Shorcontrol Safety Next Reviewed	Document Title	Subcontracting of Program Delivery		
	Doc. Number	TRA-PRO-007	Doc. Owner	Head of Training & Development
	Author	Adam Romans	Revision	Rev. 02
	Reviewed by	John Kelly	Approved by	John Kelly
	Next Review	6/4/2024	Approved	6/4/2021
	Date		Date	

1. Policy Statement

At Shorcontrol Safety we are committed to ensuring that any persons contracted to and associated with the company, agree to perform their work to high professional and ethical standards. Our subcontractors, and external experts are required to comply with the policies and procedures set out by the company and awarding organisations where applicable.

2. <u>Purpose</u>

This document's purpose is to describe the manner in which Shorcontrol Safety will procure a subcontractor to deliver program training. This document also details how Shorcontrol Safety will ensure that the quality of the training, as well as the handling of paperwork and results reporting, will remain at an acceptable level.

3. <u>Scope</u>

All members of Shorcontrol Safety who are responsible for procuring second party tutors and/or liaising between subcontractors, learners, and Shorcontrol Safety.

This procedure will apply whenever Shorcontrol Safety is required to select a secondary provider to facilitate training programs; this is only done when Shorcontrol Safety cannot meet the requirements of the learner due to schedule conflicts or inadequate certifications by its tutors.

4. **Definitions**

Term	Definition

5. <u>Procedure</u>

5.1 Subcontractor Selection and Contracting

- A third-party will be contracted to perform training on Shorcontrol Safety's behalf only when Shorcontrol Safety canon meet the requirements of the learner due to scheduling or certification.
- A third-party may only be contracted if they are accredited by the authorized governing body to instruct the specific course or program.
- For non-accredited courses, the Training and Development Manager or their superiors may assess and ultimately determine whether the third-party is of the correct qualification that would allow them to instruct the course.
- Shorcontrol Safety Staff must ensure that selected subcontractors are accredited and recognized with the corresponding awarding/governing body of the course (when applicable).

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- Potential subcontractors must supply an original or copy of their accreditations.
- When supplied with the original, a copy must be made and securely stored in the Training and Development storage system.
- A member of staff must contact the relevant governing body and confirm that the subcontractor is qualified to deliver the course prior to offering the subcontractor an offer to facilitate the training on behalf of Shorcontrol Safety.
- Shorcontrol Safety must assess potential subcontractors to determine whether they meet qualifications requirements for non-accredited courses.
- The Head of Training & Development will be responsible in determining what qualifications are necessary to meet requirements for non-accredited courses.
- All selected subcontractors are required to complete a Subcontractor Evaluation Form and sign and agree to Shorcontrol Safety's Subcontractor Code of Practice prior to delivering training on behalf of the company.
- Written contracts, provided by Shorcontrol Safety, will be offered to approved subcontractors that will detail the terms of work and renumeration.
- Contracts will be considered null and void until the subcontractor has agreed and signed to Shorcontrol Safety's Subcontractor Code of Practice.
- Contracts will inform the subcontractor of their responsibilities with regards to Quality Assurance and company policies/
- Shorcontrol Safety will retain a list of viable contracted tutors for each course offered by the company.
- This list will be used to ensure there is an availability of more than one tutor for a course as deemed necessary by the company.
- Any third-party instructor or training organization will be hired on a contract-only term of employment.
- All paperwork regarding the accredited courses is handled by the third-party's verifier.
- The third-party must inform Shorcontrol Safety of each learners pass or fail status of the course upon completion of the course.
- Shorcontrol Safety will monitor the performance of the third-party instructor, ensuring that the quality of the course remains intact.

5.2 Program Reporting and Monitoring Arrangements

- All the coursework and assessments procured in use of the training will be handled by the subcontractor and its verifier.
- Upon completion of the course, the subcontractor must inform Shorcontrol Safety to the learner's results status as either pass or failure of the course.
- The coursework and assessments must then be sent to SOLAS for the purpose of issuing awards, certificates and/or registration cards.

