifies role-specific training needs beyond the mandatory LMS courses
- Delivers department-specific job training and induction for new starters
- Ensures team members complete mandatory training by the specified deadlines
- Reports training gaps or competence concerns to the GCD
- Supports the GCD in identifying training requirements when procedures or operations change

5.3 All Staff

- Complete all mandatory training courses within the deadlines communicated
- Maintain awareness of management system requirements relevant to their role
- Report any training needs, competence gaps, or knowledge shortfalls to their Department Manager
- Participate in refresher training when scheduled

6. NEW STARTER TRAINING

6.1 Training Requirement Identification

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When a new staff member joins the Company, the GCD identifies their training requirements by:

- Determining the role category (Management and Compliance, Operations Staff, or Support Staff) from SM/INT/REG/008
- Identifying all Mandatory (M) courses for that role category
- Identifying any Recommended (R) courses relevant to the specific role
- Noting any additional training required by the Department Manager for role-specific competence

The training requirements are communicated to the new starter and their Department Manager as part of the onboarding process (SM/INT/FORM/002 – New Starter Checklist).

6.2 Induction Training

All new staff receive the following within their first week:

- Introductory compliance briefing with the GCD – covering the management system structure, key policies, reporting obligations, and the role of the LMS and Safety App
- LMS account registration and orientation – the new starter is shown how to access courses, complete assessments, and download certificates
- Safety Reporting App registration – the new starter is shown how to submit reports and access documents
- Department-specific induction by the Department Manager – covering role-specific procedures, systems, and working practices

6.3 Mandatory Course Completion

- New starters must complete all Mandatory courses identified in Section 6.1 within 30 days of joining
- Course completion is tracked via the LMS – certificates are generated automatically on passing the assessment
- The GCD reviews completion status at 14 days and 28 days, issuing reminders where courses remain outstanding
- Failure to complete mandatory training within 30 days is escalated to the Department Manager and recorded as a potential non-conformance

7. EXISTING STAFF TRAINING

7.1 Annual and Recurring Training

Training courses with a defined frequency (Annual, Induction + Annual, etc.) must be completed within the period specified in SM/INT/REG/008. The GCD:

- Monitors training expiry dates and upcoming renewals via the LMS
- Issues renewal notices to staff at least 14 days before the training due date
- Reports training completion rates as a KPI in management review inputs
- Escalates persistent non-completion through the line management chain

7.2 Refresher and Update Training

Existing staff may require refresher or update training when:

- A procedure or policy is significantly revised
- A new standard requirement is introduced or an existing one is amended
- An audit finding identifies a training gap or competence deficiency
- An incident investigation identifies inadequate training as a contributing factor

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- A new operational activity, region, or client requirement is added

The GCD determines whether the change requires a new course, an update to an existing course, or a targeted briefing. The decision is recorded and communicated to affected staff.

7.3 Department-Specific Training

Department Managers are responsible for identifying and delivering role-specific training that falls outside the LMS course catalogue. This includes:

- System and software training (1Clearview, Google Workspace, operational systems)
- Client-specific requirements communicated during commercial engagement
- Shadowing, mentoring, or on-the-job training for new responsibilities
- External courses, workshops, or conferences relevant to the role

Department-specific training is recorded by the Department Manager and reported to the GCD for inclusion in the personnel training record.

8. IDENTIFYING NEW TRAINING REQUIREMENTS

8.1 Triggers

New training requirements may be triggered by:

- New or revised ISO standard clauses
- New or revised company procedures, policies, or SOPs
- Shell or client audit findings requiring competence improvement
- Internal audit findings (SM/INT/PRO/003)
- Incident investigation outcomes (SM/INT/PRO/006)
- Management review actions
- Regulatory or legal changes identified in SM/HSE/REG/002
- New operational regions, vessel types, or service lines

8.2 Assessment and Response

When a new training requirement is identified, the GCD:

- Assesses the scope – which role categories and personnel are affected
- Determines the delivery method – LMS course (auto-generated from PDF/PPT or manually built), toolbox talk, briefing, or external training
- Creates or commissions the training material
- Updates SM/INT/REG/008 with the new course entry and role category assignments
- Communicates the new requirement to affected staff with a completion deadline
- Tracks completion and reports in the next management review

9. TRAINING RECORDS AND EVIDENCE

- The LMS is the primary record of training completion for all LMS-delivered courses
- Certificates generated by the LMS are accepted as evidence of completion
- Department-specific training records are maintained by the Department Manager and copies provided to the GCD
- External training certificates are filed centrally and recorded in the personnel training record
- Training completion data is reported as a management review input per SM/INT/REG/006 objectives
- Training records are retained in accordance with SM/INT/PRO/005 (Control of Records)

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10. NON-COMPLIANCE AND ESCALATION

- Staff who fail to complete mandatory training within the specified deadline are issued a formal reminder by the GCD
- Continued non-completion after 14 days of the formal reminder is escalated to the Department Manager
- Persistent non-completion may be recorded as a Minor Non-Conformance under SM/INT/PRO/001
- Non-completion of mandatory training may affect probation confirmation (new starters) or performance review outcomes (existing staff)
- The CEO is informed of any systemic training non-compliance at management review

11. CONTINUAL IMPROVEMENT

The training programme is subject to continual improvement through:

- LMS analytics – course completion rates, assessment pass rates, time to complete
- Staff feedback – collected via LMS and during toolbox talks or briefings
- Audit findings – training gaps identified during internal or external audits
- Management review outputs – actions related to training effectiveness or coverage
- The GCD reviews the Training and Competence Matrix (SM/INT/REG/008) at least annually and updates course content, frequencies, and role assignments as needed