

Diving Operations Procedure

Document title		
Diving Operations Procedure		
Document author and department	Responsible person and department	
Laura Sayers Health & Safety Office Corporate Governance	Adrian Parry Chair of University Health & Safety Committee	
Approving body	Date of approval	
University Health & Safety Committee	13 th March 2019 Min no. 18.20.03	
Review date	Edition no	ID code
3 yearly or earlier if required	1	HAS007
EITHER	OR	
For public access online (internet)? Tick as appropriate	For staff access only (intranet)? Tick as appropriate	
Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	
For public access on request copy to be mailed Tick as appropriate	Password protected Tick as appropriate	
Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
<p>External queries relating to the document to be referred to the Health and Safety Office. For a large print version of this document please contact the Health and Safety Office: Email hsservicedesk@port.ac.uk or telephone: 023 9284 3075.</p>		

Contents

<u>Summary</u>	4
<u>Introduction</u>	5
<u>Legislation</u>	5
<u>Responsibility</u>	6
<u>Arrangements for Managing Health and Safety</u>	6
<u>Information and Training</u>	8
<u>Record Keeping</u>	8
<u>Equality and Diversity</u>	8
<u>Further Information</u>	9
<u>Appendices</u>	

Summary

Purpose of this procedure

This Diving Operations procedure is designed to secure a healthy and safe environment for everyone who undertakes diving as a part of their employment, study, visit or business at the University of Portsmouth and to ensure compliance with current legal requirements.

Who is this procedure for?

This procedure is intended for all University staff and students, who engage in diving activities whilst on University business or study. This procedure does not cover diving activities carried out by the Student Union Sub-Aqua Club.

How does the University ensure this procedure is implemented?

The Health & Safety Office monitors the implementation of control measures and procedures identified in risk assessments for all activities. Results from audits of procedures, risk assessments, accident and incident data, as well as feedback from staff and students are utilised to ensure continual improvement.

This procedure and associated documentation are subject to internal audit.

Who can you contact for enquiries about this Procedure?

Any questions about this procedure should be directed to the Health & Safety Office.

Introduction

Diving is considered to be a high risk activity and because of this, all University diving activities are covered by the following specific HSE legislation: The Diving at Work Regulations 1997 and associated ACOP's 'Scientific and archaeological diving projects' and 'Recreational diving projects'.

The University has academic courses where diving can be taken as an optional unit and in some circumstances, diving operations may be allowed as part of University business or research (including fieldwork). All University diving activities are covered under this procedure. The procedure does not cover diving activities carried out by the Student Union Sub-Aqua Club.

No teaching, business or research diving activity is to take place without prior approval of the appropriate Head of School/Department, Health and Safety Office and University Insurance Officer.

Legislation

[The Health and Safety at Work Act 1974 \(HASWA\)](#)

The University is required under section 2 of the Health and Safety at Work Act 1974 to ensure, so far as is reasonably practicable, the health, safety and welfare of employees whilst at work. This legislation includes a general duty of care to protect our students. These requirements are applicable to all work situations, including provision of a working environment that is safe and without risk to health.

[The Management of Health and Safety at Work Regulations 1999 \(MHSWR\)](#)

The University is required to make suitable and sufficient assessment of the risks to the health and safety of employees whilst they are at work and to ensure the health and safety of third parties (i.e. students, visitors and contractors) arising out of, or in connection with University activity.

[The Diving at Work Regulations 1997](#)

The University is required to ensure that those responsible for or engaged in diving projects have taken such measures as is reasonable to ensure the health and safety of those who are engaged in the diving activity, or who may be affected by it.

[The Equality Act 2010](#)

The Equality Act protects people against unfair treatment (discrimination) on the basis of their 'protected characteristics'. These 'protected characteristics' are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation. The University must ensure that staff with protected characteristics are not put at a substantial disadvantage compared with other staff. In order to do this, reasonable adjustments may need to be made to enable those

with protected characteristics to participate in workplace activity, if, without such adjustments they would be excluded.

[The Data Protection Act 2018](#)

The University is required to ensure that all data collected as part of this procedure is done so in line with the Data Protection Act 2018. Data collected on the appendices is being collected by the Health & Safety Office to ensure that all staff who wish to dive on University business hold the correct qualifications and a valid medical to dive certificate, in order to, as far as reasonably practicable, ensure their safety during the risk activity. This data will be shared with the University Insurance Officer to ensure that proper insurance is in place when diving for University purposes.

The data collected will be kept for 6 years from termination of employment.

