



WORKER CONSULTATION AND PARTICIPATION PROCEDURE

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1. PURPOSE

This procedure establishes the mechanisms for consulting workers and enabling their participation in the development, planning, implementation, performance evaluation, and improvement of the occupational health and safety management system.

Worker consultation and participation is a core requirement of ISO 45001:2018 (Clause 5.4) and reflects Seagull Maritime's commitment to ensuring that those who carry out the work have a meaningful voice in OH&S decisions that affect them.

2. SCOPE

This procedure applies to all Seagull Maritime personnel across all entities, operations, and locations, including:

- Directly employed staff (shore-based offices in Athens, Dubai, Lagos, UK)
- Contracted PCASPs deployed on Indian Ocean Region (IOR) operations
- Contracted personnel deployed on West Africa (WAF) Security Escort Vessel operations
- Seagull Offshore personnel (fisheries protection, vessel provision)
- Subcontractor and agency personnel working under Seagull Maritime's operational control

The term "workers" throughout this procedure includes all of the above categories regardless of employment status, in line with ISO 45001 Clause 3.3.

3. REFERENCES

- SM/HSE/POL/001 – Occupational Health and Safety Policy
- SM/INT/POL/002 – Code of Conduct
- SM/INT/DOC/005 – Roles, Responsibilities and Authorities Matrix (RACI)
- SM/INT/PRO/001 – Non-Conformance, OFI and Corrective Action Management
- SM/INT/PRO/002 – Control of Documents
- SM/INT/PRO/006 – Incident and Crisis Management Procedure

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- SM/INT/PRO/012 – Staff Training and Competence Procedure
- SM/INT/PRO/013 – Management of Change Procedure
- SM/HSE/PRO/001 – Hazard Identification and Risk Assessment Procedure
- SM/HSE/PRO/003 – Emergency Preparedness and Response Procedure
- SM/INT/REG/006 – Company Objectives Register
- SM/INT/REG/008 – Training and Competence Matrix
- SM/CAM/BRAG/001–009 – Basic Risk Assessment Guides
- ISO 45001:2018 Clause 5.4
- ISO 18788:2015 Clause 5.3.3

4. DEFINITIONS

- Consultation: Seeking the views of workers before making a decision. The decision-maker considers worker input but retains decision-making authority.
- Participation: Involvement of workers in the OH&S management system processes, including contributing to hazard identification, risk assessment, control determination, and improvement actions.
- Worker: Any person performing work or work-related activities under the control of the organisation, regardless of contractual arrangement.
- Worker Representative: A person nominated or elected to represent workers in OH&S consultation, or in the absence of a formal representative, any worker who raises OH&S matters on behalf of colleagues.
- Management Review: Periodic evaluation of the management system by top management (SM/INT/PRO/006).
- Safety App: The Seagull Safety Reporting App (report.seagullmaritimeltd.com) used for hazard, incident, near-miss, and improvement reporting.

5. ROLES AND RESPONSIBILITIES

5.1 CEO

Ensures adequate resources are allocated for worker consultation and participation. Demonstrates visible commitment to listening to worker input through Management Review and direct engagement.

5.2 Group Compliance Director (GCD)

Accountable for the design, implementation, and effectiveness of consultation and participation mechanisms. Reviews consultation outcomes and ensures they feed into management system improvements. Reports on consultation activity to Management Review.

5.3 QHSE Manager

Responsible for the day-to-day facilitation of consultation activities, collection and analysis of worker feedback, and coordination of participation opportunities. Maintains records of all consultation activities.

5.4 Senior Operations Manager / WAF Operations Director

Ensure consultation and participation mechanisms are applied within their operational areas. Facilitate worker access to consultation channels and act on feedback received from deployed personnel.

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5.5 Team Leaders (Embarked)

Act as the primary consultation link between deployed personnel and shore management. Conduct pre-deployment and operational briefings that include consultation opportunities. Relay worker concerns, suggestions, and feedback to the Operations Centre.

5.6 All Personnel

Participate in consultation activities when invited. Report hazards, near-misses, concerns, and improvement suggestions through the available channels. Engage constructively in risk assessment and safety briefing processes.

6. CONSULTATION REQUIREMENTS

ISO 45001 Clause 5.4(c) requires workers to be consulted on decisions relating to:

6.1 Matters Requiring Worker Consultation

Top management consults with workers, including non-managerial workers, on the following:

- The OH&S policy – workers are consulted when the policy is drafted, reviewed, or revised (SM/HSE/POL/001)
- OH&S objectives and planning – workers are consulted on the setting of objectives (SM/INT/REG/006) and plans to achieve them
- Organisational roles, responsibilities, and authorities – workers are consulted when changes are proposed to the RACI matrix (SM/INT/DOC/005)
- Actions to fulfil legal and other requirements – workers are consulted when changes to legal or regulatory obligations affect their work
- Changes to the management system – workers are consulted through the Management of Change process (SM/INT/PRO/013) when changes may affect OH&S
- Emergency preparedness arrangements – workers are consulted on emergency procedures and exercise planning (SM/HSE/PRO/003)
- Monitoring and measurement priorities – workers are consulted on what should be measured and how performance data is used
- Audit programme planning – workers are consulted on internal audit scope and focus areas (SM/INT/PRO/003)
- Continual improvement priorities – workers are consulted on improvement initiatives and the allocation of improvement resources

6.2 Consultation Methods

The organisation uses the following methods to consult workers, selected as appropriate to the subject matter, urgency, and the operational context of the personnel involved:

- Pre-deployment and operational briefings – Team Leaders conduct structured briefings that include consultation on operational risks, controls, and any concerns before deployment
- Post-transit debriefs – conducted after each IOR transit or WAF tasking to capture worker observations and feedback on controls, procedures, and conditions
- Management of Change consultation – the change request process (SM/INT/PRO/013, online form at campaign/tools/change-request.html) enables any worker to submit concerns or suggestions about proposed changes

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- Direct communication – workers may raise OH&S matters directly with their Team Leader, Operations Manager, GCD, or CEO at any time
- Toolbox talks and safety briefings – delivered using the BRAG series (SM/CAM/BRAG/001-009) and supported by method statements, with opportunity for discussion and feedback
- Training feedback – the company's online training platform includes feedback mechanisms built into course completion
- Safety App – the Seagull Safety Reporting App provides a direct channel for any worker to report hazards, near-misses, incidents, and suggestions from any location

Where consultation is conducted, the GCD ensures that the outcomes are recorded, considered, and – where the input results in a decision – that affected workers are informed of the outcome and the rationale.

7. PARTICIPATION REQUIREMENTS

ISO 45001 Clause 5.4(d) requires workers, including non-managerial workers, to be enabled to participate in the following processes:

7.1 Matters Requiring Worker Participation

- Hazard identification and risk assessment – workers participate in the identification of hazards, assessment of risks, and determination of controls through involvement in the RA-003 series risk assessment process (SM/HSE/PRO/001)
- Actions to eliminate hazards and reduce OH&S risks – workers contribute to the selection and implementation of controls through operational feedback, incident reporting, and debrief processes
- Competence requirements and training needs – workers participate in identifying training needs and provide feedback on training effectiveness through the LMS and through Team Leader engagement
- Investigation of incidents, nonconformities, and corrective actions – workers involved in or witnessing incidents participate in investigations and are consulted on corrective action proposals (SM/INT/PRO/001)
- Communication arrangements – workers participate in determining what OH&S information is communicated, when, and how
- Adequacy of controls – workers participate in evaluating whether existing controls are effective through near-miss reporting, observation feedback, and debrief discussions

7.2 Participation Mechanisms

The following mechanisms enable worker participation:

- Safety App reporting – any worker can report hazards, near-misses, unsafe conditions, or improvement suggestions at any time via report.seagullmaritimeltd.com
- Risk assessment involvement – Team Leaders and Operations personnel are involved in reviewing and validating risk assessments for their operational areas
- Incident investigation participation – workers involved in incidents participate in the investigation process and contribute to root cause analysis
- BRAG development and review – frontline feedback is incorporated when BRAGs are updated or new guides are developed
- Change request submissions – any worker can submit a change request via the online form or directly to the GCD
- Management Review input – worker feedback, consultation outcomes, and participation data are standing agenda items for Management Review

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7.3 Removing Barriers to Participation

The organisation identifies and removes barriers to worker participation. Given the nature of Seagull Maritime's operations (contracted personnel deployed across multiple regions, many working at sea with limited connectivity), specific measures include:

- The Safety App is accessible from any device with internet access, requiring no company login or credentials
- Reports can be submitted anonymously if the worker prefers
- Team Leaders are trained to actively seek feedback during briefings and debriefs, not merely deliver information
- The BRAGs are written in plain language accessible to all personnel regardless of first language or education level
- No worker will face reprisal, disadvantage, or negative consequence for raising OH&S concerns, reporting hazards, or participating in consultation – this is stated in SM/HSE/POL/001 and SM/INT/POL/002
- Workers who identify genuine improvements through consultation or participation are recognised through the company's campaign programme ("Your Watch. Our Standard.")

8. RECORDING AND REPORTING

8.1 Consultation Records

The following records are maintained as evidence of consultation activity:

- Pre-deployment briefing records (including attendees and topics discussed)
- Post-transit debrief records
- Change request submissions and outcomes (SM/INT/REG/009)
- Safety App reports and responses
- Toolbox talk attendance and discussion notes
- Management Review minutes (consultation outcomes as standing item)
- Training feedback summaries

8.2 Reporting to Management Review

The GCD reports the following to each Management Review:

- Summary of consultation activities conducted in the period
- Key themes and trends from worker feedback
- Actions taken in response to worker input
- Participation rates and engagement metrics (Safety App submissions, change requests, training feedback)
- Barriers identified and measures taken to address them
- Recommendations for improving consultation and participation effectiveness

9. INTEGRATION WITH THE MANAGEMENT SYSTEM

Worker consultation and participation is not a standalone activity. It is integrated into the existing management system processes:

- Risk assessment (SM/HSE/PRO/001, SM/SEC/PRO/001) – worker input feeds hazard identification and control validation
- Incident management (SM/INT/PRO/006, SM/INT/PRO/001) – worker participation in investigations and corrective actions

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- Management of Change (SM/INT/PRO/013) – worker consultation on proposed changes
- Training (SM/INT/PRO/012) – worker input on training needs and effectiveness
- Internal audit (SM/INT/PRO/003) – worker consultation on audit scope; worker interviews during audits
- Emergency preparedness (SM/HSE/PRO/003) – worker consultation on emergency arrangements and exercise planning
- Continual improvement – worker suggestions, Safety App submissions, and debrief outcomes drive improvement actions

Where worker consultation results in a change to the management system, this is processed through SM/INT/PRO/013 (Management of Change) and reflected in the relevant documents and registers.

10. REVIEW

This procedure is reviewed:

- At least annually
- Following any Management Review where consultation or participation effectiveness is identified as requiring improvement
- When there are significant changes to the workforce, operational structure, or deployment patterns
- When requested through the Management of Change process (SM/INT/PRO/013)
- As directed by Management Review or the certification body

Review outcomes and any resulting changes are communicated to all affected personnel.