

## Temporary to Full Diving Contractor Membership Assessment Procedure

### Introduction

This Membership Assessment Procedure is maintained by the IMCA Secretariat in accordance with IMCA's bye-laws.

IMCA promotes improvements in health, safety, environmental, quality, technical and contracting standards and IMCA expects its Members to comply with IMCA's bye-laws, codes of practice, guidelines, information notes and other materials. An entity's membership of IMCA, does not constitute a representation, warranty or guarantee by IMCA that the Member will perform their operations consistently in accordance with IMCA's bye-laws, codes of practice, guidelines, information notes and other materials. IMCA assumes no responsibility or duty of care to any person in respect of any operations of any Member (or IMCA certified person) and IMCA shall not be liable in tort, contract or otherwise in respect of any such operations.

This document describes the application and audit assessment procedure for all applicants upgrading from temporary to full contractor membership of the IMCA Diving Division, encompassing both contractors undertaking surface supplied diving operations only and those utilising both surface supplied and saturation diving techniques.

Applicants should note the following points:

- 1) Full contractor membership of the IMCA Diving Division is only open to offshore diving contractors.
- 2) Applications for full contractor membership of the IMCA Diving Division will only be accepted with a Letter of Recommendation from a client company. A client company is defined as a company which has commissioned diving services from the applicant diving contractor.
- 3) IMCA defines offshore diving as diving operations carried out anywhere in the world being:
  - ◆ outside the territorial waters of a country (normally 12 nautical miles or 22.2 kilometres from shore);
  - ◆ inside territorial waters where diving operations are conducted from an offshore structure, vessel or floating structure normally associated with offshore oil & gas or renewable/alternative energy industry activities.

Note that diving operations carried out on SBM installations situated inside territorial waters are considered to fall under IMCA's definition of offshore diving.

Specifically excluded from IMCA's definition of offshore diving are diving operations being conducted in support of stacked drilling rigs, coastal refineries, vessel husbandry, civil, inland, inshore, salvage or harbour works or in any case where operations are not conducted from an offshore structure, vessel or floating structure normally associated with offshore oil & gas or renewable/alternative energy industry activities.

- 4) To become a full contractor member of the IMCA Diving Division, all acceptance criteria (as detailed in Appendix 1) must be met. Any material submitted must be from an offshore diving project, undertaken by the applicant, within the last 3 years.
- 5) In the event that an application for full contractor membership of the IMCA Diving Division does not meet the acceptance criteria detailed in Appendix 1, no re-application for membership will be accepted for a period of six months from the date on which the applicant was informed of their failure to meet the criteria. This period will allow sufficient time for the rejected applicant to prepare a new application and also allow IMCA to progress, in a timely way, those prospective members who have focused upon the quality and completeness of their application.

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- 6) Failure to meet the acceptance criteria in three or more sections will result in the application being rejected. Applicants will need to ensure that they carefully check all provided material against what is requested in Table 1 – Documentation to be submitted by the applicant diving company, in order to fulfil each element in the membership assessment criteria, according to IMCA guidance.
- 7) Failure of one or more elements within a section can result in failure of that section. Failure of three or more sections will result in the application being rejected.
- 8) IMCA will not begin review of the application until the required application fee has been received.

## **Assessment Procedure**

### **Document Submission (all documents submitted for review must be in English)**

The applicant diving contractor needs to demonstrate an ability to meet the acceptance criteria (see Appendix 1). Applicants must submit the documents listed in Table 1 below Documentation to be submitted by the applicant diving company. Each document submitted must include a reference to the section of Table 1 to which it relates. If an applicant fails to submit their documents in this manner, their application may be returned. Applicants are required to submit their application in a well-structured manner. Numerous emails containing multiple attachments will not be accepted. All the material provided in support of the application must be generated by the applicant company and used during the course of their company activities.

Upon receipt of the application and supporting documents, and provided the application fee has been paid, IMCA will undertake an initial high-level administrative review to assess whether the application is complete. Should the application be considered incomplete, the applicant will be contacted regarding any missing documents. There will be a 4-week period, commencing on the date of IMCA's request, in which the applicant can submit the requested missing documents. If the requested documents are not received within this 4-week period, the application will be considered incomplete and will be rejected.

