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## Occupational divers under training – trainee divers

This technical bulletin provides guidance about the work trainee divers may undertake while under direct supervision during occupational diving operations.

### Introduction

WorkSafe New Zealand requires applicants to provide dive logs to support their Certificate of Competence (CoC) application.

WorkSafe has recently seen an increase in divers submitting dive logs that indicate a need to make clear the distinction between a ‘diver under training’ and a ‘diver working without a CoC’.

This technical bulletin clarifies recommendations for divers who do not hold a current CoC as an occupational diver, but who are doing training dives while at work.

### Background

The Health and Safety in Employment Regulations 1995 (the Regulations) require occupational divers working for a Person Conducting or Undertaking a Business (PCBU) to hold a CoC in the category in which they are diving. The CoC is issued by WorkSafe.

The Regulations have a provision allowing workers to undertake training to become the holder of a CoC, but require diving ‘under the direct supervision’ of another diver who holds a CoC for that category of diving.

WorkSafe defines direct supervision as being ‘within reach or contact at all times to ensure immediate assistance can be provided if necessary’.

### When is a diver under training?

If a diver does not hold a current CoC, they must be under the direct supervision of a current CoC holder while diving is taking place. In this case they are considered a ‘trainee diver’.

As with all trainees in the workplace, supervision is required because they do not yet meet the necessary level of competency to operate independently in the workplace. For divers, this level of supervision is higher than expected in other workplaces.

Students undertaking formal instruction on a diving course (for example, Australian Diver Accreditation Scheme, Professional Association of Diving Instructors, and Science Diving New Zealand) are not working and do not require a CoC under the Regulations providing all the diving is in accordance with the course syllabus and supervised by a suitably qualified trainer holding a CoC.

But if they begin work tasks outside of their dive course (for example, leading dives, taking samples, fixing nets, cleaning aquariums or being a safety diver) they are considered to be working and will be seen as requiring a CoC.

## What sort of training can be undertaken?

While the Regulations allow for employees to train to become a holder of a CoC, the Health and Safety at Work Act 2015 (HSWA) requires a PCBU to ensure the reasonable safety of all workers, including those under training.

Before conducting any trainee diving, a PCBU must ensure that the minimum diver level pre-requisite competency has been met, and the trainee divers are competent to learn the specific tasks required for that category of CoC. This includes the use of the diver's breathing equipment and any hazardous powered tools – both of which should be taught in a formal diving course before use in any workplace.

As trainee divers are learning, PCBUs must also consider both the environment and duration of the training as well as competency levels. Dive sites should be assessed to be of low risk, close to appropriate surface and emergency support and in an environment where the focus is on the work skills being taught, not the hazards of the actual dive site. Remote and isolated sites are not recommended.

Further, being a 'trainee diver' should be time limited to ensure the diver has an expectation of how long it will take to achieve competency in the assigned work skills and be able to be assessed for all the skills learnt. Most trainee divers should be able to effectively show competency within a few weeks or months, depending upon the complexity of diving and skills required. In any case the trainee period should be limited to six months at maximum, unless there are exceptional circumstances.

## What is not considered training?

A trainee diver cannot fill the role of a standby diver – any standby diver must be able to immediately come to the working diver's assistance, and as such must already hold a suitable CoC. Performing the role of a standby diver is not considered training.

Even though a trainee diver may be considered the CoC diver's 'buddy' when diving, they cannot be counted as an extra 'working diver'. Doing so without having separate direct supervision may not be considered training and could indicate the diver is working without a CoC.

## Dive logging as a trainee diver

It is expected practice that trainee divers log any supervised dives as training dives to achieve a competency requirement or qualification. This practice is clearly undertaken in a formal course environment and should be replicated by all divers under training.

All normal dive log details should be recorded (such as date, location, depth and time) along with details of their supervising diver, other divers in the team as well as the competencies and activities being undertaken. The logs of training dives should then be submitted as part of their CoC application.

Any dives not directly supervised are not considered training or suitable recent experience for the trainee diver and could indicate that the diver may have been working without a CoC.

## Medicals for trainee divers

The Regulations require that occupational divers be 'medically fit'. Due to the health and exposure risks associated with occupational diving, any trainee diver should be medically assessed and hold a diving medical clearance prior to undertaking any training dives under supervision.

## Recommendations

The competency requirements for the relevant categories of CoC are the minimum standards for an occupational diver in the respective sectors. Sometimes a risk assessment will identify additional competencies that divers may require.

WorkSafe recommends:

- A trainee diver must be under direct supervision of a suitable CoC holder when underwater.
- A trainee diver should hold a suitable medical clearance for occupational diving and have the minimum pre-requisite diving qualifications required to apply for a CoC in that category of diving before starting in-water training.
- Training should only be conducted with appropriate controls for the safety of both the trainee and supervising diver.
- Training sites should be assessed as suitable for the trainee diver and with adequate surface and emergency support.
- At no time should a trainee diver be using any diver's breathing equipment or hazardous powered tools unless qualified from, or as part of, a formal training program.
- All training dives should be logged as such with appropriate details included.
- Employers should aim to achieve the competency requirements in a timely manner with minimal delay. Divers should not be operating as divers-in-training for an extended period.

## **Further information**

[WorkSafe occupational diving guidance](#)

[Health and Safety in Employment Regulations 1995](#)

[Providing information, training, instruction or supervision for workers](#)

## **Acknowledgement**

This technical bulletin has been developed in consultation with the Diving Industry Advisory Group (DIAG).