

QUESTIONS CAPTURED DURING THE SP 1157 v7 WORKSHOP on 18<sup>th</sup> April 2010  
AND PDO RESPONSES

1. What are the HSE Course requirements for short time visitors?  
HLD8: Anyone working within the PDO concession area for more than 7 continuous days is subject to the core HSE Learning Ladder requirements. De-selection and equivalent prior training options should be taken into account and agreed by the CH before deciding which courses should be booked.
2. PDO to give step-out for approved DDC courses from other countries such as UK?  
MSE 13: Yes provided is the equivalent definition attached.
3. What is a new hire? Is it someone fresh or even someone who has 2 or 3 years experience and joins the company now?  
HLD8: A new hire is defined as an individual employed (hired) by PDO or a PDO contracting company after the 31st August 2009 and who is or may in future be appointed to PDO contracting activity. 'Appointed' has been used to differentiate between those hired and used on PDO activities, and those who are not.  
EMPLOYED (HIRED) BEFORE 1st September 2009
  - Employee of the contracting company appointed to PDO contract activities. He is NOT a new hire for SP 1157 v7 purposes.
  - Employee, NOT appointed to PDO contract activities initially, but is moved to PDO contract activities AFTER 31st August 2009, BECOMES A NEW HIRE for SP 1157 v7 purposes on the date he is appointed to work on the PDO contract activity.EMPLOYED (HIRED) AFTER 31st AUGUST 2009
  - Employee, hired and appointed to work on PDO contract activities or who may be used to work on PDO contract activities, IS A NEW HIRE for SP 1157 v7 purposes.
4. How about the employees working currently for Schlumberger and moved to new contracts – will you consider them as competent staff having completing similar courses at Schlumberger?  
HLD8: If such employees have continuously worked with the same employer, and on other PDO contract activities, they are NOT considered to be new hires. Schlumberger has an approval for in-house training with a program that matches the present competencies on specific PDO HSE courses. These matched programs are known to Schlumberger and HSE passports of those who have achieved the agreed competence will be endorsed as if they had attended the appropriate PDO course.
5. How about other staff moving from other companies but having equivalent HSE or DD courses similar to the one required by PDO?  
HLD8: Equivalent prior training options must be considered before deciding which courses should be booked. Guidance on equivalent is attached.

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6. After recruiting new staff such as an experienced Rig Manager, why should he be idle for 3 months prior to start working? Can a step-out be provided for such key personnel with good experience?  
HLD8: He need not be 'idle' at all. The option for Equivalent prior training means competence assessment to verify currency and competence is the most appropriate solution. A rig manager is supervisory staff. In theory, the assessment process for the entire core HSE Learning Ladder could take as little as 7 hours. Once core HSE competence is verified and achieved, he can be deployed. If other HSE course attendances are required within the first 3 months by virtue of his role, a Step-Out should be agreed with the CH and applied for, to enable this developmental training to be completed. The equivalency option may even apply to these courses as well.
7. What is the relevance of the 1<sup>st</sup> of September as the start of this new system?  
HLD8: This was the date when the new arrangements were agreed by PDO to be introduced.
8. Is PDO planning to conduct any Audits to ensure compliance?  
HLD8: Yes. They are already planned for this year.  
Why is there a delay in accepting the DD course requests? Why do TATI not go for a Sub-Contractor?  
MSE 13: The PDO MSE1 team have not received any evidenced complaints regarding delays in training being provided.
9. What are the PDO DD In-house training requirements?  
MSE13: These are all contained in detail in Appendix 1 Part II of SP 1157 v7 under a specific section relating to in-house driver training requirements. This is available on the PDO contractor website.
10. Should the DD courses be part of the HSE Competency Ladder?  
Yes. Approximately 75% of the workforce is required to drive as part of their work role. Hazards associated with road transport are the biggest single hazard, faced by the largest single target population in the workforce. For this reason, the courses are included on the core HSE Learning Ladders. Those that are not required to drive as part of their work, should simply be de-selected from the driving courses by agreement with their CH.
11. Did PDO put any guidelines for the HSE Competency Assessments?  
HLD8: Post-training and equivalency Assessors must all be qualified to an Internationally recognised standard in order to assess competency. The performance criteria for the core HSE Learning Ladder courses are listed in SP1157 v7 on pages 140 – 148. If further guidelines other than those covered by the Assessor qualification are felt to be necessary, PDO will prepare and issue them to Assessors. Guidance will be prepared and issued to assist workplace supervisors who have not attended the Coaching, Mentoring & Competence Assessment course, to understand what is required.