If the initial high-level administrative review confirms the application to be complete, then the application is passed on for formal Audit.

### **Audit**

A desktop audit of the documentation submitted is performed by the IMCA secretariat (or its designated auditor).

Following completion of the desktop audit, IMCA will provide feedback to the applicant as follows:

- 1) that the documentation demonstrates the ability of the applicant diving contractor to comply with all sections of the acceptance criteria and a recommendation to consider the applicant for full contractor membership of the IMCA Diving Division will be made to the IMCA Operations Committee; or
- 2) that minor and specified supplementation of the documentation is required to meet all of the acceptance criteria. A period of 28 calendar days, from the date feedback was provided to the applicant diving contractor will be available for provision of such documentation. Note that IMCA will review and, where appropriate, verify supplementary documentation within 28 calendar days of receipt. Should the applicant company fail to provide the required supplementary documentation within 28 days, no re-application for membership will be accepted for a period of six months from the date on which that applicant was informed that they failed to meet the criteria; or
- 3) that the documentation does not demonstrate the ability to comply with the acceptance criteria sufficiently. The applicant diving contractor will fail at this point in time and no re-application for membership will be accepted for a period of six months from the date on which the applicant was informed of their failure to meet the criteria. In this case, the company will receive a copy of the auditor's report.

Whilst contractor membership of the IMCA Diving Division may be awarded on the basis of desktop audit alone, IMCA reserves the right to visit any applicant diving contractor and/or undertake further enquiries by any other

means, having given due notice of the intention to do so. Please refer to Appendix 2 Visit to Applicant: On Site Audit for further information.

### **IMCA Operations Committee review**

If the audit demonstrates the ability of the applicant diving contractor to comply with all sections of the acceptance criteria a recommendation to consider the applicant for full contractor membership of the IMCA Diving Division is made to IMCA's Operations Committee (which takes a minimum of three weeks). No commercially sensitive information will be distributed to the Operations Committee.

The Operations Committee will then consider the application and will decide whether to:

- 1) admit the applicant for full contractor membership of the IMCA Diving Division; or
- 2) reject the application.

### **Appeal Process**

Any member, applicant or other body wishing to appeal against any decision taken should notify the IMCA Technical Director, in writing, of their intention to appeal and should do so no later than the tenth working day following notification of the decision. The Technical Director will take into consideration all the relevant details and their decision shall be final and binding.

### **Concluding Remarks**

For the avoidance of any doubt, the purpose of this procedure is to ascertain whether an applicant company has the ability to meet the acceptance criteria for full contractor membership of the IMCA Diving Division.

IMCA want prospective members to fully understand that an assessment of their capabilities as a Diving Contractor and prospective IMCA member can be a somewhat complex process, which will, on occasions, take an extended period of time to complete. However, IMCA will try to ensure that its timelines for membership assessment are appropriate and consistent with what we believe can reasonably be achieved. We do not wish to raise unrealistic expectations with respect to application processing times.