For any questions relating to Data Protection please contact the University's Data Protection Officer.

Responsibility

Areas of responsibility are defined in the [University Health and Safety Policy Organisation and Arrangements](#). Non-compliance may lead to formal action being taken under the University's disciplinary procedure.

Senior Managers

Senior Managers are responsible for implementing this procedure and the effective management of risk to protect staff and students and assign the resources required.

Departments

Departments are responsible for ensuring that:

- A 'diving school/commercial diving contractor registration form' is completed for every dive school/commercial dive contractor used for diving activities and the documentation is sent to the Health & Safety Office.
- All staff divers complete a 'staff diver application form' attaching copies of their fitness to dive certificate and qualifications.

Health & Safety Office

The Health & Safety Office are responsible for:

- Receiving copies of the 'diving school/commercial diving contractor registration form', and liaising with the University Insurance Office to ensure that the delegated company meet health and safety requirements.
- Receiving copies of the 'staff diver application form' along with copies of their fitness to dive certificate and qualifications, and liaising with the University Insurance Office to confirm that all is suitable and fit for purpose.
- Periodically reviewing the Diving Operations Procedure.

Staff and Students

Staff and students have a responsibility to take care of their own safety and to co-operate

with University procedures. They should not knowingly place themselves in situations which expose them to additional risk.

Arrangements for Diving Operations

All Diving Activities (Staff and Students)

Appointment of a Diving Contractor

The Diving at Work Regulations 1997 states that no person may take part in any diving project within the UK unless the project is carried out under the control of a 'diving contractor'. All duties required under the Diving at Work Regulations 1997 and ACOP's are the responsibility of the 'diving contractor'.

Departments who are responsible for and carry out diving activities must appoint a HSE accredited diving school/commercial dive contractor as their 'diving contractor'.

The use of diving schools/commercial dive contractors overseas is the only exemption to this requirement as HSE accreditation is only applicable in the United Kingdom. The overseas dive school must still register with the University (see paragraph below).

All dive schools/commercial dive contractors used by the University need to be registered with the University to ensure that they meet insurance and health & safety requirements. A diving school/commercial dive contractor registration form (appendix 1) must be completed by the Department and sent to the Health & Safety Office (hsservicedesk@port.ac.uk) for approval. Information will be shared with the Insurance Officer.

Staff Diving Activities

All members of staff and postgraduate students must adhere to the following requirements:

1. Registering as a University Diver

All staff wishing to dive as part of University business must complete the staff diver application form (appendix 2) and send it to the Health and Safety Office (hsservicedesk@port.ac.uk) before they commence any diving activities. Information will be shared with the Insurance Officer and Occupational Health.

2. Qualifications

All staff divers must hold either a HSE SCUBA qualification, CMAS 3*** or equivalent (BSAC Advanced diver or PADI Divemaster) or any qualification listed under schedule 1, 2 and 4 of the [approved list of qualifications](#) in order to dive on University business (UK and overseas).

Qualifications alone do not always demonstrate fitness to undertake a task therefore staff must also declare their diving experience on the diver registration form.

3. Fitness to Dive Certificate

The Diving at Work Regulations 1997 requires all divers to have a valid certificate of medical fitness to dive issued by a HSE medical examiner of divers, generally known as an Approved Medical Examiner of Divers (AMED). The certificate of medical fitness to dive is a statement of the diver's fitness to perform work underwater, and is valid for as long as the doctor certifies, up to a maximum of 12 months.

All staff who are diving on University business must hold a valid medical fitness to dive certificate, carried out by an [Approved Medical Examiner of Divers](#).

Student Diving Activities

As students are not 'at work', the Diving at Work Regulations do not apply to student diving projects. However, the University does have a legal obligation to ensure the Health and Safety of students under the Health and Safety at Work Act 1974.

The HSE issued a formal statement (June 2004) on the status of undergraduate students who take part in scientific diving as part of their study. This document indicates that "as a minimum, the University should ensure that diving is carried out under the auspices of a recognised recreational diving agency or organisation and in accordance with their safe diving rules and recommendations."

Qualifications

All student divers must hold a PADI open water certificate or equivalent in order to dive at the University or be diving as part of training towards an appropriate diving qualification by an approved dive training centre.

Diving Abroad

This procedure is the minimum standard required by the University for all diving activities, even if conducted abroad. In addition to this, any international legislation that is applicable must also be adhered to.

Information and Training

All staff divers must hold either a HSE SCUBA qualification, CMAS 3*** or equivalent (BSAC Advanced diver or PADI Divemaster) or any qualification listed under schedule 1, 2 and 4 of the [approved list of qualifications](#) in order to dive on University business (UK and overseas).