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12. What are the de-selection criteria when compared to the competency assessment?  
– Record of competency and stamping the HSE passports and issuing of the permits?

HLD8: **De-selection** of an HSE course is considered as an option if the normal role of an individual will never expose them to the hazards and risks covered by a particular course. For example, permanent office based staff at the coast and H2S. Specific guidance concerning the equivalent prior training option in SP 1157 v7 will be issued shortly.

**HSE Passports** will have an appropriate entry made and be stamped by an Approved Training Provider when the delegate produces the de-selection agreement email.

**Records of competence** achievement, are made in the HSE passport, along with the appropriate entry and stamp by the Approved Training Provider, and any **permit** associated with it will be issued.

13. For staff assessed as not yet competent, what should be done?

HLD8: They should receive remedial training to address the identified competence gap(s). Where the individual fails the initial competency assessment, one more attempt to verify his competency may be undertaken. Any second (final) assessment required, must be immediately booked on the day of the failed assessment and taken at the earliest assessment opportunity afforded by the ATP or DDAT. Should the individual fail both assessments, he will be assessed as 'not yet competent' and must undergo the PDO approved training.

14. What are the requirements differences to assess existing staff compared to the new staff?

HLD8: No difference. There is only one competence standard.

15. Do we have enough resources in place to complete all the courses before the deadline of 30<sup>th</sup> of June?

HLD8: There is a network of 7 Approved Training Providers (ATPs). They very frequently have to cancel scheduled courses through lack of client support, as there are specified minimum delegate numbers. In the majority of cases, courses are being run at well below maximum delegate numbers. Clients need to understand that there is only so much flexibility available to the Approved Training Providers and there is a finite number of trainers available, spread between the coast and the interior. Collectively there is sufficient capacity between all the ATPs to service contractor requirements if scheduled courses are used rather than an expectation of individual client arrangements being made.

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16. How flexible is the new process when it comes to the legal labor Law? How can we manage the new differences set for existing staff, new staff and the new recruited staff in the future?

HLD8: The new arrangements do not conflict with the Labour Law, and there is no difference in how existing, new or future recruited staff should be dealt with. When staff are assessed they are either assessed 'competent' or 'not yet competent' in respect of HSE. When 'not yet competent', the employer would be expected to arrange for further coaching, mentoring and training opportunities to provide the best opportunity for the individual to achieve competence. If this is not achieved within a reasonable timeframe, and 3 months is usually considered reasonable, the continued threat to safety of the individual and those they work with becomes unacceptable. Provided the employer has done everything that could reasonably be expected in providing opportunity to the employee to achieve the required competence through coaching, mentoring and training, and has documented what has been done, there should be no issue.

17. Can the 3 month period be built into the pre-mobilisation of new contracts. Refresher courses vs assessments?

HLD8: Not really. The 3 month period in the workplace is intended to be an opportunity for the individual to demonstrate to his line supervisors/managers sustained safe behaviour at work, brought about through training and the application of knowledge and understanding to build skills. If there is no workplace activity in the mobilisation period, it will not achieve a meaningful measure of sustained safe behaviour in the workplace.

18. New supervisors and current supervisors are they competent to assess?

HLD8: Any competent supervisor (they all should be, as contractors have always been required to employ competent staff) carries out informal assessment of performance all the time he is supervising the work of others. It is a routine and expected part of supervisory behaviour. The only difference with assessing PDO's core HSE competence in the workplace is that the supervisor is required to measure competence against a specific performance standard set out in SP 1157 v7. New supervisors going through the core HSE Learning Ladder courses, will have had the benefit of attending a 1 day course to help them with this role. Existing supervisory staff can attend the course on application, at any time. For those that cannot, guidance will be prepared and published to assist workplace supervisors who have not attended the Coaching, Mentoring & Competence Assessment course, understand what is required.