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- All coursework and assessment papers used to gauge a learner's competency in the course must be made available to Shorcontrol Safety prior to allowing the subcontractor to administer the course.
- Subcontractors must distribute and collect Learner Evaluation Sheets to and from the learners in the course.
- Collected Learner Evaluation sheets must be submitted to Shorcontrol Safety after the completion of each course.

5.3 Subcontractor Performance Oversight

- Learner evaluation sheets, along with all other relevant communication received by Shorcontrol Safety from delegates in relation to the tutor will be reviewed by staff.
- All negative remarks are to be submitted to the Head of Training and Development.
- The Head of Training and Development will continuously monitor the tutor's performance by following the *Internal Verification* process (TRA-PRO-003).
- Any indication that the tutor is not being consistent or fair in their assessment of learners will require that the Head of Training and Development investigate whether the tutor's performance is deficient of either Shorcontrol Safety or the respective governing bodies requirements.
- Any reports supplied to Shorcontrol Safety of monitoring or audits performed by a governing body will be reviewed by the Head of Training and Development for remarks related to a tutor's performance.
- The Head of Training and Development has the discretion in determining whether an investigation should be sought in determining whether a tutor's performance is deficient of either Shorcontrol Safety or the respective governing bodies requirements.
- All available remarks and information pertaining to a tutor will be used.
- If the Head of Training and Development cannot make an impartial judgement to a tutor's performance evaluation, then a third party may be sought.
- Tutors will be informed by the Head of Training and Development if their ability to facilitate a training course is being reviewed.
- This may include verbal or written forms of communication.
- The Head of Training and Development may offer coaching with aims of improving the tutor's ability to better facilitate the course.

5.4 Subcontractor Involvement in Shorcontrol Safety Decisions

• Subcontractors are encouraged to utilize Shorcontrol Safety's *Communication Policy* if they wish to include themselves in program review and development processes as well as other activities associated with the company.

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6. <u>Responsibilities</u>

Employee Title/Classification	Responsibility
Head of Training & Development	Determine requirements and qualifications needed for a subcontractor to deliver a course; Review learner evaluation sheets; review subcontractor supplied coursework and assessment sheets.
Telesales Manager	Collect and file Subcontractor Evaluation Sheets and Subcontractor Code of Practice forms.
General Manager	Write and approve contracts; Ensure that the Head of Training & Development are following their responsibilities outlined in this procedure.
Subcontractor's Verifier	Submit completed coursework and assessments to FÁS; Communicate to Shorcontrol Safety whether learners have passed or failed a course.

7. <u>Enforcement</u>

Employee Title/Classification	Responsibility
Head of Training & Development	Has the discretion of determining the repercussions for the discovery of a subcontractor, or their Verifier's, failure to comply with this procedure on up to two separate occasions.
General Manager	Has the discretion of determining the repercussions for the discovery of a subcontractor, or their Verifier's, failure to comply with this procedure on more than two separate occasions.
General Manager	Has the discretion of determining the repercussions for the discovery of either the Head of Training & Development or the Telesales Manager's failure to comply with this procedure.

8. <u>Related Information and Documents</u>

Document ID	Title
ADM-PRO-001	Results Approval, Internal and External Verification

9. <u>Procedure History</u>

This procedure will be reviewed when:

- There is a change of General Manager at Shorcontrol Safety Ltd.
- There is a change of Head of Training and Development
- There is a change in any of the related documents found in section 9 of this document
- As prescribed in Shorcontrol Safety Ltd.'s policy and procedure review schedule

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Revision Date	Author with Title	Description
18/08/08	John Kelly; Head of Training & Development	Creation of procedure
26/11/19	Adam Romans; Quality Coordinator	Consolidation of B8.1, B8.2, B8.3, B8.4; format standardization