

## HSE Diving Health and Safety Strategy to 2010

This document provides HSE staff and all our stakeholders with an outline of our strategy for diving at work. The diving strategy reflects the broader vision, mission and aims outlined in the HSC paper “A Strategy for Workplace Health and Safety in Great Britain to 2010 and beyond”. HSE’s Diving Group is a part of the Hazardous Installations Directorate Offshore Division and diving in support of the offshore oil and gas industry is included within the principles of HSE’s “Offshore Health and Safety Strategy to 2010”. This document also addresses the management of HSE’s resources and systems within the Offshore Division.

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## Background to the Diving Industry

Diving at work covers a wide range of activities from deep saturation diving in support of the offshore oil and gas industry to recreational instruction by an individual professional instructor. The “diving industry” can be considered as a number of sectors where people need to go underwater to work. With the exception of the recreational sector, diving is primarily a method of getting to a work site that happens to be underwater. These sectors generally align with the Approved Codes of Practice (ACoPs) which support the Diving at Work Regulations (DWR97) and the “classes of diving” in HSE’s list of approved qualifications for diving. These sectors are as follows:

Offshore

Inland/Inshore

Scientific/Archaeological

Media

Recreational

Police

Military

This list is not exclusive, and within each category there can be a wide range of activities. For example, the Inland/Inshore sector includes diving in support of major construction sites, inspecting and repairing ships, sewers and even swimming pools.

The total population at risk is estimated at around 53,000. These include approximately 5,000 “commercial” divers holding current diving medicals, approximately 8,000 members of the armed forces (includes “recreational at work” diving as part of adventurous training) and in excess of 40,000 members of the public receiving some form of paid instruction every year.

Diving is perceived by many as a dangerous occupation and is considered by HSE to be “high hazard”. The fatal accident rate for the Offshore and Inland/Inshore sectors has typically been in the region of 20 – 40 per 100,000 - considerably higher than construction or agriculture. The fatal accident rate for all diving at work activities is estimated at 6 – 7 per 100,000.

The “diving industry” poses many challenges to HSE due to its size and diversity in terms of geographic locations and the type and scale of activities undertaken. Diving contractors range from large international marine operators who outsize some of the oil companies who employ them, through to self-employed recreational instructors operating from their homes.

HSE’s continuing goals for the diving industry are:

To secure a significant and sustained reduction in the number of fatal and major accidents across all sectors of the diving industry.

To work with all sectors of the industry to reduce risks to the health and safety of those involved in diving at work activities.

To encourage collaboration within and across all industry sectors (including “not at work” recreational diving) to develop and share best practice.

The Diving Group has taken a broad based approach to improving health and safety within the diving industry - and will continue to do so, but with an increasing focus on risk-based prioritisation. Resources will be allocated to a wide range of activities - including inspection, investigation, enforcement, advice, standards development and technical research. HSE will remain involved in diver training and certification through the recognition of UK based training schools, the approval of overseas qualifications and the maintenance of a diver certification database.

## **Inspection and Investigation**

The Diving Group's inspection and investigation activities include:

Inspection visits to dive sites (may be pre-arranged or unannounced).

Inspection visits to offices/bases of diving contractors and client companies.

Investigation of accidents/incidents and complaints.

Assessment of diving aspects of offshore safety cases.

Inspections effort will be directed towards higher risk activities/groups with priorities being reviewed at least annually. The Diving Inspection Teams will prioritise inspection programmes within their areas, based on local knowledge and experience.

As a key part of the inspection programme, inspectors will be looking specifically at management systems, in particular how risks are assessed and controlled and how diving projects are planned. Where necessary, formal enforcement action may be taken.

## **Enforcement**

Diving inspectors apply the HSC Enforcement Management Model (EMM), a framework that helps inspectors make fair and consistent enforcement decisions in line with HSC's Enforcement Policy Statement (EPS). The EPS sets out principles that inspectors should apply when determining what enforcement action to take in response to breaches of health and safety legislation. Enforcement action should be proportional to the health and safety risks and the seriousness of the breach.

HSE works closely with other regulators responsible for legislation that applies to diving at work. These include the Maritime and Coastguard Agency and Local Authorities. In some cases, HSE's diving inspectors will provide specialist advice or assistance to other regulators.

## **Advice and Information**

The provision of advice and information will remain a key activity for the Diving Group. This includes advising duty holders on how to comply with the law as well as promoting good practice throughout all sectors of the industry. In common with HSE's wider approach in this area, this will increasingly be done by communicating via industry working groups, trade associations and other representative bodies. However, HSE will continue to produce guidance – including leaflets, information sheets and videos/DVDs when appropriate.

Where appropriate, HSE will attend diving trade shows to meet stakeholders, give advice and distribute information leaflets and other media.

Information, including accident and incident statistics, will increasingly be made available via HSE's website. Accident trends will be highlighted and inspection, advice and enforcement will be targeted as

required. As a part of this effort, HSE will seek to increase the reporting rates for dangerous occurrences and less serious accidents.

## **Standards Development**

HSE will continue to support and contribute to the development of relevant National, European and International standards and guidance for the diving industry in order to maintain and improve the health, safety and welfare of divers. Recent and current work includes the development of standards for self-contained rebreathers, surface-supplied diving equipment, diving suits and standards for recreational training schemes.

## **Technical Research**

HSE has commissioned a wide variety of diving related research projects in recent years. These have covered long term health effects of diving, diving equipment performance and reliability and the modelling of decompression procedures. Research projects will be considered in the future where there is clear need to respond to specific problems or in support of HSE's broader strategic programmes.

## **Diver Training and Certification**

An important part of the Diving Group's work involves the recognition of diver training schools in the UK and the approval of overseas and other diving qualifications. This includes maintaining and reviewing the HSE competence standards for divers in conjunction with European and international government representatives to ensure the continuing development of common worldwide diver competence. The Diving Operations Strategy Team are also responsible reviewing EU Member State diver competence standards and approving certificates as the UK point of contact for Council Directive 92/51/EEC.

## **Summary**

Diving at work is a high hazard activity which can be carried out safely if properly planned and the risks managed appropriately. HSE will continue to work with all sectors of the industry to reduce accident rates and improve the health and safety of all those involved.

Specialist Inspectors from the Diving Group will continue to use a variety of intervention methods ranging from formal inspection and investigation to the provision of advice and information. Where appropriate, resources will also be allocated to supporting standards development and technical research.