

UNIVERSITY DIVING PROJECTS POLICY

Date	Purpose of Issue / Description of Change	Equality Impact Assessment Completed	
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Policy Officer	Senior Responsible Officer	Initially Approved By	Date
Head of Health & Safety	Chief Operating Officer	Health & Safety Committee	24 th May 2017

This Policy will be reviewed in 2026

1. INTRODUCTION

Excluding the recreational sector, diving is primarily a method of getting to a **work site** that happens to be underwater.

Diving is considered a high hazard activity and diving for work purposes is governed by the Diving at Work Regulations, issued under the Health and Safety at Work etc. Act. Each year there are a number of fatalities and serious incidents during and following dives, reflecting the risks involved in diving. The UK Diving at Work Regulations specifies the legal framework for all work-related diving activities and the Health and Safety Executive has produced 5 detailed Approved Code of Practices (ACOPs) for various work activities and aspects of diving at work.

This Policy interprets the relevant parts of both the legislation and the ACOPs and specifies what is required and expected when diving on University related activity.

2. POLICY STATEMENT AND SCOPE

It is the policy of Bangor University, so far as is reasonably practicable, but in accordance with the relevant statutory requirements and good practice, to ensure the health and safety of staff, students, and visitors to the University.

This Policy states the requirements placed on the University and any College or Professional Service who has responsibility for, control over or is engaged in a diving project / operation that is carried out as part of University business in the UK and overseas.

The Policy also states procedures, duties and responsibilities placed on staff, students, contractors, and any other participant involved in a University related diving project / operation.

The Policy applies to:

- a. The University, it's subsidiary companies and all Colleges and Professional Services who undertake or commission diving activities.
- b. Staff and students.
- c. Diving project / operation carried out in the UK and overseas, including those undertaken as part of a University research and teaching activity.
- d. Diving undertaken by students in the UK and overseas, during which data could be gathered for their University credited course.
- e. Diving Contractors (3rd Parties) appointed to manage / undertake diving projects / operations on behalf of Bangor University.

The Policy does not apply to:

- Recreational diving
- Snorkeling and swimming without breathing apparatus
- Students' Union related diving activities e.g., AU Club

3. RELATED POLICIES AND LEGISLATION

In addition to those general duties in law, the University and its constituent Colleges and Professional Services, has a numerous obligation under the Diving at Work Regulations and through its Approved Codes of Practices (ACOPs), which set out the safety goals and responsibilities of any person who is responsible for, has control over, or is engaged in diving work in the UK. For the purposes of this Policy and reflecting a general duty of care, every effort should be made to apply the principles of the Diving at Work Regulations and this Policy to University related diving operations / projects carried out overseas.

4. **DEFINITIONS / TERMINOLOGY**

For this Policy the following terms and definitions apply:

- Diving: includes all diving work underwater whilst breathing air or other gases at a pressure greater than atmospheric pressure.
- Diver: a person at work who dives (for the purposes of this Policy 'at work' includes staff and students carrying out diving projects as part of a University related teaching and research, and where the data obtained from the diving activity goes towards publication with academic or financial value.
- Volunteer Divers: there may be situations when an unpaid volunteer taking part in a diving project would not be considered to be at work, even though they are a part of the diving project. An example of this would be a diving project being run with at least the minimum number of staff/divers required. If a suitably qualified volunteer diver (eg divemaster) offered to join the dive either to 'tag along' or to provide additional back up to the 'at work' divers/staff (and they received no payment, favour or reward), they would not necessarily be considered to be diving at work. If the diver's presence and involvement is required in order to 'make-up' the dive team, then that person will be deemed to be diving at work and not a volunteer diver.
- Certificate of medical fitness to dive: under the Diving at Work Regulations, all divers at
 work must have a valid certificate of fitness to dive, issued by an Approved Medical
 Examiner of Divers (AMED). All divers must have a valid certificate of medical fitness when
 participating in a University Diving Project.
- Diving Contractor (The University): Bangor University is registered with the HSE as a Scientific and Archeological Diving Contractor and holds a duty to ensure diving projects are planned, managed, and conducted safely within the UK.
- Diving Contractor (External): a Non-University organisation, appointed to manage / undertake diving projects / operations on behalf of Bangor University and who must be registered with the HSE as a Commercial, Media or Scientific Diving Contractor and who will perform the duties of the Dive Contractor for the diving project / operation.
- University Diving Officer: a person appointed by the University and notified to the HSE, to
 oversee all diving projects and confirm they are adequately planned, managed, and can
 be conducted safely.
- Project Dive Officer: a person appointed by the College/Service to ensure diving projects are planned, managed, and conducted safely.
- Dive Supervisor: a person(s) who have responsibility for the diving project itself and who
 is knowledgeable and competent with the diving equipment, the diving operations in
 progress, emergency diving procedures, diving physics and physiology and medical
 aspects of diving.
- Diving Project: a term used for overall diving job, whether it lasts two hours or two months.
 - Activity consisting of one or more diving operations in which at least one person takes part or will take part as a diver.
- Diving Project Plan: a document required for each diving project which is based on an
 assessment of the health and safety risks to persons taking part. It should identify how
 the project is broken down into diving operations and identifies the number of Dive
 Supervisors needed.
- Diving Operation: the diving operation identified in the Diving Project Plan.

Supplementary Diving: dives undertaken by students in the UK or overseas during which
data, images or information may be gathered for use on their own academic project. For
example, images obtained whilst participating in a Dive Club activity, whilst on work
placement and whilst undertaking conservation or voluntary work overseas. Where such
data is a significant part of a student's post-graduate research project they may be
considered to be at work and not supplementary diving.

5. DUTIES OF THE UNIVERSITY

Before a corporate body (the University) undertakes any diving project in the UK, a Diving Contractor must be formally appointed via notification to the Health and Safety Executive's (HSE) Diving Inspection Team. Bangor University, as this Duty Holder, is the Diving Contractor and as such has notified the HSE that it is a Scientific and Archeological Diving contractor. The central Health and Safety team, act as the main point of contact with the HSE, on behalf of the University.

To ensure the health and safety of all staff and students participating in diving projects related to University activities in the UK and overseas, the University has delegated responsibility to the University Diving Officer and each College / School / Service to put in place suitable health and safety management arrangements.

6. UNIVERSITY DIVING OFFICER RESPONSIBILITIES

The University Diving Officer is a formal University Appointment, and they will ensure, so far as is reasonably practicable, that all University related diving projects (UK and overseas) are undertaken in accordance with the requirements of this Policy, the Diving at Work Regulations 1997, and the relevant Approved Code of Practice (ACOP). This includes:

- a. Advising colleagues who are planning to undertake a diving project associated with a University related activity, credited course and diving activity which is approved by it.
- Reviewing and approving Diving Project Plans and Dive Risk Assessments before a diving project starts, both University-led dives and those undertaken by external dive contractors.
- c. Checking the documents in b) confirming the number of Dive Supervisors, divers and equipment needed to undertake the diving project safely, including those needed to manage an emergency, e.g., First Aiders, divers trained in Resuscitation & Oxygen Administration, and appropriate diving qualifications and experience.
- d. Confirming local project Dive Officers, Dive Supervisors and / or external Dive Contractors have the necessary knowledge and competence to oversee the type of dives being undertaken as part of the diving project and that they understand their responsibilities regarding ensuring the health and safety of all divers under their supervision. Knowledge and competence encompass:
 - i. Associated diving equipment
 - ii. The diving operations in progress
 - iii. Emergency diving procedures
 - iv. Diving physics and physiology and medical aspects of diving
- e. On behalf of the University (as the Dive Contractor) and for all University dives, appoint Dive Supervisors in writing.
- f. Confirming all University staff and students participating in a University diving project have an in-date Medical Examination, undertaken by an Approved Medical Examiner of Divers.