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19. What does 3 months in the workplace mean for rotational staff?  
HLD8: The purpose of the 3 month core HSE competence re-assessment is to confirm employees are sustaining the required safe behaviours they have been taught, at work. If the training has been effective and the immediate post-training competencies achieved, there should be no difficulty for rotational staff confirming through assessment in the workplace during their normal working activities, that they apply what they have learnt consistently within a 3 month calendar period.
20. Is travel/accommodation/salary of personnel waiting/attending required training taken into account?  
HLD8: No. This is a business risk the contractor should have considered at the tender stage. Delays and associated costs brought about by the need to train staff 'not yet competent' in HSE are not PDO's responsibility.
21. How may a contractor submit an alternative PTW system and associated in-house PTW training for PDO approval?  
HLD8: Contractors who believe their PTW system is an acceptable alternative to PDO's must apply to their CH, who will consult with PDO's PTW focal point (UOP7). If agreement is reached, the contractor's PTW system, including the training elements, is recorded as an acceptable alternative and the contractor's staff would not then need to attend the PDO course. A record of such agreements will have to be maintained by UOP7, and PTW Licensing Boards need to be kept aware, so that candidates appearing before them will have the appropriate entries in their HSE passport.
22. Will additional people be required to administer competence assessments and reassessments?  
HLD8: Competent contracting organisations will already be monitoring and recording the competence of their staff through feedback received from trainers and supervisory staff. Any additional time/records required for the 3 month workplace core HSE competence will be minimal and certainly should not require additional staffing.
23. Driving assessment, some 6 month going up to 3 years? Depends on the driver and instructor. How can we consider it as a cost saving?  
MSE 13: The assessment frequencies are set in the new scheme as a minimum 1 year frequency and a maximum 3 year frequency. This averages out at 2 years and also removes the mandatory first year recertification after the initial training. PDO is taking the average frequency at 2 years as the standard competency which contractors will reach. If a contractor decides to employ less competent drivers who require more training then this is their decision and hence at their own cost.

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24. What is the difference between drivers and instructors, as both are licensed by the ROP in the same way?

MSE 13: All instructors have been trained by professional road safety training organisations and professionally qualified by them to the driving instructor diploma standard. They have then been assessed as to driving trainer competency by the DDAT. This enables them to teach defensive driving and tutor a student in how to rectify their mistakes or bad habits. This provides a level of competency far greater than a person who has simply passed their driving test and gained a PDO permit.

25. Is there any standard for driving in PDO? What is it?

MSE 13: The PDO defensive driving training and assessment regime within PDO has been certified and accredited by DIAMOND, the Driving Instructor Association in the UK. They will recertify the quality of this every two years.

26. DDC Training Providers are asking the contractor to bring their own heavy vehicles, buses or tankers – is this not the Training Provider's obligation?

MSE 13: Their contract requires the DD Training Provider to provide light vehicles for training and assessment and these are provided. The contract specifically excludes the need for them to provide the vehicles for heavy, bus or tanker training as it was agreed during extensive consultation on the contracts that it is far better for PDO contractor drivers to receive training and be assessed in the vehicles their employer will expect them to drive.

27. Does the DDC Approved Training Provider have enough training facilities especially in the PDO South area?

MSE 13: TATI have reported that volumes of training enquiries in the interior are low as most requests relate to the coast. PDO has received no reports of training not being provided due to a lack of training facilities in the interior. However, during May, PDO will be opening two additional classrooms in Nimr to be able to accommodate additional training requirements in the South.

28. Where and who will carry out the competence assessments?

HLD8: In relation to HSE course competencies, initially by PDO Approved and qualified trainer/assessors within the ATP community. Those who have attended the core HSE Learning Ladders will be assessed 3 months later, by supervisory staff within the individual's own organisation. The quality of the assessment will be internally verified by the organisation's line management, and externally verified by either the CH or by PDO HLD8 staff. Competence Assessments may be carried out at the training location, or by arrangement with the ATP and when appropriate, at the workplace. In respect of DD assessments, these will be carried out ONLY by PDO's contracted assessing body, SDI-Sheida. Location comment as for HSE courses.

