

Scuba EdVentures

HEALTH & SAFETY POLICY

Version 1.3

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Next review due: August 2027 (or sooner, following any incident or change in the law or guidance it relies on)

Owner: Director

Scuba EdVentures Ltd, company number 15923090
57 Hobart Road, Loddon, Norfolk, NR14 6LD

Overview

Scuba EdVentures (SEV) has a duty of care to everyone affected by its trips — participants, accompanying staff, its own people, and anyone else involved in planning or running a trip. This policy sets out how SEV meets that duty under the Health and Safety at Work etc. Act 1974 (so far as it applies to SEV as an employer and trip organiser), and — because every SEV trip centres on scuba diving abroad — how SEV benchmarks the specific safety of diving instruction and checks that the overseas dive centres and resorts it uses meet an equivalent standard. References to “participants” below cover school pupils and college or university students taking part in an SEV trip.

SEV doesn't deliver diving instruction directly; it's delivered by PADI-accredited delivery partners overseas. SEV's job is to choose those partners carefully, check their safety arrangements before and during the relationship, make sure participants are properly screened and insured before they dive, and have clear plans for when something goes wrong. This policy, and the Safeguarding Policy it sits alongside, are how SEV does that.

Persons responsible

Role	Who / responsibility
Director	Ian Brown. Overall responsibility for this policy and for SEV's compliance with it. Contact: 07491826684 / ian@scubaedventures.co.uk .
Designated Safeguarding Lead (DSL)	Zara Dyer. First point of contact for anything that touches a participant's welfare or safety, including matters raised under this policy. Contact: concerns@scubaedventures.co.uk .
Deputy DSL	Ian Brown. Covers when the DSL is unreachable, including during trips abroad.
Trip Lead (per trip)	On-the-ground point of contact for health and safety during a trip — usually the accompanying school staff, supported by the delivery partner's own dive supervisor and, remotely, by the Director.
Delivery partners	Responsible for day-to-day activity safety: dive supervision, instructor ratios, equipment, and their own site/vessel safety. Checked against Section 10 below before use.

Our policy

1. Policy statement

SEV will do everything reasonably practicable to prevent injury and ill health to participants, staff, and anyone else who could be affected by its trips. This means identifying hazards, assessing and controlling risk, using only delivery partners who meet a recognised safety standard, providing clear information before and during a trip, and learning from anything that goes wrong. Health and safety takes priority over cost or convenience in every decision about how a trip is run.

2. Roles and responsibilities

- **Director:** owns this policy, reviews it at least annually, makes sure risk assessments exist for every trip, approves and re-checks delivery partners (Section 10), holds or arranges appropriate insurance, and investigates any serious incident.
- **Trip Lead:** carries the trip risk assessment and emergency contacts, briefs participants on arrival, keeps headcounts, and is the first point of contact if something happens on the day.
- **Delivery partners:** responsible for the safety of the diving instruction itself — dive supervision, equipment, briefings, and stopping an activity if conditions aren't safe — and for meeting the standards in Section 4 and Section 10.

3. Risk assessment

SEV keeps a general risk assessment covering the recurring hazards of its trips (travel, transfers, accommodation, and diving), reviewed at least annually and after any incident or near-miss. Before each trip, a

trip-specific risk assessment is prepared covering the dates, destination, group, and anything unusual about that trip (for example, a participant's specific medical need, a new destination, or a change in delivery partner). Foreign travel advice for the destination (gov.uk/foreign-travel-advice) is checked as part of this, before booking and again shortly before departure.