- g. Confirm the suitability of the dive vessel or platform, the appropriateness of the equipment, qualifications and experience of vessel operator(s) and their emergency procedures. For dives undertaken by a commercial Dive Contractor, vessel and operator requirements stipulated by the relevant ACOP should be confirmed.
- h. Maintaining relevant diving records for diving projects within their area of responsibility.
- Advise students who wish to dive as part of a work placement and those who wish to gather data or information whilst participating in an organised dive and confirm the requirements to enable them to do so safely, in accordance with Diving at Work Regulations, good practice and this Policy.

7. COLLEGES / PROFESSIONAL SERVICE RESPONSIBILITIES

- a. Each Dean of College / Director of Service has a duty to ensure the health and safety of people participating in University related diving projects in the UK and overseas. This includes diving projects associated with a University research project, course or study, and which is assigned academic credits directly by the University or which is formally recognised by it.
- b. As such, Colleges and Services planning to undertake diving activities in the UK and overseas must, as applicable, put in place the following arrangements:
 - Appoint a Project Dive Officer who has suitable competence, experience, and knowledge to oversee diving projects and ensure they are planned, managed, and conducted safely in accordance with the Diving at Work Regulations and relevant Diving Approved Code of Practice.
 - ii. Inform the University Diving Officer of dive projects and appointments of Dive Supervisors and supply relevant information for the Diving Officer's approval ahead of each dive project. The University Diving Officer will confirm the appointment of Dive Supervisor in writing and will liaise with them on the proposed project.
 - iii. Ensure suitable and sufficient Project Dive Plans are produced for each project, that divers are competent and authorised to dive and vessels and crew are suitable for purpose.
 - iv. Ensure no diving activity is undertaken without notification to and consent from the University Diving Officer.
 - v. Make sure other relevant University approvals are received and applicable maritime requirements, wreck protection licences, protected placed (military remains), controlled sites, and harbour authority stipulations are adhered to, and approvals obtained, as required.
 - vi. Ensure all divers participating in a University Diving Project have an in-date Medical Examination, undertaken by an Approved Medical Examiner of Divers (AMED).
 - vii. Ensure all divers are aware of their health and safety responsibilities when participating in a University related diving project.
 - viii. If diving is to take place overseas, make sure the requirements of the University Overseas Travel Policy are complied with, local diving legislation and controls are known and followed, and that the spirit of this Policy and the ACOP are followed.
 - ix. When appointing an external, non-University (3rd Party), Diving Contractor to carry out a University related diving project / operation, confirm their competence and

registration with the HSE, and share relevant information with and seek approval from the University Diving Officer (See Section 6).

8. DIVE SUPERVISOR RESPONSIBILITIES

A Dive Supervisor must be appointed to oversee each diving project. If one Supervisor cannot safely supervise a diving project the project should be divided into separate diving operations with further Dive Supervisors appointed for each diving operation. Enough Dive Supervisors must be appointed to cover the entire diving project.

Diving Supervisor(s) legally have direct responsibility for the diving project they are supervising and must have appropriate knowledge and qualifications to manage the type of dive undertaken. Experience should encompass the diving equipment, the diving operations in progress, emergency diving procedures, diving physics and physiology and medical aspects of diving. It is essential Dive Supervisor(s) inform the Dive Officer immediately if they have concerns regarding their ability to manage a diving project.

In summary, Dive Supervisors must:

Pre-dive:

- a. Not undertake any diving project until formally appointed, in writing by the Dive Officer.
- b. Notify the School / Service Dive Officer of all relevant diving projects.
- c. Obtain all necessary permits, permissions etc.
- d. Select a Dive Team that has the competence, ability, and fitness to undertake the tasks and use the equipment assigned to them during the diving project.
- e. Ensure suitable equipment is available for the diving project, or if divers wish to use personal dive equipment, confirm it is inspected and tested as required.
- f. Submit a Project Diving Plan and associated Dive Risk Assessment to the Dive Officer.
- g. Ensure d) to f) above includes the resources / arrangements needed to manage an emergency.

