

INDUSTRY STANDARD NO. 002

Training Evaluation Procedure

13 March 2019

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Document Control Sheet

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Terms and definitions

| H&S | Health & Safety |
|--------|----------------------------------------------------------------|
| HSE | Health Safety and Environment |
| ILT | Inspectie leefomgeving en transport |
| NBBE | Nederlands bureau brandweerexamens |
| NOGEPA | Netherlands Oil and Gas Exploration and Production Association |
| PSL | Personal Safety Logbook |
| SodM | State Supervision of Mines |

Legal Requirements

| @ | @ |
|---|---|
| @ | @ |

Related Standards

| Standard 001 | Training for the Oil & Gas Industry | |
|--------------|-------------------------------------|--|
| | | |

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Important Nomenclature used in this Standard

| In the context of this Sta | andard and when so used to describe a method or practice: | |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| 'shall' means that such method or practice reflects a mandatory p law (in Dutch: dwingend recht). Such method or practice is a for those who are the addressees of such provision (n operators). A Standard can describe or quote, but not amend, a provisions. When an operator in exceptional cases for operational or HSE reasons cannot comply, exceptions documented and reported, and risks mitigated. Please not does not release the operator from the obligation to compl law. * | | |
| 'should' | means that such method or practice reflects a Good Operating Practice An operator is generally expected to apply such method or practice, bu a specific situation may require a specific alternative. In other words: the operator complies or explains, and documents the explanation. * | |
| 'could' means that such method or practice is of an advisory nature or mentioned by way of example. An operator is not obliged to comply and is not obliged to explain if he does not comply. | | |
| * Please refer to paragraph 2.3 of Standard 80 (Standards and Document Control), for further explanation on an exception of a 'shall' provision, or on a comply-or-explain of a 'should' provision. | | |

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1. Executive Summary

The NOGEPA Industry Standards aim to provide guidance and clarity on a range of topics relevant for onshore and offshore oil and gas operations in the Netherlands and on the Netherlands continental shelf. The Standards cover a wide variety of topics, many of them related to health, safety and environment, and as well as to operational matters.

This Standard is closely related to Standard 001, Training for Oil & Gas Industry. Standard 001 aims to elaborate, specify and clarify the requirements and NOGEPA's interpretation of the national regulations, primarily the Mining legislation and the Working Conditions legislation. As such it describes the requirements for training of personnel working in the oil and gas industry in order to demonstrate compliance with Dutch regulations and company policies.

The procedure in Standard 002 applies to the evaluation of the quality of safety and emergency response training as described in Standard 001. The purpose of the procedure in this Standard is to provide a method of scheduling, conducting, reporting and closing out audits.

NOGEPA gives recognition for Training Providers and training courses, provided that the evaluation by means of an audit has been found satisfactory.

This Standard consists of the following chapters. Section 2 of this Standard describes the scope and application. Section 3 describes the types of audits, section 4 the audit procedure and section 5 the withdrawal of the recognition. Section 6 provides more detail about roles and responsibilities in the audit process. Finally, section 7 provides information about the financial arrangement and chapter 8 about confidentiality.

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2. Scope and application

2.1 **Scope**

The purpose of the procedure in this Standard is to provide a method of scheduling, conducting, reporting and closing out audits, in order to:

- Determine in the extent of conformity of the Training Provider, with the evaluation criteria outlined in Standard 001, Training for the Oil & Gas Industry;
- Evaluate the effectiveness of the training
- Identify areas of potential improvement of the training; and
- Demonstrate that recognized Training Providers in The Netherlands meet the Dutch legislative requirements, and where applicable, the internationally mutual agreed standards of harmonization.

The conditions for withdrawal of the NOGEPA recognition is also included in this Standard.

2.2 Application

The procedure in this Standard applies to the evaluation of the quality of safety and emergency response training as described in Standard 001, Training for the Oil & Gas Industry. It applies to Training Providers in The Netherlands providing training to personnel working in the oil and gas exploration and production industry. Evaluation of training will take place by means of audits of the training programs, facilities and resources provided by the Training Providers.