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29. Will a newly employed company be able to work in PDO facilities within their first 3 months? (e.g. you may require 10 permit holders).

HLD8: Not as a Permit Applicant, Holder unless a Step-Out of the standard pre-requisite requirements through the CH and PTW focal point in PDO has been agreed, and only if there is a fully justifiable case. For many years there has been a pre-requisite requirement for delegates attending any PTW course to have 3 months experience in the relevant PDO concession area. It is a pre-requisite to provide sufficient opportunity for the candidate to familiarize himself with the relevant installations, activities, hazards and risks in the area in which he may operate, before facing a Permit Licensing Panel.

30. Should reassessment come before any refresher?

HLD8: PDO's expectation is that the individual and his supervisory staff must ensure the required competency is consistently maintained. Contractors are required to use competent staff within the contract. The ONLY refresher training now available is for Basic Life Support. No other refresher training is provided. Therefore, reassessments will always be carried out before any remedial training is identified as being necessary. If, a second re-assessment is necessary and carried out, and the individual is then assessed as 'not yet competent', he must re-attend the full course to regain competency, and at the contractor's expense.

- 31.** Can we have clear assessment criteria to define the validity period of driving license?

MSE 13: This is a good suggestion and PDO will consider this proposal and revert back with a decision after consultation with the road safety standards contractor.

32. Isn't 3 months too short a period to complete a core HSE competence reassessment in the workplace?

HLD8: PDO does not agree it is too short. If an individual cannot demonstrate his consistent use of core HSE safe behaviours in the workplace 3 months after training, there is something wrong with the supervision of his work performance and behaviours. The coaching and mentoring elements of supervision are not reserved exclusively for 1st line Supervisors. Managers should routinely be making sure their 1st line Supervisors are effective in the workplace as well.

33. If an experienced driver who has already obtained DD permit fails the reassessment, will he be allowed to drive?

MSE 13: He is allowed to undergo remedial training and then apply for a reassessment again. During this time he is not allowed to drive as he is not deemed competent.

34. If a driver fails to achieve competence after the DD recertification assessment, who bears the re-test costs?

MSE 13: There is no change as all training costs have historically been built into the contract value, therefore the contractor must bear the cost.

35. When does the CH start to apply penalties for non-compliance?

HLD8: The conditions in your contract concerning non-compliance penalties and when they are awarded are specified. More guidance is available in the contract C9.

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36. Why must we attend courses? Can PDO provide online training to PDO/Contractors equally?

PDO's future strategies in relation to HSE training and competence assessments are being prepared currently. E-Learning, Computer-Based Training and assessment are certainly being considered as part of a potential blended learning solution along with more traditional methodologies.

37. People behaviours are the main cause of accidents. How has this been captured in revision 7?

The entire portfolio of core HSE Learning Ladder courses in SP 1157 v7 are focused on tackling the common workplace hazards and risks, and controlling them through the use of sustained safe behaviours in the workplace, and at all levels in the pan-PDO organisation. Safe behaviour is a feature emphasised in all courses on the core HSE Learning Ladders.

38. Can we have a reliable corporate contract tool for measuring compliance of PDO staff? The current sapphire does not work. Departments have spreadsheets that often do not work at all and are very admin intensive.

The standardised reporting template being issued to CHs and CMs is also based on Microsoft Excel 2003, but at least ensures all parties capture/report on the same information in the same way. Part of the review work underway presently is looking at the most resource and cost-effective way of capturing and analysing the required data in future. This may involve the integration of several different databases. For the present time, we are reliant on the Training Management Systems available.

39. Why not limit the training to the coast rather than in the interior, taking into consideration the traveling cost?

Over 40% of all present HSE training takes place at interior locations. Interior based training is less expensive, and less working time is lost through travel. Transport risks are generally reduced by interior based training too. This also maximizes the effectiveness of the ATPs in meeting client demand for the maximum number of delegates. Graded roads driver training (DD03) is returning to interior locations exclusively due to the constant difficulty in locating and securing graded roads that are suitable for training at the coast.

40. How do we measure the effectiveness of the courses delivered by TATI?

MSE 13: There is a system in place to ensure that the courses are delivered by competent staff, audited by the Standards Body. All TATI instructors have been assessed and certified by the Standards Body as competent to deliver the courses. The performance of each instructor is analysed monthly by the Standards Body via the driver database and as such remedial measures are instigated should their performance not be up to the required standard.

