

The Way the World Learns to Dive®

This is true. However, to clarify, a "member" is a PADI professional and this requirement extends to all student divers taking technical diving courses, not just members. The diver is required to have a physician's approval to dive which may last up to a year, providing no changes to their medical status have occurred since that time. The PADI Instructor teaching the course is required to have the student complete a new Medical Statement

2. The inherent danger of technical diving is recognised by PADI in that there is a requirement for members undertaking technical diving courses to have a medical certificate confirming their fitness to dive.

PADI and participants acknowledge the additional risks of technical diving beyond those of recreational diving, however the occurrence of incidents is relatively small. PADI's TecRec courses have higher pre-requisites, both in terms of physical fitness and diver knowledge and experience plus more demanding assessment standards and supervision requirements than recreational diving courses, to address these increased risks. PADI's technical diving courses are designed and written by experts in instructional design who are also experienced technical diving instructor trainers. Input, consultation and review by both internal and external experts ensures the thoroughness of training and that courses meet or exceed industry norms.

1. Diving is both a method of work and a recreational sport. There is an inherent danger in diving, particularly when diving to a depth that requires decompression stops and the use of different gases. Because of the depths of the dives the risk of death or serious harm is significant.

I will respond to each of your concerns in order.

I am writing on behalf of PADI EMEA Ltd in response to your Regulation 28 letter dated 3<sup>rd</sup> March 2014, following the inquest into the death of Carl Andrew Morris, which the Professional Association of Diving Instructors (PADI) did not attend. By way of clarification, PADI members are licensed to conduct PADI training, but are not agents, employees or franchisees of PADI EMEA Ltd. I should also point out that the solicitors and barrister representing [REDACTED] at the inquest were not instructed by and did not represent PADI EMEA Ltd.

Dear Mr Roberts

29 April 2014

Mr D.L.I Roberts LLB  
 H.M. Senior Coroner  
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at the beginning of each course to assess whether there are changes to the student's medical condition that may warrant a new physician's approval. If there are no changes in history, the physician's approval that may be on file is then considered valid for one year from the date of the physician's signature. The fact that Mr Morris was also a PADI member does not change the requirements from the point of view of PADI standards.

3. In Mr Morris' case he must have been aware of the need for a medical certificate, but omitted or neglected to ensure that his certificates were up to date for each course. No check was made to ensure that he was compliant for the Tec 50 course.

The PADI Instructor in charge of the course is responsible for ensuring that all requirements are met.

PADI makes sure that instructors understand these requirements as part of the Tec Deep Instructor training process. During this process, instructors must familiarise themselves with the course specific standards and complete an exam to test this knowledge, including questions about the medical requirements.

PADI provides a *Tec Diver Training Record*. This form allows instructors to record each step of training, including paperwork, to make sure they have not missed anything. There is a specific section to record the *Medical Statement (signed by student and physician)*, with a sign off line for the instructor to add their signature.

The student diver is also informed of the requirement to maintain physical fitness for tec diving: and the need for a physician's approval.

In the Tec Deep Diver Manual Introduction:

Maintain adequate physical and mental health, and to alert the instructor to any problems you have with them. Falling to meet these obligations and responsibilities can have unfortunate consequences. In the worst case, you could be injured, disabled or killed.

In Tec Deep Diver Manual Section One:

Physical Fitness and Tec Diving. Hand in hand with your training and experience limits, you need to consider your physical limitations....Most tec dives call for higher fitness requirements than recreational dives. Lack of the physical fitness required can affect your safety by limiting your ability to respond to an emergency, or by directly leading to injuries such as a heart attack, heat exhaustion or stroke, broken bones or muscle tears due to falling or strain. Consider that your cardiovascular system needs to be able to tolerate thermal stress, plus support the muscle demand for oxygen while wearing and moving in heavy equipment out of water and while swimming at a moderate pace against the drag....Only you and your physician can determine your fitness and assess its suitability for different types of diving. It's your responsibility to stay fit to dive, and to dive within the limits of your fitness.