On-site:

- h. Be on site, in direct control of the diving project they are responsible for.
- Be responsible for the divers in a diving project until all necessary decompression has finished, unless treatment takes place in a hospital or other place, or responsibility is handed over to another appointed Dive Supervisor.
- j. Ensuring the Diving Project Plan and emergency arrangements are clearly understood by all those engaged in the diving project e.g., in a Pre-dive Briefing Session.
- k. Provide / arrange extra training as needed, for example use of a specific item of equipment.
- I. Ensure a site-specific Dive Risk Assessment that is current for the prevailing circumstances on the day of, and during the dive is carried out.
- m. Maintain accurate, up to date Dive Records which includes divers signing daily to confirm they are fit to dive.

Post-dive:

n. Forward relevant diving project records to the Dive Officer as requested.

9. DUTIES OF STAFF AND STUDENTS PARTICIPATING IN DIVING ACTIVITIES

Every member of staff and each student diving within the UK and overseas on University related business, must:

- a. Never dive unless they hold appropriate diving qualifications and experience for the diving activity / role they wish to undertake.
- b. Provide evidence they have passed a Medical Examination undertaken by an Approved Medical Examiner of Divers (AMED).
- c. Ensure personal ('owned') dive equipment is inspected and serviced as required with records provided to the Dive Officer / Dive Supervisor on request.
- d. Comply with the requirements of the Project Diving Plan and Dive Risk Assessment.
- e. Follow all instruction from their appointed Dive Officer and Dive Supervisor.
- f. When diving, confirm daily to their Dive Supervisor they are fit to dive and immediately of anything, including any illness or medical condition that could affect their fitness to dive.
- g. Not interfere with or mis-use systems / equipment supplied or used in the interest of safety.
- h. Maintain dive records as required e.g., Dive Passport, Daily Dive Record, Inspection / Service records for owned dive equipment with copies forwarded to their Dive Supervisor and Diving Officer as requested.
- i. Report any concerns to their Dive Supervisor, Diving Officer, Line Manager, H&S Coordinator or directly to Health and Safety, as appropriate.

10. APPOINTING EXTERNAL DIVING CONTRACTORS

On occasion, it may be necessary to commission diving companies or other diving specialists to undertake diving operations on behalf of the University. Such appointments are often in relation to funded research or maritime studies.

Where this is the case, the University and the commissioning College will have a duty to ensure they appoint a suitable and competent contractor, and confirm sufficient resource and time is available to undertake the dive safely. The Diving Contractor/company also has a duty to comply with the Diving at Work Regulations and its relevant ACOP, as applicable.

In respect of the University's responsibility for diving operations it commissions, the pertinent College/Service who commission an external Diving Contractor must ensure that:

- The Dive Contractor is competent, registered with the HSE for the type of diving activity (Scientific, Media or Commercial), has appropriate insurance and in-date medical certificates for all divers.
- Suitable and sufficient Dive Project Plans are produced, that these specify diving qualifications and confirm the minimum size of the dive team, and confirm emergency arrangements.
- The Dive Vessel is suitable for the operation, with appropriate on-board controls and personnel confirmed.
- Details of any Dive Volunteers who may participate in the project must be included in the dive project plans, with clarity provided on how they will not be at work.
- Details of the dive project, the Dive Contractor and all relevant information are shared with and approved by the University Diving Officer before entering into a contract.

They monitor compliance with the stated controls, as far as is reasonably practicable.

11. STUDENTS ON PLACEMENT

Where a Student wishes to undertake a period of work placement that involves diving, and this is recognised by their School through academic credit, award or acknowledgement, then that activity will also be subject to the general University Work Placement arrangements. For the diving element of the work placement, the activity will be regarded as Diving at Work and the relevant ACOP will apply to the diver and the Placement Provider, and for Overseas Placements the same controls as the UK will be applied, as far as is practicable.