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3. Recognition of Training Providers and training courses

NOGEPA gives recognition for Training Providers and training courses. To become a NOGEPA recognized Training Provider the following requirements are to be met:

- payment of the registration fee, see section 6
- a satisfactory initial audit, see section 3.1.

Recognition is valid for a period of 3 years. Blocks of 3 years are used:

- 2011 2013;
- 2014 2016, etc.

Since February 2012 Deltalings Training-Loket, hereafter called Deltalings is tasked with the auditing of NOGEPA recognized Training Providers and the associated courses as required by the NOGEPA Training Handbook.

Address and contact of Deltalings:

| Address: | Krammer 8, 3232 HE Brielle |
|-----------------|----------------------------|
| Telephone: | 0181 - 470441 |
| Contact person: | Jeroen Metz |
| Email: | training@nogepa.nl |

3.1 Initial audit

When a Training Provider seeks an initial recognition the recognition process starts with an initial audit.

Prior to the audit the following information need to be submitted for approval/screening:

- A description of the Training Provider's management system, organization, resources, competence of the trainers;
- The lesson plan(s);
- The detailed instructor manual(s);
- The delegate hand-out, and
- A description of training facilities, equipment, classrooms, safety and first aid, etc.

When satisfied with the information Deltalings will contact the Training Provider to agree on a date for the audit of the course(s) at the premises of the Training Provider, see section 3.2.

3.2 Types of audits

There are two types of Audits:

1. The Training Provider audit. This audit will focus on the general organization concerning all recognized NOGEPA courses of that provider. Specific criteria are stated in NOGEPAstandard

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001 paragraphs 3.1 (Requirements for the Training Provider); 3.2 (Qualifications of instsructing personnel); and 3.3 (Requirements concerning the facilities of the Training Provider).

This type of audit will always be held in case of an initial audit at a new Training Provider and once a Training Provider is regconized once per 3 year recognition period.

2. The Training Courses audit. This audit will focus specifically on the targeted course. The criteria described in NOGEPA standard 001 (3.2 and 3.3).

The audits can be either an initial or a subsequent follow up audit. A summary of the evaluation process is described in Appendix 1.

3.3 Follow up audit

This type of audit can be both a Training Provider audit and/or training course audit, and will be held at no cost to the Training Provider.

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4. Audit procedure

The audit process consists of five separate phases discussed in this section:

- Audit scheduling
- Preparation and planning of the audit
- Conducting the audit
- Reporting, and
- Follow-up and close-out.

4.1 Audit Scheduling

4.1.1 Audit Programme

Deltalings will prepare a general Audit Programme that covers a period of 3 years. Prior to issue, the Audit Programme will be authorized by the NOGEPA Workgroup Training. Deltalings will ensure that at the end of the 3 year period all recognized Training Providers have been audited at least once in this period.

4.1.2 Annual Audit Schedule

Deltalings will propose to the NOGEPA Workgroup Training an annual Audit Schedule. Review of the previous year Audit Schedule and the Audit Programme will take into account:

- Results and trends of the audits held, and
- Conformance with the evaluation procedure

Deltalings will ensure per audit the availability of relevant partners such as audit team members and Training Provider personnel

The NOGEPA Workgroup Training reserves the right to request Deltalings to conduct unscheduled audits. Audits may also be conducted on specific request of NOGEPA members.

4.1.3 Audit Team

The audit will be conducted by an Audit Team. The Audit Team will be appointed by Deltalings. When appointing an Audit Team, the Audit Coordinator of Deltalings will take into account the scope of a particular audit and the required competencies (skills, knowledge, personal attributes) of the team members.

The team members shall be sufficiently unbiased regarding the Training Provider to be audited.

An Audit Team consist of an:

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- Audit Team Leader;
- A Member (with expertise in the field of the training to be audited, in case not covered by the Audit Team Leader), and
- An Observer from the Dutch government on invitation, but this is optional upon their discretion.