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41. Can the training providers and training cost be included in C9?  
Currently No, But will be reviewed in the future training strategy.
42. Can claims be raised after the completion of the contract?  
No.
43. Are current contracts that are about to be completed within 6 months period, supposed to comply with SP 1157 version 7 as well?  
The CH and CM must discuss and agree as Step-Out applications, the degree to which changed requirements are implemented within any contract that has less than 6 calendar months to run. Any extension to the contract term that is agreed within that 6 month period, will require full compliance to be achieved, as will any contract with longer than 6 months to run. The Step-Out agreement should be recorded for audit purposes.
44. Who should be the final party to decide to pay VTCs or claims or not?  
FPB3: The final valuation of any potential Variations To Contract or claims shall be carried out in accordance with the general conditions of the contract.
45. Is 3 months beyond the expiry date the grace period for DD06,?  
MSE 13: Yes, provided the employee can show evidence that he attempted to book the courses before his permit expired.
46. Please provide the basis for the cost calculation on savings or extra training costs;  
HLD8: It is for contractors to conclusively demonstrate how they based their original HSE training costs and to quantify their estimates, and how they justify any present claim in relation to those original estimates and the actual costs expended since the start of the contract. All of the figures presented by PDO during the workshop on the 18<sup>th</sup> April were based on the detailed data received about actual HSE training deliveries by ATPs to the contracting community.
47. Is 57% of the full courses charge for an assessment of 1 hour for a 5 days course reasonable?  
HLD8: The average of all assessment fees across the entire suite of HSE courses was stated as 57%. Many are significantly less than this, e.g. PTW competence assessment is less than 11% of the course fee. The variation is due to both location (in relation to buildings and equipment ownership, maintenance and repair) and whether there are consumables involved.

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48. Shouldn't PDO provide all training to their contractors free of charge? What are the incentives for in-house training?

HLD8: PDO already provides the contractor with its HSE training 'free of charge', when it agrees to pay the contractor his estimated costs included in the bid price at award of contract stage. The contractor should have taken account of all the material business risks when calculating his estimates.

The incentive for in-house training rests entirely on whether the contractor considers it more convenient to do so. Approving a contractor to do so, and the quality assurance work associated with it, actually increases costs to PDO..

49. If a contract is extended and requires more staff to meet the increased activities, how should a contractor deal with this issue?

HLD8: The manpower in the contract would be required to comply with SP 1157 v7.

50. Why is the same approach applied to short term contracts (1 to 1.5 years)? E.g. contract started 11.01.2009 → Sp1157 changed on 1.9.2009 and contract completing on September 2010?

HLD8: Anyone working in our concession area is exposed to the same hazards and risks no matter how long they are there for. We are concerned about the individual's safety as well as those he or she works with. Our focus is on promoting safe behaviours and a safe workplace across the entire pan-PDO community in order to keep people safe whilst at work – GOAL ZERO – no harm to anyone or anything at work.

**Rules relating to HSE and Defensive Driving direct equivalence competence assessments for new hire PDO and PDO contractor staff**

**1. Introduction**

PDO allows PDO and PDO contractor management to submit a 'new hire' direct for a PDO competency assessment, provided it can be proven the training was received prior to employment to the company/contractor and it is equivalent to the PDO standard. A new hire is defined as an individual employed (hired) by PDO or a PDO contracting company after the 31<sup>st</sup> August 2009 and who is or may in future be appointed to PDO contracting activity.

The following rules provide the management of this process to ensure standards and the integrity of the process is maintained.

**2. Providing training to New Hires**

**2.1 General**

To qualify for an equivalence assessment any previous training deemed equivalent to the PDO standards must have been conducted before the person was employed by the contractor (on PDO or non PDO contracts). Before putting the employee forward for an assessment, the Contract Manager must ensure the eligibility criteria have been met.

**2.2 General HSE course Equivalency**

Only a PDO Approved Training Provider (ATP) , or in the case of defensive driving the Defensive Driving Assessment Team (DDAT), may conduct equivalency assessments. If a second equivalency assessment is required, the ATP or DDAT conducting the first assessment must always conduct the second (and final) equivalency assessment.