It is recognised that, by default, the Work Placement student will be 'at work' when on placement and the Placement Provider will be considered as the Employer and be subject to Diving at Work and other health and safety legislation (UK).

If a student is planning to undertake University recognised work placement involving diving, they should in the first instance discuss this with the University Diving Officer and confirm that the necessary controls can be employed, before agreeing to the placement.

12. SUPPLEMENTARY DIVING: STUDENT GATHERING DATA FOR OWN PROJECTS

During their academic studies, there may be opportunities for students to dive during their work placements, study abroad, their participation on conservation projects or through other organised diving activities. Many of these activities offer opportunities for students to use their diving skills to improve their own knowledge, employability and, possibly, to gather information for use on projects. This Policy supports such activity, as far as is allowed under general health and safety and diving legislation and good practice.

Where a diving activity is undertaken outside of the auspices or direct influence of the University and no academic credit or recognition is awarded, the University will have no specific legal obligation for the dive, as the dive is not a University led, directed or recognised activity. In such circumstances the University would not be approving or supporting the activity.

Note: where a dive is undertaken under the auspices of the University, the student diver must, in all circumstances, have appropriate diving qualifications and diving experience, and in most circumstances have a Certificate of Medical Fitness to Dive, issued by a HSE approved medical examiner of divers. Diving with the **sole or primary purpose** of obtaining data, information, or images for use on a study or project is considered a University Diving Project in its own right and will be subject to diving project controls instructed by this Policy.

Student gathering data whilst participating on Non-University organised dives within the UK

Where a Student wishes to participate in an organised dive by a Club or Society or participate as a volunteer diver in a supervised marine archaeological or scientific activity, such as Sea Watch, and whilst doing so gather information, data or images for use in their project then that activity may be permitted, subject to consideration and approval by University Diving Officer and confirmation that the necessary controls will be in place.

Diving qualifications and experience will need to be sufficient for the activity and the environment and the primary purpose of the dive cannot be for the student to obtain data or images.

ii. Gathering Data whilst participating on Non-University organised dives Overseas

Where a student wishes to participate in diving overseas and, whilst doing so, gather information, data or images for use in their own academic project, then that activity may, in certain circumstances, be permitted, subject to consideration and approval by University Diving Officer and confirmation that the necessary controls will be in place.

Diving overseas should follow the same principles and controls as if diving in the UK, as far as is reasonable and practicable to do so, with confirmation of compliance with local diving legislation and controls received.

When diving overseas, diving qualifications and experience will need to be sufficient for the activity and the local environment and a HSE medical certificate obtained. In most cases, a Dive Leader or Dive Master diver qualification will be required, as a minimum.

This section does not apply to staff where, in most circumstances, data, images, samples or information is obtained for research or teaching and is therefore 'work-related' and will be subject to Diving at Work Regulations, and the controls stipulated by this Policy.

13. FURTHER GUIDANCE

Several Approved Codes of Practice support the Diving at Work Regulations. The following felt to be the most relevant to University related activities.

- L106: Approved Code of Practice Media Diving Projects.
- L107: Approved Code of Practice Scientific and Archaeological Diving Projects.

14. EQUALITY IMPACT ASSESSMENT

This Policy statement and its associated guidance should have no detrimental impact on any person with a protected characteristic provided they, as applicable. In most cases this will include their undertaking and passing a Medical Examination, performed by an Approved Medical Examiner of Divers (AMED). Where this is not possible then that person will not be able to participate in the diving operation for their own safety and the safety of others.

15. REVIEW AND AUDIT PROCEDURES

Health and Safety, Campus Services, may undertake periodic audits or reviews to assess the effectiveness of and compliance with, this Policy.

Colleges / Professional Services must periodically review their own procedures to ensure the requirements of this Policy are implemented, suitable and effective.

The Health, Safety and Emergency Management Task Group will review this Policy in accordance with the agreed Review Schedule, with any significant changes considered by the University Executive.

End.