4.2 Preparation and planning of the audit

The Audit Coordinator will contact the team members to make appointments and brief them regarding the audit. If deemed necessary e.g. when auditing a new Training Provider the Audit Team Leader will ask the Training Provider to submit information on its safety and quality management system, certifications, permits and training documentation i.e. lesson plans, certifications, delegate hand-outs and other relevant documentation or records in advance. With subsequent or follow up audits this can be omitted, unless significant changes in the management system and documentation are expected.

If, after the review of the documentation, the Audit Team Leader concludes that the documentation does not comply with the audit criteria to a certain extent that a major nonconformity should be raised he may postpone the audit and inform the Training Provider regarding the follow-up actions.

4.3 Conducting the Audit

4.3.1 **Opening meeting**

The Audit Team Leader will convene an opening meeting with the management of the Training Provider. The purpose of the meeting is to:

- Introduce the Audit Team Members, including an outline of their roles;
- Outline the definition, objectives and scope of the audit;
- Confirm the evaluation criteria;

- Identify and agree personnel to be interviewed;
- Confirm the proposed timetable and other relevant arrangements;
- Confirmation of safety procedures and required protective equipment relevant to the Audit Team during the audit, and
- The method of reporting, including any grading of non-conformity with the requirements.

Non-conformities will be graded and classified according to the table below:

| Grading | Non-conformity |
|---------|----------------|
| | |

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| Major Non-conformity (to be solved in 1 month) | A situation of action is noticed in which the safety of delegates is seriously threatened. This will corrected immediately and notified to NOGEPA; Non-compliance with legal requirements; One or more elements of the requirements have not been documented while required by the audit criteria; On or more elements of the requirements have not been implemented; A non-conformity raised during the previous audit(s) has not been corrected or corrective measures have not been initiated, or There is a trend in similar non-conformities on various requirements. | |
|---------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| Non-conformity | Shortcomings are observed with respect to one or more | |
| (to be solved in 3 months) | elements of the requirements | |
| Observations | It is expected that, without appropriate action, a non- | |
| (to be reviewed during the | conformity will occur in the near future regarding one or more | |
| next audit) | elements of the requirements. | |

4.3.2 The audit

The Audit Team will be familiarized by Provider with the facility. The Audit Team will undertake any safety introduction etc. as required, before commencing the evaluation. Audits may be conducted using questionnaires as a guide.

Objective evidence will be examined and essential information recorded i.e. deviation from a requirement will be deemed as a non-conformity. Non-conformities and observations will be registered in the Audit Report.

4.3.3 Closing meeting

The Audit Team Leader will keep a closing meeting with the management of the Training Provider. The purpose of this meeting is to:

- Present an objective summary of the audit, making reference to the satisfactory aspects of performance as well as any non-conformities noted or observations made, and
- Discuss the audit findings and ensure that they are understood by the Training Provider.

Confirm a time frame within which information regarding corrective measures is to be submitted to the Audit Coordinator.

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4.3.4 Reporting

Following completion of an audit the Team Leader arranges for the preparation of an Audit Report which will expand on the information discussed in the closing meeting. The Audit Report will contain at least the following information:

- Summary of finding;
- Remarks from the Training Provider;
- Audit objectives, scope, criteria;
- Audit Team members and
- Appendices corrective actions to be taken and supporting documentation.

The Audit Team Leader is responsible for the completion of the Audit Report. Upon approval by the Audit Team Leader it will be sent within 3 weeks to the management of the Training Provider.

The Audit Report will also be sent to the NOGEPA Secretary Operations/H&S, who will inform the Workgroup Training of the results and place it on the NOGEPA member's website.

4.3.5 Follow-up and Close-out

Following the audit, the Training Provider develops and submits to Deltalings the corrective measures to be taken regarding the non-conformities within 3 weeks after dispatch of the Audit Report. The proposed corrective actions will indicate the person who is responsible for implementing the action and the target date for completion as confirmed with the Audit Team Leader.