4. Diving safety

SEV benchmarks every diving programme it runs — wherever in the world it takes place — against the standard the UK sets for diving safety, and requires the delivery partner to meet the relevant standard in the country where the diving actually happens:

- **UK benchmark:** the Diving at Work Regulations 1997 and the associated Recreational Diving Projects Approved Code of Practice (L105), published by the Health and Safety Executive (HSE). These set out how a diving project should be planned and supervised safely, including the role of a dive supervisor, and are the standard SEV uses to judge whether a delivery partner's own safety management is good enough, even on projects that sit outside UK jurisdiction.
- **Malta:** the delivery partner must hold a current Recreational Dive Centre licence issued by the Malta Tourism Authority under the Recreational Diving Services Regulations (Cap. 409, S.L. 13).
- **Philippines:** the delivery partner must hold current accreditation from the Philippine Commission on the Development and Promotion of Sports Scuba Diving (PCSSD), or the equivalent Department of Tourism recognition current at the time.
- **Any new destination:** before SEV uses a delivery partner in a country not listed above, the Director identifies the equivalent local licensing or regulatory regime for dive centres, and records what was checked on SEV's Supplier Health & Safety Assessment. If no clear regulatory regime exists locally, SEV relies more heavily on the partner's PADI accreditation and its own audit (Section 10) as the safety benchmark instead, and says so on the record.

On top of local licensing, every delivery partner must hold current PADI 5-Star Career Development Centre status (or an equivalent recognised training agency's top-tier accreditation), and must meet SEV's required instructor-to-participant ratios: 6:2 for pool training, 4:1 for open water. These ratios are never exceeded, regardless of what the local minimum might allow.

Every participant completes mandatory medical screening (the RSTC Diver Medical Participant Questionnaire, the standard medical screening form used by PADI and other diving training agencies, plus a swim/float test) before being accepted onto the programme. Where the questionnaire flags a condition, SEV asks for a diving-qualified doctor's clearance before the participant is confirmed to dive, rather than making that judgement itself — see also the Equal Opportunities Policy on how this is handled fairly. DAN (Divers Alert Network) dive insurance is held for all staff and participants for the duration of any diving activity. Instructor vetting (DBS or local equivalent) is covered in the Safeguarding Policy, Sections 3–4.

5. First aid

At least one person present at every pool, boat and open-water session — either SEV's own Trip Lead or a delivery partner instructor — holds a current first aid qualification appropriate to the activity, and the delivery partner is expected to have emergency oxygen and a first aid kit immediately available wherever diving takes place. Where participants are diving in open water, the Trip Lead also confirms before departure how the delivery partner would evacuate an injured diver to medical care, and what the DAN emergency assistance number is for that destination — noted on the trip's emergency contacts sheet.

6. Fire safety and emergency evacuation

Accommodation is checked, as part of the trip risk assessment, for basic fire safety — smoke alarms, marked and unobstructed escape routes, and an evacuation meeting point — and participants are briefed on this on arrival, alongside the general safety briefing covering what to do if separated from the group.

7. Transport

Where SEV or a delivery partner arranges transport (transfers, boat trips), vehicles and vessels must be roadworthy/seaworthy and meet local legal requirements, drivers and boat operators must be appropriately licensed and experienced, and a first aid kit should be carried. Life jackets are provided and worn as appropriate for boat-based activity.

8. Accommodation standards

Accommodation must be safe, clean, and appropriate for the group. The safeguarding-specific rules on separating participants and adults, and on single-sex arrangements, are set out in the Safeguarding Policy, Section 11 — this policy's concern is the general safety of the building and site (fire safety per Section 6 above, and any site-specific hazards picked up in the risk assessment, such as pool or waterside access out of session hours).

9. Equipment

All diving and safety equipment used by participants must meet PADI's own equipment standards and, where it's personal protective equipment, be CE or UKCA marked as applicable. Equipment is serviced, maintained and logged according to the manufacturer's and the delivery partner's own procedures, and visually checked before each use. SEV doesn't own or maintain diving equipment itself — this sits with the delivery partner and is checked as part of Section 10.