**2.3 Defensive Driving course Equivalency**

Only the Defensive Driving Assessment Team (DDAT) may conduct driving assessments and issue PDO permits. Only the Defensive Driving Training Provider (DDTP) or a PDO contractor with an authorised in-house driver training scheme is allowed to provide defensive driving training to PDO employees or PDO contractor employees after they have been employed/appointed to a PDO contract.

**3. Equivalency eligibility criteria**

PDO determines that for a previous course to be deemed equivalent to that of PDO the following rules must apply:

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- i) The course must be of a similar or greater duration than the equivalent PDO course.
- ii) The course must have been completed on a date before the individual concerned was employed by the contracting company.
- iii) The course must have addressed all aspects of the subject matter in the equivalent PDO course.
- iv) The assessment of competence method and competencies assessed must be similar to those on the equivalent PDO course.
- v) For claimed equivalencies against any other PDO HSE course, the previous course must have been delivered by a bona-fide, recognised, professionally approved Training Provider whose training staff hold similar or better qualifications and experience to that required of PDO's ATPs
- vi) For claimed equivalences against any PDO Defensive Driving course, the previous course must have been certified by an internationally recognised Road Safety Organisation.

#### **4. Verification of equivalency**

A contractor, who determines that the criteria for equivalency have been met, must be able to formally support this determination. PDO (MSE,HLD, Departmental Head or Contract Holder) reserves the right to request the evidence on which the determination was made by the contractor or PDO manager.

Where PDO determine that equivalency has not been satisfactorily proven, the request for a direct assessment will be denied outlining the justification for this decision.

#### **5. Preventing abuse of the previous equivalent training option.**

The verification, by assessment only, of what is considered to be equivalent previous training is an option made available to avoid unnecessary additional training to individuals previously trained, who are considered already able to achieve the PDO competence standard.

It is not a method which allows 'clandestine' training by PDO unapproved training providers to train PDO contractor staff already employed.

Only PDO contractors are allowed to nominate employees for equivalency testing, members of the public are not allowed.

To help prevent abuse of contractor employees receiving training after they have been employed by the PDO contractor, any equivalence based competency assessment must be:

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- Booked with the assessment body within 2 days of the person being employed.

Note; for driving competency, this applies only where the individual is already in possession of a ROP licence. Where the individual has not yet received his ROP licence when employed then it must be booked within 2 days of the issuing of the ROP licence.

- taken within 5 days of booking, unless the assessment body is unable to provide an equivalence assessment within the 5 days

## **6. Supporting documentation**

Any employee who is put forward for equivalence competency assessment must provide the following documentation to the assessment body:

- i) A dated training certificate relating to the competency area(s) to be assessed.
- ii) A company stamped record of employment indicating the employees start date.
- iii) A letter confirming that the employee will be reimbursed by the contractor for the cost of the training the individual has received and personally paid for, if the training took place within 6 months of the employment date.
- iv) Evidence of passing a PDO HSE induction
- v) A valid ROP licence for the vehicle to be used in the assessment.

No person will be allowed to receive a competency assessment unless this information is provided prior to taking the assessment.

## **7. Failure to prove competence**

Where the individual fails the initial competency assessment, one more attempt to prove his competency may be undertaken. Any second (final) assessment required, must be immediately booked on the day of the failed assessment and taken at the earliest assessment opportunity afforded by the ATP or DDAT. Should the individual fail both assessments, he will be assessed as 'not yet competent' and must undergo the PDO approved training and assessment before being allowed to drive on PDO business.

## **8. Remedial Training**

To ensure complete transparency of the process in the case of general HSE courses, should an individual fail both their equivalency competency assessments any further training must be carried out by a different ATP to that used for the equivalency assessment(s) or, if the employing contractor is approved by PDO to deliver the appropriate course in-house, by the in-house trainers approved by PDO.

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In the case of Defensive Driving should an individual fail their equivalency competency assessments any further training must be carried out by the PDO Defensive Driving Training Provider, or in-house by the contractor if it has in-house driver training scheme sanctioned by the Defensive Driving Assessment Team.