If the Training Provider's actions are considered effective in correction the identified deficiency and preventing recurrence, the Audit Team Leader will recommend a close out to the NOGEPA Secretary Operations/H&S. When agreement cannot be reached between the Audit Team Leader and Training Provider regarding the effectiveness of corrective action taken in order to close out, the matter will be referred to the Workgroup Training.

4.4 Competence of audit team members

4.4.1 Audit Team Leader

The Audit Team Leader must have attended a Lead Auditor training course according to ISO 19011 or equivalent in HSE and/or Quality Systems Assessment and must have extensive understanding of the applicable audit criteria.

4.4.2 Team member

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Training requirements for Team members are determined by the NOGEPA Workgroup Training. The level and extent of this training will depend on the knowledge and experience of individual audit team members in relation to the particular subject of the audit, but it may include any or a combination of the following:

- Pre-audit briefing by the Audit Team Leader, or a
- Practical 'on the job' training as part of an experienced audit team.

Note: by composing a team either the Audit Team Leader or the Team member must have at least specific knowledge and experience on the subject of the training to be audited.

4.4.3 Observer from the Dutch government

The Audit Team Leader will invite an observer from the Dutch Government (SodM, ILT) to participate in the audit, but their attendance will be on their own discretion.

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5. Withdrawal of the recognition

5.1 Conditions for withdrawal of the recognition

The recognition is valid for 3 years but under certain circumstances the recognition can be withdrawn during this 3 year period.

Reasons for withdrawal of the recognition are:

- Experiences of operators,
- Audit results, or
- Number of certificates issued/number of training provided

5.1.1 Experiences of operators/audit results

When the Workgroup Training receives signals of operators that they are not satisfied with a certain training or Training Provider this should be discussed in the regular meeting of the Workgroup. The Workgroup then decides what to do with the signals, one of the options is to perform an audit. The audit should be conducted as described in section 4. In case of non-conformities the Training Provider should be given the opportunity to solve these.

5.1.2 Number of certificates issued/number of training provided

The number of certificates issued by every Training Provider is registered. When a recognized Training Provider doesn't issue or hardly issues any certificates for a certain training the lack of routine in training delivery has a negative impact on the quality of the training.

Therefore the following requirements are set:

- Nominal lower limit of the number of participants per year, 10% of the average of all the certificates issued for a certain training in the previous 2 years,
- More than 5% of the total number of participants over the recognition period, or
- The training provided at least 3 times per year.

Conditions for the above:

- There is more than 1 Training Provider for the training;
- The number of participants for a certain training is that high that the requirements can be met;
- Training Providers that are recently recognized get a period of 3 years after the first recognition to get up and running.

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5.2 Process withdrawal

The steps to take in the process of withdrawal are:

- Define the non-conformity;
- Discussion with the Training Provider;
- Intensive communication with the training provider when the non-conformity continues;
- Withdrawal

5.2.1 Define the non-conformity

As a result of the audit the non-conformity should be defined.

5.2.2 Discussion with the Trainer Provider

The results and non-conformities should be discussed with the Training Provider. It should be very clear what is expected of the training provider to solve the non-conformity and within what time frame the non-conformity should be solved.

5.2.3 Intensive communication with the Training Provider

When the Training Provider doesn't solve the non-conformity within the set time frame NOGEPA should discuss with the Training Provider why the non-conformity isn't solved. From this discussion it should become clear if the Training Provider is willing to take action and what the consequences are of not solving the non-conformity.

NOGEPA should announce -in writing- within which (final) time frame the non-conformity should be solved. If the Training Provider doesn't comply the consequence is withdrawal of the recognition. The NOGEPA Secretariat will notify all oil and gas operators of the withdrawal.

5.2.4 Withdrawal

If the recognition is to be withdrawn, NOGEPA should send the Training Provider a letter with the official announcement of the withdrawal.

Furthermore the Workgroup Training and all the members of NOGEPA should be informed of the withdrawal. The withdrawal should also be announced on the NOGEPA website.

NOGEPA should ensure that the list of recognised training providers on the NOGEPA website is up to date.