- 1) Criteria for IMCA membership should be transparent, proportionate, non-discriminatory and based on objective standards.
- 2) The criteria for admission are that the applicant diving contractor should:
  - ◆ demonstrate the ability to undertake offshore diving activities in accordance with the IMCA International Code of Practice for Offshore Diving (IMCA D 014) and associated documentation which describes global good practice for offshore diving. The applicant should provide an explanation for how they:
    - operate an appropriate diving safety management system;
    - select and monitor personnel;
    - control their offshore operations;
    - deal with medical/safety issues.
  - ◆ demonstrate the ability to operate and maintain diving systems in accordance with:
    - the Code of Practice on the initial and periodic examination, testing and certification of diving plant and equipment (IMCA D 018);
    - DESIGN (Diving Equipment Systems Inspection Guidance Note)
      - IMCA D 023 *DESIGN for surface orientated (air) diving systems* and/or;
      - IMCA D 024 *DESIGN for saturation (bell) diving systems* (if appropriate) and/or;
      - IMCA D 037 *DESIGN for surface supplied mixed gas diving systems* and/or;
      - IMCA D 040 *DESIGN for mobile/portable surface supplied systems*;
      - IMCA D 053 *DESIGN for the hyperbaric reception facility (HRF) forming part of a hyperbaric evacuation system (HES)* (if appropriate);
  - ◆ have a current emergency procedure manual for the type of operations undertaken;
  - ◆ have a set of current operations manuals and procedures for the type of operations undertaken. For saturation diving applications this must include procedures for hyperbaric evacuation;
  - ◆ ensure that all diving and supervisory personnel engaged in offshore diving work are qualified in accordance with IMCA D 014.
- 3) To be considered for full surface supplied and/or saturation contractor membership of the IMCA Diving Division, applicant diving companies must be able to demonstrate that they have met all the required acceptance criteria, as detailed below in [Table 1](#), in an offshore operational setting. This means that applicants for full membership will be required to submit copies of documents listed in [Table 1](#) that were generated during the planning, execution and completion of at least one offshore diving project.
- 4) A company applying for surface supplied diving operations membership must provide evidence for ownership of at least one complete surface supplied diving system meeting all the requirements of IMCA D 023. Ownership of at least one complete surface supplied diving system is a pre-requisite at the time of application.
- 5) Additionally, a company applying for saturation diving membership must own, or have control over, at least one complete saturation diving system meeting all the requirements of IMCA D 024 at the time of application. If the applicant company is utilising a hired saturation diving system, then it should provide a copy of the hire agreement.

All the documentation listed in [Table 1](#), must be sent by the applicant. Incomplete applications will be rejected and returned to the applicant diving company. The documentation should be appropriate for the type of diving undertaken and needs to be their own. Only provide the material requested in [Table 1](#). The provision of poorly targeted or irrelevant material will delay completion of the audit.

With the desktop review having been successfully completed, IMCA reserves the right to undertake a formal visit to the applicant.

If an on-site audit is to be undertaken:

- ◆ the reasons behind IMCA's decision to undertake an onsite audit will be discussed with the applicant diving contractor;
- ◆ a date will be agreed and the scope of the audit will be provided;
- ◆ the auditor will visit the applicant and provide a written report to the IMCA Secretariat on his findings.

Following the audit, the IMCA secretariat will then provide feedback to the applicant as follows:

- ◆ that the on-site audit has confirmed that the applicant is able to comply with the Acceptance Criteria and can progress;
- ◆ that the on-site audit has identified issues which indicate that the applicant does not demonstrate the ability to comply with the acceptance criteria sufficiently to proceed further. The application will fail at this point in time and no re-application for Diving contractor membership will be accepted for a period of six months from the date on which the applicant was informed of their failure to meet the criteria.

IMCA will invoice the applicant in accordance with Appendix 3 – *Schedule of Rates* and this must be paid before the application is considered by IMCA. Fees for on-site audits and additional enquiries must be paid before the audit / additional enquiries take place. Travel and subsistence expenses will be invoiced at cost plus 5% upon completion of the on-site audit. IMCA will not progress an application if fees are outstanding.

Prior to the consideration of any application, IMCA will invoice the applicant diving contractor for the application fee. IMCA will not begin considering the application until the required application fee has been received.

Receipt of payment does not guarantee acceptance into IMCA Diving Contractor membership. Any rejected applicants that choose to re-submit will also be invoiced as per the below rates.

<b>Membership Application Fees</b>	<b>Application Fee</b>
Desktop Review Upgrade from Temporary to Full IMCA Contractor Membership	4,500.00 GBP

**On-Site Audit Fees / Additional Enquiries (if required)**

Audit fees for site visit (2 days)	3,000.00 GBP
Any additional days (if required) per day	1,200.00 GBP
Any additional enquiries (if required) – minimum half day – per half day	600.00 GBP

**Travel and Subsistence Expenses**

Travel and subsistence expenses will be invoiced at cost plus 5% upon completion of the audit.

Liability insurance fulfils two purposes:

- 1) to protect the insured company and its personnel in the event of a successful claim following an incident; and
- 2) to provide compensation to an injured person or his family in the event of an incident as a result of failures by the insured company and its personnel.

