



MCIB

Marine Casualty Investigation Board
Bord Imscrúdú Taisní Muirí

**REPORT OF AN INVESTIGATION
INTO A FATAL INCIDENT INVOLVING
KAYAKERS
ON THE UPPER CARAGH RIVER,
GLENCAR, CO. KERRY
2 NOVEMBER 2019**

**REPORT NO. MCIB/296
(No.1 OF 2023)**

The Marine Casualty Investigation Board (MCIB) examines and investigates all types of marine casualties to, or onboard, Irish registered vessels worldwide and other vessels in Irish territorial waters and inland waterways.

The MCIB objective in investigating a marine casualty is to determine its circumstances and its causes with a view to making recommendations to the Minister of Transport - for the avoidance of similar marine casualties in the future, thereby improving the safety of life at sea and inland waterways.

The MCIB is a non-prosecutorial body. We do not enforce laws or carry out prosecutions. It is not the purpose of an investigation carried out by the MCIB to apportion blame or fault.

The legislative framework for the operation of the MCIB, the reporting and investigating of marine casualties and the powers of MCIB investigators is set out in the Merchant Shipping (Investigation of Marine Casualties) Act, 2000.

In carrying out its functions the MCIB complies with the provisions of the International Maritime Organisation's Casualty Investigation Code and EU Directive 2009/18/EC governing the investigation of accidents in the maritime transport sector.



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Glossary of Abbreviations and Acronyms

AED	Automated External Defibrillator
C	Celsius
CI	Canoeing Ireland
CGU	Coast Guard Unit
CoP	Code of Practice: The Safe Operation of Recreational Craft (2017) ¹
CPR	Cardiopulmonary Resuscitation
HSE	Health Service Executive
ICF	International Canoe Federation
IRCG	Irish Coast Guard
IWW	Irish White Water
LOA	Length Overall
MCIB	Marine Casualty Investigation Board
MRCC	Marine Rescue Co-ordination Centre
MRSC	Marine Rescue Sub-Centre
NEOC	National Emergency Operations Centre
PFD	Personal Flotation Device
PRA	Principal Response Agency
QQI	Quality and Qualifications Ireland
REC	Rescue Emergency Care (certificates)
RSR	River Safety and Rescue (certificates)
SITREP	Situation Report
UL	University of Limerick
ULKC	University of Limerick Kayak Club
ULSU	University of Limerick Students' Union
UTC	Universal Co-ordinated Time

Feet	ft
Inches	ins
Kilogram	kg
Kilometres	km
Litres	lts
Metres	m
Millimetre	mm

Glossary of Terminology

Drop	Change in level of river downwards, usually over a waterfall between boulders and rocks
Portage	Walking kayak along the bank around obstacles
Put-in	The point on the river where kayakers are launched
Rapids	Sections of water with waves formed by rocks on riverbed
River-run	Planned river route for kayakers
Spray-deck	A waterproof apron worn by kayakers designed to clip around the kayak coaming in order to keep water out of the kayak's cockpit
Strainer	Tree branches in the current that allow water to flow through but trap a kayaker
Take-out	The point on a river where kayakers are taken out of water
Truck and Trailer	Kayaking beginners/intermediates paddling between leaders and seconds

Note: All times are local time = Co-ordinated Universal Time (UTC).

1. Updates to the Code of Practice: The Safe Operation of Recreational Craft (2017), (Marine Notice (MN) No.51 refers), were published in November 2019. The updates can be downloaded in electronic format at:
<https://www.gov.ie/en/publication/66ff7e-safe-operation-of-recreational-craft/>

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28th February 2023.

1. SUMMARY

- 1.1 On 2 November 2019 a group of 27 kayakers set out on a down-river trip of the Upper Caragh River, Co. Kerry. The kayakers consisted of experienced and beginner kayakers, split into three sub-groups. The first sub-group (sub-group 1) successfully navigated the river-run. The second and third sub-groups experienced difficulties. Two kayakers became distressed, and the emergency services were called. One kayaker was resuscitated but a second kayaker, who was trapped under a tree branch, was rendered unconscious and stopped breathing. The latter Casualty was recovered from the water, resuscitated and transferred to hospital but subsequently died.
- 1.2 Conclusions Part 5 of this report sets out the contributory factors that led to this outcome. In summary, the prevailing conditions including the features of the river were not suitable for all the members of the trip to manage safely. The trip was not properly assessed for the risks attached to the prevailing conditions and having regard to the skills and experience of the group taking part in what is a high-risk sport. The persons in charge of identifying and assessing the risks in advance, and on the day, were insufficiently trained and experienced themselves to be able to assess the risks given the combined factors of river conditions and the nature of the group. This arose as there was a lack of adherence to the University of Limerick Kayak Club (ULKC) Safety Statement and Trips Policy and Procedure which set out control measures, which led to a lack of accredited training, which in turn led to poor decision making. Had there been Canoeing Ireland (CI) qualified instructors available (or persons with recognisable equivalent training and experience) they would have identified that the group was too large and its makeup too inexperienced and would not have approved a trip that involved a group of beginners in those conditions, and/or, having embarked would have realised that the conditions being experienced were not suitable and would have terminated the trip.
- 1.3 The gaps in the Club safety environment were contributed to by the lack of any supervision/audit, or capacity to effectively supervise or audit, the safety of University students engaged in high risk activities by the University of Limerick Students' Union (ULSU), and by the absence of any overarching, agreed, and communicated, spheres of responsibility between the ULSU and University of Limerick (UL), leading to an environment at club level where there was a serious disregard of the ULKC Safety Statement 2014 and the Trips Policy and Procedure, and CI recommended standards.

2. FACTUAL INFORMATION

2.1 The Kayaks

A kayak is a small narrow boat propelled by means of a bladed paddle. The kayaks used by the group were of two types, type A and type B, as follows:

Type A:	ZET RAPTOR 8.6.
Builder:	Zet Kayaks.
Length Overall (LOA):	2.55 metres (m).
Breadth:	0.68 m.
Weight:	19 Kilogram (kg).
Volume:	303 Litres (lts).
Construction:	Roto-Moulded/Polyethylene.

This craft is an 8 feet (ft) 6 inches (ins) Kayak with spray deck designed for river descents.

Type B:	MAMBA 8.
Builder:	Dagger.
LOA:	2.44 m.
Breadth:	0.66 m.
Weight:	21 kg.
Volume:	235 lts.
Construction:	Roto-Moulded/Polyethylene.

This craft is an 8 ft kayak with spray deck designed for river descents.

See Appendix 7.1 - Photograph No. 1 Kayak Types and Models.

2.2 Incident Location

The Upper Caragh River is located on the Iveagh Peninsula, in County Kerry in southwest Ireland. The river has a water precipitation catchment system area of approximately 66 square miles. The River Caragh is lake fed and drains from

Lough Caragh to the sea in Dingle Bay. According to the rating made by Irish White Water (IWW) (www.iww.ie), it is graded a Grade 3 or Grade 4 river, meaning difficult to very difficult.

See Appendix 7.2- Incident Location.

- 2.2.1 The incident occurred in the latter part of a river descent in a river section, approximately 3.87 kilometres (km) in length upstream of Blackstones Bridge in an area of over-hanging vegetation and trees.

See Appendix 7.3 - River Trip Route and Incident Site.

See Appendix 7.4 - Photograph No. 2 The Incident River Section.

See Appendix 7.5 - Photograph No. 3 The Tree Bough.

See Appendix 7.6 - Plan of Incident Area - Satellite Image.

See Appendix 7.7 - Photograph No. 4 Location where Casualty 1 was Brought Ashore.

- 2.2.2 River Grades

Rivers are graded according to their difficulties for kayaking purposes. In describing levels of CI skills training/qualification and instructor training/qualification, ULKC purports to adhere to CI safety guidelines. IWW is a well-regarded website that records reports from kayakers on the conditions of rivers and is one of the tools commonly used by kayakers in planning a trip. The Upper Caragh River is recorded by IWW as a Grade 3-4, meaning Grade 3 (Difficult) with stretches of Grade 4 (Very Difficult) river. The river description is set out and where/how to evaluate the stretches. The descriptive terms used include “low hanging trees”, “rapids”, “a larger Grade 4 rapid”, “a meaty hole”.

Listed River Hazards are:

- *“The overhanging trees early on in the river*
- *Rocks on some of the rapids*
- *Potential for wire fencing to run across the river*
- *The big meaty hole on river right of Blackstones rapid”*

See Appendix 7.8 - Irish White Water - River Grades.

See Appendix 7.9 - Irish White Water - Upper Caragh River Description.

See Appendix 7.10 - Irish White Water - Gearhameen River Description.

The Code of Practice (CoP): Safe Operation of Recreational Craft (2017) Chapter 7, page 88 describes, in table form, the grades of river referred to by IWW from Grade I (Flat Water) to Grade V (Extremely Difficult) as illustrated in the Table of River Grades below.

Grade I: Flat Water	Water is stationary or extremely slow moving and without any obstructions.
Grade II: Moderately Difficult	The way down a river is clear but simple obstructions do exist. Small stoppers and small drops can be present. There are places where the flow accelerates. There is a choice of routes.
Grade III: Difficult	There is a route that is easily recognisable from the water. Waves can be irregular. Boulders and obstructions can be numerous. Stoppers and small eddies exist. Inspection is advisable.
Grade IV: Very Difficult	The route is not always clear and inspection is advisable. Rapids are continuous and breakouts are few and small. Stoppers are powerful. Continual manoeuvring with precise control and good decision making is required.
Grade V: Extremely Difficult	Inspection is essential because serious dangers can exist. Large drops, narrow passages, very complex boulder fields, ever changing water and difficult holes are characteristic of this grade. Difficulties are continuous.

2.3 Casualty Information

This was a very serious casualty resulting in two casualties, one of whom subsequently died in hospital and the other who required medical resuscitation and hospitalisation.

2.3.1 Location Information

Date: 2 November 2019.

Time: 14.25 hrs.

Position: Latitude 52.0073609° - Longitude -9.8710472°.

Location: Upper Caragh River Co. Kerry, 1.2 km upriver from Blackstones Bridge.

Boat Operation: River kayaking on Grade 3-4 river, Difficult to Very Difficult.

Location Factor: Obstacle in the river (tree bough).

Consequences: One fatality, one near fatality.

2.3.2 Environment Information

The Met Éireann estimate of weather between 06.00 hrs and 18.00 hrs local time was that a fresh to strong and gusty west to northwest airflow covered the area. Mostly cloudy with the odd limited bright spell breaking through the cloud. Rain occurred during the day with some heavy outbursts between 07.00 hrs and 12.00 hrs. Total rainfall was estimated at between 10 to 15 millimetres (mm). A yellow rainfall warning was issued by Met Éireann at 08.00 hrs, valid until 23.59 hrs and in operation for County Kerry on 2 November 2019.

Air temperature was 11 degrees Celsius (C) at 06.00 hrs but between 9 to 10 degrees C at 18.00 hrs.

See Appendix 7.11 - Met Éireann - Estimate of Weather Conditions.

See Appendix 7.12 - Met Éireann - Weather Alert.

2.4 Emergency Services Involvement

2.4.1 Irish Coast Guard (IRCG)

Reference: Glencar UIIN2241/19 - Situation Report (SITREP) One.

From Marine Rescue Sub-Centre (MRSC) VALENTIA Routine 02 1448Z Nov 19 to MRSC Valentia SITREP Group.

Day Time Group 02 1448Z Nov 19.

A - Identity of Casualty: Kayakers.

B - Position: 52°00.38'N 009°52.14'W.

C - Situation: Upturned Kayaker, Glencar.

D - Number of Persons: 2.

E - Assistance Required: Locate and Assist.

F - Coordinating RCC: MRSC Valentia.

G - Description of Casualty: 2 x Kayakers.

H - Weather on Scene: /Wind: 5, West.

/Air Temp: 8.7°C.

/Visibility: Good.

/Cloud Cover: Overcast.

/Precipitation: Slight.

/SitRep Weather-Time: 02 1433Z NOV 19.

I - Initial Actions taken: Tasked IVERAGH Coast Guard Unit (CGU).

K - Search Area: LICKEEN WOOD, Glencar.

L - Coordinating Instructions: Assist Health Service Executive (HSE) ground crew.

M - Future Plans: Incident Closed.

N - Additional information:

14.30 National Emergency Operations Centre (NEOC) request assistance with upturned kayaker in Glencar, tasked IVERAGH CGU.

15.00 IVERAGH CGU proceeding.

15.06 NEOC advise of a second Casualty at the same incident.

15.31 NEOC advise first Casualty in care of HSE, second Casualty in cardiac arrest.

16.24 IVERAGH CGU advise second Casualty in the care of HSE. IVERAGH CGU stood down and returned to base. Incident Closed.

See Appendix 7.13 - Irish Coast Guard SITREP.

2.4.2 Emergency Response (from various sources)

14.20 First Casualty observed under water in kayak (approximate time).

14.25 Call made to NEOC Limerick Ambulance service who tasked the IRCG and fire services.

14.39 Killorglin Fire Service tasked and responding.

14.51 Killorglin Fire Service Unit J1 at Blackstones Bridge rerouted to Glencar House.

14.53 Unit J1 at Glencar House met with Gardai in attendance.

14.57 Unit J1 assisting in resuscitation of first Casualty (**Casualty No. 1 in this report**).

- 15.01 Killorglin Fire Service Unit KY19 A1 at Glencar House.
- 15.02 HSE ambulance at Glencar House.
- 15.04 Air Ambulance at Glencar House.
- 15.06 Emergency services informed of second Casualty at scene (**Casualty No.2 in this report**).
- 15.15 Kayakers & Fire service administering Cardiopulmonary Resuscitation (CPR) on second Casualty.
- 15.17(E) Air Ambulance paramedics attending to second Casualty.
- 15.20 Iveragh CGU on scene.
- 15.58 First Casualty transferring to hospital via ambulance.
- 16.24 Second Casualty being transferred to hospital via air ambulance.

2.5 The Kayaking Group Details & Skills Levels

- 2.5.1 The kayaking group was on an organised outing from the ULKC and consisted of 27 kayakers. The group of kayakers was split into three sub-groups each comprising nine kayakers.
- 2.5.2 CI is the national accrediting body for paddle sports in Ireland and provides skills assessments and instructor accreditation which are set out in greater detail hereafter.

The ULKC Safety Statement 2014 (Academic year 2018-2019) provides:

Internal page 4: *“The governing body for canoeing and kayaking in Ireland is Canoeing Ireland, herein referred to as the CI. They provide training and instruction to all kayakers nationwide and provide course syllabi that must be followed by all ULKC instructors during courses, as well as all CI safety guidelines that will be adhered to by all ULKC instructors and experienced members.”*

At paragraph 2.1.3:

“Role of the ULKC Instructor

ULKC recognises that competent leadership by activity instructors is the most important safety factor of all. Instructors need to be able to safeguard the physical and psychological health of the people in their care.”

At paragraph 2.8.3.3.

“Group/Skills requirements

- *Groups size of no less than 3 people.*
- *There must be a ratio of 1:1 where there is one member who has passed proficiency assessments equivalent to the grade of water being paddled to one member who is less experienced.*
- *Instructors; different ratios apply to qualified CI or C BCU instructors (as outlined in the CI syllabus).*
- *Previous experience; in addition to proficiencies members need to ensure that there is sufficient experience in the group. Paddling members should have previous experience of similarly graded rivers.*
- *Level 4 paddlers and above, if willing have the option to adopt a 2:1 ratio of less experienced members to each Level 4 paddler on water no higher than Grade 3, i.e. 2 less experienced members to each Level 4 paddler.*
- *Surf Kayaking trips: One competent club paddler in order to borrow club gear. Surf conditions, weather conditions, location and paddler experience have to be taken into account by the Safety Officer. Two core committee members must be contacted. Safety Officer has last say on if trip goes ahead.”*

At paragraph 3.4:

“7. The Club adheres to all Canoeing Ireland recommendations regarding teaching ratios (1:8 - Beginners, 1:6 - Improvers).”

The ULKC Trips Policy and Procedure provides for trips as follows:

“These trips are limited by safety ratios on rivers, spaces in vehicles and general logistics of a trip organised by volunteers.Trips are also limited by the availability of Experienced River Leaders and Advanced Intermediate Paddlers known as Seconds. River Leaders are defined as a person who is competent to instruct and lead a group of intermediate/beginner paddlers down a river suited to their skill level. Leaders should have the relevant qualifications and experience as outlined (here and or in our Safety Statement). A Leader is to be a Level 4 standard as accredited by Canoeing Ireland or equivalent. A Second is defined as a person who is competent to look after themselves in Grade 3+ Water and be capable of assisting in a group with beginners present. A Second is to be a Level 3 standard as accredited by Canoeing Ireland or equivalent.”

See Appendix 7.14 - University of Limerick Kayak Club Safety Statement 2014 Edition.

See Appendix 7.15 - University of Limerick Kayak Club Trips Policy and Procedure (April 2018).

2.5.3 Each of the kayakers had individual and varying levels of kayaking competencies and skills, instructor and other qualifications and experience, summarised as follows and then set out in more detail by reference to each sub-group:

- Four of the kayakers were qualified by CI as Level 2 Instructors.
- Four of the kayakers had done their CI Level 2 instructor training (but were awaiting assessment with CI to qualify).
- 13 kayakers with Level 3 river kayaking skills qualifications (of whom four of these kayakers were the Level 2 qualified Instructors mentioned above).
- Three kayakers with Level 2 Kayaking Skills awards qualifications.
- 13 of the 27 kayakers were qualified with a Rescue Emergency Care (REC) Certificate for emergency procedures.
- 21 of the 27 kayakers were qualified with a River Safety and Rescue (RSR) Certificate for rescue procedures.
- 11 kayakers with no kayaking qualifications (eight of these kayakers had up to two years kayaking experience each and two were novice beginner kayakers).
- Ten of the kayakers had completed the 2019 Gene 17 Advanced Steep Creek Training Course.

2.5.4 **Sub-group 1 - comprising nine paddlers**

Leader No.1/1 Level 2 Kayak Instructor.
 Level 3 Kayak Skills.
 Paddling Grade 4 Rivers.
 RSR 2, REC 3.
 Four years' kayak experience including rivers in Ireland and Europe.
 Gene 17 - Advanced steep creek training in Italy 2019.

Leader No.2/1 Level 2 Kayak Instructor.
 Level 3 Kayak Skills.
 Paddling Grade 4 Rivers.
 RSR 2, REC 3.
 Six years' kayak experience including rivers in Ireland and Europe.
 Worked as sea kayaking guide/instructor summer 2019.
 Gene 17 - Advanced steep creek training in Italy 2019.

Second No.1/1 Level 2 Kayak Instructor.
Level 3 Kayak Skills.
Paddling Grade 4 Rivers.
RSR 2, REC 3.
Six years' kayak experience including rivers in Ireland and Europe.
Worked as sea kayaking guide/instructor since 2012.
Gene 17 - Advanced steep creek training in Italy 2019.

Second No.2/1 No CI skills grade.
RSR 1.
One and a half years' kayak experience.
Grade 3+ rivers in Ireland and Europe.

Intermediates

Kayaker No.1/1 One and a half years' kayak experience including Grade 3 rivers in Ireland and Europe.

Kayaker No.2/1 No CI skills grade.
Two years' kayak experience, Grade 3 rivers in Ireland.
RSR 1.

Kayaker No.3/1 Level 2 Kayak Skills.
Eight years' kayak experience, Grade 2 rivers in Ireland.

Beginners

Kayaker No.4/1 No CI skills grade.
RSR 1.
One year's experience on Irish rivers.

Kayaker No.5/1 No CI skills grade.
One year's experience on Irish rivers.

Sub-group 2- comprising nine paddlers

Leader No.1/2 Level 3 Kayak Skills.
Paddling Grade 4 Rivers.
RSR 2, REC 3.
Four years' kayak experience including rivers in Ireland and Europe.
Gene 17 - Advanced steep creek training in Italy 2019.

Leader No.2/2 Level 2 Kayak Instructor training.
Level 3 Kayak Skills.
Paddling Grade 4 Rivers.
RSR 2, REC 3.
Three years' kayak experience including rivers in Ireland and Europe.
Gene 17 - Advanced steep creek training in Italy 2019.

Leader No.3/2 Level 2 Kayak Instructor training.
Level 3 Kayak Skills.
Paddling Grade 4 Rivers.
RSR 2, REC 3.
Three years' kayak experience including rivers in Ireland and Europe.
Gene 17 - Advanced steep creek training in Italy 2019.

Second No.1/2 Level 3 Kayak Skills.
Paddling Grade 4 Rivers.
RSR 2, REC 3.
Ten years' kayak experience including rivers in Ireland and Europe.

Intermediates

Kayaker No.1/2 Level 2 Kayak Skills, one year's experience on Irish rivers.
RSR 1.
(Casualty No. 2, deceased).

Kayaker No.2/2 No Grade.
One year's kayak experience including Grade 3 rivers in Ireland and Europe.
RSR 1.

Kayaker No.3/2 No CI skills grade.
One year's kayak experience, including Grade 3 rivers in Ireland and Europe.
RSR 1.

Beginners

Kayaker No.4/2 No CI skills grade.
Training at Castleconnell.
RSR 1.

Kayaker No.5/2 No CI skills grade.
Two years' kayak experience, Grade 3 rivers in Ireland.

Sub-group 3 - comprising nine paddlers

Leader No.1/3 Level 2 Kayak Instructor training.
Level 3 Kayak Skills.
Paddling Grade 4 Rivers.
RSR 2, REC 5.
Expedition Medic (Pre-Hospital Care Council registered practitioner at Emergency Technician Level).
Five years' kayak experience including rivers in Ireland and Europe.
Gene 17 - Advanced steep creek training in Italy 2019.

Leader No.2/3 Level 2 Kayak Instructor.
Level 3 Kayak Skills.
Paddling Grade 4 Rivers.
RSR 2, REC 3.
Seven years' kayak experience including rivers in Ireland and Europe.
Gene 17 - Advanced steep creek training in Italy 2019.

Second No.1/3 Level 2 Kayak Instructor training.
Level 3 Kayak Skills.
Paddling Grade 4 Rivers.
RSR 2, REC 3.
Three years' kayak experience including rivers in Ireland and Europe.
Gene 17 - Advanced steep creek training in Italy 2019.

Second No.2/3 Level 3 Kayak Skills.
Paddling Grade 4 Rivers.
RSR 2, REC 3.
Three years' kayak experience including rivers in Ireland and Europe.
Gene 17 - Advanced steep creek training in Italy 2019.

Second No.3/3 Level 3 Kayak Skills.
Paddling Grade 4 Rivers.
RSR 2, REC 3.
Three years' kayak experience including rivers in Ireland and Europe.
(Casualty No.3, rescued from tree - no injuries).

Intermediates

Kayaker No.1/3 Level 3 Kayak Skills.
Paddling Grade 3 Rivers.
RSR 2, REC 3.
Three years' kayak experience including rivers in Ireland and Europe.
(Casualty No.1, resuscitated at scene and hospitalised).

Beginners

Kayaker No.2/3 No CI skills grade.
Level 2 Kayak Skills course.
Beginner from September 2019.

Kayaker No.3/3 Level 2 Kayak Skills.
One year's experience on Irish rivers.
RSR 1.