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6. Roles and Responsibilities

6.1 NOGEPA Health & Safety Committee

The NOGEPA Health & Safety Committee is the custodian of the NOGEPA Industry Standard 001 'Training for the Oil & Gas Industry' and charged with monitoring the quality of the training provided by the Training Providers in The Netherlands. For this purpose, it has installed a Workgroup Training, of which the members are selected from or appointed by the NOGEPA Health & Safety Committee.

6.2 Workgroup Training

The Workgroup Training will discuss and agree with the Audit Coordinator from Deltalings the preparation, implementation, monitoring, reviewing and, if necessary, improving the Audit Program and the Audit Year Schedule. The Workgroup Training is responsible for:

- The identification and provision of resources needed to conduct the audits;
- Proposing to NOGEPA via the Chairman of the Health & Safety Committee the recognition of Training Providers when they are in conformance with the Industry Standard 001, as well as the continuation of such recognition, after meeting the evaluation criteria demonstrated during the audits; and
- Maintaining contact with members of associations around the North Sea in view of harmonization of safety and emergency response training.

6.3 Audit Coordinator

The Audit Coordinator of Deltalings arranges the audits as per Audit Year Schedule as agreed with the Workgroup Training, and is responsible for:

- The quality of the Audit Program and audits;
- Appointment of the Audit Team Leader and composition of the audit team(s);
- Maintaining contacts with the Training Providers for the audits;
- Coordinating and follow up of the Audit Reports and related non-conformities and observations, and
- Responding to questions from those interested relating to offshore safety training.

6.4 Audit Team Leader

The Audit Team Leader is responsible for correctly conducting the audit. All Team members will work under his supervision. His is authorized to collect any information necessary for the audit within the defined scope. The Audit Report will be authorized by the Audit Team Leader.

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6.5 Training Provider

The Training Provider will co-operate with the audit team to enable a speedy expedition of the audit process, and take appropriate actions upon audit results if deemed necessary, in order to either achieve or to maintain the recognition of NOGEPA.

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7. Financial arrangements

When a Training Provider seeks NOGEPA recognition, and in case NOGEPA Training courses will be added during for recognition period of 3 years the costs will be borne by the Training Provider and is directly payable to NOGEPA upon receiving an invoice in advance to the initial audit.

Subsequent audits carried out by Deltalings during the recognition period of 3 years will be financed by a "fee" on every delegate following a training course at a Training Provider in The Netherlands and will be held at no direct cost to Training Provider.

NOGEPA will invoice the Training Providers with a fee per delegate who successfully completed a training course.

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8. Confidentiality

All information related to privacy of persons and parties, as well as the business related aspects of the Training Providers and associated partners will be treated confidentially and not disclosed to any others without the explicit consent of the party involved.

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9. Annual management review

Deltalings will on an annual basis draw up a "Management Review" on the progress of the Audit Program, the Audit schedule and further provisions of this NOGEPA Standard. The results of the review will be reported to and discussed with the Workgroup Training with the aim to improve the system, the training programs, and Standard 001 if deemed necessary.

The NOGEPA Secretary Operations/H&S will receive all relevant documentation and will keep it filed for at least a period of 7 years (covering 2 periods of recognition of Training Providers/Courses).

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Appendix I Summary of the Evaluation process

1.1 Pre-evaluation

Before recognizing a course the Training Provider will submit to Deltalings at least the following documents:

- Lesson plan and instructors manual
- Hand-out to delegates
- Description of the facilities

1.2 Audits

All courses are audited at random by the Audit Team consisting of:

- An Audit Team Leader of Deltalings
- A Team member representing one of the NOGEPA members
- A representative on behalf of the Dutch government (SodM, ILT)

Subject of examination can be any or all of the requirements listed under the evaluation criteria (Standard 001 paragraphs 3.1 to 3.8; 3.14 and 3.15)

All audits will be reported on in writing. The report will include a description of the evaluation method and criteria. Audit team members will be named. Non-conformities will be graded and classified to either (major) Non-conformity or Observation.

The training Provider will receive the report and will be asked to reply in order to close the-out or to follow-up if necessary.

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