Student divers confirm their understanding of this information by answering questions at the end of each chapter. Their required paperwork also includes reminders of this and asks them to indicate their understanding of the requirements by their signature on the following forms:

- i. The Tec Diver Statement of Understanding and Learning Agreement: ensures divers understand the risks of tec diver training including:  
*Maintain good mental and physical health for diving.*

- ii. The Standard Safe Technical Diving Practices Statement of Understanding: this has the student diver agree to good habits for diving during and beyond training: dives including:  
*Maintain good mental and physical fitness for diving..... As someone making challenging technical dives, recognize that regular dive medical assessments helps reduce my risk.....*

4. *Where recreational divers are undertaking technical diving courses, particularly with instructors who know them well, there is a danger that those requirements are overlooked, there is no system for policing compliance.*

Proactively, PADI work to remind members of the standards, including, but not limited to:

- PADI Members agree to the Membership Agreement every year when they renew. The Membership Agreement lists the areas of compliance required to be a PADI Instructor, including following PADI standards and that student divers must meet pre-requisites (such as diving medical requirements).
- PADI instructors are required to have instructor guides for all courses they teach and to keep them updated.
- PADI provides an updated PADI Instructor Manual as part of the membership renewal fee, every year.
- Quarterly Training Bulletins update members on any changes to PADI standards and are required reading.
- Training Bulletin Live webinars are provided for additional support. Reasons for change are discussed and members can ask questions or for clarification.
- A full time team of training consultants are available in each regional headquarters; these Training Consultants are experienced instructors who can answer training and standards related questions for PADI members.

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If a potential breach of standards is identified the member(s) involved are approached and asked for their perspective. They may be asked to submit training records, if appropriate. PADI has both a regional and global Quality Management Committee made up of executive level staff with experience in all areas of diver training. They assess all serious cases and action taken is agreed on a global basis to ensure consistency. Action may include retraining, removal of ratings, suspension or expulsion.

*Prior to any in-water training, were you required to obtain medical approval to dive?*

The Tec 40, 45 and 50 diver CEQs include the following question:

PADI divers are required to register their email addresses with PADI for the purpose of Quality Management communications. PADI send Course Evaluation Questionnaires (CEQs) to all student divers to check that the course has been run according to PADI standards and procedures. Reports are run to identify instances where course standards may come into question. While PADI recognises that student divers may not always recall everything about their training correctly, we use this as an opportunity to contact the instructor (and Dive Centre, if the training was completed at a PADI registered Dive Centre) to find out whether there were any problems. PADI can also identify patterns to check for ongoing problems.

PADI has one of the diving industry's most robust quality management and training systems. In addition to the proactive measures described above, PADI's Quality Management program monitors and responds to all concerns regarding omissions from training and paperwork.

5. As PADI have recognised the need to ensure that divers, before starting a course, are compliant with PADI rules, there should be a method devised to police adherence to these rules.

It is clear from the standard above that paperwork must be current for the course in question.

(this section of the Guide goes on to list other required forms).

*Medical Statement. The student must have a physician's approval and signature on the Medical Statement. If the student received a physician's approval and signature on a Medical Statement for another course within the last year and has had no medical condition change, and if you have that Medical Statement on file, then the student diver does not need to see a physician again.*

*Student divers in the Tec 40, Tec 45 and Tec 50 courses must complete the following paperwork before beginning any inwater training. The paperwork must be completed even if it was completed at the previous level, except as noted:*

PADI standards relating to medical requirements for the Tec 50 diver course are in the Tec Diver Instructor Guide:

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*Action should be taken. The Professional Association of Diving Instructors is in the position of devising the courses, supervising the level of training of instructors, and providing certificates of competence. In my opinion action should be taken to prevent further deaths and I believe that the professional Association of Diving Instructors has the power to develop a system for policing adherence to the requirements for its technical courses.*

PADI checks that instructors meet all requirements to be Tec Deep Instructors; this is also personally verified by suitably qualified Instructor Trainers who teach them. Once certification has been gained, at any particular level, the PADI Instructor is responsible for staying up to date and maintaining familiarity with the course standards and procedures, aided by a variety of tools from PADI and a robust quality management system. PADI believes that its course materials and paperwork are clear for both the student diver and instructor with regards to the need for medical fitness and physician's approval. To further reinforce the issue of medical fitness, we plan to include an additional statement in the Tec Diver Statement of Understanding and Learning Agreement, to have the student diver confirm that they have submitted a medical signed by a physician within the last year and that there have been no medical changes since that time. This will be notified to instructors via the quarterly Training Bulletin, 3<sup>rd</sup> Quarter 2014, scheduled to be distributed in July.

Yours sincerely  
[Redacted]  
Training Director

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