Kayaker No.4/3 No CI skills grade.
Beginner from September 2019.

The above CI qualifications are explained in greater detail later in the report. The additional qualifications are as follows:

- River Safety and Rescue Certificate (RSR) Levels 1 - 3.
- Rescue Emergency Care (REC) Certificate Levels 1 - 5.
- Gene 17 - Advanced steep creek training in Italy 2019.
- Beginners - Weekly pool training and/or open water training on River Shannon behind College (out-back) and on Grade 2/3 section at Castleconnell, Shannon River.

CI note that RSR Level 2 is a Grade 2 river qualification. RSR Level 3 would be the more suitable qualification for people paddling Grade 3 or higher rivers. The Gene 17 course is not recognised by CI who note that it may have been a bespoke course for ULKC and while arguably it could be equivalent to Level 4 Skills certification, it would not be equivalent to CI Level 4 Instructor certification.

2.6 Safety Practices, Guidelines and Rules

2.6.1. The CoP was published by the Department of Transport, Tourism and Sport in 2017 (with updates in 2019). It is a code of practice for the safe operation of recreational craft. This guidance was prepared with the assistance of CI, CH Marine Ltd., Inland Waterways Association of Ireland, Irish Sailing Association, Water Safety Ireland (now Irish Water Safety), Maritime and Coastguard Agency UK, Met Éireann, Royal National Lifeboat Institution and Waterways Ireland. While not mandatory in terms of legal enforceability, it is a code that encourages compliance with safety recommendations. Kayaks are recreational craft. The Recreational Craft EU Directive (DIRECTIVE 2013/53/EU OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 20 November 2013 on recreational craft and personal watercraft and repealing Directive 94/25/EC²) defines “recreational craft” as any watercraft of any type, excluding personal watercraft, intended for sports and leisure purposes of hull length from 2.5 m to 24 m, regardless of the means of propulsion. So, the Type A kayaks are within the scope of the Directive being more than 2.5 m in length. However, Article 2 of the Directive limits the scope of the Directive so that, with regard to the design and construction requirements set out in Part A of Annex I, it does not apply to the following products:

- (i) watercraft intended solely for racing, including rowing racing boats and training rowing boats, labelled as such by the manufacturer;
- (ii) canoes and kayaks designed to be propelled solely by human power, gondolas and pedalos;

2.6.2 Chapter 7 of the CoP sets out recommendations for canoeing/kayaking. In the case of training, the CoP recommends that recognised training courses be undertaken so that participants are completely familiar with relevant rescue/recovery drills and notes that CI has a comprehensive training and accreditation scheme which covers river kayaking, sea kayaking and open canoes. Chapter 7, paragraphs 7.1 to 7.6 apply specifically to Canoeing/Kayaking and Safety Guidelines. Among other matters it includes the following:

“River kayaking ranges from touring on slow moving Grade 1 water in either open canoes or recreational kayaks, to the more extreme white water river running, which can include white water rapids, waterfalls and features such as stoppers and undercuts. Freestyle kayaking is at the more extreme end of the canoeing spectrum. Trained and competent persons only should attempt this activity.

In addition to the basic safety precautions mentioned previously, operators should observe the following additional checks and advice:

2. Official Journal of the European Union L 354/95
<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32013L0053&rid=9>

Potential courses should be studied for hidden dangers, snags, currents, etc., prior to putting boats in the water;

Be aware of the river's grading and of the water level before committing. The different grades are listed in the Table on the following page.

The CI website has more detail on the levels of river grading (<http://canoe.ie/rivergrading-and-area-definitions>).

- Be particularly cautious during flood water conditions.*
- Inspect unknown drops before running them; be aware that drops may change or that new hazards may have formed (e.g. fallen trees, etc.). Set up bank based rescue, where appropriate.*
- Consult Waterways Ireland Marine Notices and lockkeepers for local information.*
- Kayaking groups making descents on remote rivers of Grade 3 and higher should carry registered Personal Locator Beacons (PLBs). This will enable early alerting of the rescue services in the event of an emergency.*
- In rivers of a high flow rate, with extended periods of rapids, it is recommended that kayaking groups should consider using waterproof radios to allow communication between group members when line of sight is not possible.”*

See Appendix 7.16 - Code of Practice: The Safe Operation of Recreational Craft (2017) Chapter 7 - River Grades.

2.7 Canoeing Ireland Training and Accreditation Schemes

2.7.1 CI is recognised by the Irish Sports Council and the Olympian Federation of Ireland as the governing body of the sport and recreation of canoeing and paddle sports in Ireland and is affiliated to the International Canoe Federation (ICF) and the European Canoe Association. It is an acknowledged contributor to the CoP. The level of qualification CI considers appropriate is described as “*recommended*”. It has no statutory remit and qualifications are not mandatory except within its own regime. As noted at Section 7.1 of the CoP, CI has a comprehensive training and accreditation scheme which covers river, sea kayaking and open canoes.

2.7.2 CI makes a distinction between Sea as compared to River qualifications. The reason for the classification system adopted by CI is as follows:

“The main reason for the classification system we use when defining the scope of our awards is to promote safe practice both at personal skills level and as Instructors in any of the disciplines. It is our view that Sea and River are two entirely separate disciplines, thus our training and assessment scheme reflects

that difference.”

“While some of the skills are transferrable across the two disciplines, there is a requirement for an individual to be trained and assessed for the specific environment in which they are paddling in order to comply with our safety guidelines.”

2.7.3 CI have identified the criteria for each type of activity and the reasons for the difference in their training and qualifications regime as follows:

“The difference between River and Sea Awards is quite distinct. For example, the kayaks themselves, have substantial differences in how you paddle, operate and rescue them. River or whitewater kayaking takes place on fresh water with challenges such as rapids, boulders, drops, stoppers etc. to navigate. Sea kayak training focuses on wind, weather and tides.”

2.7.4 The following is an extract from CI’s website under the section “Education” “Instructor and Coach Qualifications”. As can be seen, this summarises instructor qualifications accredited by CI and in the case of river kayaking, categorises the competencies of the levels of instructor as follows:

Level	Qualification	Can assess for	Instruction Ratio
Level 1 Instructor	Qualified to lead and teach groups of kayakers on flat water within close proximity of their launch point.	Can assess for Level 1 Skills Awards.	Instruct on flat water with a ratio of 1:6. Instructors and participants must stay within 300 metres of launch site
Level 2 Instructor	Qualified to lead and teach on flat water journeys on inland and sheltered waters that remain close to bank/shore.	Can train and assess for Level 1 and 2 Skills Awards.	Instruct on flat water with a ratio of 1:6. Journeying on flat water allowed.
Level 3 Instructor	Qualified to lead and teach groups on Grade II rivers.	Can train and assess for Level 1 – 3 Skills Awards.	Instruct on flat water with a ratio of 1:8. Instruct on Grade II rivers with a ratio of 1:6.
Level 4 Instructor	Qualified to lead and teach groups on Grade 3 and advanced white water	Can train and assess for Level 1 – 4 Skills Awards.	Operate within any of the ratios above. Instruct on water above Grade II with a ratio of 1:4.
Level 5 Instructor	Qualified to lead and teach groups on Grade IV and above white water. As well as in advanced conditions	Can train and assess for Level 1 – 5 Skills Awards.	Operate within any of the ratios above. Instruct on water above Grade 3 with a ratio of 1:4.

2.7.5 The CI skills qualifications are different to Instructor skill and are described as follows:

Level 1	Fundamental Kayaking skills on flat water.
Level 2	Basic Kayaking skills for Grade I water.
Level 3	Intermediate Kayaking skills on Grade II water as part of a group.
Level 4	Advanced Kayaking and Safety skills on Grade III rivers with a group of peers.
Level 5	Advanced Kayaking and Safety & Rescue skills on Grade IV and advanced white water.

See Appendix 7.17 - Canoeing Ireland Kayaking Skill Levels and Awards - Level 1 to 4 - Requirements and Syllabi.

See Appendix 7.18 - Canoeing Ireland - Instructor Level 1-4.

See Appendix 7.19 - Canoeing Ireland River Safety and Rescue Course Description.

See Appendix 7.20 - Canoeing Ireland Rescue and Emergency Care Course Description.

CI have commented that Level 2 Kayak instructor is not directly relevant as it is for leading and instructing groups in flat water. The training does not cover safety and rescue techniques for advanced dynamic water environment as encountered on the river on 2 November 2019. The Level 3 Kayak skill certifies that the person is competent to paddle Grade 2 rivers as a member of a group of peers, but not with a group of lesser ability.

2.8 Safety Equipment and Protective Clothing

Each kayaker wore safety equipment which comprised:

- Personal Flotation Devices (PFDs) rated at 55 newtons, CE marked and to ISO 12402-5:2006. These type of flotation devices are designed for good swimmers and for use near to a riverbank or shore where help is close at hand in accordance with Appendix 5 of the CoP.
- Safety Helmets - PEAK UK Predator Centre Helmet - CE marked and approved.

The clothing worn by Casualty 2 (the deceased Kayaker) comprised:

- Shoes: Converse/Vans (Canvas Shoes).
- Socks: No socks.
- Outerwear: Club Wetsuit (CrewSaver Centre 3.5 mm Wetsuit, new 2019).
- Club overcoat: Splash Cag (Yak) - for wind protection and worn over wetsuit.
- Underclothes: Polyester and/or Fleece layers.

3. NARRATIVE

The University of Limerick Kayak Club

3.1 ULKC is an autonomous club which operates under the ULSU and has been in operation in UL since 1975. ULKC is affiliated with CI (www.canoe.ie) and the ICF (www.canoeicf.com). At the time of the incident, it operated the Common Constitution for University of Limerick Clubs and Societies (February 2012 with adopted additions in 2015).

3.2 ULKC had at the time two documents that were applicable, the ULKC's Safety Statement 2014 (Academic year 2018-2019) (updated in November 2018) and a Trips Policy and Procedure (April 2018) which describe the Club's philosophy about trips.

See Appendix 7.14 - University of Limerick Kayak Club Safety Statement 2014 Edition.

See Appendix 7.15 - University of Limerick Kayak Club Trips Policy and Procedure (April 2018).

The Club adopts a "Challenge by Choice" philosophy in all its activities, thus students are never pushed beyond their limits allowing full participation at the discretion of the participants own knowledge of the risks involved. CI observes that while this is a philosophy that is widespread within the outdoor sector, it calls into question how beginners/novices could provide informed consent unless they were fully advised of all risks to be able to make an accurate risk calculation based on likelihood versus consequences. The ULKC Safety Statement 2014 provides at internal Page 4 that *"The governing body for canoeing and kayaking in Ireland is Canoeing Ireland, herein referred to as the CI. They provide training and instruction to all kayakers nationwide and provide course syllabi that must be followed by all ULKC instructors during courses, as well as all CI safety guidelines that will be adhered to by all ULKC instructors and experienced members."*

3.3 Paragraph 3.2 of the ULKC Safety Statement states - *"Kayaking/Canoeing is deemed a high-risk activity."* Paragraph 3.1 of the ULKC Safety Statement 2014 headed *"Kayaking/Canoeing Hazards"* recognises a total of ten hazards identified as being associated with kayaking and canoeing activities. These are:

- *"Drowning*
- *Injury from equipment or capsizing (concussion etc.)*
- *Separation of person from kayak/canoe*
- *Manual handling injury*
- *Capsizing and entrapment*
- *Slips, trips and falls*

- *Collisions*
- *Weather and conditions*
- *Hypothermia*
- *Bacterial and viral infections (i.e. leptospirosis)*

Five of these hazards were present during the incidents occurring during this river trip. These particular hazards are:

- Drowning.
- Separation of person from kayak/canoe.
- Capsizing and entrapment.
- Hypothermia.
- Weather and conditions.

3.4 The ULKC Trips Policy and Procedure states:

“Trips are also limited by the availability of Experienced River Leaders and Advanced Intermediate Paddlers known as Seconds. River Leaders are defined as a person who is competent to instruct and lead a group of intermediate/beginner paddlers down a river suited to their skill level. Leaders should have the relevant qualifications and experience as outlined (here and or in our Safety Statement). A Leader is to be a Level 4 standard as accredited by Canoeing Ireland or equivalent. A Second is defined as a person who is competent to look after themselves in Grade 3+ Water and be capable of assisting in a group with beginners present. A Second is to be a Level 3 standard as accredited by Canoeing Ireland or equivalent.”

Both CI and the Marine Casualty Investigation Board (MCIB) read the following sentences from the above section, as referring to CI Skills rather than Instructor levels: *“A Leader is to be a Level 4 standard as accredited by Canoeing Ireland or equivalent.”*..... *“A Second is to be a Level 3 standard as accredited by Canoeing Ireland or equivalent.”* CI also considered the following sentence to be confusing: *“A Second is defined as a person who is competent to look after themselves in Grade 3+ Water and be capable of assisting in a group with beginners present”* as CI do not currently have a leader award for moving water and Leading and Instructing lesser skilled paddlers is not included in the CI Level 4 Skills Award. CI note that under their guidelines, a person competent to look after themselves in Grade 3+ rivers would be a person with Level 4 Skills, not a Level 3 as stated in the sentence that follows: *“A Second is to be a Level 3 standard as accredited by Canoeing Ireland or equivalent.”* Seconds therefore should have Level 4 Skills to comply with the policy, which means that both Leaders and Seconds would all be Level 4 Skills with no requirement for CI instructor qualifications. The lack of clarity is added to by the terminology used in the ULKC Safety Statement 2014 extracts that are set out below, where there

is reference to qualified CI instructors, and Level 4 paddlers although the ULKC Safety Statement 2014 at page 42 correctly sets out the skills levels to river grade.

- 3.5 CI Level 4 Skills only provides for *“Advanced Kayaking and Safety skills on Grade III rivers with a group of peers.”* Clearly the group here were not *“peers”* as this was a mixed ability group. By contrast, the CI Level 4 Kayak Instructor would have had the following abilities:

“The Level 4 Kayak Instructor Qualification aims to enable candidates to:

- 1. Become qualified to instruct advanced kayaking skills and lead safe kayaking trips on Grade III/ IV water with groups of up to 4 students.*
- 2. Train and Assess for the Canoeing Ireland Levels 1, 2, 3 and 4 Kayak Skills Awards.*
- 3. Teach advanced River Safety and Rescue and run RSR 1, RSR 2 and RSR 3 Training Courses.*
- 4. Promote safe kayaking standards, foster further participation and improvement in kayaking standards.”*

As set out above, IWW recorded the Upper Caragh River as being a Grade 3 or Grade 4 depending on environmental conditions at the time of assessment, which would, according to CI guidelines, require groups (or up to four students) to be led by a Grade 4 Instructor. ULKC consider that standards applicable to CI instructors are being incorrectly referred to in this report when they did not apply to the Leaders on this trip. ULKC assert that the requisite numbers of Leaders and Seconds had the equivalent of CI Level 4 Skills. The Safety Statement 2014 refers to instructors in a number of places. The ULKC Trips Policy and Procedure, an extract from which is set out above, includes the following *“...River Leaders are defined as a person who is competent to instruct and lead a group of intermediate/beginner paddlers down a river suited to their skill level. Leaders should have the relevant qualifications and experience as outlined (here and or in our Safety Statement). A Leader is to be a Level 4 standard as accredited by Canoeing Ireland or equivalent.”* This issue is analysed in greater detail in part 4 Analysis.

- 3.6 Paragraph 2.3 of the ULKC Safety Statement is headed *“Personal Trip Safety Requirements”* and includes the following:

“.....Members must have the trip approved as a club trip by either the Captain and Safety Officer, or Captain or Safety Officer and one other committee member in verbal and or written form.

- *Members should comply with the guidelines 2.8.3.2, 2.8.3.3, 2.8.3.4, 2.8.3.5 and 2.8.3.6.”*

(2.8.3.2 and 2.8.3.6 deal with equipment which is not relevant here)

2.8.3.3 provides:

“Group/Skills requirements

- *Groups size of no less than 3 people*
- *There must be a ratio of 1:1 where there is one member who has passed proficiency assessments equivalent to the grade of water being paddled to one member who is less experienced.*
- *Instructors; different ratios apply to qualified CI or C BCU instructors (as outlined in the CI syllabus)*
- *Previous experience; in addition to proficiencies members need to ensure that there is sufficient experience in the group. Paddling members should have previous experience of similarly graded rivers.*
- *Level 4 paddlers and above, if willing have the option to adopt a 2:1 ratio of less experienced members to each Level 4 paddler on water no higher than Grade 3, i.e. 2 less experienced members to each Level 4 paddler.*
- *Surf Kayaking trips: One competent club paddler in order to borrow club gear. Surf conditions, weather conditions, location and paddler experience have to be taken into account by the Safety Officer. Two core committee members must be contacted. Safety Officer has last say on if trip goes ahead.*

2.8.3.4 River levels and weather

The river in question has to be assessed on the day and paddled ‘within its grade’. If the river looks high, the river grading may have to be adjusted upwards. This has to be reflected in group members’ proficiency levels.”

2.8.3.5 Outback sessions Solo paddling on Grade 1 directly behind the boat house (from below the rapids at Kilmurry to Corbally Bridge) is low risk both in terms of likelihood and magnitude of any dangers. Despite this we regard it as necessary to take a cautious step by requiring paddlers to go a step further in skills requirements by needing a minimum of level 3 proficiency and an RSR course (or equivalent).”

There are therefore three key aspects that must be taken into account; the

grade of the river on the day, the instructor qualification level, and the ratio of instructor/leader to less experienced persons.

3.7 Kayaker Competencies and Leader Selection.

Per the ULKC Trips Policy and Procedure “A River Leader is defined as a person who is competent to instruct and lead a group of intermediate/beginner paddlers down a river suited to their skill level”. MCIB learned from the ULKC river trip Leaders that the appointment of ULKC Group Leaders is based on their qualifications by having:

- Minimum of Level 3 (CI) Kayaking Skills.
- RSR certificate 2 (RSR 2) and REC certificate 3 (REC 3).
- Further competency training, for example ULKC have engaged with the Gene 17, a three day course comprising advanced steep creek training course in Italy and a three day White Water Techniques Course (www.gene17kayaking.com).
- Regularly paddled Grade III and Grade IV rivers and are usually 3rd and 4th year UL students.

3.8 CI Level 3 Kayak Skills award enables the kayaker to safely and competently kayak on rivers up to and including Grade 2 as a member of a group of peers. The Level 4 Kayak Skills award enables the kayaker to safely and proficiently paddle on rivers up to and including Grade 3 rivers as part of a group of peers.

3.9 Four ULKC Leaders on this river trip were CI qualified as Level 2 Instructors. Level 2 qualification is considered by CI to be in the ‘Beginner Instructor’ category and enables the instructor to instruct basic kayaking skills and lead kayaking journeys on flat water with groups of up to six students.

3.10 The CI Level 2 Kayak Instructor Qualification requires that the Level 2 Instructor must have successfully completed a 32 hour, eight module, Level 1 Kayak Instructor Training Course and Assessment and completed logbook requirements prior to taking the Level 2 Kayak Instructor training course and a half day Level 2 assessment by CI. According to CI, the option outlined here is the pathway usually undertaken by people who are engaged in a long-term education programme or instructor training at Quality and Qualifications Ireland (QQI) level five and six. The general aims of the Level 2 Kayak Instructor qualification are to enable successful candidates to:

- Become qualified to instruct basic kayaking skills and lead kayaking journeys on flat water with groups of up to six students.

- Train and assess for the Levels 1 and 2 Kayak Skills Award.
- Teach basic flat water Safety and Rescue and run RSR 1 training courses.
- Mentor Level 1 and 2 Kayak Instructor trainees.

3.11 For a Level 2 Kayak Instructor the CI definition of flat water operating areas is described as “*Very Sheltered Inland Water*” and further defined for Rivers as being “*Sections of slow moving rivers that do not include rapids or weirs.*” In summary, a Level 2 Kayak Instructor is qualified under the CI awards scheme to:

- Lead and teach on flat water journeys on inland and sheltered waters that remain close to the bank/shore.
- Train and assess students for Level 1 and Level 2 Skills Awards.
- Instruct students on flat water with a ratio of 1:6.

By contrast, CI sets out the following to qualify as a Level 4 River Instructor:

“The Level 4 Kayak Instructor Qualification requires that a candidate attend a registered four day Level 4 Kayak Instructor training course and a one day assessment.

Applying to attend a Level 4 Kayak Instructor Training Course

Before applying to attend a Level 4 Kayak Instructor Training Course a candidate must

1. *Be currently registered with the Canoeing Ireland Office as a Level 3 Kayak Instructor.*
2. *Have completed Level 5 Kayak Skills Training.*
3. *Have unrestricted access to a suitable kayak, personal equipment and additional equipment as listed for the Level 5 Kayak Skills award.*
4. *Be at least 18 years of age at the time of application.*
5. *Be registered as a member with the Canoeing Ireland.*
6. *Complete a course application and return to Canoeing Ireland office.*
7. *Submitted your Garda vetting form.*

Candidates will only be invited to attend an assessment on the satisfactory

attainment of Level 5 Kayak Skills award and hold the Level 3 Kayak Instructor qualification for at least one year.

Before applying to attend a Level 4 Kayak Instructor Assessment, a candidate must:

- 1. Be a Level 3 Kayak Instructor for a minimum of one year.*
- 2. Be currently registered as a member with Canoeing Ireland Training & Development Unit.*
- 3. Hold the Level 5 Kayak Skills award.*
- 4. Attend two Level 4 Kayak Skills Training Courses.*
- 5. Attended two Level 4 Kayak Skills Assessments.*
- 6. Attend two RSR 3 courses*
- 7. Participate in five Irish Canoeing Competitions or hold two Level 3 Skills Awards in other disciplines, or hold a Level 4 Skills Award in another discipline.*
- 8. Be at least 18 years of age at the time of application.*
- 9. Have unrestricted access to a suitable kayak, personal equipment and additional equipment as listed for the Level 5 Kayak Skills award*
- 10. Possess a current Canoeing Ireland approved First Aid Certificate (REC 3 or equivalent)*
- 11. Have completed a Sport Ireland approved Child Protection Awareness Workshop.”*

See Appendix 7.17 - Canoeing Ireland Kayaking Skill Levels and Awards- Level 1-4 - Requirements and Syllabi.

- 3.12 The ULKC river trip Leaders advised that all the Leaders (four of whom had Level 2 Instructor qualifications and four who had completed the training but had not been assessed) on the trip to the Upper Caragh River on 2 November 2019 considered that, having attended the Gene 17 Advanced Steep Creek training course, they would pass a CI Level 4 Skills assessment. The Club Leaders viewed this as a level of higher competency enabling them to paddle higher grade rivers. Ten of the river trip Leaders and Seconds had completed the Gene 17 training in Italy earlier in 2019. There is no written record maintained of these skills nor is there any audit system in the Club.

3.13 Two of the Leaders had applied to CI to be assessed to the CI Level 4 Skills award. Reasons given by the Leaders for not getting assessed by CI included:

- Difficulty experienced in getting on an assessment day from CI.
- Finding time off college to do the assessment.
- Cost involved.
- Perceived lack of relevance of the Level 4 Grade to their (ULKC) kayaking activities.