IMCA encourages its Members to purchase adequate insurance cover and to hold the following three different liability policies (as a minimum):

- ◆ Employers liability insurance;
- ◆ Public liability insurance;
- ◆ Medical health insurance to provide for injured parties' immediate needs; possible medical evacuation; together with any potential long term aftercare.

The amount of cover (limit of liability) should be suitable and sufficient for the company, the nature of its operations and the areas the company operates in. It is not therefore possible for IMCA to issue specific guidance on the level or nature of cover that is appropriate.

**IMCA advises all members to take appropriate insurance advice from a specialist insurance broker and/or law firm. Whilst IMCA encourages all members to purchase adequate insurance it is not able to provide specific advice and does not check insurance policy wordings in order to verify their adequacy.**

[Form of letter to be printed on Applicant’s letterhead and signed by a director of the Applicant]

Attn: IMCA

Dear Sirs,

As a director of [ *insert company name* ] (the “Company”), I hereby confirm that:

- (1) the Company has obtained professional advice from an insurance broker and consider that the insurance purchased by the Company is appropriate;
- (2) I will regularly review the level of cover to ensure that it remains appropriate; and
- (3) the Company will maintain adequate insurance cover throughout the duration of its membership of IMCA.

Yours faithfully,

Director



**Table 1 – Documentation to be submitted by the applicant diving company**

Document	Required contents	Evidence Location - PDF Binder Page No(s)
<b>SECTION 1 – BACKGROUND</b>		
1.1 Contact details	<i>Provide name and contact details (email address and phone number) for the administrative lead for the applicant company. This person will be the point of contact for IMCA throughout the audit process.</i>	
1.2 Project history	<i>Brief summary of the diving project/projects being used in support of your application from Temporary to Full membership.</i>  <i>If applying for both surface supplied and saturation diving membership then details of both the SDDE and saturation project are required.</i>	
1.3 Director’s Insurance Declaration	<i>A declaration signed by a director of the applicant company confirming:</i> <i>(1) that they have obtained professional advice from an insurance broker and consider that the insurance purchased by the applicant company is appropriate;</i> <i>(2) that they will regularly review the level of cover to ensure that it remains appropriate;</i> <i>and</i> <i>(3) they will maintain adequate insurance cover throughout their membership of IMCA.</i>  <b>Note:</b>  ◆ <i>Appendix 4 IMCA Guidance on Insurance and Appendix contains additional guidance on the subject.</i> ◆ <i>Appendix 5 Director’s Insurance Declaration Form may be used by a director of the applicant company for the purpose of satisfying this requirement.</i>	
1.4 Letter of recommendation	<i>A dated and signed letter of recommendation from a recent client following the satisfactory completion of a diving project. The letter must include the contact details of the signatory.</i>	

<b>SECTION 2 – SAFETY MANAGEMENT SYSTEM</b>		
2.1 Health, safety and environmental policies	<i>Copies of current company health, safety and environmental policies signed by a senior officer at board level in the organisation.</i>	
2.2 Safety management organisation charts for offshore and onshore	<i>Provide organograms showing the safety management system can function outside the commercial pressures of a project team. The organograms should show direct access for safety personnel to senior management must be available, if required. Provide both onshore and offshore organisation charts.</i>	
2.3 Offshore safety management system (SMS)	<i>Provide a detailed overview of how your safety management system functions offshore including details of how the offshore SMS team reports to shore.</i>	
2.4 Safety performance	<i>Provide details of the company’s safety performance to date including a description of the near miss reporting system. Include the results for the previous year.</i>	
2.5 Leading performance indicators	<i>Provide details of leading safety performance indicators showing how senior management monitors the performance of the SMS.</i>	
2.5.1 Lagging performance indicators	<i>Provide details of lagging safety performance indicators showing how senior management monitors the performance of the SMS</i>	
2.5.2 Leading and lagging performance indicators for the previous year	<i>Include the leading and lagging safety performance results for the previous year.</i>	
2.6 SMS auditing	<i>Provide an example of an internal Safety Management System audit of your company for an offshore project during time as a temporary member.</i>	
2.6.1	<i>Provide an example of an external third-party Safety Management System audit of your company for an offshore project during your time as a temporary member.</i>	
2.7 Near miss/accident reporting procedures	<i>Provide a copy of your accident and near miss reporting procedures. Produce copies of any relevant forms.</i>	