Student divers must be trained by an approved PADI dive training centre or equivalent and hold a minimum of PADI open water certificate or equivalent.

Qualifications alone do not always demonstrate fitness to undertake a task therefore staff must also declare their diving experience on the diver registration form.

A copy of their qualification must be sent to the Health & Safety Office along with the diver application form. This will be kept securely in line with the University retention schedule.

Record Keeping

Personal Diving Log

All staff divers must complete a personal dive log for every diving task undertaken. This log should hold information such as date, time and location, profile of the dive, equipment used, air usage, above and below water conditions (temperature, current, wind and waves) and a verification of buddy, instructor or supervisor.

Logs can be paper based, software based or web based. A copy of this log should be held by the diver for at least two years following the diving activity.

Fitness to Dive Certificate

A copy of the fitness to dive certificate must be sent to the Health & Safety Office along with the diver application form. This will be kept securely for the duration of the certificate.

Accident and Incident Reporting

All accidents or incidents should be reported, using the HS1 form, to the Health & Safety Office as soon as possible. This is in addition to the 'diving contractors' procedures.

Equality and Diversity

The University's Equality Analysis Impact procedure was used in the development of this Policy and is available on request.

This Policy is subject to review to ensure it is used appropriately and that it meets with the University's commitment to equality and diversity.

Further Information

[HSE: Diving](#)

[HSE List of approved diving qualifications](#)

[HSE List of Approved Medical Examiners of Divers](#)

[Diving at Work Regulations 1997. Approved Code of Practice and guidance: Scientific and archaeological diving projects](#)

[Diving at Work Regulations 1997. Approved Code of Practice and guidance: Recreational diving projects](#)

[HSE Statement on University students and Diving Safety \(June 2004\)](#)

Appendices

Appendix 1: Diving school/commercial dive contractor registration form

Appendix 2: Staff diver application form

Appendix 1: Diving School/Commercial Dive Contractor Registration Form

 UNIVERSITY OF PORTSMOUTH	Diving School/Commercial Dive Contractor Registration Form
---	---

This form needs to be completed by the Department in relation to the HSE approved dive company that they wish to appoint as their 'Diving Contractor'.

Company Details	
Company name	
Company address	
Telephone number	
Email address	
Legal status of diving contractor i.e. limited company, PLC, sole proprietor, partnership or other	
Insurance	
Please attach a copy of the company's public liability insurance certificate (£10M Liability Insurance)	
Course accreditation	
Please attach a copy of the company's diving accreditation (i.e. PADI, SSI etc)	
Health and Safety Policy	
Please attach a copy of the company's Health and Safety policy	
Risk Assessments	
Please attach copies of the company's risk assessments (specific to diving operations)	
Emergency Procedure Arrangements	
Please provide details of any emergency procedures and first aid arrangements in place (i.e. first aid personnel, decompression chambers etc)	
Declaration	
Name (Senior Manager)	
Signed	
Date	

Appendix 2: Staff Diver Application Form

 <p>UNIVERSITY OF PORTSMOUTH</p>	<p>Staff Diver Application Form</p>
--	-------------------------------------

This form needs to be completed by all staff who wish to carry out diving as part of their University business.

Personal Details		
Full name		
Department		
Faculty		
Staff number		
Diving qualifications and experience (highest qualification)		
Qualification title		
Awarding body		
Date awarded		
Expiry date (if applicable)		
Please provide a short summary of your diving experience (number of dives, locations, number of dives in the past year and depths)		
Please attach a copy of your highest qualification to this application		
Certificate of medical fitness		
Do you have a current certificate of medical fitness? (issued by an approved HSE medical examiner of divers)	YES	NO
Date of your most recent HSE certificate of medical fitness		
Serial number of certificate		
Expiry date of certificate		

Doctors name and examining centre	
Please attach a copy of your current certificate of medical fitness to this application	
Declaration	
<p>I am applying for registration as a University diver. I understand that all work-relating diving must be carried out in accordance with the University Diving procedure. I understand that I must hold a valid certificate of medical fitness issued by a HSE medical examiner of divers and a HSE SCUBA qualification, CMAS 3*** or equivalent (BSAC Advanced diver or PADI Divemaster) or any qualification listed under schedule 1, 2 and 4 of the approved list of qualifications in order to dive on University business (UK and overseas).</p> <p>I agree to act responsibly and abide by all directions given by the diving contractor</p>	
Signed	
Date	