3.14 CI have noted that Level 4 Skills (personal competency) assessments are carried out according to the availability of white-water river conditions and are therefore weather dependent and notice of assessment dates is at short notice. White-water river conditions need to be at a level where the paddlers can be tested in the right but safe environment. When the levels are present there is usually no shortage of assessments available. Because Level 4 Skills assessments are weather dependent and therefore at short notice; assessments are, by necessity, advertised (on short notice) on social media and relevant websites. Depending on the prevailing weather and the river height levels, it is normal for these assessments to occur during autumn and winter.

3.15 On the day of the incident the following ULKC criteria were considered by the Leaders as having been met within the ULKC river trip group and complied with the ULKC Safety Statement:

- The ratio of persons with Level 3 Kayak Skills to Level 2 Kayak Skills grade/no grade was 1:1.
- All Leaders on the trip had Level 3 Kayak Skills and RSR and REC certificates.
- Ten of the Leaders and Seconds had completed the Gene 17 - Advanced Steep Creek Training Course in Italy earlier that year (2019) which the Leaders considered as being equivalent to CI Level 4 Skills standard.

The presence of CI Level 2 Instructors was not taken into consideration as it was considered irrelevant, and also considered that Leaders did not require to be instructors or have instructor qualifications. The group Leaders and Seconds stated that they all had experience paddling Grade 3 and Grade 4 rivers both in Ireland, UK and Europe. The European river experience was in Slovenia and the Italian Alps. Four of the group had paddled the Upper Caragh River in recent years prior to the incident, but not with the river at such high levels and with the state of flood experienced on that day.

- 3.16 As set out above, 13 of the 27 kayakers had Level 3 River Kayaking Skills qualifications (of whom four of these kayakers were Level 2 Instructors and another four who had done the CI Level 2 Instructor training). The remaining 14 included three kayakers with CI Level 2 Kayaking Skills, and 11 kayakers with no kayaking qualifications. The Trips Policy and Procedure provided that *“A Leader is to be a Level 4 grade competency standard as accredited by Canoeing Ireland or equivalent.”* The Level 2 Instructor was, according to CI accreditation, qualified to lead and teach on flat water journeys on inland and sheltered waters that remain close to the bank/shore, and could instruct on flat water at a ratio 1:6. On a Grade 3-4 river, instructors have to be Grade 4 Level or Grade 5 Level Instructors with a ratio of 1:4.
- 3.17 The ULKC Safety Statement also provided for ratios and required *“a ratio of 1:1 where there is one member who has passed proficiency assessments equivalent to the grade of water being paddled to one member who is less experienced.”* There were 13 kayakers with CI Level 3 Skills which meant they had Intermediate Kayaking skills on Grade 2 water as part of a group (although many reported that they had paddled on Grade 4 rivers). According to the CI skill descriptions the 13 kayakers with CI Level 3 Skills were not qualified on a Grade 3 river to “pair” with less experienced paddler. Even if the 13 had CI Level 4 Skills that would only have qualified them for *“Advanced Kayaking and Safety skills on Grade III rivers with a group of peers.”*
- 3.18 In addition to the foregoing analysis of instructor level and ratios, the groups should be assessed by reference to their individual makeup. While the ratio of CI Level 2 Instructor to kayakers in the entire group was four instructors to 23 kayakers, i.e. 1:6, however, three of the Level 2 Instructors were in sub-group 1; none were in sub-group 2 (there were two who had done the training). One of the Level 2 Instructors was in sub-group 3 (with two who had done the training). The division of persons with CI River Kayak Level 3 Skills was as follows:
- Sub-group 1 had three kayakers with CI Level 3 Skills.
 - Sub-group 2 had four kayakers with CI Level 3 Skills.
 - Sub-group 3 had six kayakers with CI Level 3 Skills.

River Grade and Weather Conditions

- 3.19 The Upper Caragh River is recorded on IWW as a Grade 3-4, meaning Grade 3 (Difficult) with stretches of Grade 4 (Very Difficult) river. The river description is set out and where/how to evaluate the stretches. The descriptive terms used include “low hanging trees”, “rapids”, “a larger Grade 4 rapid”, “a meaty hole”. Listed River Hazards are:
- *“The overhanging trees early on in the river*
 - *Rocks on some of the rapids*
 - *Potential for wire fencing to run across the river*
 - *The big meaty hole on river right of Blackstone rapids”.*
- 3.20 Met Éireann estimate of weather conditions that day was inclement with strong west to northwest gusty winds and recent rainfall and with a yellow weather alert in force. The river was swollen due to overnight rain and had flooded over its banks. As set out in more detail in the Analysis of this report, the weather changed the river from mostly Grade 3 to Grade 4. The ULKC Leaders assessed that the river could be treated as a lesser grade primarily as some of the sections would be “portaged”, i.e., kayaks are lifted out and carried along the bank around the obstacle and then re-launched into the river again on the other side of the obstacle. They assessed the river to be run, as safe for the experience levels of the members of the group. This assessment is analysed in part 4 Analysis.
- 3.21 The ULKC Safety Statement 2014 at internal page 42 states the following proficiency (skill) levels for ULKC kayakers and the local rivers they can paddle on:
- Level 2 - ability to kayak on Grade 1 river, i.e. out-back at Castleconnell.
- Level 3 - ability to kayak up to Grade 2 river, i.e. Rapids out-back, Castleconnell in low water.
- Level 4 - ability to kayak up to Grade 3 river, i.e. Castleconnell, Deel, Clare Glens in low water.
- Level 5 - ability to safely kayak advanced Whitewater, Grade 4 river, i.e. Glens in higher levels.
- 3.22 Paragraph 2.8.3.4 of the ULKC Safety Statement 2014 - River levels and weather, states:

“The river in question has to be assessed on the day and paddled ‘within its grade’. If the river looks high, the river grading may have to be adjusted upwards. This has to be reflected in group members’ proficiency levels.”

It also provides, at page 42:

“Make sure you have observed the following safety regulations:

- *The river is running **within its grade** (not too low, not in spate: if in doubt, consult safety committee)*
- *The **weather** is not likely to increase the grade of the river drastically*
- *The group members have the appropriate **proficiency levels***
- *The appropriate **ratios** have to be observed.”*

3.23 Selection of rivers for river trips: the ULKC river trip Leaders stated that suitable rivers for trips are selected using the following criteria:

- By river grading (Grade 1 to Grade 5).
- And additionally, by special knowledge acquired from Club members who have paddled the river before.

3.24 In general, Grade 3 rivers are chosen, and sections of river above the grade of the paddlers competency or that have obstructions (such as overhanging trees), are portaged.

The River Trip on 2 November 2019

3.25 The Leaders planned a methodology for the trip taking into consideration the ratio of beginners to experienced kayakers and the number of competent kayakers available as follows:

- Grouping: a river trip might be run as a singular group or with a number of sub-groups, or smaller, run with beginners/intermediates between Leaders and Seconds ‘truck and trailer’. However, on this particular river trip it was decided to run with three sub-groups, each comprised of a balance of beginners and Level 3 experienced kayakers (set out in detail above).
- White water/rapids river sections: Occasionally sections of white water or rapids would be run with beginner/intermediates rafted to a Leader/Second. Otherwise, these sections would be treated as an obstacle or a difficult section and portaged around (lifting out the kayaks and walking along the bank around the difficult section and then re-launching).

- If a section was considered too difficult it would be portaged.

The Leaders stated that they expected a Grade 2 - 3 river trip on the basis that the more difficult stretches of the river would be portaged and that they would exit before the more difficult final section. ULKC advise that there was no documented Trip Plan as provided for in Paragraph 2.3 of the ULKC Safety Statement (“.....*Members must have the trip approved as a club trip by either the Captain and Safety Officer, or Captain or Safety Officer and one other committee member in verbal and or written form.*”).

- 3.26 The ULKC river trip on 2 November 2019 was described in the ULKC calendar as “Week 8 trip” (the 8th week of the first term). The Week 8 trip involved an overnight journey away from Limerick and was at least the fourth trip of the college year and open to all members.
- 3.27 The region of County Kerry was selected as the 2019 venue and a group of 27 kayakers travelled on Friday night 1 November 2019 and stayed overnight at the Black Valley Hostel near Killarney which was well positioned for a choice of rivers the following day.
- 3.28 Local river levels were running high as there had been a heavy downfall of rain the night before. Weather was inclement and Met Éireann had a yellow rain alert in force for the Kerry area between 08.00 hrs and 23.59 hrs on 2 November 2019.
- 3.29 On Saturday morning 2 November 2019 the Leaders planned to look at the Upper Caragh River (approximately 1½ hours away by road) as one of the Leaders had paddled the river some weeks before and other members also had experience of it. It is described as being “*probably one of the best Grade 3 rivers in Ireland with the occasional stretch of Grade 4. This river requires plenty of recent rain to bring it up.*” River hazards included, “*overhanging trees early on in the river*” and “*Rocks on some of the rapids.*”

See Appendix 7.9 - Irish White Water - Upper Caragh River Description.

- 3.30 The Leaders planned the River Gearhameen situated close by Killarney for the second day of the trip. IWW rate this river as a Grade 3-4 river and describes it as “*mainly Grade three with some Grade four drops. There is a lot of flat sections, but these are broken by great whitewater*”. River hazards for the Gearhameen are described as “*Major pinning potential on slot drop*” and “*lots of trees.*”

See Appendix 7.10 - Irish White Water - Gearhameen River Description.

- 3.31 The IWW information on the Upper Caragh river grades it as a Grade 3 river with occasional stretches of Grade 4 sections. The IWW recommended put-in point is at Bealalaw Bridge. There is a particular warning about evaluating water height

at Blackstones Bridge (*“if the water is on the road upstream of the bridge its very height and the trees upstream will be a serious hazard”*). The Bealalaw Bridge has a river water level/height gauge installed. On arrival at Bealalaw Bridge the river level was found to be elevated. The Leaders used the bridge river water level gauge to assess the river height. On this day the river height was not up to the high end of gauge. No estimation of flow or water volume was usually made, and none was made on this occasion.

- 3.32 River conditions were considered by the instructor Leaders of the group who assessed that the river was suitable (as gauged from Bealalaw Bridge). The planning group expected Grade 2-3 river conditions despite the grades associated with this river, described in the IWW site on the basis that the more difficult stretches of the river would be portaged and that they would exit before the more difficult final section. At the outset the Leaders observed and discussed the condition of the river and were satisfied that it was safe for this group to kayak on that basis. A plan and methodology was developed for the downriver trip. The river conditions further downstream were not assessed at that time as the methodology adopted allowed for a pathfinding group to navigate the downriver section in stages, reporting back to the main body of conditions found and obstacles encountered. The Leaders considered that a comprehensive risk assessment was made for the Upper Caragh River trip.
- 3.33 After unloading all the kayaks and equipment some of the vehicles were transferred to the take-out point at Blackstones Bridge and parked up about 4.2 km downriver.
- 3.34 The kayaking group was sub-divided into three sub-groups, each with leaders, seconds, and novices. The composition of the three sub-groups is set out above together with the allocation of CI Level 2 Instructors. As noted above the key aspects of the ULKC Safety Statement was i) a mandatory *“ratio of 1:1 where there is one member who has passed proficiency assessments equivalent to the grade of water being paddled to one member who is less experienced.”* ii) *“Paddling members should have previous experience of similarly graded rivers.* iii) *Level 4 paddlers could adopt a 2:1 ratio of less experienced members to each Level 4 paddler on water no higher than Grade 3”*.
- 3.35 Sub-group 1 was considered by the Leaders to be a ‘strong’ group in that it was led by two Leaders qualified to Level 2 Instructor competency (and a Second also qualified to Level 2 Instructor) and who had completed the Gene 17 Steep Creek Training Course. The group included three kayakers with CI Level 3 Skills. The presence of CI Level 2 Instructors was not taken into consideration as it was considered irrelevant, and that Leaders did not require to be instructors or have instructor qualifications. The nominated Leader had paddled the river a few weeks previously and was familiar with the route. Sub-group 1 Leader was tasked to lead sub-group 1 and ‘path-find’ down the river and report the conditions ahead by mobile phone to the Leaders of the other two sub-groups.
- 3.36 Sub-group 1 launched and set off at approximately 10.45 hrs and immediately

encountered obstacles presented by over-reaching trees along the riverbanks. The kayakers lifted out and portaged around the obstacles and while doing so shouted back advising the other two sub-groups to portage until they had by-passed the tree obstacles.

- 3.37 After approximately another 30 minutes, sub-group 1 encountered rapids approximately 1 km downriver and the Leader/Seconds rafted up with the beginners and ran the rapids successfully. Sub-group 1 then paddled into the bank at the bend of the river, halted and waited until sub-group 2 (which included Casualty No.2) came into sight, meanwhile communicating with them by mobile phone. One of the Leaders of sub-group 2 walked across to sub-group 1 for a consultation regarding the grade of the rapids.
- 3.38 Sub-group 2 was sighted by sub-group 1 across the river bend moving down river. Sub-group 1 then paddled on and proceeded down river, keeping to the mid channel without incident until they came to the bridge at the Glencar Resort Hotel (Glencar, Co. Kerry, V93 EH95, hereafter called Glencar Resort) about 800 m downstream. Sub-group 1 then proceeded further down river (and thereafter were not involved with the events unfolding within the other two groups) but encountered more rapids and two of the novices capsized. The novices and their kayaks were recovered but shortly afterwards the sub-group 1 Leader found that the river water was faster flowing at that point and sub-group 1 got out and portaged to the vehicles at Blackstones Bridge, arriving there at approximately 14.15 hrs.
- 3.39 By this time some of sub-group 1 kayakers were cold. Although one of the group transport vehicles was parked up at Blackstones Bridge no one in the sub-group had keys for the vehicle. The cold kayakers were wrapped into bivvy bags to warm-up in the care of the Seconds while the Leader walked back along an overland track to Glencar Resort bridge. Subsequent interviews with the Leaders ascertained that novices wearing wetsuits often suffered from the cold. The more experienced kayakers, typically the Leaders and Seconds, who had kayaked for a number of years wore dry or semi dry pants and tops.
- 3.40 Sub-group 2 put-in to the river at Bealalaw Bridge at about 11.00 hrs. Sub-group 3 (which included Casualty No.1) followed shortly after and put-in to the river at about 11.20 hrs. Both sub-groups were behind sub-group 1 by approximately 15 minutes and 35 minutes respectively. Sub-group 2 had no CI Level 2 Instructors (it included two who had done the training) and had four kayakers with CI Level 3 Skills. Sub-group 3 had one Level 2 Instructor (with two who had done the training) and had six kayakers with CI Level 3 Skills.
- 3.41 Each sub-group (sub-group 1 and sub-group 2) paddled in turn to the early over-reaching trees obstacle section, the sub-group kayakers portaged around the tree obstacles, re-launched and then paddled until they arrived at the rapids approximately 1 km downriver. During this 1 km run downriver some of the

kayakers in both sub-groups became caught in riverbank undergrowth and trees and a number capsized. In all cases the capsized kayakers were recovered and all kayakers from both sub-groups headed for the riverbank above the rapids where they all got out.

- 3.42 In the case of sub-group 2, kayakers in this sub-group sighted sub-group 1 kayakers across the field of the river bend at the down-river end of the rapids. One of the Leaders of sub-group 2 walked across to sub-group 1 for a consultation regarding the grade of the rapids. After some discussion, the Leader instructed sub-group 2 to portage around the rapids a distance of approximately 900 m.
- 3.43 Before sub-group 2 started their portage to by-pass the 900 m section of rapids, sub-group 3 arrived on the scene. There followed a general discussion between the Leaders regarding the way to progress the river trip at this point. The Leaders of both sub-group 2 and sub-group 3 decided that some of them (the Leaders) would press ahead on the river and paddle the rapids while the rest of the Leaders and all the Seconds and novice kayakers of both sub-groups took the overland route and portaged. The sub-groups would rendezvous with their Leaders immediately below the rapids where sub-group 1 had previously waited after the river bend. This plan was followed without mishap and both sub-groups which had by now consolidated into one large sub-group assembled on the riverbank below the rapids and about 800 m from Glencar Bridge.
- 3.44 The Leaders of the consolidated sub-group (sub-group 2 and sub-group 3) now conferred with the leader of sub-group 1 by mobile phone to swap information about progress so far and the way ahead to the Glencar Resort bridge, a distance of approximately 800 m downriver. The plan settled on was that sub-groups 2 and 3 should stick to the centre of the river, that there was a left-hand bend, that they could get out on the right-hand side, and that the rapid was manageable and easy going. The instructions given to the consolidated sub-group by the Leaders were that the rapid had a left-hand bend and the centre line was recommended. There was an eddy identified on the right-hand side from where the group could exit the water. Presumably it was after this, sub-group 1 departed from the bridge and headed further downstream.
- 3.45 With this plan based on the information from sub-group 1, the consolidated sub-group joined together as a flotilla with some Leaders at the front. The group (with five Leaders, four Seconds, and nine others) followed down in pairs, “truck and trailer” fashion behind them (this is where a novice kayaker is followed by an experienced kayaker, Leader or Second). Two of the Leaders went ahead to set up a safety zone to help people ashore and another two Leaders were at the rear of the flotilla to help stragglers.
- 3.46 During this final run to the bridge at least six of the kayakers in the flotilla strayed from the middle of the river into the riverbank where they became

entangled in undergrowth and trees, some of them on more than one occasion. At least three of the kayakers capsized and exited their boats. As the flotilla rounded a left-hand bend in the river the kayakers experienced further difficulties in staying in the centre of the river away from the trees on the riverbanks. A situation rapidly developed where the two Leaders at the rear were attending to two of the kayakers entangled in trees while the rest of the flotilla spread out ahead. Three kayakers ended up in critical situations by getting caught in overhanging trees and capsizing in three separate incidents.

The Incidents

- 3.47 On the flotilla's (sub-groups 2 and 3) final run of the river trip from below the rapids to Glencar Bridge, three incidents occurred in quick succession which rapidly developed into serious situations.

Incident 1

- 3.48 Two kayakers, one paddled by a beginner/novice Kayaker accompanied by another kayak, paddled by an intermediate/novice Kayaker (**Casualty No. 3** who had been in sub-group 3 and who was a Second, had Level 3 Kayak Skills, been paddling Grade 4 rivers, had RSR 2, REC 3 and had three years' kayak experience including rivers in Ireland and Europe) were experiencing difficulties with the river current flow which was pushing them both towards the right riverbank as they approached the left-hand bend on this final stretch of the river. The beginner/novice was experiencing the most difficulty while the accompanying intermediate/novice Kayaker was giving advice to the novice on how to get out of the strong current flow. They were trying to turn their kayakers to the other side (river left) where the current flow was less powerful, but the intermediate/novice Kayaker was distracted by the difficulties experienced by the beginner/novice and inadvertently crashed into a low overhanging tree branch on the right riverbank, lost her paddle and while trying to extricate herself from the branch capsized the kayak.
- 3.49 The intermediate/novice Kayaker grabbed the tree branch and exited the capsized kayak which was taken away by the current. The Kayaker had her arms wrapped around the branch, with head and shoulders above the water but was unable to pull herself up on to the branch due to the force of the current flow dragging her legs and body underneath the branch. The Kayaker was stuck on the branch unable to pull herself out of the river.
- 3.50 An accompanying Leader, seeing the plight of the intermediate/novice Kayaker in the tree branches, exited his boat and managed to haul himself onto a group of branches that were just behind the immobilised Kayaker. He grabbed onto the Kayaker's buoyancy aid, waited until the intermediate/novice Kayaker had calmed down and regained some strength back before hauling her up onto the

tree branches. They both took a minute or two to catch their breath before climbing along the tree branch and making their way from the riverbank. Both kayaks were washed downriver, so the two Kayakers (1 Leader and 1 intermediate/novice Kayaker) then made their way overland towards the Glencar Resort bridge rendezvous.

Incident 2

3.51 This incident commenced when an Intermediate Level 3 Skills Kayaker (**Casualty No. 1**) spotted a kayaker with Level 2 Kayaker Skills stuck in some trees on the right side of the downriver side. Casualty No. 1 paddled over to assist the stuck Kayaker. Before he rendered assistance, he was instructed by one of the Leaders of the consolidated sub-group to continue on down with the flotilla and the Leader would attend to the stuck Kayaker. Casualty No. 1 had CI Level 3 Kayak Skills, had been paddling Grade 3 rivers, held RSR 2, REC 3 certificates and had three years' kayak experience including rivers in Ireland and Europe.

3.52 Casualty No.1 proceeded downriver but paddled too far over from the centre of the river and became quickly entangled in branches from an overhanging tree on the left side of the river. The kayak capsized and the paddle was caught in a branch. The Kayaker hung on to a branch of the tree with his body trapped in the boat. He tried to remove the spray deck and release himself, but the water pressure on the boat was too strong. When his head became submerged, he let go of the branch and floated free with the kayak in an inverted position. He did not have the strength to exit the inverted kayak and had no paddle with which to right himself.

See Appendix 7.3 - River Trip Route and Incident Site.

See Appendix 7.4 - Photograph No. 2 The Incident River Section.

See Appendix 7.5 - Photograph No. 3 The Tree Bough.

See Appendix 7.7 - Photograph No. 4 Location where Casualty No. 1 was Brought Ashore.

3.53 Just as he submerged, Casualty No. 1 recalls how he saw another Kayaker (whom he subsequently believed to be Casualty No. 2 from Incident 3 described below) becoming entangled and caught in the upstream side of the same branch. The Kayaker remembers being under the water about 30 seconds, during which time he tried desperately to pull himself up out of the water. After roughly 30 seconds he was unable to hold his breath any longer and started swallowing water into his stomach first and then into his lungs after which he lost consciousness.

3.54 Fortunately, the upturned hull of the kayak containing the unconscious Casualty No. 1 was spotted by the Leaders who had paddled ahead of the flotilla to set

up the safety zone at Glencar Resort bridge. They immediately set out to recover the upturned kayak which, by now was swept out from under the overhanging tree and was approximately 50 m downstream with the Kayaker inverted inside the kayak. The Leaders caught up with the drifting kayak and as a result found the trapped Kayaker who was by then, unconscious and not breathing when the rescuers brought him ashore on a grassy part of the right bank of the river; the opposite bank to the overhanging tree.

- 3.55 One of the Leaders called the emergency services. The call was timed at 14.25 hrs. The Leader stayed in direct contact with the operator at the NEOC and was able to inform it of the exact location of Casualty No.1. While doing so Incident 3 was unfolding and this Leader updated the NEOC as the seriousness of this incident became apparent and that there was another casualty (Casualty No. 2).
- 3.56 Casualty No. 1's situation was serious. ULKC rescuers initiated CPR and obtained a pulse and breathing but Casualty No.1 remained unconscious. The rescue party erected a storm shelter (a pop-up tent) and put Casualty No.1 inside in the recovery position while talking and encouraging him. The Casualty's wet clothing was removed, and he was wrapped in dry clothing, and he became responsive shortly afterwards. This was the situation when the crew from Killorglin Fire Service J1 unit arrived on scene at 14.57 hrs and when the Casualty was strong enough, he was brought to the ambulance at Glencar Resort about 500 m away.