<b>SECTION 3 – OPERATIONS</b>		
3.1 Project organisation chart	<p><i>Copy of the project organisation chart (organogram) for the onshore and offshore management of a diving project. Include names, titles and positions for the onshore staff and titles and positions for the offshore team.</i></p> <p><i>Please clearly indicate the role and reporting lines for your offshore safety representative/officer.</i></p>	
3.2 Project-specific emergency response plan	<p><i>Provide the project-specific emergency response plan which may include bridging documentation between the client(s) and the diving contractor.</i></p>	
3.3 Emergency response plan (onshore)	<p><i>Provide details of the Emergency Response Plan ashore. This should provide guidance to onshore staff on the management of a reasonably foreseeable emergency offshore. This should include: family liaison arrangements, contact and detailed arrangements for emergency evacuation, client contact details, details of relevant local authorities, company press and media policy etc.</i></p>	
3.4 Emergency response drills (offshore)	<p><i>Provide details of how offshore emergency response drills were developed and conducted on a recent diving project.</i></p> <p><i>If the upgrade includes both SDDE and saturation diving, then the submission must include examples for both.</i></p>	
3.4.1	<p><i>Provide an example emergency response drill matrix used during a recent offshore diving project.</i></p> <p><i>If the upgrade includes both SDDE and saturation diving, then the submission must include examples for both.</i></p>	

3.5 Diving emergency response drill	<p><i>Provide an example of a completed diving emergency response drill from the diving project including;</i></p> <ul style="list-style-type: none"> <li>▪ <i>toolbox talk</i></li> <li>▪ <i>drill report</i></li> <li>▪ <i>DPR for the day of the drill</i></li> <li>▪ <i>copy of the Diving Operations Record for the day of the dive</i></li> </ul> <p><i>If the upgrade includes both SDDE and saturation diving the examples must be provided for both.</i></p>	
3.6 Emergency response drill (onshore)	<p><i>Provide either details of an emergency response drill or desktop exercise for an offshore emergency, testing the emergency response plan ashore.</i></p> <p><i>If the upgrade includes both SDDE and saturation diving, then the submission must include examples for both.</i></p>	
<b>PLANNING AND EXECUTION OF A DIVING PROJECT</b>		
3.7 Risk assessment (onshore HIRA)	<p><i>Provide an example of a completed risk identification meeting (HAZID or HIRA) completed prior to the development of step-by-step work procedures for a recent diving project.</i></p> <p><i>This should identify site specific and task-based hazards for the project together with the relevant control measures.</i></p>	
3.8 Step-by-step procedures	<p><i>Provide an example of the step-by-step procedures developed for a recent offshore diving project generated from the onshore risk identification meeting (HAZID or HIRA).</i></p> <p><i>If the upgrade includes both SDDE and saturation diving, then the submission must include examples for both.</i></p>	
3.9 Mobilisation Plan	<p><i>Provide an example of a completed risk assessment for a recent diving project mobilisation.</i></p>	

3.9.1	<i>Provide an example of a completed deck plan for a recent diving project mobilisation.</i>	
3.9.2	<i>Provide a lift plan for a recent diving project mobilisation.</i>	
3.10 Bridging Document	<i>Provide an example of a project specific SMS interface document (bridging document) agreed with all parties concerned for a recent diving project. This as a minimum should include bridging for both contractor and client SMS.</i>	
3.11 Project Specific Emergency Response Plan	<i>Provide an example of a finalised diving project specific emergency response plan which may include bridging documentation between the client(s) and the diving contractor.</i>	
3.12 Toolbox talk	<i>Provide examples of at least five toolbox talks conducted during a recent diving project.</i>  <i>If the upgrade includes both SDDE and saturation diving then the submission must include examples for both.</i>	
3.13 Permit-to-Work (PTW)	<i>Provide an example of a completed PTW linked to one of the toolbox talks provided.</i>	
3.14 Dive Plan	<i>Provide an example of a completed Dive Plan used to brief the divers and linked to one of the toolbox talks provided.</i>  <i>If the upgrade includes both SDDE and saturation diving then the submission must include examples for both.</i>	
3.15 Daily Progress Reports (DPR)	<i>Provide examples of completed DPRs for the days referenced on the toolbox talks above.</i>	
3.16 Diving Operations Records	<i>Provide completed examples of Diving Operations Records (dive logs) linked to all the DPRs above.</i>	