10. Vetting our delivery partners' health & safety

Before approving a delivery partner, and at least annually after that, SEV obtains and reviews:

- Current general and activity-specific risk assessments for the activities SEV participants will take part in.
- The qualifications used for each activity delivered, and the instructor-to-participant ratios applied.
- A list of instructors, with their qualifications, additional training, and first aid certification.
- Confirmation of current local licensing/accreditation (Section 4) and PADI 5-Star CDC status.
- Public liability insurance cover, and the level of it (SEV's current working benchmark, based on its delivery partners' actual cover, is in the region of €4 million per event / €20 million in total — this is checked and recorded per partner, not assumed) — plus employer's liability insurance for the partner's own staff.
- Accident, emergency and business continuity procedures, including for severe weather, illness/injury, and evacuation.
- Procedures for analysing accidents and incidents afterwards to improve future safety.
- A policy or procedure for child security and welfare (cross-checked against the Safeguarding Policy's own delivery-partner checklist — the two checks are normally done at the same time).
- Confirmation the partner is not currently subject to legal proceedings over a health or safety matter.
- Whether the partner outsources or subcontracts any part of the activity to a further supplier, and if so, that this policy's checks extend to that supplier too.

This is recorded on SEV's Supplier Health & Safety Assessment, which follows the same format the School Travel Forum (STF) uses across the school travel industry for excursion supplier vetting and adventure activity safety audits — so a school comparing SEV's due diligence against its own supplier-vetting process will recognise the approach. A partner who can't evidence one of these points isn't used until the gap is closed, or SEV puts in place its own additional control to cover it (for example, requiring the school's own accompanying staff to hold first aid cover if a partner can't evidence its own).

11. Incident reporting and review

Any accident, injury, dangerous occurrence or near-miss on a trip is recorded on the Accident/Incident Report Form as soon as possible afterwards, and reported to the Director. Where an incident happening in Great Britain would be reportable under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR), it's reported to the HSE in the normal way; incidents overseas are recorded to the same standard even though RIDDOR itself doesn't apply, so that SEV has a consistent record to review. Every incident is reviewed to see whether anything about SEV's own arrangements, or a delivery partner's, needs to change — this feeds into the annual review of this policy and of the delivery partner it involved.

12. Insurance

SEV holds its own public liability insurance (up to £5,000,000) and employer's liability insurance (up to £10,000,000), currently with Simply Business and renewed annually, in addition to its ATOL licence (ATOL

12876) and Travel Trust Association membership (X6870), which protect customer money rather than health and safety as such but are part of the overall assurance SEV gives schools.

13. Training

The Director keeps up to date with the diving regulations and standards referenced in Section 4, and reviews them as part of the annual policy review. Trip Leads are briefed before each trip on the risk assessment, emergency procedures, and this policy. Delivery partner training is covered by Section 10 above and by the Safeguarding Policy.

14. Reviewing this policy

This policy is reviewed at least once a year, and sooner after any incident, near-miss, or significant change to the regulations it relies on. Changes are recorded, and the updated policy is reissued to everyone who needs to read and confirm it.

Documentation

- SEV's Safeguarding and Child Protection Policy.
- SEV's Equal Opportunities Policy.
- Each trip's own risk assessment.
- SEV's Supplier Health & Safety Assessment (kept internally).
- SEV's Accident/Incident Report Form (kept internally).

Appendix 1

References and further guidance

- **Health and Safety at Work etc. Act 1974** — general duty of care referenced in Section 1.
- **Diving at Work Regulations 1997** and the **Recreational Diving Projects Approved Code of Practice (L105)** — HSE, used as SEV's diving safety benchmark (Section 4). [hse.gov.uk](https://www.hse.gov.uk).
- **Recreational Diving Services Regulations (Cap. 409, S.L. 13)** — Malta Tourism Authority dive centre licensing (Section 4).
- **Philippine Commission on the Development and Promotion of Sports Scuba Diving (PCSSD)** — accreditation of dive establishments in the Philippines (Section 4).
- **Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)** — incident reporting referenced in Section 11.
- **Out-of-school settings: safeguarding guidance for providers** (Department for Education) — general health & safety expectations for out-of-school activity providers, alongside the safeguarding content it's mainly used for.
- **School Travel Forum (STF) Handbook** — supplier vetting and adventure activity safety audit practice used as a model for SEV's supplier assessment.