

DEFENCE INSTRUCTIONS AND NOTICES

(Not to be communicated to anyone outside HM Service without authority)

Title:	Guidance for Commanding Officers of Units with Service Sub Aqua Diving Clubs
Audience:	All Commanding Officers, Delegated Officers and all personnel involved in Sub Aqua Diving
Applies:	Immediately
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Content:	To inform Commanding Officers of their responsibilities for Sub Aqua Diving within their Units and to describe the supervisory and management structure available to advise and assist them in carrying out their duties
Sponsor:	HMS TEMERAIRE SO2AT
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References:

- A. Joint Services Sub-Aqua Diving Regulations (JSSADR),
- B. Diving at Work Regulations 1997 (DWR 97) - Approved Code of Practice (ACOP)
- C. JSP 375 Health and Safety.
- D. Medical Certification for Sports Divers 2007DIN06-116

INTRODUCTION

1. Sub-Aqua diving is an adventurous training activity that fosters values and standards such as integrity, courage, commitment, professionalism, pride, loyalty and teamwork: it also develops self-confidence and self-discipline as well as physical strength and powers of endurance. As with all adventurous training (AT), diving involves controlled exposure to risk within the confines of sound progressive training and compliance with proven safety procedures. The responsibilities and duty of care of all those appointed to oversee Sub-Aqua diving must be clearly understood.
2. Whilst there is a comprehensive supervisory and management structure in place to ensure the correct regulation of Sub-Aqua diving, Commanding Officers also have specific responsibilities for Sub-Aqua diving undertaken by their units.

AIM

3. The aim of this instruction is to inform Commanding Officers of their responsibilities for Sub-Aqua diving within their units and to describe the supervisory and management structure available to advise and assist them in carrying out their responsibilities.

RESPONSIBILITIES FOR SUB-AQUA DIVING

4. The DNPd is the Tri-Service sponsor for AT Sub-Aqua Diving, within the Joint Services Adventurous Training (JSAT) scheme. On behalf of DNPd, SO1AT (the CO of HMS TEMERAIRE) is responsible for Sub-Aqua diving policy within the JSAT scheme. OIC Joint Services Sub Aqua Diving Centre is SO1 AT's SME for Sub Aqua diving and related matters. Finally, each Service has a Sub-Aqua Association whose Chairmen also have certain responsibilities for the activities of their registered branches. The responsibilities of the Single Service Sub-Aqua Association Chairmen are, in essence:

- The functional control and management of Association.
- Contribution to the formulation of Single Service policy (such as it is required) by the appropriate single Service AT policy branch and contribution to the formulation of Joint policy through the Joint Service Sub-Aqua Diving Policy Advisory Committee (JSSADPAC).

- Championing the interests of the Association and its members through liaison within the Service, across Defence and with the British Sub-Aqua Club (BSAC).
- Provision of advice and guidance to Association constituent branches.
- Provision of advice and guidance to the Commanding Officers of Association constituent branches.
- Withdrawing or denying membership of the single Service Sub-Aqua Association to individuals

or

Branches in the extreme circumstances where conduct of those individuals or branches has or is likely to breach JSSADR, BSAC Safe Diving, cause unwarranted risk to diving members of the Association or bring the Association or Service into disrepute. In such circumstances the Association Chairman will make his decision in consultation with the appropriate unit CO, with the single Service AT Policy Branch and with the Tri-Service sponsor of AT sub-aqua diving. A decision to deny or withdraw Association membership from a branch will result in the CO disbanding that branch within his unit until such time as the causes of the denial/withdrawal have been rectified to the satisfaction of both the CO and the Association Chairman.

- The Association Chairmen should be regarded as the primary source of external advice for COs regarding the establishment and running of a constituent branch within their unit and on other matters related to Service AT sub-aqua diving.

DWR 97

5. The MOD Superintendent of Diving (SofD) is responsible for the JSSADR. As the MOD Diving Focal Point nominated to the HSE he is to ensure that MOD's obligations as a diving contractor are enforced, and he leads in all aspects of diving related to safety. To assist him in this duty the Diving Standards Officer (Adventurous Training) (DSO(AT)) is required to carry out regular inspections of Tri-Service Diving Branches. The DSO(AT) is to be given access to the Branch diving records and equipment on request. During the DSO(AT) inspection the Unit should assist by delegating the Branch Diving Officer (DO) and Equipment Officer (EO) for the duration or relevant representatives who can answer all matters arising from the visit. AT Sub-Aqua diving, is classed as 'at work' and is therefore subject to the Diving at Work Regulations 1997 (DWR 97). DWR 97 only applies to service personnel undertaking authorised sub-aqua diving that has 'on-duty' status. What constitutes authorised diving activities is explained below. While civilian members of Service branches do not have 'on duty' status and are not therefore subject to DWR 97, they remain subject to all elements of JSSADR unless specifically excluded and thus, de-facto, are compliant with DWR 97 while diving in a Service branch context.

6. Service personnel diving outside authorised Sub-Aqua Diving activities (i.e. on leave and not using military AT equipment) are governed by the regulations of the diving organisation that they are members of; for example BSAC or PADI. These activities have off-duty status.

REGULATION OF SUB-AQUA DIVING

7. All authorised Sub-Aqua diving is carried out under the regulations of:

- The National Governing Body (NGB) - the British Sub Aqua Club (BSAC) and in line with BSAC Safe Diving.
- JSSADR, Reference A.

Specific regulations covering the participation of holders of qualifications from other certifying organisations (PADI, SAA etc) are contained in Reference A.