Incident 3

- 3.57 As the upturned kayak (with Casualty No. 1 trapped in the kayak) was spotted, another Kayaker (Casualty No. 2) capsized above the overhanging tree bough and this Kayaker was swept by the current flow into the overhanging branches and became lodged around the tree bough. She was pinned to the bough by the strong flow of water. Casualty No. 2 was reported as having capsized on an earlier occasion. Casualty No. 2 had Level 2 Kayak Skills and one year's experience on Irish rivers, with an RSR 1 qualification. She had been in sub-group 2 before the groups were consolidated.
- 3.58 The Kayaker shouted for help and two of the experienced kayakers with ropes immediately went to assist her. Casualty No. 2 was pinned by the current against the horizontal bough of the tree at surface level. The Kayaker's head was above water, and she was calm and responding to the rescuers.
- 3.59 The kayaker rescuers tied ropes to the Casualty's buoyancy aid but efforts to pull her upwards failed as the ropes were only pulling the buoyancy aid upwards. The rescuers cut off the buoyancy aid and tied a rope sling under her arms. However, all attempts to pull the Casualty up and out of the water were unsuccessful as they could not get a good or firm purchase.

- 3.60 As the rescuers tired, they were relieved by others who renewed efforts to extricate the Kayaker. After about 20 minutes, Casualty No. 2 became unresponsive, and her head started to drop.
- 3.61 A decision was made to push Casualty No. 2 under the bough, and when this was done, she floated free and was pulled from the water on to the bank on the opposite side of the river (the left bank) where Casualty No.1 was being treated. Killorglin Fire Service J1 unit arrived on scene at 14.57 hrs.
- 3.62 Casualty No.2 was unconscious, not breathing and had no pulse. CPR was initiated immediately, and the kayaker rescuers were joined by a member of the fire service at 15.15 hrs. A member of the fire service asked one of the kayakers to get his defibrillator. When this arrived, it was used to monitor the presence of a heartbeat. Shortly afterward two paramedics from the Air Ambulance arrived with their defibrillator. They attached it and administered adrenaline. Shortly afterwards a heartbeat was detected, and the defibrillator was used which resulted in restoring a continuous beat. Casualty No.2's breathing was restored with the aid of an oxygen breather and some colour returned to her face. When the paramedics considered Casualty No. 2 was stable enough, she was put on a stretcher and carried over rough boggy ground for about 400 m to the air ambulance landing site and airlifted to hospital.

Events post incidents

- 3.63 Both Casualty No. 1 and Casualty No. 2 were transported by HSE emergency services to University Hospital Kerry, located in Tralee, for treatment. The remaining kayakers re-grouped at Glencar Resort, boarded their transport and returned to the Black Valley Hostel where the Leaders briefed them on the events that occurred. On return to the university campus the kayakers were offered counselling.
- 3.64 Casualty No. 1 was discharged from hospital later that week.
- 3.65 Casualty No. 2 died in hospital on Monday 4 November 2019. The cause of death is a matter for the coroner, the post mortem report records the death of Casualty No 2 “...*following cardiac arrest due to drowning in a kayaking accident.*”

4. ANALYSIS

4.1 Canoeing/Kayaking is a high-risk activity. The risks can be mitigated by good planning, having control measures in place, kayaker training and experience. The occurrence of this incident had a number of contributory factors which stretch beyond the morning of 2 November 2019 when ULKC embarked on its down-river trip on the Upper Caragh River. Working with young people, particularly in a water training environment, demands special skills and expertise, not just from the Leaders at the coal face, but also in the culture and ethos of the organisations promoting young people's engagement with sports. The incident contained two distinct events; firstly, the series of kayak capsizes occurring immediately prior to the incident and secondly the serious incidents involving two kayakers, Casualty No. 1 who capsized and was unable to exit his upturned kayak and Casualty No. 2 who exited her kayak and became entangled under a tree bough. Causative and contributory factors identified and analysed in this report extend beyond the decisions of the Leaders of the river trip to higher levels of the Club's safety culture and the guidelines and education provided by CI. Analysis of this incident will consider the relevant causative and contributory factors that arose from:

- Planning the river trip including risk assessment.
- Selection of and assessment of the river.
- Arrangements for the large group.
- Control measures in place.
- Kayaker training.
- Kayaker leader experience.
- Emergency actions around the incident.
- The safety environment.
- The regulatory/oversight environment.

Planning the River Trip Including River Assessment

4.2 The river trip on 2 November 2019 was at least the fourth trip away from the local UL area. The group of 27 kayakers stayed overnight near Killarney which was well positioned for a choice of rivers the following day.

4.3 The river trip planners did not carry out a formal or effective risk assessment for the river trip. Had the planners done so the following hazards would have been identified and risk assessed:

- Prevailing river grade on the day.
- Recent rainfall effect on river conditions.
- River rapids and overhanging tree branches.
- Inexperience of the beginner/novice kayakers.

- Winter environmental conditions and protective clothing.
- Effects of cold-water immersion.

Had there been a comprehensive risk assessment, it would have significantly affected the planning of this river trip and either re-directed the trip to a more suitable venue, altered the composition of the river trip groups, and/or the conduct during the river trip. The absence of a comprehensive risk assessment was a causative factor in the capsizing incidents.

- 4.4 CI does not grade rivers, and the CI website carries a direct link to IWW which has an online river guide, aimed at kayaking and canoeing enthusiasts. The site has river guides for many rivers all over Ireland, along with grades, ratings, descriptions of hazards, features and photographs. IWW (www.iww.ie) is an independent website. The website does not operate or record real-time conditions and rivers change with time and prevailing weather conditions. The site is considered a good tool when planning a river trip particularly when novice and beginner kayakers are involved and the website's river grades, hazards and descriptions are a good guide for planners. However, kayakers are advised to gauge the river on the day of their river trip as to its suitability to their skills level.
- 4.5 The IWW website grades the Upper Caragh River as a Grade 3-4 river and mentions a variety of hazards including overhanging trees. The grade usually refers to the difficulty in paddling and the extent of rapids and drops. There will be stretches of river with smooth water and with the higher water, many of the rapids would be less severe due to the depth. The day before the expedition there was heavy rain, a yellow rain warning in the locality was in place from 08.00 hrs to 23.59 hrs on 2 November 2019. This resulted in high water levels which overflowed the low-lying riverbanks and submerged the branches of trees. Objective assessment of river conditions such as flow/volume rate or height of river above normal are difficult to measure and without these metrics the assessment can only be subjective.
- 4.6 The Club operated under a Safety Statement and a Trips Policy and Procedure. The former outlined the training, quality of equipment and risk assessment and mitigation procedures to be followed. Of particular note were the following control measures to be followed from paragraph 2.8.3.4 of the Safety Statement:
- “The river in question has to be assessed on the day and paddled ‘within its grade’. If the river looks high, the river grading may have to be adjusted upwards. This has to be reflected in group members’ proficiency levels.”*
- 4.7 The Leaders first choice for the river trip was the River Gearhameen situated close to Killarney. IWW rate this river as a Grade 3-4 river and describes it as *“mainly Grade three with some Grade four drops. There is a lot of flat sections,*

but these are broken by great whitewater". River hazards for the Gearhameen are described as "Major pinning potential on slot drop" and "lots of trees". Local river levels were running high as there had been a heavy downfall of rain during the night and Met Éireann had an active yellow alert weather warning for the Kerry region on 2 November. The Leaders considered the River Gearhameen to be too high and the river also had many overhanging trees.

- 4.8 The Leaders planned the first day of the trip on the Upper Caragh River (approximately 1½ hours away by road) as one of the Leaders had paddled the river some weeks before and other members also had experience of it. It is described as being "probably one of the best Grade 3 rivers in Ireland with the occasional stretch of Grade 4. This river requires plenty of recent rain to bring it up." River hazards included, "overhanging trees early on in the river" and "Rocks on some of the rapids" (see Appendix 7.9 - Irish White Water - Upper Caragh River Description). The Leaders of the river trip were confident that the Upper Caragh River would be suitable for the river trip. The Leaders planned the River Gearhameen situated close to Killarney for the second day of the trip. IWW rate this river as a Grade 3-4 river and describes it as "mainly Grade three with some Grade four drops. There is a lot of flat sections, but these are broken by great whitewater". River hazards for the Gearhameen are described as "Major pinning potential on slot drop" and "lots of trees".

See Appendix 7.10 - Irish White Water - Gearhameen River Description.

- 4.9 Four of the group had paddled the Upper Caragh River in recent years, but not at such high levels and state of flood as experienced on that day. The decision to run the river was mainly influenced by the experience of members of the group who had paddled on this river before and the expectation that the difficulty levels would be the same. There were sections of the river that were Grade 2, and the intention was to portage around the more difficult sections. The planning group expected Grade 2 - 3 river conditions on the basis that the more difficult stretches of the river would be portaged and that they would exit before the more difficult final section, despite the grades associated with this river, described in the IWW site and outlined above. Even in low water a Grade 3 river would not become Grade 2. In fact, the lower water would expose more rocks and obstacles and may in fact make the river more technical and difficult to navigate for the novice paddler. Another factor in the planning of this trip was that due to the flooding of the river there were no eddies where normally a leader could wait to monitor and shepherd the less experienced kayakers past the river obstacles.
- 4.10 ULKC stated that the decision to proceed down the last stretch by the combined sub-group was based on the requirement that they should stick to the centre of the river, that there was a left-hand bend, that they could get out on the right-hand side, that the rapid was manageable and easy going, that the rapid had a left-hand bend and the centre line recommended, and finally, that there was an

eddy on the right-hand side that the group could exit the water from. At this point on the trip each of sub-groups 1 and sub-group 2 had paddled to the early over-reaching trees obstacle section, had portaged around the tree obstacles, re-launched and paddled until they arrived at the rapids approximately 1 km downriver. During this 1 km run downriver some of the kayakers in both sub-groups had become caught in riverbank undergrowth and trees and a number had capsized. The assessment by the Leaders of sub-group 1 of the last stretch before Glencar Bridge proved to be incorrect as in the event, experienced Level 3 Skills kayakers (in the following combined sub-group) had difficulty with the high flow rate of water due to the recent rain. Even the first (scouting) group found the river water was faster flowing than expected and they encountered more rapids with two of the novices capsizing and got out and portaged to the vehicles at Blackstones Bridge. ULKC acknowledge the presence of tree obstacles and that the high flow of water made those obstacles more dangerous once encountered. The river should have been considered by the river trip Leaders as a Grade 4 for the complete river run and the overall conditions should not have been considered suitable for a group of its size and mixed experience.

- 4.11 The river conditions on the Caragh River that day had advanced from the expected Grade 3 (Difficult) to the Grade 4 (Very Difficult) river conditions experienced that day. The planning group had not made plans for the Grade 4 river conditions and the difficulties experienced and were unprepared for the contingency of providing more supervision on the river trip and of a higher level. It appears that by having novices portage difficult sections the trip was designed to make it suitable for those who had completed the Gene 17 course in Italy that year and for novices. Even the CI Grade 3 skills qualification only qualified the person to kayak on a Grade 2 river.
- 4.12 In their observations on the draft report made to the MCIB, ULKC stated that in their opinion there *“were three basic factors which had to combine to create the serious incidents which occurred:*
1. *The presence of tree obstacles.*
 2. *High flow of water which made those obstacles more dangerous once encountered.*
 3. *Kayakers going off course from the middle of the river.”*

These factors, which related to the suitability of conditions were not correctly assessed. CI observe that portaging is not an easy exercise as it frequently requires kayakers to exit at very specific spots which can be a very difficult task, as is keeping to particular channels in a fast-flowing river.

- 4.13 Underestimating the grade of the Upper Caragh River, particularly after heavy rainfall had swollen river courses, was a causative factor in this incident. The river conditions experienced by the kayakers was a causative factor of the number of serious capsizing incidents that day. The river trip planners did not correctly gauge the river grade or conditions on the day. The river trip planners

did not re-assess the suitability of the conditions when the consolidated sub-group was allowed to proceed down the final stretch. This was a causative factor in the capsized incidents that day.

Instructor Levels and Skills Qualifications

4.14 ULKC requires CI recommendations to be followed. In the ULKC Safety Statement at page 4 it states: *“The governing body for canoeing and kayaking in Ireland is Canoeing Ireland, herein referred to as the CI. They provide training and instruction to all kayakers nationwide and provide course syllabi that must be followed by all ULKC instructors during courses, as well as all CI safety guidelines that will be adhered to by all ULKC instructors and experienced members.”* At paragraph 2.1.3, it states under Role of the ULKC Instructor *“ULKC recognises that competent leadership by activity instructors is the most important safety factor of all. Instructors need to be able to safeguard the physical and psychological health of the people in their care.”* CI, as set out above has important guidelines to note in relation to the skills levels and in the context of river grades, as follows:

- “• The skill level of the kayaker should be greater than the grade of river the kayaker can go on in a group without instruction, i.e., a Level 3 kayaker can canoe in a group on a Grade 2 river without instruction.*
- Instructor skill levels should be greater than the grade of river they are on, i.e., a Level 2 Instructor can instruct on Grade 1 river but not on a Grade 2 river.”*

The position of ULKC is that there is no requirement for an instructor qualification, that instructors are not required on trips, that leaders are what is required and are adequately skilled, and that in relation to CI Skills qualifications they may self-assess other courses as being equivalent.

4.15 The group Leaders and Seconds all had experience paddling Grade 3 and Grade 4 rivers in Ireland, UK and Europe. The European rivers were in Slovenia and the Italian Alps. The Leaders and Seconds had between three to six years paddling year-round experience in Irish and UK rivers from Autumn to Spring, and European rivers in the Summer. The intermediate paddlers had all paddled Grade 3 rivers. Two of the intermediate kayakers had worked as kayaking instructors/guides in Ireland. Four of the group had paddled the Upper Caragh River in recent years, but not at such high levels and state of flood as experienced on that day. While the Leaders and Seconds had Level 3 Kayak Skills Awards, they all had been paddling Grade 4 rivers for a number of years and the Leaders and four of the Seconds having completed the Gene 17 Steep Creek Course, were of the opinion that they had CI Level 4 Kayak Skills and exposure to Leadership skills. ULKC acknowledged that the Italian course is not equivalent

to CI level 4 Instructor but to the skills qualification. CI point out that there is significant difference in those qualifications.

- 4.16 As set out above, the Leaders of the group self-assessed that the trip complied with ULKC criteria and was considered by them to comply with ULKC Safety Statement 2014 because they determined themselves that the Leaders and Seconds had the requisite skills. CI have commented as follows on:

- “i) The ratio of persons with Level 3 Kayak Skills to Level 2 Kayak Skills grade/no grade was 1:1. CI observation: Level 3 paddlers were not paddling in the environment they are training in i.e. they were paddling in a Grade 3-4 river. Level 3 paddlers are trained to paddle Grade 2 rivers, and the personal skills awards does not address paddling with people who are of lesser ability.*
- ii) All Leaders on the trip had Level 3 Kayak Skills and River Safety and Rescue (RSR) and Rescue Emergency Care (REC) certificates. CI observation: Level 3 Skills would permit paddling on a Grade 2 river with peers. RSR is a personal skills award and does not train for leadership of lesser experienced paddlers. RSR2 teaches river safety and rescue skills on a Grade 2 river.*
- iii) Ten of the Leaders and four of the Seconds had completed the ‘Gene 17’ - Advanced steep creek training in Italy earlier that year (2019) which the Leaders considered as being equivalent to Canoeing Ireland Level 4 Skills standard’. CI observation: That would only qualify them to paddle on Grade 3 rivers with peers. CI have no way of evaluating the content, training or assessment of Gene 17 or any other non-national course.”*

- 4.17 As set out previously no regard was had to the presence, or the ratio, of Level 2 Instructors to Level 2 Kayak Skills grade/no grade students as ULKC did not consider any instructor qualification was required. CI observation in any case is: the presence of CI Level 2 Instructors had no relevance because the kayakers were on a river environment that is not covered in their training. Level 2 Instructor is a flat water instructorship and the ratio is 1:6 in flat water. This ratio has no bearing as they are not on flat water. Even a Level 4 Instructor would be outside of their remit at 1:6. In this environment, the ratio for Level 4 Instructor is 1:4 on the river as outlined in this report. It also appears that no regard was had to the requirement that even on a Grade 1 river, kayakers should have Level 3 Skills as set out in the Safety Statement.

- 4.18 During this investigation the MCIB consulted with CI, the national governing body for the sport, who explained the importance of identifying the nature of the river event:

“In recreational kayaking, there are two scenarios which are usually present:

***Scenario 1.** The paddle group are peers of equal ability, no designated leader/s but everyone plays a role in decision making and ultimately looks after themselves and the team if need be. There is a strong group dynamic. Peers will normally always paddle together as a team.*

***Scenario 2.** The group are of mixed abilities and are being led (shepherded) on the day. There will be designated Leaders. The group will be managed and guided on rivers that are suitable and safe. Designated Leaders should have had the required training and ability to carry out the tasks associated with this role.*

Instruction, leading and guiding are all covered under the Canoeing Ireland instructor training programmes. A Level 3 Instructor can lead, guide and instruct kayakers on Grade II rivers. A Level 4 Instructor can lead, guide and instruct kayakers on Grade III rivers and in some more advanced white-water environments.”

It is a very different event to go on the river in a group of equal peers but bringing a group with lesser abilities requires upper-level leadership, risk assessment and instruction skills. In short, CI recommendations mean that a group which has a mixed ability should have Leaders with instructor qualifications and that there should be a Level 4 instructor in a mixed ability group on a Grade 3 river. ULKC state that the policy on the required experience of group Leaders and ratios of experienced to less experienced kayakers is set out in the Safety Statement at paragraphs 2.8.3.3. That paragraph however makes specific reference to instructors: *“Instructors; different ratios apply to qualified CI or C BCU instructors (as outlined in the CI syllabus).”*

- 4.19 In the Safety Statement at paragraph 2.3 it also provides for CI instructors having the required first aid training.

Paragraph 3.4 which sets out control measures includes the following:

“3. All kayaking/canoeing participants will be assessed by the instructor/senior member after launching and only participants of capable abilities will be allowed to continue.

7. The Club adheres to all Canoeing Ireland recommendations regarding teaching ratios (1:8 - Beginners, 1:6 - Improvers).”

Paragraph 3.5 which sets out how instructors fit in to the Club structure provides:

“3.5 The Instructors

The kayaking/canoeing instructor has an important role in ensuring the safety of clients. The club aims to have a certain number of qualified CI instructors amongst their members. Trainee instructors or experienced members will be encouraged to follow REC 3 training. In addition to his/her responsibilities under Section 2.3 of the ULKC Safety Statement the kayaking/canoeing instructor should:

- a. Be trained and be sufficiently competent to coach members to the appropriate level.*
- b. Define a safe operational area on the water taking account of the nature of the activity, the ability of the group, water and weather conditions and the equipment available. Brief participants to stay at or within it.*
- c. Ensure that safety and rescue equipment appropriate for the activity is available.*
- d. Modify or curtail the activity if prevailing conditions are inappropriate for the customers or the planned activity.*
- e. Ensure that all on-water activities occurs only during official daylight hours.”*

4.20 The position of ULKC that instructors were not required is not consistent with the Safety Statement terms that require compliance with CI safety standards or with other references to the term “instructor” set out above. There is no content in the Safety Statement that explains the position of ULKC or refers to the self-assessment of non CI qualifications as being permissible. No qualified CI Instructors able to take members out on Grade 3 - 4 waters have been identified to the MCIB as being present in the Club at the time that the trip was planned and approved.

4.21 ULKC’s Trips Policy and Procedure does refer to the term ‘Leader’ and states that a Leader is to be of Level 4 competency standard as accredited by CI or an equivalent, he/she is to be competent “*to instruct and lead a group of intermediate/beginner paddlers down a river suited to their skill level*”. The Trips Policy and Procedure refers to Leaders and Seconds. The latter is to be a Level 3 CI standard or equivalent. There is no reference to persons with lesser skills being on trips. The Trips Policy does not refer to any variation in the content of the Safety Statement being permitted on a trip. It expressly states that “*Leaders should have the relevant qualifications and experience as outlined (here and or in our Safety Statement)*”. It cannot be the case that because the Club embarks on a trip that the requirements for safety set out in the Safety Statement can be set aside. The Trips Policy does not provide a basis

for what are accepted to be as self-assessed Leaders (without requisite instructor qualifications) taking out those with less than Level 3 CI Skills.

- 4.22 While the Leaders and Seconds were to CI Level 3 Skills standard and four had Level 2 Instructor qualifications (with four more having done the Level 2 Instructor training), the additional training and experience gained through engagement with the Gene 17 course of training pursued by the senior kayakers of ULKC was from a different competency assessment system and had no CI equivalence or recognition. It is accepted by ULKC that it is not equivalent to Level 4 Instructor level. The Level 3 Kayaking Skills qualification measures a kayaker's ability to handle himself/herself on the water and is also a good qualification for giving peer to peer paddling (intermediate kayaking skills on Grade 2 water as part of a group). Level 4 Instructor River Kayaking qualification is a significant step up from Level 2 Instructor qualifications (and from Level 3 Skills as it examines a person's ability to lead groups and make risk assessments on river conditions).
- 4.23 Had some of the Leaders passed a CI Level 4 Instructor River Kayaking Assessment the group may have decided not to run the river on that day. That, in turn raises a question as to the suitability of the criteria set out in the ULKC Safety Statement. The ULKC Safety Statement provides for *"a ratio of 1:1 where there is one member who has passed proficiency assessments equivalent to the grade of water being paddled to one member who is less experienced."* This requirement is not in fact consistent with CI skills qualifications, which only recognises the skills as applicable to paddling with peers, not juniors. It appears that ULKC does not require groups to be led by persons with CI Instructor level skills notwithstanding certain references that suggest they intend standards to comply with CI recommendations. That position has not altered since this casualty.
- 4.24 The assumption by ULKC senior kayakers (including Leaders and Seconds on this river trip) that their qualifications complied with the ULKC requirements was mistaken and a contributory factor in the incidents. Even if they were correct that Gene 17 was equivalent to CI Level 4 Skills, that evaluation should have been carried out by some objective method, probably in conjunction with CI. In any case it is a personal skills qualification to enable paddling on a Grade 3 river with peers, not leading/training those less experienced.
- 4.25 CI point out that as the Club is affiliated to it, that it expects its recommendations as to standards and safety practises to be adhered to. It does not accept that clubs can themselves determine what courses are or are not equivalent to CI training. CI emphasises the importance it places not just on the course content but on the hands-on training carried out by experienced kayakers, and in particular the importance of the fact that assessments are carried out by experienced kayakers who are very experienced in safety matters. CI is the accredited national body for kayaking in Ireland. It has in

place a specific process for recognition of qualifications which have been approved by international federations affiliated to the ICF, the international umbrella body. The Gene 17 course qualification is listed as leadership training provided by a commercial operator. This specific award does not appear on the framework of any of the international counterparts to CI. CI advise that there was no application to CI for recognition of this qualification prior to the incident. The proposition by ULKC that self-assessment of courses and qualifications is permissible can only create an entirely unregulated situation.