3.17 Management of Change (MOC)	<i>Provide a copy of the company MOC procedure together with a completed example from a recent diving project if available.</i>	
3.18 Simultaneous Operations (SIMOPS)	<i>Provide a copy of the company SIMOPS procedure together with a completed example from a recent diving project if available.</i>	
<b>SATURATION DIVING APPLICATIONS ONLY</b>		
3.19 Hyperbaric Evacuation Plan	<i>Provide an example of a company hyperbaric evacuation plan for a recent project including;</i> <ul style="list-style-type: none"> <li>▪ <i>the launch sequence for the SPHL/HRC</i></li> <li>▪ <i>recovery plan</i></li> <li>▪ <i>the procedure for the safe decompression of the evacuated divers</i></li> </ul>	
<b>SECTION 4 – PERSONNEL MANAGEMENT</b>		
4.1 Diving Personnel	<i>Provide copies of the CVs and certificates of all the dive team personnel listed on the submitted DPRs above.</i>  <i>This should include;</i> <ul style="list-style-type: none"> <li>▪ <i>supervisors</i></li> <li>▪ <i>divers</i></li> <li>▪ <i>dive technicians</i></li> <li>▪ <i>if appropriate, life support personnel (LSSs and LSTs)</i></li> </ul> <i>All personnel as a minimum should meet IMCA’s qualifications/certification requirements.</i>	
4.2 Offshore Performance Reports	<i>Provide offshore performance reports for two of the diving personnel listed above.</i>  <i>If the upgrade includes both SDDE and saturation diving, then the submission must include examples for both.</i>	

4.3 Personnel Tracking	<p><i>Provide details of your personnel tracking system designed to ensure that time expired qualifications and certificates remain in-date and valid.</i></p> <p><i>This may be a simple project specific spreadsheet.</i></p>	
<b>SECTION 5 – DIVING PLANT AND EQUIPMENT</b>		
5.1 Diving Plant and Equipment List	<p><i>Provide a list of the diving plant and equipment used on the diving project. This list must show that the applicant company had sufficient plant and equipment to support the offshore diving project and may be the load out list for the project together with details of any other diving plant and equipment used on the project</i></p> <p><i>For saturation diving applications this must include details of the saturation diving complex along with information about the hyperbaric evacuation system.</i></p>	
5.2 DESIGN Audits  <i>DESIGN audits must have been undertaken by third party auditors. The third-party auditor must not be associated with or work for the contractor company applying for membership</i>	<p><i>If applying for surface supplied diving membership provide a completed D 023 DESIGN audit for your own dive system.</i></p> <p><i>If applying for both surface supplied and saturation diving membership provide a completed D 023 DESIGN audit and a completed D 024 DESIGN audit for your dive systems. In addition, provide a D053 DESIGN audit for a hyperbaric reception facility specified in one of your company hyperbaric evacuation plans.</i></p> <p><i>Provide the DESIGN auditors' comments on the effectiveness and performance of the company's PMS.</i></p>	
5.3 DESIGN Audit Non-conformance Tracking	<p><i>Provide evidence of how any non-conformances identified during the DESIGN audits were tracked and closed out</i></p>	
5.4 DESIGN Auditor CV	<p><i>Provide the contact details and CV for the DESIGN auditor(s) who undertook the DESIGN audit(s) submitted.</i></p>	
5.5 Issues Raised from Previous Membership Audit	<p><i>Evidence that issues raised from the previous membership audit have been addressed.</i></p>	

For more information, please contact [Bryan.McGlinchy@imca-int.com](mailto:Bryan.McGlinchy@imca-int.com)