8. Within the Services an additional level of supervisor is in place to ensure the highest standards of supervision commensurate with our Duty of Care. The Sub-Aqua Diving Supervisor (SADS) is the critical element in diving safety and, except for clearly mandated circumstances contained in Reference A; a SADS must directly supervise all diving activities from the surface.

9. The OIC JSSADC is the authority for training and qualifying SADS and is responsible for ensuring SADS remain in date and briefed on diving regulations and practice.

10. Each Service has its own Sub-Aqua diving association and it is mandatory for all Service clubs to be members of the relevant Association. A number of Joint clubs do exist and these are allocated to a parent association by the SO1PAT.

CO'S RESPONSIBILITIES

11. Commanding Officers are responsible for:

- a. Ensuring their unit Sub-Aqua club is a Special Branch of the BSAC and is also registered with the appropriate Association. For Joint units SO1PAT can provide guidance on which Association is applicable. This requirement applies to units based both within the UK and overseas and branches in HM Ships. For geographically recruited branches (e.g. Plymouth Command Sub-Aqua Club) the CO of the host unit is responsible for the activities of that branch. Where the host unit is not readily apparent or in dispute, this will be determined by SO1PAT in consultation with the appropriate Association Chairman. Each Service Association will maintain a register of all branches, including those geographically recruited and their designated host unit.
- b. Appointing the Chairmen of the unit sub-aqua branch. The Chair person is to be a serving officer who is responsible to the CO for all activities of the branch. This could include RNR, TA or RAFVR at the CO's discretion.
- c. Approving the appointment of the branch Diving Officer. The Diving Officer is directly responsible to the CO for all diving operations and safety issues connected with branch diving activities and where possible should be a SADS and a BSAC Qualified Instructor. The Diving Officer may be a civilian member of the branch if no suitably qualified serviceman is available. BSAC produces a comprehensive Diving Officer's Handbook that all branches must possess.
- d. Ensuring that all equipment subject to regulatory inspections and maintenance are inspected as required to meet the relevant regulation. Conducting regular inspections to establish that all equipment is in service and maintained fit for use. This includes SofD's representative, DSO(AT) inspections held at planned regular intervals.
- e. Ensuring all incidents involving the branch are reported in accordance with both JSP 375 and JSSADR. Because of the nature of Sub-Aqua diving, certain incidents may also require reporting to the HSE under the requirements of Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) and also to the LAND Accident Prevention & Investigation Team (LAIT). In parallel to the unit reporting chain there is a requirement for all incidents to be reported by the responsible SADS to DSO(AT) as directed in JSSADR, Reference A.
- f. Directing branch Chairmen to produce an annual report on the state of the branch, its activities, membership and any notable achievements during the reporting period. This report, in addition to internal use, is to be submitted to the appropriate Association Chairman.
- g. In the event of a Board of Inquiry, Regimental Inquiry or other investigation into a sub-aqua related incident, the Tri Service Sponsor and the SoD are to be invited to provide technical and subject matter expertise. This will usually be through OIC JSSADC and DSO(AT) who will provide technical and subject matter expertise.

AUTHORISED ACTIVITIES

12. In essence authorised activities are those approved by the appointed Diving Officer of the unit branch. Each Service has its own method of promulgating that authorisation. Such activities include weekly branch dives as they form part of the training programme for each branch to ensure members are trained for more demanding activities; authorised activities also allow qualified divers to maintain currency in skills and drills. With regard to recreational diving conducted by members of the ship/unit/establishment:

- a. If any constituent branch equipment is used on a dive (even by a single participant) then that dive is a branch dive and must be conducted in accordance with JSSADR.
- b. If a diving activity is conducted predominantly by members of the constituent branch and is organised through the auspices of the branch, then it is a branch dive and must be conducted in accordance with JSSADR.
- c. If no constituent branch equipment is used and the event is organised independently of the branch, then it is considered to be an independent activity and is not subject to JSSADR but, in this case all Service divers would be regarded as being off duty and would bear the consequences in terms of medical and insurance cover in the event of mishap.

13. Diving Expeditions are subject to specific Single Service regulations under the JSAT scheme. They must also be conducted in compliance with JSSADR.

14. Commanding Officers from deployed units such as RN ships, who do not have a Sub-Aqua branch, but who wish to authorise unit members to dive with a commercial organisation or diving school, must get permission from the relevant Single Service AT Authority prior to such diving taking place; the authorities can also provide guidance on what constitutes a suitable diving operation. Diving undertaken by suitably qualified personnel when deployed overseas, unless authorised as described above, is considered off-duty. (See paragraph 12). This requirement must be clearly understood by COs and those who wish to dive.

MEDICALS

15. Medical standards for Service sports divers are as promulgated in Reference D. The detail within this reference is likely to be updated in the near future as the result of ongoing discussions with the HSE, but there are no local exemptions and deploying units and expeditions should consider their medical requirements prior to deployment.

16. Civilian members of Service Sub-Aqua branches do not require an annual medical by a doctor and must comply with the UKSDMC requirement which is contained in Reference A.

CONCLUSION

17. Sub-aqua diving provides an excellent challenge at many levels as required under the JSAT scheme. The nature of diving carries with it a recognised degree of risk but application of the proper controls and supervision coupled with good training will ensure we meet our Duty of Care to all our divers.

18. Commanding Officers should seek to use their Service Association Chairmen as their first point of call for advice. COs can get further advice from the Diving Standards Officer (Adventure Training) at FDHQ (+ 44 (0) 23 9222 4137; Mil: 93 832 4137 or MOB: 07795 012561 service e-mail; FDHQ-DST-DSOAT@mod.uk) from OIC JSSADC 01752 405573 or dii JSSADC-OIC or from the single Service Sub-Aqua Diving Association Chairmen whose contact details are held by JSSADC and Single Service AT Authorities.