- 4.26 The skills shortfall for making a thorough risk assessment on the day highlighted the absence of adequate CI Level 4 Instructor River Kayaking in the leadership training amongst the Leaders. This shortfall resulted in several risk factors not being identified (particularly on that section of river after the bend which had trees on either side and, due to the flooding and high river levels, the presence of a number of ‘strainers’), which resulted in the three main capsized incidents. The absence of Leaders who were CI Level 4 Instructor River Kayaking qualified (or who had evaluated equivalent training) was a contributory factor in the incidents. The absence of such a requirement by ULKC was also a contributory factor.

Conduct of the Trip

- 4.27 The Upper Caragh River, river trip was planned for a mixed ability group of kayakers with reliance on the capabilities of the experienced paddlers as being able to shepherd the less experienced kayakers over the course of the river run.
- 4.28 The group comprised 27 kayakers which was considered to be a large group. The Leaders’ solution to managing the group was to split the 27 kayakers into three sub-groups each of nine kayakers and constitute a balance of experienced kayakers to intermediate/novice kayakers. The list of the sub-groups and their kayaker complement as set out above records that 13 of the 27 kayakers had Level 3 River Kayaking Skills qualifications (of whom four of these kayakers were also Level 2 qualified Instructors and four had done the Level 2 qualified Instructors training). The remaining 14 included three kayakers with CI Level 2 Kayaking Skills, and 11 kayakers with no kayaking qualifications. While the ratio of CI Level 2 Instructor to kayakers in the entire group was four instructors to 23 kayakers, i.e. 1:6, three of the Level 2 Instructors were in sub-group 1; none were in sub-group 2 (two who had done the training); one of the Level 2 Instructors was in sub-group 3 (with two who had done the training). The spread of persons with CI River Kayak Level 3 Skills was as follows:

Sub-group 1 had three kayakers with CI Level 3 Skills.

Sub-group 2 had four kayakers with CI Level 3 Skills.

Sub-group 3 had six kayakers with CI Level 3 Skills.

4.29 This division changed when the two groups consolidated which left the consolidated group with only one CI qualified Level 2 Instructor and the four who had done the training, and 14 other kayakers with varying degrees of skills and experience. The ULKC observation made in response to the draft report, that no instructor qualification was necessary and that it was permissible to self-assess their skills as equivalent to CI Level 4 Skill, is not supported by the contents of the Safety Statement, or the CI safety recommendations, and does not alter the analysis in relation to ratios addressed in this part.

4.30 In addition to this, the ratios of instructor/skills to less experienced kayakers did not comply with either the ULKC Safety Statement or with CI recommendations for the level of Instructor required for this grade of river with the accompanying ratios. Paragraphs 2.8.3.3 of the ULKC Safety Statement provided that:

“Group/Skills requirements

- *Groups size of no less than 3 people.*
- *There must be a ratio of 1:1 where there is one member who has passed proficiency assessments equivalent to the grade of water being paddled to one member who is less experienced.*
- *Instructors; different ratios apply to qualified CI or C BCU instructors (as outlined in the CI syllabus)*
- *Previous experience; in addition to proficiencies members need to ensure that there is sufficient experience in the group. Paddling members should have previous experience of similarly graded rivers.*
- *Level 4 paddlers and above, if willing have the option to adopt a 2:1 ratio of less experienced members to each Level 4 paddler on water no higher than Grade 3, i.e. 2 less experienced members to each Level 4 paddler.*
- *Surf Kayaking trips: One competent club paddler in order to borrow club gear. Surf conditions, weather conditions, location and paddler experience have to be taken into account by the Safety Officer. Two core committee members must be contacted. Safety Officer has last say on if trip goes ahead.”*

4.31 The Trips Policy provided that *“A Leader is to be a Level 4 grade competency standard as accredited by Canoeing Ireland or equivalent.”* He/she is to be ‘competent’ *“to instruct and lead a group of intermediate/beginner paddlers down a river suited to their skill level”*. The Level 2 Instructor was, according to CI accreditation, qualified to lead and teach on flat water journeys on inland and sheltered waters that remain close to the bank/shore, and can instruct on

flat water at a ratio 1:6. On a Grade 3-4 river, instructors have to be Grade 4 Level or Grade 5 Level Instructors with a ratio of 1:4 in both cases.

- 4.32 For the entire group of 27, the ratio of Level 2 Instructors (four who were CI Level 2 qualified Instructors) to kayakers (23) who were Level 2/3 skills grade/no grade students was 1:6. This excludes the additional four kayakers who had done Level 2 Instructor training but had not been assessed by CI to qualify for the competency certificate. If the additional four are factored in then the ratio of 1:4 would have been achieved, but that still leaves the instructor level at Level 2 rather than Level 4 as recommended by CI.
- 4.33 The ULKC Safety Statement also provided for ratios and required *“a ratio of 1:1 where there is one member who has passed proficiency assessments equivalent to the grade of water being paddled to one member who is less experienced”*. This requirement is not in fact consistent with CI skills qualifications which only recognises the skills as applicable to paddling with peers, not juniors. There were 13 kayakers with CI Level 3 Skills which meant they had Intermediate Kayaking Skills on Grade 2 water as part of a group (although many reported that they had paddled on Grade 4 rivers). According to the CI skill descriptions the 13 kayakers with CI Level 3 Skills were not qualified on a Grade 3 river to “pair” with less experienced paddler. Even if the 13 had CI Level 4 Skills that would only have qualified them for *“Advanced Kayaking and Safety skills on Grade 3 rivers with a group of peers.”* There was no written audit of the skills and qualifications or any evidence of an objective evaluation of the varying experiences.
- 4.34 In overall terms for the Group as a whole, the ratio of participants to instructors was not in keeping with that identified by CI, namely a ratio of 1:4, nor was the level of instructor as recommended, nor did the ratios and skill sets comply with the ULKC Safety Statement and prescribed by the ULKC Safety Statement, for this grade of river, or with the Trips Policy and Procedure. It is noted again that ULKC do not consider instructor qualifications to be necessary to lead a trip.
- 4.35 In addition to the foregoing analysis of instructor level and ratios, the groups should be assessed by reference to their individual group makeup. To do otherwise would lead to a fundamentally incorrect interpretation of the CI recommendations and the ULKC policies. The composition of the three sub-groups is set out above together with the allocation of CI Level 2 Instructors. As noted above, the key aspects of the ULKC Safety Statement was i) a mandatory *“ratio of 1:1 where there is one member who has passed proficiency assessments equivalent to the grade of water being paddled to one member who is less experienced.”* ii) *“Paddling members should have previous experience of similarly graded rivers.”* iii) *“Level 4 paddlers could adopt a 2:1 ratio of less experienced members to each Level 4 paddler on water no higher than Grade 3.”* The ratios and instructor level within the sub-groups and within the consolidated group complied even less than that required by CI. The

consolidated group had one only CI qualified Level 2 Instructor and the four who had done the training, and 14 other kayakers with varying degrees of skills and experience unless the lack of CI qualification is overlooked (which still leaves the instructor level at 2 rather than at 4). The consolidated group did have the benefit of the Leaders of sub-group 1 before they set off down the final 800 m run to Glencar Bridge from below the rapids.

- 4.36 As set out previously there were two points where there was conferral and decisions were taken. First, before the rapids there was general discussion between the Leaders regarding the way to progress the river trip at this point. The Leaders of both sub-group 2 and sub-group 3 decided that some of the Leaders would press ahead on the river and paddle the rapids while the remaining Leaders and all the Seconds and novice kayakers took the overland route and portage. It appears no assessment was carried out then to abandon the trip given the difficulties that had preceded it up to that point (shortly after which, further down river, below Glencar Bridge, sub-group 1 had retired after difficulties). The first phase of the plan was followed however without mishap. The Leaders of the consolidated sub-group (sub-group 2 and sub-group 3) then conferred with the Leader of sub-group 1 by mobile phone to swop information about progress so far and the way ahead to the Glencar Resort bridge, a distance of approximately 800 m downriver. The plan settled on was that Groups 2 and 3 should stick to the centre of the river, that there was a left-hand bend, that they could get out on the right-hand side, and that the rapid was manageable and easy going. The instructions given to the consolidated sub-group by the Leaders were that the rapid had a left-hand bend and the centre line was recommended. There was an eddy identified on the right-hand side that the group could exit the water from. It did not turn out to be as planned. There appears to have been little regard to the fact that the experience of sub-group 1 had to be adjusted to reflect the fact that they were the stronger group and had the more experienced Leaders. CI have also expressed the view that the group was too large to be managed safely in the conditions with the makeup of its members.
- 4.37 Had there been more and better qualified CI instructors on the trip different decisions might have been taken, and there would have been more skills and experience available to assist when the less experienced kayakers got into difficulties. The noncompliance with CI standards, and the ULKC policies was a contributory factor in this incident.
- 4.38 The ULKC Safety Statement which, as set out above, provides for “*a ratio of 1:1 where there is one member who has passed proficiency assessments equivalent to the grade of water being paddled to one member who is less experienced*” is not in fact consistent with CI Skills qualifications which only recognises the skills as applicable to paddling with peers of the same/higher skills qualification, not juniors. It appears from the Safety Statement and the Trips Policy and Procedure that ULKC does not require groups to be led by persons with CI Instructor level

skills notwithstanding certain references that suggest they intend standards to comply with CI recommendations. Further, the Trips Policy and Procedure is not clear on CI skills standards, and appears to approve of Leaders without any CI instructors' skills where it states:

“River Leaders are defined as a person who is competent to instruct and lead a group of intermediate/beginner paddlers down a river suited to their skill level. Leaders should have the relevant qualifications and experience as outlined (here and or in our Safety Statement). A Leader is to be a Level 4 standard as accredited by Canoeing Ireland or equivalent.”

- 4.39 If ULKC intend that leaders should comply with CI accreditation then that should have been made very clear, and it appears not to have been the understanding of the actual Leaders at all. The inappropriate requirements and the lack of clarity in the ULKC documentation contributed to the incidents.

Conduct of the Plan

- 4.40 Sub-group 1 completed the run with only a few kayakers capsizing. Sub-group 2 and sub-group 3 were consolidated into a flotilla for the last river section, and whilst the kayakers of this flotilla were paired into relatively experienced to less experienced ‘truck and trailer’, the risk of the flotilla becoming dispersed along the river during the final section of the river run from below the rapids to Glencar Bridge was heightened. In this situation the distance between the truck and trailer pairs became apparent. Leaders were strung out during the course of the last section of the river run with the result that when the kayakers got into difficulties, a more experienced leader was not close at hand to give advice or render immediate assistance (as they were in the first sub-group).
- 4.41 Had sub-groups 2 and 3 remained separate, sub-group 2 could have completed the final 800 m river-run to Glencar Resort bridge independently. This would have:
- reduced the number of kayakers on the water at any one time.
 - given the Leaders of the sub-group 2 time to report on any problems or obstacles encountered.
 - it would have created a reserve of Leaders from sub-group 3 available (with their less experienced people safely on the bank) to react and assist in an emergency situation.

CI observe that the combined group was too large for the size and nature of the river and the experience level of the group. Combing the two sub-groups would have caused line of sight and group management issues. Combining sub-groups 2 and 3 was a contributory factor to the incident.

Absence of Contingency Planning

- 4.42 Leaders in the planning group considered that the intermediate paddlers would be capable of looking after themselves leaving the more experienced Leaders and Seconds to focus on the novice beginner kayakers. The Leaders had made no contingency for the intermediate kayakers getting into difficulties. On the day, the Leaders made the decision that the river was runnable by their groups, based on past knowledge of the river and that a cautious approach to each section would be made.
- 4.43 The Leaders reasonably accepted that some kayakers would capsize, but that is normal, and they assessed they had the rescue and safety cover to deal with minor incidents such as these. As this incident unfolded it became apparent that there was insufficient depth of capabilities available to control and mitigate the results of a multi capsize event.
- 4.44 Another criterion to consider is the severity of a consequence if a kayaker gets into difficulty. The river had good access from the banks with only a few places with trees and bushes (on river left, as noted in the river description from www.iww.ie). This would enable rescue actions to remove people from the water. The presence of trees and strainers however, present a hazard to be avoided and would have severe consequences to a kayaker exiting their boat in their vicinity. This is what happened in this instance.
- 4.45 The absence of a contingency plan in the event of the Leaders and Seconds requirement to closely supervise an increased number of inexperienced (intermediate plus beginner) kayakers due to the prevailing river conditions was a contributory factor in this incident.

Emergency Training and Planning

- 4.46 CI provides a comprehensive training scheme from beginners to advanced levels and instructor levels including river rescue courses. All but four beginner/novices had completed RSR training, and the Leaders had completed RSR to Level 2 certification. RSR is a personal skills award and does not train for leadership of lesser experienced paddlers. RSR 2 teaches river safety and rescue skills on a Grade 2 river. All Leaders and Seconds had completed a REC course to at least Level 3 certification standard. Additional training of these skills was completed during Club training sessions. The immediacy and efficiency in which rescue and resuscitation were commenced on the two Casualties bears testimony to the proficiency and competence of these rescue and emergency skills within the group.

See Appendix 7.19 - Canoeing Ireland River Safety and Rescue Course Description.

See Appendix 7.20 - Canoeing Ireland Rescue and Emergency Care Course Description.

Emergency Equipment and Resources

- 4.47 The group had brought ropes, rescue equipment, and survival shelters to shelter casualties and members of the group knew how to deploy them. The group included 13 people with REC 3 capable of administering CPR and use the equipment. The group was well equipped in emergency resources for the river trip.
- 4.48 Communications were provided through mobile phones which were used extensively throughout the day to keep groups in contact with each other. When the emergency call was made to the emergency services the leader reporting the emergency situation kept communications to the NEOC open in order to direct the emergency services to the incident site. They were thus able to report the second Casualty (Casualty No. 2) quickly and alert the emergency services to the situation. The emergency services responded and were directed to the incident location accurately and expeditiously.

Emergency Actions Around the Incident

- 4.49 The emergency care from the ULKC kayakers was proficient. The first Casualty (Casualty No. 1 from incident 2) was brought ashore unconscious having ingested water and stopped breathing. CPR was administered and he was revived, stable and responsive and in the shelter tent by the time the first emergency team from the Killorglin Fire Service arrived on scene.
- 4.50 The second Casualty (Casualty No. 2 from incident 3) was trapped against a horizontal bough of a tree. After about 20 minutes the Casualty became unresponsive. The Casualty's head was under water for a period of time. The Casualty was quickly brought ashore, and CPR administered by the ULKC rescuers. The Casualty was revived by the Air Ambulance team with the aid of an Automated External Defibrillator (AED). She left the site unconscious but breathing with the aid of an oxygen breather, but subsequently died in hospital.

Cold Shock and Hypothermia

- 4.51 Irish Water Safety identifies two problems associated with sudden immersion in water, namely "cold shock" and "hypothermia" (where the body temperature drops by at least 2°C). Irish Water Safety identifies those two problems in the case of immersion for people not used to cold water (temperature less than 15°C). The effect of immersion in cold water and hypothermia on a person is well known and recognised. If cold exposure is due to being immersed in cold water, heat loss can occur 25 times faster than it would if exposed to the same air temperature. The water temperature in a flowing river in Kerry in November

would be between +4°C and +10°C. The air temperature was 10.2°C. Table (1) gives between 30 and 60 minutes before the onset of exhaustion or unconsciousness at that temperature range. Casualty No. 2 was probably quite cold before the incident as it was reported she had capsized earlier and she had been in a wetsuit for over an hour, so a shorter time of 20 minutes before she became unresponsive is not unexpected. Poor fitting wetsuits are not adequate protection from repeated immersions in cold water.

See Appendix 7.21 - Irish Water Safety (extract): Cold Shock Hypothermia.

See Appendix 7.22 - Table 1 - Expected Survival Times in Cold Water. Source; SAR Task Force.

- 4.52 The cause of death is a matter for the coroner. The coroner for West Kerry has advised the MCIB that her findings were that hypothermia was not a contributing factor to the cause of death of Casualty No. 2.
- 4.53 Overall, the composition of the three sub-groups had a good dispersal of those with REC training. However, the river trip planners did not take into account the prevailing river environmental conditions, the effects of cold-water immersion on the kayakers with wetsuits and critically the multiple number of capsize events. CI point out that RSR 2 certification is applicable to river safety on a Grade 2 river and was therefore less than what was required on this trip with the makeup of the group.

The Club Safety Environment: ULKC, ULSU and UL

- 4.54 The content of ULKC Safety Statement 2014 (Academic year 2018/2019) and Trips Policy and Procedure indicates a proactive regard for safety practices, procedures and control measures and outwardly shows that a safety system was in operation within the Kayaking Club. The documents show the recognition by ULKC of kayaking as being a high-risk activity. However, the translation of the Club's safety system to the planning, risk assessments and hazard identification processes adopted by the river trip planners was not to the required standards outlined in the Safety Statement 2014 and the Trips Policy and Procedure. River grades were underestimated, and Leader and Seconds CI qualifications were unsuitable for the river grades experienced that day, especially when paddling with less experienced paddlers.
- 4.55 Compliance with the aforementioned requirements does not appear to have been audited by the Club or the ULSU (who were mandated to receive a copy of the Club's Safety Statement annually, the receipt of which was a pre-condition for ULSU club funding) (see clause 2.11). The trip has no recorded pre-approval process as set out in the Safety Statement 2014.

- 4.56 In its engagement with the MCIB during this investigation, the ULSU adopted and endorsed the observations of the ULKC. The ULSU accepts that it has no person or persons having experience and training to be able to audit the ULKC safety practises, and ULSU endorses the ULKC proposition that it can self-assess and regulate its members without regard to CI. It would appear that once an annual Safety Statement is provided to the ULSU no further auditing in relation to safety practises is carried out by ULSU.
- 4.57 The determination that CI safety standards can be disregarded and substituted by self-assessment based on courses outside Ireland that cannot in any way be assessed by CI is a matter of considerable concern. CI is the national accredited body for the sport in Ireland. The ULKC Safety Statement 2014 clearly recognises this on paper, but this is expressly disregarded by Club Officers and continues to be the position even after this marine casualty.
- 4.58 UL made observations (on the draft of the report furnished to it) to the effect that it is unconnected with the ULSU, and university clubs, that it has no role in club management or safety, and that it is the ULSU, described as a wholly independent entity, that has the role in the management and/or audit of club activity including safety. The ULSU agrees with this.
- 4.59 The ULKC operates out of UL as its name suggests. Its members are students of UL. The position of UL is that it does not hold responsibility for the governance, operation or oversight of the clubs and societies as it is not provided for in its statutory functions. The legal basis provided by UL for this is from sections 12 and 13 of the Universities Act 1997 which sets out the University's objects and functions. These include, inter alia, the advancement of knowledge through teaching and research and the promotion of learning in its student body and in society generally. The provision of sports and activities to its student body are not within the University's objects and functions. UL acknowledges however that participation in sports and activities is an important part of student life and UL supports this participation by way of funding contribution to the student clubs and societies. A capitation grant is given to the ULSU by UL.
- 4.60 Both UL and ULSU submitted that ULSU is a separate entity which is autonomous to the University. This reflects the principles of independence of the Student Union as the student representative body, and the students' right to association, as is the case with most universities in this part of the world. UL's position is that it actively facilitates the independence and autonomy of ULSU. ULSU employ its own staff, is responsible for the application of its resources and maintains its own insurance.
- 4.61 ULSU has its own constitution which states that it derives its authority not from the university but from the student body (see the Constitution Preamble), and, inter alia, provides as follows:

- *“One of the aims and objectives set out in ULSU’s constitution is to promote, encourage and facilitate student Clubs and Societies equally (Article 2.4)*
- *Membership of ULSU shall be those students who are registered as students with the University (Article 3.1).*
- *The Student Council is the supreme decision-making body of ULSU (Article 7.1). This Student Council is made up exclusively of UL students. There is, in addition to the Student Council, an Executive elected by members of the Union who are, also, exclusively members of the UL student body.*
- *ULSU shall facilitate the establishment of clubs and societies. For a club or society to be recognized by ULSU, the club or society must satisfy the conditions set out in the clubs and societies rulebook (Article 12.1).*
- *ULSU will distribute two thirds of the entire student capitation received annually to clubs and societies (Article 12.17).*
- *The Clubs and Societies Council of the Student’s Union consists of the Clubs and Societies Executive and at least one liaison officer from each club and society (Article 12.8.).”*

4.62 On 7 February 2012, the Clubs and Societies Council passed a Master or Common Constitution for all UL Clubs and Societies. On 22 October 2015, ULKC adopted this Common Constitution for itself. Paragraph 6 of the ULKC Constitution recognizes the existence of a duty of care owed by the ULKC Committee and further provides that the Club must have a Health and Safety Statement which was required to follow the template provided by the Health and Safety Consultants for Clubs and Societies. The ULKC Safety Statement applicable at the time of this incident, provided to the MCIB dates from 2014 and is entitled Safety Statement 2014 (for Academic year 2018-2019) having been updated in November 2018.

4.63 The ULKC Safety Statement 2014 states in its Introduction that it should be read in conjunction with the UL Safety Statement stating that *“The University Safety Statements sets out duties and responsibilities of staff, students, and visitors, as well as general policies and arrangements for safety within the University.”* It also contains certain reporting aspects that are not consistent with an entire separation of function and obligations from UL. ULKC is obliged to report accidents to UL and is mandated to carry out an investigation.

“2.8 Reporting of Accidents and Near Miss Events All accidents and near misses (incidents that could have lead to a serious injury but didn’t) must be reported to the Club Safety Officer and must be recorded in the appropriate logbooks. The Club Safety Officer will investigate the causes of the incident and together

with the involved members fill out the University Accident Report Form or the University Dangerous Occurrence Form. Copies of the completed form should be forwarded to the University Safety Officer. The purpose of an investigation is to establish all the facts relating to the incident, to draw conclusions from the facts and make recommendations to prevent reoccurrence. Each accident will be looked at from the point of view of location, activity, procedures and people.”

- 4.64 No records were provided to the MCIB evidencing any reporting documentation relating to this incident. Further, during the course of the investigation process under Section 36 of the Act (where a draft of the Report is provided to parties), both the ULSU and UL stated that there was no investigation into the trip.
- 4.65 The Club advised that it decided that it was not appropriate for the Club to carry out a separate investigation which might overlap and interfere with the statutory investigation being carried out by the MCIB. Because there was no separate Club investigation, there was also no University Accident Report Form or University Dangerous Occurrence Form filled out by the Club. UL advised the MCIB that having sought advice in relation to the incident they were advised that the Gardai and the MCIB would assume responsibility for the investigation and that the University should liaise with the Gardai and the MCIB in the course of their investigation rather than initiate an internal review. UL, accordingly, decided to allow the statutory investigations to proceed, and advised that they would thereafter conduct an internal review of the Garda/MCIB reports. In those circumstances, UL did not expect that the investigation as provided for in the ULKC Safety Statement would proceed. It should be noted that the MCIB was not consulted in relation to the decision taken by UL and ULKC not to complete accident reporting documentation or to conduct an investigation and did not itself at any time seek any deferral of any reporting or investigation.
- 4.66 Both UL and ULSU have stated in this investigation that their entities are entirely independent of each other. ULSU, in particular asserts that UL has no role in the safety functions of the ULSU and that no recommendations from this investigation should be addressed to UL. There are, however, a number of features that are not entirely consistent with this position. As can be seen from the ULSU constitution above, only UL students can be members of the ULSU (and in turn members of its clubs and societies). ULSU operates in some manner on UL premises and its clubs avail of UL facilities (playing pitches etc.). The Student Council is made up exclusively of UL students. ULSU receives funding from UL via a capitation grant, of which two thirds of capitation received annually must be given to its clubs and societies in accordance with the ULSU constitution. ULSU is therefore funded, at least in part, by UL. As set out above, the ULKC Safety Statement 2014 (which is stated to be subject to the more general UL Safety Statement) contains certain reporting aspects that are not consistent with an entire separation of function and obligation from UL. ULKC, as a club

operates under ULSU but is obliged to report accidents to UL and ULKC is entitled to conduct investigations. UL has also acknowledged it has a role in working with the ULSU to address recommendations from this investigation.

- 4.67 ULSU in further observations made by it, as to its own remit in respect of safety within its affiliated clubs including the ULKC, asserted that the only affiliations that the ULKC has are with the ULSU solely for governance matters, and with CI in respect of kayaking matters. The latter assertion is inconsistent with the practise in the Club as is apparent from the disregard of the standards recommended by CI. The restricted role of the ULSU in respect of governance is also inconsistent with information provided by ULSU of the steps it has taken to improve safety, and its stated position as a leader in the administration of health and safety systems in the third level sector. The ULSU is also charged to receive the ULKC annual Safety Statement. The value of this is questionable if it has no expertise available to it to review/audit the safety statements and adherence to its contents.
- 4.68 ULSU states that it does not have the necessary experience and training to audit ULKC safety practises because it is a students' union which provides general support and governance advice to clubs which operate under their umbrella, and that they are not experts in kayaking or in water safety. It asserts that auditing of water safety requirements should only be carried out by external expert affiliating bodies such as CI. It does not believe it has any role in addressing any recommendation about safety supervision/auditing from this investigation as it has no expertise available to it in respect of kayaking or water safety. It also asserts that no recommendations should be addressed to UL stating that it would be "*counterproductive for MCIB to make recommendations involving UL*". In effect, ULSU does not accept that it has any role in the safety within ULKC save in some general governance respects. This position, were it to operate, would result in ULKC being left to its own devices on the UL campus with no "on campus" safety supervision/audit from either ULSU or UL. The MCIB does not consider that this would provide an appropriate level of safety within ULKC having regard to the contents of this Report.
- 4.69 ULSU has, however, advised that it and ULKC have engaged outside safety consultants. It has also provided information as to its engagement with numerous external health and safety bodies and consultants on how best to advise on minimising risk within clubs. Commencing before 2019, ULSU started a process, which is ongoing, to enhance education awareness and to carry out a review of processes around health & safety as they pertain to clubs and societies and their responsibilities as volunteers. While there is reference to a consultant having met specifically with clubs on the UL campus who engage in high risk activities, no details have been provided as to what learnings have been provided to ULKC. The actions taken by ULSU (which are to be welcomed) do not appear to be consistent with the much more limited role ascribed by ULSU to

itself, in particular its role in being responsible to ensure that ULKC has an annual Safety Statement before any capitation monies are issued.

- 4.70 ULKC itself has not identified any internal audit process or any investigation or review into this incident. The rules applicable at the time have not been altered in a later version provided for the academic year 2020-2021 (save for the updating of club officers and the inclusion of a section on Covid issues). The MCIB has not been furnished with any evidence of any changes in safety practises or learnings. It is however noted that external safety consultants have been engaged. ULSU has advised in September 2022 that they have engaged “*a leading authority on kayaking with over 40 years’ experience*” who is tasked with visiting Limerick to meet with ULKC. The planned training is described as exploring various risks, agreeing the process for authorising trips, and writing a new policy. Leadership will also be explored to ensure that there is a new and clear management system in place and plan for transitioning to the new system.
- 4.71 While this development by ULSU, and ULKC, is to be welcomed it is of concern that no reference has been made to any process being planned or undertaken in concert with CI. CI has expressed the view that if so much responsibility for safety is in fact being left with the ULSU and ULKC officers that much greater engagement with CI and the embedding of CI safety guidelines is required. The somewhat inconsistent position of ULSU with regard to its role in club safety and its aversion to any input from UL may not lead to the optimum improvement in safety that is required. Further, while ULSU correctly points out that the remit of the MCIB is limited to recommendations arising out of this incident and hence to kayaking, the MCIB notes that the stated position of ULSU in relation to its lack of expertise is in respect of kayaking and water safety.
- 4.72 MCIB investigations are not designed to find fault but to identify the causes of marine incidents with a view to making recommendations to improve safety. The MCIB does not propose to make any determination as to the legal correctness of the positions advanced by UL and the ULSU or as to the scope of their respective roles with regard to the safety of students in a club engaged in a high risk sport on/out of the UL campus. The assertion of independence by ULSU appears to derive from a concern about any diminution of the independence of its functions as a students union. While that is understandable, the MCIB does not agree that it should take precedence over ensuring the better safety of students attending a university campus, irrespective of the fact that the UL and ULSU have different objects and functions. There is an insufficient safety regime on a third level education campus if clubs carrying out kayaking, which is a high risk sport, are left to their own devices without any safety auditing from a clearly identified and empowered “on campus entity”. This absence was a contributory factor in this incident.

The Code of Practice for the Safe Operation of Recreational Craft

4.73 The CoP for the Safe Operation of Recreational Craft was launched in 2006 as the result of a collaboration between the Maritime Safety Directorate and the Irish Coast Guard under the oversight of the then Department of Transport. The CoP was launched in order to advance the safety agenda which continues to this day through the latest 2017 edition of the CoP. Chapter 7 is dedicated to Canoeing and Kayaking activity. While the precepts and recommendations were largely followed by ULKC organisers, on this particular trip they did not heed advice relating to the river grading, kayaking Leader qualifications and skill sets, nor did they exercise particular caution during flood water conditions. The CoP is not referred to in the ULKC documentation, and while it is more important that the ULKC documentation and practise aligns with recommendations from CI, it would also be useful to ensure there is no inconsistency with the broader principles of the CoP.

Canoeing Ireland

4.74 CI is a non-statutory body and has no legislative power to regulate accredited instructors. It operates on the basis that its accreditation is recognised as the valued and respected accreditation, and that its accredited instructors are similarly recognised as valued and respected accredited instructors. CI rely on their accredited instructors to conduct themselves in accordance with their training and any standards, rules and regulations of CI. It has no legal basis to enforce standards of conduct. It reports that it believes its accredited instructors do conduct themselves in compliance with the CI safety regime, and thereby contribute to safety standards in clubs, and commercial providers of paddle sports. It has no regulatory remit in respect of commercial paddle sports providers, save indirectly through the voluntary conduct of its accredited instructors.

4.75 As an accredited member of CI, CI was entitled to believe that ULKC would have regard to its safety standards. CI also points out that one of the reasons why clubs within third level institutions need to pay particular attention to their safety management systems is because of the likelihood that those clubs do not have more experienced kayakers due to the more transient nature of student members. CI expressed surprise that UL professed itself as having no involvement in university clubs and therefore no role in safety management or audit.

4.76 CI describe themselves as having *“a broad role in educating and information sharing to assist both the casual paddler and the enthusiast in water safety. As our inland and costal waterways are public spaces, we accept that our capacity to reach all paddlers is limited. We consistently promote safety on our website and in regular social media posts: <https://www.canoe.ie/safety-on-the-water/>. Any courses or events run by our partners and clubs are risk assessed to a very*

high standard and safety is one of our key strategic priorities and is built into everything that we do.”

- 4.77 CI also expressed some surprise at the position of UL which was not known to them and understood from its title that the ULKC was an entity within the University. As set out above, CI have concerns about the possible absence of sufficient experience being available to clubs in third level institutions because of the transient nature of student life. Had there been more experienced CI qualified instructors available, CI advise that they would have identified that group was too large and its makeup too inexperienced and would not have approved a trip that involved a group of beginners on a Grade 4 and even probably on a Grade 3 (even with portaging). There is in addition, the human factor of youth and inexperience leading to less regard for safety in what is a high-risk outdoor sport.
- 4.78 ULSU recognises and accepts the need for ULKC to engage with CI. This is to be welcomed. The ULSU also suggested that CI should have been *“supervising and evaluating the safety of members of their affiliated clubs”* at the time of this incident. They advance no basis for this assertion, nowhere is that sort of role described in the Clubs’ Safety Policy 2014 (where other roles are identified). The ULKC Safety Statement 2014 provides at internal Page 4 that *“The governing body for canoeing and kayaking in Ireland is Canoeing Ireland, herein referred to as the CI. They provide training and instruction to all kayakers nationwide and provide course syllabi that must be followed by all ULKC instructors during courses, as well as all CI safety guidelines that will be adhered to by all ULKC instructors and experienced members.”* The duty to comply with CI is directed to ULKC instructors. There is no additional reference to any auditing by CI. If there had been such a system, one would expect to see evidence of ULKC engaging with CI to have such review/audit conducted.

The ULKC Safety Statement 2014 is therefore inconsistent with the proposition by ULSU. It is also a proposition that is not consistent with the stated position of ULKC that it can self-assess kayaking standards, which ULSU agrees with. It is not an assertion that the MCIB agrees with having regard to the aforementioned and to the remit of CI. However, the MCIB welcomes any moves to engage with CI to achieve the recommended safety standards.

The General Safety Environment

- 4.79 ULSU recognises and the MCIB has investigated a number of canoeing/kayaking incidents on fast flowing rivers since 2007 up to 2019 as a result of which six fatalities occurred. The incidents are as follows:

MCIB 155 - Gaddagh River, 2007.

MCIB 180 - Clodagh River, 2010.

MCIB 241 - Inchavore River, 2014.

MCIB 275 - River Suir, 2017.

MCIB 283 - Roughty River, 2019.

See Appendix 7.23 - Synopsis of Kayaking Incidents on Fast Flowing Rivers 2007 to 2019.

4.80 The circumstances of the above canoeing incidents have some common features in that:

- In winter or spring months the rivers are more likely to be in flood with higher water levels.
- Incidents occurred in winter or spring months when there is sufficient water in Irish rivers for white water kayaking. This has implications for cold shock and the onset of hypothermia.
- Skills level of kayaker/instructor are not sufficient for the grade of river.
- Mixed ability groups do not have sufficiently qualified leaders/instructors.
- Casualties capsized, exited their canoe and were subsequently caught by a river obstruction.
- Incidents occurred during the latter half of the excursion.

All the above features were prevalent in some way during the course of the incident on the Upper Caragh River on 2 November 2019.

4.81 The Maritime Safety Strategy published in 2015 recognised that safety is a wide-ranging issue in the recreational sports domain which a number of organisations including CI and other national governing bodies, seek to improve. Lives continue to be lost on the water, despite regulation, inspections, training, certification, safety information and the work by the MCIB to investigate incidents and fatalities and to highlight their causes. Statistics show that between 2002 and 2013:

- Recreational craft were involved in 49% of all fatal incidents in the marine sector.
- Distress calls from recreational craft accounted for 65% of all distress calls in the marine sector.

Incidents involving recreational craft account for a significant effort and costs to search and rescue organisations and a human cost to users, family and friends. Trends show that incidents involving recreational craft have been increasing steadily. The increase in the number of incidents coincided with the exponential growth in the economy since the 1990s. The MCIB continues to see an increasing number of incidents involving kayaking and canoeing. CI also reports a similar anecdotal observation. Many of these are incidents involving multiple persons. This is not surprising given the increase in outdoor activities which expanded greatly during the Covid pandemic.

See Appendix 7.24 - Maritime Safety Strategy 2015 - Statistical Pie Charts Showing Maritime Fatalities and Irish Coast Guard Distress Calls by Sector.

See Appendix 7.25 - Trends in Irish Coast Guard Distress/Urgency Calls by Vessel Type.

5. CONCLUSIONS

Summary

- 5.1 The factors that led to the outcomes are set out in more detail hereafter. In summary, the prevailing conditions including the features of the river were not suitable for all the members of the trip to manage safely. The trip was not properly assessed for the risks attached to the prevailing conditions and having regard to the skills and experience of the group taking part in what is a high-risk sport. The persons in charge of identifying and assessing the risks in advance, and on the day, were insufficiently trained and experienced themselves to be able to assess the risks given the combined factors of river conditions and the nature of the group. This arose as there was a lack of adherence to the ULKC Safety Statement 2014 and the Trips Policy and Procedure which set out control measures, which led to a lack of accredited training, which in turn led to poor decision making. Had there being CI qualified instructors available (or persons with recognisable equivalent training and experience) they would have identified that the group was too large and its makeup too inexperienced and would not have approved a trip that involved a group of beginners in those conditions, and/or, having embarked would have realised that the conditions being experienced were not suitable and would have terminated the trip.
- 5.2 The gaps in the Club safety environment were contributed to by the lack of any supervision/audit, or capacity to effectively supervise or audit, of the safety of university students engaged in high risk activities by the ULSU, and by the absence of any overarching, agreed, and communicated, spheres of responsibility between the ULSU and UL, leading to an environment at club level where there was a serious disregard of the ULKC Safety Statement 2014 and Trips Policy and Procedure, and CI recommended standards.

Causative Factors

- 5.3 The Upper Caragh River was a Grade 4 river on the day and a Grade 3 with parts at Grade 4 normally. The river trip planners and Leaders did not correctly gauge the river as a Grade 4 river despite the elevated river levels. Incorrectly gauging the grade of the Upper Caragh River and underestimating the river conditions experienced by the beginner/novice kayakers, particularly after heavy rainfall had swollen river, were causative factors in the number of serious capsized incidents.
- 5.4 The ULKC Leaders' previous experience of the River Upper Caragh was gained at a time when the river was not in flood. The recent heavy rains in the locality resulted in the river level being higher, current flows being considerably faster and more powerful to the degree that the intermediate paddlers had difficulties in controlling their boats. Casualties No. 1 and No. 2 were intermediates at Level 2 and Level 3 Skills competency.

- 5.5 The river trip planners and Leaders made no risk assessment for the river trip on the Upper Caragh River. Had they done so the assessment of the corrected river grade that day (Grade 4) would have significantly affected the planning of the river trip process and either altered the composition of the river trip groups and/or the conduct of the river trip or may have re-directed the trip to a more suitable venue. The absence of a comprehensive risk assessment was a causative factor in the capsized incidents.
- 5.6 The ULKC Safety Statement (2014) and the Trips Policy and Procedure set out control measures which were not adhered to, which led to a lack of training, which in turn led to poor decision making by the group Leaders.
- 5.7 The Club operated under a safety policy which enumerated several control measures by outlining the training, quality of equipment and risk assessment and mitigation procedures to be followed. The Leaders of the group did not observe or follow the ULKC control measures and was a causative factor in this capsized incident.
- 5.8 The safety and risk assessment by the river trip planners and Leaders in which the river trip was undertaken was insufficient and not in line with ULKC's safety system and was a causative factor in the capsized incidents.
- 5.9 The absence of a clear, or any, requirement for CI instructor qualifications (which would have recommended Level 4 Instructors for this grade of river, and the correct ratio of instructors to less experienced paddlers) was a causative factor in the capsized incidents.
- 5.10 ULKC submitted that *“there were three basic factors which had to combine to create the serious incidents which occurred:*
1. *The presence of tree obstacles.*
 2. *High flow of water which made those obstacles more dangerous once encountered.*
 3. *Kayakers going off course from the middle of the river.”*

They also stated that:

“The most serious incidents involving Casualty 1 and Casualty 2 took place up at the same tree. This was an unusual and unexpected obstacle. The usual obstacle which kayakers face involves overhanging branches. But this was a large bough of a tree which extended out into the river and was mostly submerged. Group 1 had not encountered this obstacle, so there was no warning of it.”

The point that arises from this investigation, and as emphasised by CI, is that it is the very nature of these type of unexpected features that creates the need for adherence to safety standards in a high-risk sport which includes having sufficient

experience to be able to assess when a trip should or should not take place with the makeup of the group.

Contributory Factors

- 5.11 The Leaders had made no contingency for the intermediate kayakers getting into difficulties. The absence of a contingency plan in the event of the Leaders and Seconds requiring closer supervision of an increased number of inexperienced kayakers due to the prevailing river conditions was a contributory factor in this incident.
- 5.12 Combining sub-groups 2 and 3 increased the number of paddlers on the river during the latter section of the river descent and exacerbated the shepherding role of the remaining Leaders and Seconds of the group. Combining sub-groups 2 and 3 was a contributory factor to the incident.
- 5.13 The ULKC Leaders and Seconds had extensive experience and skills enhanced through attendance at courses abroad. However, the experience and additional courses were not a recognised equivalence for the defined leader training as promoted in CI Level 4 Instructor assessment training. The assumption by ULKC senior kayakers and the reliance of ULKC's more experienced kayakers (including Leaders and Seconds on this river trip) on their experience and training gained during the Gene 17 Steep Creek Course, and the perceived equivalence of the Gene 17 course to the content and skills improvement offered through the CI Level 4 Skills training and awards scheme, was mistaken and was a contributory factor to the capsized incident.
- 5.14 CI recommends that leaders of mixed ability kayaking groups should have leaders with instructor level qualifications appropriate to the grade of river being run. The grade of the river on the day was a Grade 4 river and the conditions in excess of the skills levels of the instructors present. The lack of adequate Level 4 Instructor leadership skills training among the Leaders of the river trip was a contributory factor to the capsized incidents.
- 5.15 Repeated immersion in cold water prior to the final incident resulted in the second Casualty (Casualty No. 2) becoming unconscious more quickly and complicated the resuscitation procedure.
- 5.16 The gaps in the Club safety environment were contributed to by the lack of any supervision/audit, or capacity to effectively supervise or audit, the safety of university students engaged in high risk activities by the ULSU, and by the absence of any overarching, agreed, and communicated, spheres of responsibility between the ULSU and UL, leading to an environment at club level where there was a serious disregard of the ULKC Safety Statement 2014 and Trips Policy and Procedure, and CI recommended standards. This was a contributory factor to the capsized incidents.

6. SAFETY RECOMMENDATIONS

Recommendations to University of Limerick Kayak Club

- 6.1 That University of Limerick Kayak Club should immediately review its procedures and assessments prior to embarking on group river activities with respect to:
- River grades.
 - Dynamic and pro-active risk assessment.
 - Control measures for large groups of kayakers.
 - Alignment and observance of Canoeing Ireland recommendations, advice and competency standards.
 - Instructor courses.
 - Kayaker protective clothing in inclement weather conditions.
- 6.2 That University of Limerick Kayak Club should immediately audit its procedures and in particular the adherence to Canoeing Ireland standards with regard to Instructors and the skills sets mix and that it ensures there is no inconsistency with the broader principles of the Code of Practice.
- 6.3 That University of Limerick Kayak Club should suspend its activities until its safety regime is audited to a standard acceptable to Canoeing Ireland.
- 6.4 That University of Limerick Kayak Club should comply with the procedures applicable to the reporting of incidents to University of Limerick.

Recommendations to University of Limerick Students' Union

- 6.5 That University of Limerick Students' Union should equip itself to be able to provide appropriate auditing of safety standards in the University of Limerick Kayak Club given its high-risk activity and to be able to assess the policies and procedures and provide some auditing of compliance with same. University of Limerick Student Union should ensure there is a system in place to ensure that on a regular basis the University of Limerick Kayak Club is operating within the parameters of the safety arrangements.
- 6.6 That University of Limerick Students' Union and University of Limerick should engage to ensure there are clear, overarching, agreed, and communicated, spheres of responsibility between the University of Limerick Student Union and University of Limerick, with a view to achieving an improved safety environment within the University of Limerick Kayak Club.

Recommendations to University of Limerick

- 6.7 That University of Limerick should consider the safety regime operating on its campus by University of Limerick Kayak Club.
- 6.8 That University of Limerick and the University of Limerick Students' Union should engage to ensure there are clear, overarching, agreed, and communicated, spheres of responsibility between the University of Limerick Students' Union and University of Limerick, with a view to achieving an improved safety environment within the University of Limerick Kayak Club.
- 6.9 That University of Limerick should ensure it receives the reports of incidents from the University of Limerick Kayak Club.

Recommendations to the Minister for Transport

- 6.10 That the Minister for Transport should review the effective delivery of the safety messages in the Code of Practise for the Safe Operation of recreational Craft. It should be noted that on 4 November 2022 the Irish Maritime Administration of the Department of Transport published a notification in relation to a public consultation on a review of the Code (see Marine Notice No. 75 of 2022: <https://www.gov.ie/pdf/?file=https://assets.gov.ie/240190/35aee614-c479-494e-b53d-db34183ffd16.pdf#page=null>).
- 6.11 That the Minister for Transport should engage with the Minister for Sport and the Minister for Education in relation to safety in water sports within third level establishments, and in relation to ensuring that Canoeing Ireland is resourced to provide the safety practises recommended in this Report.
- 6.12 That the Minister for Transport should engage with the Irish Coast Guard to assess whether Principal Response Agencies should consider whether a winching capacity is potentially required when tasking a helicopter to similar incidents, and that Principal Response Agencies should incorporate same in their planning arrangements.

Recommendations to Canoeing Ireland

- 6.13 That Canoeing Ireland should engage with University of Limerick Kayak Club in relation to the proper adherence by University of Limerick Kayak Club in relation to the terms of their affiliation and should terminate that affiliation if there is not sufficient compliance with the safety standards set by Canoeing Ireland.
- 6.14 That Canoeing Ireland, in conjunction with Sports Ireland, should consider establishing a programme to facilitate Canoeing Ireland in establishing a scheme for the mandatory audit of safety policies and practises in clubs in collaboration with related sport national governing bodies and, insofar as it is possible, the audit of instructors in commercial paddle sport providers.

- 6.15 That Canoeing Ireland should consider whether a safety audit and compliance system could be developed within its instructor training and registration system so that registered instructors have training in relation to safety requirements including those in the Code of Practice and Marine Notices, and so that Canoeing Ireland could better contribute to safety through its regulation of its accreditation and registration system.

Issues Arising from the Recommendations

The parties involved in this investigation received drafts of the Report including the draft recommendations and many submitted Observations. The Marine Casualty Investigation Board appreciates all the contributions. It is pertinent to address some of the observations here and to note the steps that have been taken by University of Limerick and the University of Limerick Student Union and the University of Limerick Kayak Club to improve safety since the commencement of this investigation (although it is not the role of the Marine Casualty Investigation Board to verify those steps).

It should be noted that the position of University of Limerick is that it is not the relevant body for the purposes of the Marine Casualty Investigation Board investigation or to whom recommendations in respect of oversight, auditing or governance of the activities of the University of Limerick should be addressed. It has however acknowledged that it will engage with the University of Limerick Students' Union about how the University of Limerick can better support the University of Limerick Students' Union in dealing with the Report's conclusions and in addressing the Marine Casualty Investigation Board's final recommendations. This is to be welcomed.

University of Limerick has also correctly pointed out that the remit of the Marine Casualty Investigation Board is to make recommendations arising from the investigation. University of Limerick has however voluntarily agreed to give further consideration to the safety regime operating on the campus by clubs that engage in high-risk sports (including, but not limited to kayaking). This is to be welcomed.

University of Limerick Students' Union made Observations to the effect that it does not believe it has any role in addressing recommendations from this investigation, and that neither has University of Limerick. University of Limerick Students' Union has however advised that it and University of Limerick Kayaking Club have engaged outside safety consultants. University of Limerick Students' Union has, however, advised that they have engaged a leading authority on kayaking with over 40 years' experience. The stated plan is to visit University of Limerick to meet with University of Limerick Kayaking Club. The training is described as exploring various risks, agreeing the process for authorising trips, and writing a new policy. Leadership will also be explored to ensure that there is a new and clear management system in place and plan for transitioning to the new system. This development by University of Limerick Students' Union, and University of Limerick Kayaking Club, is to be welcomed but should be carried out in co-ordination with Canoeing Ireland to ensure compliance with Canoeing Ireland recommended standards.

University of Limerick Students' Union stated, as set out above, that it does not have the necessary experience and training to audit University of Limerick Kayaking Club safety practises because it is a students' union which provides general support and governance advice to clubs which operate under their umbrella, and that they are not experts in kayaking or in water safety. It asserts that auditing of water safety requirements should only be carried out by external expert affiliating bodies such as Canoeing Ireland. It does not believe it has any role in addressing recommendation about safety supervision/ auditing from this investigation as it has no expertise available to it in respect of kayaking or water safety. It also asserts that no recommendations should be addressed to University of Limerick stating that it would be *“counterproductive for Marine Casualty Investigation Board to make recommendations involving University of Limerick”*. The Marine Casualty Investigation Board does not consider that this would provide an appropriate level of safety within University of Limerick Kayaking Club having regard to the contents of this Report.

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Appendix 7.1 Photograph No. 1 Kayak Types and Models



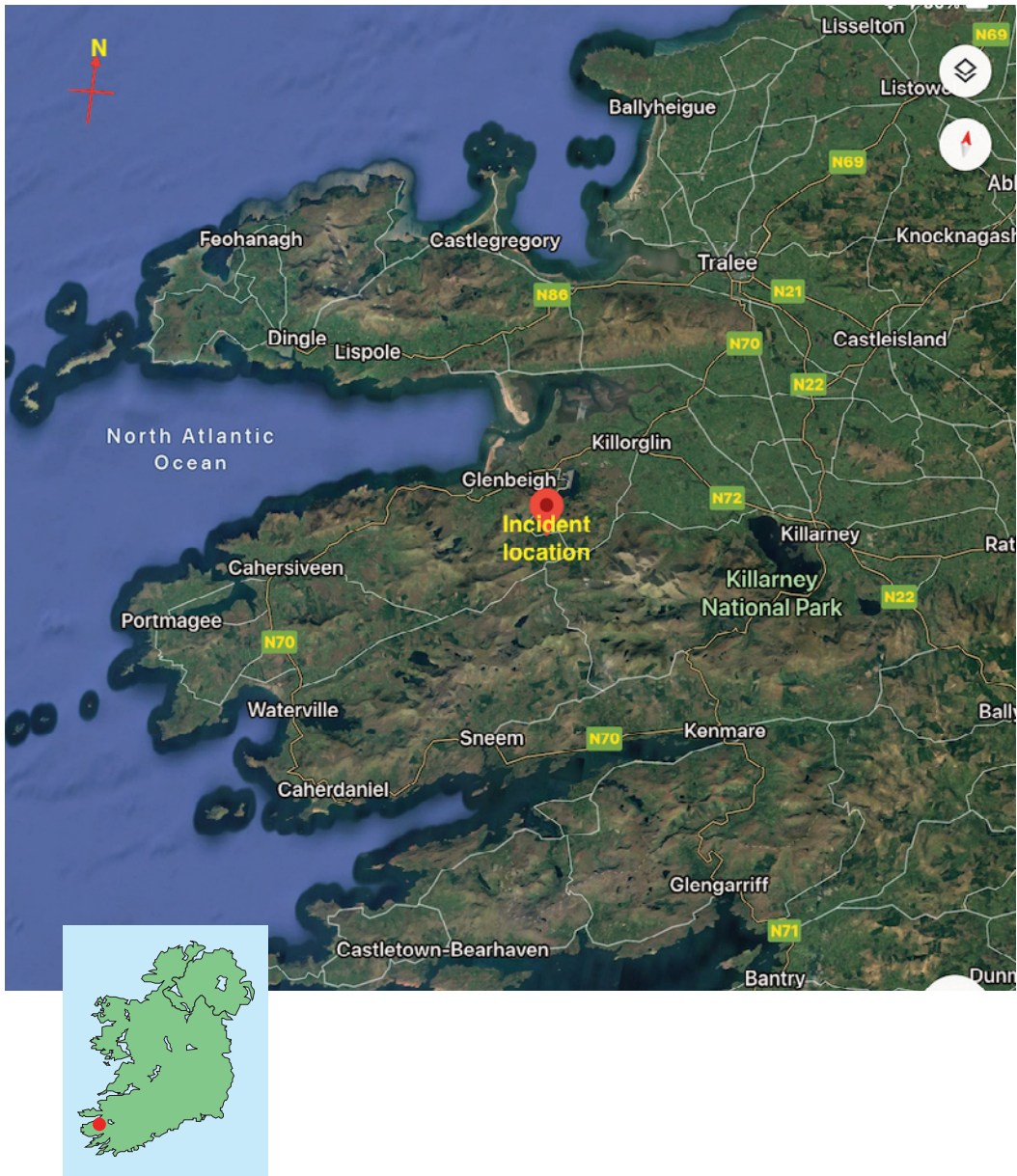
Type A - ZET RAPTOR 8 ft 6 ins Kayak



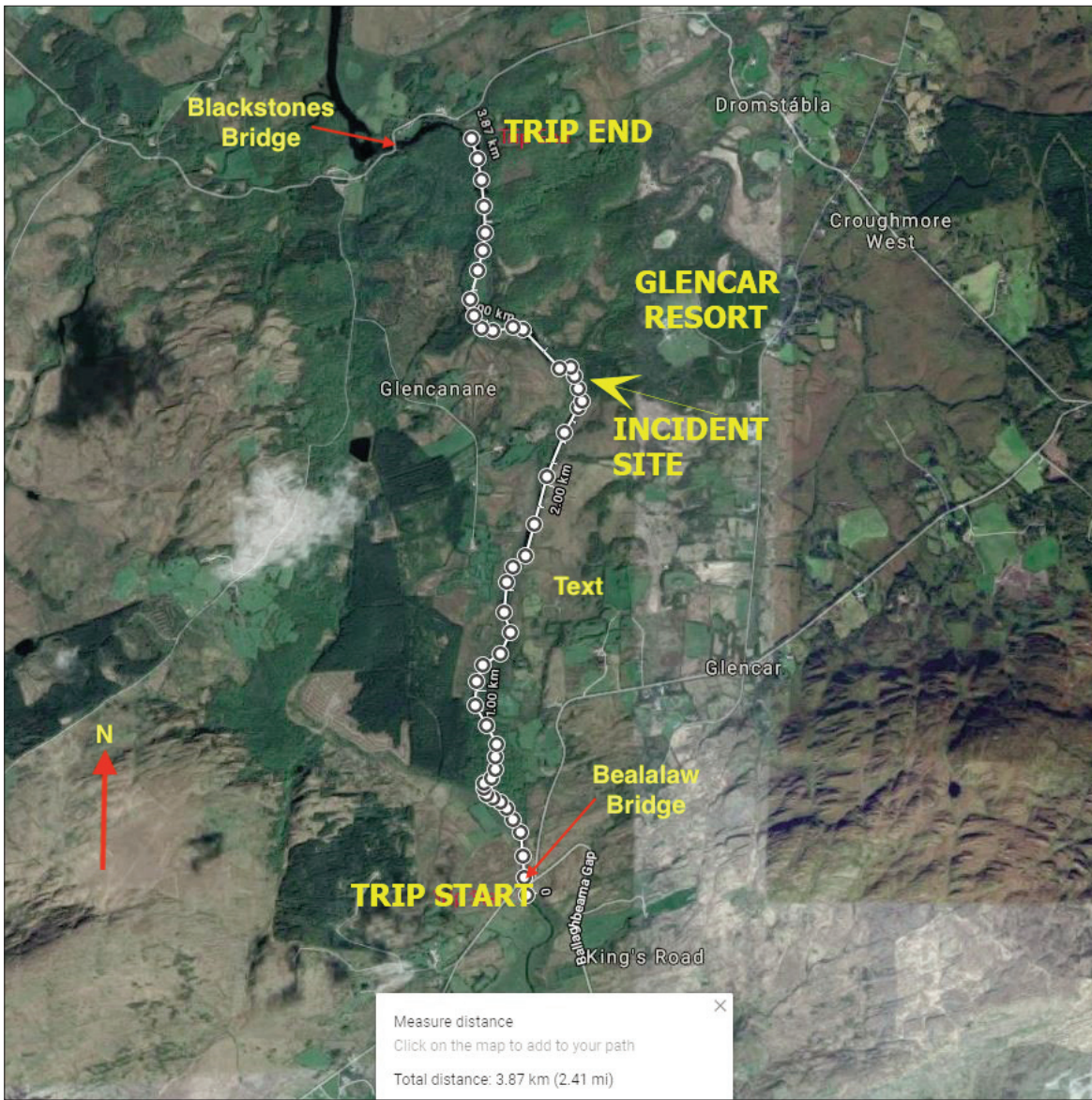
Type B - MAMBA 8 ft Kayak

APPENDIX 7.2

Appendix 7.2 Incident Location



Appendix 7.3 River Trip Route and Incident Site



Appendix 7.4 Photograph No. 2 The Incident River Section



Showing the location of the tree bough with arrow (right of picture).

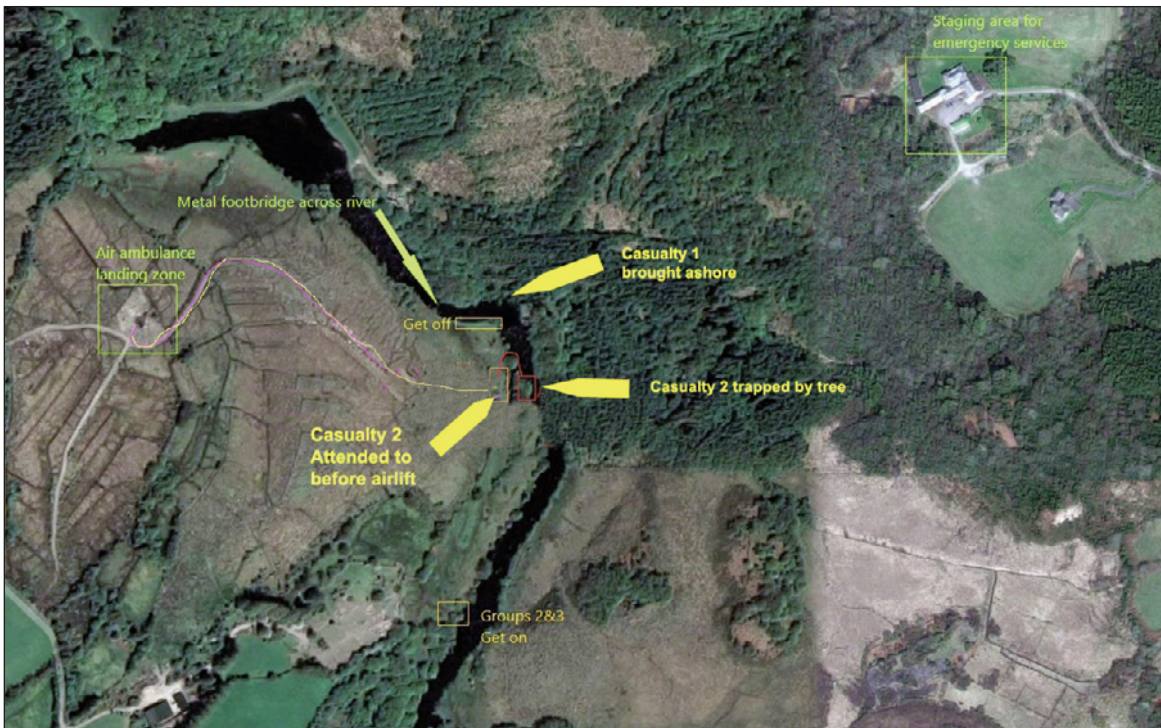
Appendix 7.5 Photograph No. 3 The Tree Bough



Red line shows approximate level of water at time of incident.

APPENDIX 7.6


Appendix 7.6 Plan of Incident Area - Satellite Image



Appendix 7.7 Photograph No. 4 Location where Casualty 1 was Brought Ashore



Appendix 7.8 Irish White Water - River Grades



Canoeing Ireland | ICU Training Unit | River Spy Gauges

search

Main / Rivers

[Add a River](#)

River Guides - All



Glencar.
Co. Kerry

- Photos
- Maps
- Videos
- Comments

River	Score	County	Grade
Adrigole	★★★★★	Cork	2 (3)
Annacloy	★★★★★	Down	2 (3)
Aughrim	★★★★★	Wicklow	1 (3)
Avonmore (Annamoe)	★★★★★	Wicklow	3 (4)
Avonmore (Clara Vale Section)	★★★★★	Wicklow	2 (2)
Avonmore (Rathdrum to the Meetings)	★★★★★	Wicklow	2 (2)
Ballaghisheen	★★★★★	Kerry	4 (4)
Ballinrillick	★★★★★	Sligo	3 (4)
Ballydonnell Brook	★★★★★	Wicklow	3 (4)
Ballysadare	★★★★★	Sligo	3 (5)
Bannagh	★★★★★	Fermanagh	2 (3)
Barra	★★★★★	Donegal	3 (4)
Barrow	★★★★★	Carlow	1 (3)
Behy	★★★★★	Kerry	2 (3)
Blackwater/Boyne	★★★★★	Meath	2 (3)
Boluisce	★★★★★	Galway	3 (5)
Bonnet	★★★★★	Sligo	3 (3)
Boyne	★★★★★	Meath	2 (3)
Brosna	★★★★★	Mayo	2 (3)
Bullaba	★★★★★	Donegal	3 (4)
Bundorragha	★★★★★	Mayo	2 (3)
Bunduff	★★★★★	Leitrim	2 (3)
Bunhowna	★★★★★	Mayo	3 (3)
Caher	★★★★★	Clare	3 (4)
Caragh, Lower	★★★★★	Kerry	2 (2)
Caragh, Upper	★★★★★	Kerry	3 (4)
Caraghbeg (Beamish)	★★★★★	Kerry	4 (4)
Cem	★★★★★	Wicklow	3 (3)
Clare Glens - Clare	★★★★★	Limerick	3 (4)
Clare River Milltown	★★★★★	Galway	2 (2)
Codiagh	★★★★★	Waterford	1 (3)
Colligan	★★★★★	Waterford	3 (4)
Colooney Falls	★★★★★	Sligo	4 (4)
Coomeelan Stream	★★★★★	Kerry	4 (6)
Coomhola	★★★★★	Cork	3 (4)

River Guides

IWW Forum

Irish Freestyle Forum

River Gauges

Playspot Guides

River Alerts

Accident Database

IWW Race League

River Updates


- Owenshagh
13/01/2017
- Avonmore (Clara Vale Section)
18/07/2015
- Tourmakeady Waterfall
06/04/2015
- Owenass ("The Catholes")
30/08/2014
- Upper Derg NEW
30/08/2014

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05/01/2016
- Owenroe
29/12/2015
- Glenarm
03/01/2015

Random Photo



Upper Caragh R.

Appendix 7.9 Irish White Water - Upper Caragh River Description


Canoeing Ireland | ICU Training Unit | River Spy Gauges

[search](#)

Main / Rivers / Caragh, Upper River

Print Guide River Guide Photos(1) Map(2) Video(2) Edit/Add to

Caragh, Upper River

Grade:	3 to 4	Rating:	★★★★☆
County:	Kerry	Date updated:	27/02/2011
Section Length:	4.2km	Version:	2 (History)

Brief River Description

The Upper Caragh is probably one of best grade 3 rivers in Ireland with the occasional stretch of grade 4. This rivers requires plenty of recent rain to bring it up. It's a 4.2km run with a gradient of approximately 8 m/km.

Directions to the Put-in

On the N70 Killorglin to Glenbeigh road there is a turn off sign posted for Glencar. This turn is approximately 8.4km from Killorglin. The turn is on the left hand side as you drive away from Killorglin on a right hand bend in the road. After the turn drive a few hundred metres and take the first turn right and follow the road. The road goes over the bridge at the Put-In for the Lower Caragh river. Follow this road around the lake until you reach a large bridge at a forest. This is Blackstone bridge. This is the end of the upper Caragh and there is plenty of parking here.

To reach the put in drive onwards over Black Stones bridge. After a kilometre or so you'll reach a fork in the road, go right here. At the next cross roads turn right again. Turn right at again at the next cross roads and this leads to Bealalaw bridge. Again there is plenty of parking here.

The shuttle for this river always seems far longer than you'd expect.

Directions to the Take-out

The take out is just upstream of Blackstone bridge on river left. There is a path leading down to the parking.

River Description

Roughly things happen in the following order. You get on, you paddle plenty of small rapids. Then the river widens and meanders for a while, this is followed by more small rapids.

This leads onto plenty of low hanging trees, which are followed by more rapids. The river widens further. At this stage there are plenty of fisherman's shelters on river left. This indicates a larger grade 4 rapid in approaching. Inspection of this rapid is best done on river left. There are good places to take photographs here. There is a large pool here for collecting gear.

Shortly after this you arrive at the largest rapid at just upstream of Blackstones bridge. Its worth inspecting this rapid from the get out before running the river. On river left there can be a meaty hole. Its hard to set up bank rescue because of the trees on river left. Its best to run the rapid on river right. Again there is some flat water for picking up gear.

Local issues

Possibly one of the most popular rivers in Ireland for fishing and they take it seriously in this part of the world. So be careful during the fishing season.

River level gauge

At Blackstone you'll see if there's enough water to get over the rocks. If the water is on the road upstream of the bridge its very high and the trees upstream will be a serious hazard.

River Hazards

- The overhanging trees early on in the river.
- Rocks on some of the rapids.
- Potential for wire fencing to run across the river.
- The big meaty hole on river right of Blackstones rapid.

River Guides

- [IWW Forum](#)
- [Irish Freestyle Forum](#)
- [River Gauges](#)
- [Playspot Guides](#)
- [River Alerts](#)
- [Accident Database](#)
- [IWW Race League](#)
- [Edit this Description](#)

If you would like to submit a modified, new or improved guide of this river please click [here](#)

Rate this river

Average: **3.66**
Votes: **6**

This River is Rated as:
★★★★☆

Give this River a Rating

★★★★★

★★★★☆

★★★☆☆

★★☆☆☆

★☆☆☆☆

☆☆☆☆☆

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River Updates

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13/01/2017
- [Avonmore \(Clara Vale Section\)](#)
18/07/2015
- [Tourmakeady Waterfall](#)
06/04/2015
- [Owenass \("The Catholes"\)](#)
30/08/2014
- [Upper Derg](#) NEW
30/08/2014
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- [Ow](#)
05/01/2016
- [Owenroe](#)
29/12/2015
- [Glenarm](#)
03/01/2015

Random Photo

Appendix 7.10 Irish White Water - Gearhameen River Description

Gearhameen River

Grade:	3 to 4	Rating:	★★★★★
County:	Kerry	Date updated:	15/08/2014
Section Length:	3 Km	Version:	2 (History)

Brief River Description

The river is mainly grade three with some grade four drops. There is a lot of flat sections, but these are broken up by great whitewater.

Directions to the Put-in

The river is located deep in the Black Valley down past the gap of Dunloe.

Best directions are to head to the gap of Dunloe and drive past Kate Kearneys Cottage. Drive right through the gap and upon leaving the gap and a little after the road begins to descend take the first right (road is marked as a cul de sac) and then the first left. Put in is at the small bridge.

The take out is back up this road but true right at the junction where you turned onto the cul de sac, continue on straight until you come to the next bridge down river. Cross the bridge and there is parking on the right.

Directions to the Take-out

The take-out is the next bridge downstream of the put-in.

River Description

The river is mainly grade 3 and relatively straight forward apart from a few main rapids.

The first rapid of note is a slot type drop, which needs protection in all water levels and is best always looked at. It has a high potential for pinning. In higher water, 2 more channels open up at this drop offering a small ledge drop on the left of the slot and a rocky small slide on the right.

From here the river eases off until the main falls. In low water this is a relatively easy run down the middle but it gets meatier and might require inspection and chicken shoots in higher water, experience tells that if you hit the hole at speed you'll shoot through. This section leads though some more drops and a river wide stopper one should be wary of.

It's mainly class 3 wavy bits until the last section which is an overgrown bushy run under a bridge. A chicken line can be had on the river right arch but the river left arch hides a nice line over a sticky hole.

Take out is on the left after this and up to the road. The locals do not like folks taking out on their land on the river right bank.

River level gauge

Low Water - Paddle under the Bridge at put in.
 Medium Water - Must roll under bridge
 High Water - Bridge is flooded, take care.

River Hazards

Major pinning potential on slot drop. Every time I've run the river I've seen pinning situations here. Lots of trees.

Very fast flowing in high water, possibly upping the grade.

Irish Freestyle Forum

River Gauges

Playspot Guides

River Alerts

Accident Database

IWW Race League

Edit this Description

If you would like to submit a modified, new or improved guide of this river please click [here](#)

Rate this river

Average: **4.8**
 Votes: **5**

This River is Rated as:

★★★★★

Give this River a Rating

- ★★★★★
- ★★★★☆
- ★★★☆☆
- ★★☆☆☆
- ★☆☆☆☆
- ☆☆☆☆☆

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River Updates

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13/01/2017
- [Avonmore \(Clara Vale Section\)](#)
18/07/2015
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- [Owenass \("The Catholes"\)](#)
30/08/2014
- [Upper Derg](#) NEW
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- [Ow](#)
05/01/2016
- [Owenroe](#)
29/12/2015
- [Glenarm](#)
03/01/2015

Random Photo

Appendix 7.11 Met Éireann - Estimate of Weather Conditions



Met Éireann

The Irish Meteorological Service

Climate Services
Glasnevin Hill
Dublin 9

Seirbhísí Aeráide
Cnoc Ghlas Naíon
Baile Átha Cliath 9

Tel: +353-1-8064260
Fax: +353-1-8064216
Email: LEGAL@MET.ie

Our Ref. WS1730/2001_33

Your Ref. MCIB/12/296

Re: Estimate of weather conditions River Caragh, Glencar, County Kerry on the 2nd November 2019 particularly between 06:00 am and 18:00 pm Local Time.

Weather: A complex area of low pressure covered Ireland. Various frontal troughs embedded in the flow tracked over the area in question. A fresh to strong and gusty west to northwest airflow covered the area.

The day was mostly cloudy with just the odd limited bright spell breaking through the cloud. Rain occurred through the day with some heavy bursts between 07:00 am and 12:00pm. A yellow rainfall warning was in operation for Co Kerry on the day in question. Some mist occurred through the period. I estimate the total rainfall for the day between 10 to 15 mm.

Temperature: The air temperature was 11 degrees Celsius at 06:00am but was 9 to 10 degrees Celsius at 18:00 pm.

Wind: A fresh to strong and gusty west to northwest wind covered the area. (mean speeds 30 to 50 km/h gusts up to 80km/h)

Visibility: Poor to Moderate at times (1- 5km)

Appendix 7.12 Met Éireann - Weather Alert



Met Éireann

General Forecasting Division

Fax: (01)8064275

Tel: (01)8064255

Web: www.met.ie

E-mail: forecasts@met.ie

Weather Alert

Level: Yellow

The following Warning has been issued by Met Éireann at 08:00 hours Saturday, 02-Nov-2019

For Galway, Mayo, Clare, Kerry and Limerick

Spells of rain during Saturday with further accumulations of up to 20mm possible, especially in

Valid from 08:00 Sat, 02-Nov-2019

Valid until 23:59 Sat, 02-Nov-2019

Appendix 7.13 Irish Coast Guard SITREP

ROUTINE
02 1448Z NOV 19
FROM MRSC VALENTIA
TO MRSC VALENTIA SITREP GROUP

BT
ASSIST NEOC, GLENCAR
UIIN2241/19
SAR SITREP ONE AND FINAL

A - IDENTITY OF CASUALTY:
KAYAKERS

B - POSITION
52°00.38'N 009°52.14'W

C - SITUATION
UPTURNED KAYAKER, GLENCAR

D - NUMBER OF PERSONS
2

E - ASSISTANCE REQUIRED
LOCATE AND ASSIST

F - COORDINATING RCC
MRSC VALENTIA

G - DESCRIPTION OF CASUALTY
2 X KAYAKERS

H - WEATHER ON SCENE
WIND: 5, W / AIR TEMP: 8.7°C / VIS: GOOD / CLOUD COV: OVERCAST / PRECIP: SLIGHT / SITREP
WEATHER-TIME: 02 1433Z NOV 19

J - INITIAL ACTIONS TAKEN
TASKED IVERAGH CGU

K - SEARCH AREA
LICKEN WOOD, GLENCAR

L - COORDINATING INSTRUCTIONS
ASSIST HSE GOUND CREW

M - FUTURE PLANS
INCIDENT CLOSED

N - ADDITIONAL INFORMATION
1430 NEOC REQUEST ASSISTANCE WITH UPTURNED KAYAKER IN GLENCAR, TASKED IVERAGH

Appendix 7.13 Irish Coast Guard SITREP

CGU.

1500 IVERAGH CGU PROCEEDING.

1506 NEOC ADVISE OF A SECOND CASUALTY AT THE SAME INCIDENT.

1520 IVERAGH CGU ONSCENE.

1531 NEOC ADVISE 1ST CASUALTY IN CARE OF HSE, 2ND CASUALTY IN CARDIAC ARREST.

1624 IVERAGH CGU ADVISE 2ND CASUALTY IN THE CARE OF HSE, NO FURTHER CG ASSISTANCE
REQUIRED. IVERAGH CGU STOOD DOWN AND RTB.

NO 1 ON CALL BRIEFED.

INCIDENT CLOSED.

BT

Appendix 7.14 University of Limerick Kayak Club Safety Statement 2014 Edition



University of Limerick Kayak Club

Safety Statement 2014

Academic Year 2018-2019

Prepared by: [REDACTED]

August 2010

Updated by: [REDACTED]

March 2014

Updated by: [REDACTED]

November 2018

Appendix 7.14 University of Limerick Kayak Club Safety Statement 2014 Edition

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SECTION 1- Introduction and Contacts

Appendix 7.14 University of Limerick Kayak Club Safety Statement 2014 Edition

1.1 Introduction

This Safety Statement is designed to address the particular arrangements for safe operation of the University of Limerick Kayak Club (ULKC). It should be read in conjunction with the University Safety Statement. The University Safety Statement sets out duties and responsibilities of staff, students and visitors as well as general policies and arrangements for safety within the University. It is the duty of all of us to take reasonable care of one's own health and safety and that of any other person who may be affected by our acts and to maintain a safe and healthy working environment.

It is our intention to provide a safe and enjoyable environment in which to participate in paddle activities such as Kayaking and Canoeing. We aim to provide an environment that is conducive to learning the above sports in a manner that is not threatening to the student and is controlled. We adopt a 'Challenge by Choice', philosophy in all our activities, thus students are never pushed beyond their limits.

We believe that the safety of our members is of paramount importance above all other matters. In the event of their safety being compromised, the activity will be stopped immediately. It will not be continued until such a time that their safety can be assured.

ULKC members will always take weather conditions into account before activities begin. All activities will be designed in relation to current forecast weather conditions bearing in mind the ability of that group.

An essential element of safety is knowledge of correct procedures and of dangers associated with each particular procedure or operation. This Safety Statement provides a framework within which safe practice of our sport is possible. It is important that the procedures in this document are followed for the prevention of accidents.

The governing body for canoeing and kayaking in Ireland is Canoeing Ireland, herein referred to as the CI. They provide training and instruction to all kayakers nationwide and provide course syllabi that must be followed by all ULKC instructors during courses, as well as all CI safety guidelines that will be adhered to by all ULKC instructors and experienced members.

Appendix 7.14 University of Limerick Kayak Club Safety Statement 2014 Edition

1.2 Contacts

ULKC Contacts

Position	Name	Phone No.
Club Captain	[REDACTED]	[REDACTED]
Club Safety, Training and Development Officer		
Clubs & Societies Officers		
UL Student Life President		

Core Committee

Club Captain	[REDACTED]
Club Safety, Training and Development Officer	
Club Secretary	
Club Public Relations Officer	
Club Treasurer	

Safety Organisations

Organisation	Phone no
Limerick Regional – Limerick	(061) 482219/482338
St. John’s Hospital – Limerick	(061) 462222
Police / Gardai - Limerick	(061) 212400
Limerick City Fire and Rescue Service	(061) 407100/316107 Emergency Number 999

1.3 Location of First Aid Kits

The majority of Leaders and senior members are first aid trained. The main club first aid kit is kept in the Boat Store and regularly checked by the club safety and training officer. Additionally, there are five smaller first aid/river rescue kits available in waterproof cases. All of these are available on all club trips and shall be carried by the group leader or other trained personnel on the river.

Appendix 7.14 University of Limerick Kayak Club Safety Statement 2014 Edition

SECTION 2 - Arrangements for Safe Working

Appendix 7.14 University of Limerick Kayak Club Safety Statement 2014 Edition**2.1 Safety Responsibilities****2.1.1 Role of the Captain of the Club**

The Captain's role with respect to safety involves the following;

- Ensuring that everyone is familiar with the Safety Statement
- That there are first aiders and first aid equipment available if required
- That trip leaders are suitably experienced
- Ensuring that novices are well looked after
- That relevant training is provided where necessary
- And that everyone is aware of the action to be taken in an emergency

2.1.2 Role of the club member

- Clubs and Societies endeavour to offer their members a safe environment in which to participate in activities. The Officers will, to the best of their abilities, bring to the attention of members the risks associated with the activities. However, members are expected to make themselves aware of hazards and to be responsible for their own health and safety.
- They must not jeopardize the health and safety of other members through their own actions.
- Members are expected to follow instructions given by Officers or trip leaders
- Members should attend relevant training courses provided for them
- They should raise any safety concerns that they have with an Officer or trip leader
- Members should inform an Officer or trip leader of any relevant medical conditions that might impinge on their ability to participate or that might affect emergency first aid treatment
- Members are responsible for obtaining as much information as possible about any planned activity, to be able to make an informed decision as to whether it is a suitable activity for them.

2.1.3 Role of the ULKC Instructor

ULKC recognises that competent leadership by activity instructors is the most important safety factor of all. Instructors need to be able to safeguard the physical and psychological health of the people in their care.

Appendix 7.14 University of Limerick Kayak Club Safety Statement 2014 Edition

2.1.4 Role of the Students

Kayak students and participants of a trip should make themselves aware and understand the safety instructions relating to the activity they are taking part in and in the equipment they use. They should:

- Follow all safety instructions from experienced members,
- Discuss any doubts and/or personal fears with the instructor prior to commencing the activity (e.g. fear of water, heights, etc.)
- Wear all personal protective equipment as instructed;
- Report all equipment problems or other unsafe systems they are aware of, and;
- Take care of their own safety and the safety of others who may be affected by their behaviour.

2.2 Safety Training

Safety training shall be provided by the club on an ongoing basis. It is up to the individual to attend these courses. For some club activities safety training may be made mandatory.

2.3 First aid

All registered CI instructors are qualified First Aiders. Relevant First Aid training and revision days will be provided each year. It is up to all club members to participate in relevant training. There is 1 large club first aid kit and several basic waterproof kits available in the boat house and it is mandatory for all club members to bring relevant first aid material on trips.

Materials	First Aid Travel Kit Contents
Adhesive Plasters	12
Individually wrapped Triangular bandages	2
Safety Pins	2
Large Individually wrapped sterile Unmedicated Wound Dressing (approx. 13x9cms)	1
Individually Wrapped Wipes	8
Paramedic Shears/scissors	1
Pairs of Latex Gloves	1
Additionally, where there is no clear running water, Sterile Eye Wash	1

Appendix 7.14 University of Limerick Kayak Club Safety Statement 2014 Edition

The officers in charge of the first aid kits are:

- [REDACTED] Safety, Training and Development Officer
- [REDACTED] Assistant Safety, Training and Development Officer

2.4 Consultation and communication

If members feel or are made aware of any unsafe practices or unsafe equipment they are encouraged to bring this to the attention of the Club Safety Officer. To confirm permission to organise a personal trip, a member of the core committee needs to be consulted: this committee will exist of the Safety Officer and/or the Captain and one more committee member

This document will be reviewed on an annual basis (or more frequently if work practices change or new equipment is introduced). Staff and the Safety Representative will be consulted on any changes to be made.

2.5 Equipment Maintenance**2.5.1 Club Equipment**

The safety and suitability of equipment is primarily the responsibility of the Club Equipment Officer. However, all members are expected to be vigilant and to address and report defects. Scheduled inspections will be carried out regularly. A major inspection will be carried out twice yearly. General inspections are to be carried out before and after each club trip.

2.5.2 Emergency Communications Equipment**2.5.2.1 Mobile Phones**

Mobile phones will be brought on all activities, preferably by all participants but at least by all the leaders and instructors. Waterproof pouches are available in the small rescue/first aid kit bags in the Boat Store.

2.5.2.2 Phone (landline)

A phone is available in the Boat House.

2.6 Alcohol and Drugs

Alcohol misuse by members strictly prohibited such that:

- No member may get on the water under the influence of alcohol or consume alcohol on the water or during breaks off the water.
- Alcohol consumption in breach of these restrictions is strictly prohibited as it risks the safety and comfort of other members and will be regarded as a disciplinary matter.

Drug misuse by members is strictly prohibited such that:

Appendix 7.14 University of Limerick Kayak Club Safety Statement 2014 Edition

- No member may get on the water under the influence of drugs or consume drugs on the water or during breaks off the water.
- Drugs misuse in breach of the above restrictions is strictly prohibited as it risks the safety and comfort of members and will be regarded as a disciplinary matter. ULKC cannot tolerate criminal behaviour in this regard.

All members are required to bring this policy to the attention of new members, if they see anyone consuming or misusing drugs, or appears to be under the influence of either to report them to the Club Safety Officer.

2.7 Bullying

Clubs and societies of UL Student Life do not tolerate bullying. Bullying is repeated aggression, verbal, psychological or physical, conducted by an individual or group against another person or persons. Isolated incidents of aggressive behaviour, while to be condemned, should not be described as bullying. Only aggressive behaviour that is systematic and ongoing should be regarded as bullying. Sanctions will be taken against those found to be in breach of the policy. Club or society members should contact the Welfare Officer for assistance on this issue. Refer to Appendix (7.8), the Clubs and Societies Bullying Policy.

Appendix 7.14 University of Limerick Kayak Club Safety Statement 2014 Edition**2.8 Reporting of Accidents and Near Miss Events**

All accidents and near misses (incidents that could have lead to a serious injury but didn't) must be reported to the Club Safety Officer, and must be recorded in the appropriate logbooks. The Club Safety Officer will investigate the causes of the incident and together with the involved members fill out the University Accident Report Form or the University Dangerous Occurrence Form. Copies of the completed form should be forwarded to the University Safety Officer. The purpose of an investigation is to establish all the facts relating to the incident, to draw conclusions from the facts and make recommendations to prevent reoccurrence. Each accident will be looked at from the point of view of location, activity, procedures and people.

2.8.1 Accident report form

Accidents are defined as incidents where a person is injured to such an extent that they require first aid or other medical treatment (doctor, nurse, hospital visit). Accidents that occur as a result of the clubs activities or while a member is participating in the club's activities must be investigated, recorded on the SU accident report form (form attached in the appendix) and a copy sent to the SU within 5 days of the accident occurring.

2.8.2 Insurance of Club Members

Members are insured against personal injury while participating in club activities. Club activities are defined as

- Official trips organised by the Trips Officer
- Competition trips that have been defined as club trips by the ULKC Committee
- Personal trips that follow the Personal Trip Safety Guidelines (see 2.8.3)

Non members are not insured. The SU will deal with claims that may arise. Officers must ensure members are signed up on the UL Wolves registration system and that each account has been activated, which is only to happen after the annual membership fee of €5 has been received by the club Treasurer.

2.8.3 Personal Trip Safety Guidelines

ULKC provides a calendar of events which includes training for personal, leadership and safety skills. The club is very strong in provision of safety and leadership skills and has a calendar of events which provides space for personal skills development.

We recognise the invaluable contribution made to the club by its members in terms of passing on these skills. The development of any individual's personal skills must not be hampered. To that end we permit use of kayak club equipment for use by members in club trips which fall outside the base club calendar.

These trips can be organised "on spec" often based on the unpredictable nature of available paddling conditions.

2.8.3.1 Definition of a personal club trip

- A club trip is any trip in which any club member **uses club gear**. The member must meet the requirements outlined below. Failure to

Appendix 7.14 University of Limerick Kayak Club Safety Statement 2014 Edition

comply with the policy equates to a failure in making the on spec trip a club trip and therefore should not be using club equipment.

- Members must have the **trip approved** as a club trip by either the Captain and Safety Officer, or Captain or Safety Officer and one other committee member in verbal and or written form.
- Members should comply with the guidelines 2.8.3.2, 2.8.3.3, 2.8.3.4, 2.8.3.5 and 2.8.3.6.

2.8.3.2 Traceability requirements

- All equipment being used must be entered into the log book (sample page in appendices). Log book to include:

2.8.3.3 Group/Skills requirements

- Groups size of no less than 3 people
 - There must be a ratio of 1:1 where there is one member who has passed proficiency assessments equivalent to the grade of water being paddled to one member who is less experienced.
- Instructors; different ratios apply to qualified CI or BCU instructors (as outlined in the CI syllabus)
- Previous experience; in addition to proficiencies members need to ensure that there is sufficient experience in the group. Paddling members should have previous experience of similarly graded rivers.
- Level 4 paddlers and above, if willing have the option to adopt a 2:1 ratio of less experienced members to each Level 4 paddler on water no higher than Grade 3, ie. 2 less experienced members to each Level 4 paddler.
- Surf Kayaking trips: One competent club paddler in order to borrow club gear. Surf conditions, weather conditions, location and paddler experience have to be taken into account by the Safety Officer. Two core committee members must be contacted. Safety Officer has last say on if trip goes ahead.

2.8.3.4 River levels and weather

The river in question has to be assessed on the day and paddled 'within its grade'. If the river looks high, the river grading may have to be adjusted upwards. This has to be reflected in group members' proficiency levels.

2.8.3.5 Outback sessions

Solo paddling on Grade 1 directly behind the boat house (from below the rapids at Kilmurry to Corbally Bridge) is low risk both in terms of likelihood and magnitude of any dangers. Despite this we regard it as necessary to take a cautious step by requiring paddlers to go a step further in skills requirements by needing a minimum of level 3 proficiency and an RSR course (or equivalent).

Appendix 7.14 University of Limerick Kayak Club Safety Statement 2014 Edition**2.8.3.6 Equipment requirements**

Members must use whatever gear is appropriate for the water they intend to paddle. Some examples:

- A rope should be brought on all river trips
- Further safety, such as a 'dope-on-a-rope' system should be provided where necessary, such as 'Little Eas' or 'Jacksons'
- At least one first aid kit per group

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2.8.4 Serious accidents and fatalities

Serious accidents or fatalities must be reported to the Development Officers, [REDACTED] or [REDACTED] as soon as possible. If Paul is not available the Secretary General must be notified or the President of the Students' Union.

2.9 Hiring of Equipment and Services.

2.9.1 Hiring of transport

When hiring minibuses or other vehicles for club outings only those named as drivers (with the appropriate drivers license) are insured to drive the vehicle. Other club members must not drive. Where possible only minibuses fitted with seat belts should be hired, check with the hire company before hand.

2.9.1.1 Clubs & Society Vehicles Usage & Policy

The Students Union's Clubs & Societies Department currently own 3 vehicles for the purposes of enhanced service provision to aid and promote the development of Clubs & Societies activities.

The usage is governed by a protocol and associated forms. Information pertaining to the Vehicles regarding the license category, age restrictions, insurance requirements, towing restrictions and legislation refer to

See Appendix 4 Forms Re C&S Vehicles 1 -Vehicle Protocol
 See Appendix 4 Forms Re C&S Vehicles 2- Committee Letter of Endorsement
 See Appendix 4 Forms Re C&S Vehicles 3 - Additional Drivers Form
 See Appendix 6 Clubs & Society Vehicle Information

What to do if the C&S vehicle breaks down:

- If you have hazard warning lights, switch them on.
- Move your vehicle on to the hard shoulder. If you cannot do this, take whatever steps you can to warn other drivers of its presence.
- Always get out of your vehicle from the passenger side. Do not attempt to walk on the motorway.
- Get help quickly and do not leave your vehicle unattended for longer than necessary. Wait for help on the embankment side of the motorway.
- To avoid being hit by a passing vehicle, never work on your vehicle from the side that's exposed to traffic. If you can, drive farther off the road to a safe, well-travelled place, and try to reach into the trouble area from the front or the side that's away from traffic.
- If you are driving the Sprinter Van or the Minibus, display your warning triangle behind the vehicle.
- When rejoining the motorway, build up your speed first on the hard shoulder. Watch for a safe gap in the traffic before rejoining it.
- Use the roadside telephone or a mobile phone to tell the Gardai.

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- If you know that you're going to need roadside assistance, use your mobile phone to call AA Rescue Service 1800 66 77 88. UL C&S membership number is 6/S 164715
- If you get a flat tire, do not attempt to change it unless you can get to the side of the road and the tire is on the side of the vehicle that's safely away from traffic.

Travelling abroad:

- When taking any of the vehicles to mainland Europe the club or society must take out AA 5* European Breakdown Cover

What Drivers Must do at an accident or in an Emergency:

- If you are involved in an accident, you must stop your vehicle and remain at the scene for a reasonable time. If vehicles are blocking the roadway or posing a danger to other road users, the roadway should be marked and the vehicle should then be removed as soon as possible.
- If you are asked by a Garda, you must give your name and address, the address where the vehicle is kept, the name and address of the vehicle owner, the vehicle's registration number and evidence of insurance, such as the name of your insurance company or a disc or motor insurance certificate. If there is no Garda at the scene, you must give this information to any person involved in the crash or, if requested, to an independent witness.
- If you or another person is injured and there is no Garda at the scene, the accident must be reported to the nearest Garda station. If the accident damages only property and there is a Garda in the immediate vicinity you must report it to the Garda. If there is no Garda available, you must provide this information to the owner or the person in charge of the property. If, for any reason, neither a Garda nor the owner is immediately available you must give all relevant information at a Garda station as soon as reasonable possible.
- At the time of the accident don't admit liability. Many people feel apologetic about accidents for which they are not responsible (aggression doesn't signify innocence either).
- Make a note of the name, address and insurance information (company & policy number) of the other people involved.
- Make a note of the registration numbers and positions of any vehicles.
- Tell us about the accident as soon as possible by calling [REDACTED] or [REDACTED]
- The ULSU C&S office requires an accident report form to be completed in every case.
- Where a person or persons are injured, the accident must be reported at the nearest convenient Garda Station if no Garda is present at the scene of the accident.

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- Where damage to property only is involved it is not necessary to report the accident at a Garda Station provided the driver gives necessary details.
- If you are involved in an accident with a visiting motorist, report the accident to the Motor Insurers Bureau of Ireland, 39 Molesworth Street, Dublin 2. Telephone: (01) 676 9944.

2.9.2 Hiring of Venues

If a venue (external to UL) is to be used by the club for its own activities or for events a club officer should ensure that there are sufficient trained security persons at the venue for the duration of the event (if required). The officer must clarify whether the venue will provide these or if they need to be supplied by the club. If there is any doubt about numbers of security the Ents Committee should be consulted.

The club officer should also request the venue manager to sign the declaration set out in the form (attached in appendix). This form is a fire safety declaration of compliance with the relevant legislation and provides assurance to the club's officers that the venue is safe from a fire safety perspective. This form is not required when clubs or societies are using conventional venues such as hotel function rooms and nightclubs but is needed when hiring halls, marquees and venues not usually used for large groups.

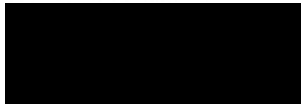
2.9.3 Purchase of Services

Where a club uses the facilities of a service provider (e.g. windsurfing school, dive centre, outdoor pursuits centre) or equipment belonging to a service provider an officer of the club must ensure that the service provider has public liability insurance. A copy of the certificate of insurance should be obtained by an officer of the club prior to the use of the venue or equipment. A copy of the insurance certificate must be given to the Development Officer [REDACTED]

Ensure that the insurance policy wording does not exclude any of the activities that your club will be participating in. If the service provider cannot provide a certificate then the club should use an alternative service provider.

2.9.4 Hiring of Equipment to be used on campus

If a club or society is hiring in equipment for use on campus such as bouncy castles or performers such as fire jugglers, the club's officers must first obtain permission from the Student's Union. Once permission is obtained the club must get an up-to-date copy of the service provider's insurance certificate. A copy of the insurance certificate must be sent to:



The equipment/event can only proceed if the event is given the go-ahead by UL's insurers through [REDACTED]

2.10 Loaning of Equipment

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Club equipment or equipment belonging to the University must not be loaned to third parties who are not members of the SU club. A club member must not borrow equipment for use by third parties even if the club member is present or in the group using the equipment.

2.11 Trips in Ireland (day and longer)

Club officers must leave contact details with a designated responsible person before setting out on a trip, giving the destination and estimated time of return. The club officer should contact the designated person on return of the club members. In the event of a problem arising, the designated person should be instructed to contact the appropriate authorities and the SU.

2.12 Trips abroad

Trips abroad should be notified in writing to the Development Officer, [REDACTED] least one week prior to departure. The names of all trip participants, their next of kin and contact addresses and numbers must be provided to the Development Officer.

2.11 Annual Review of the Safety Statement.

The Safety Officer should review the Safety Statement at the beginning of each Academic year. The names of those designated to look after first aid kits, etc should be changed. A new copy of the Safety Statement should be produced and dated with the current academic year clearly printed on the cover. A copy of the revised Safety Statement must be given to the Development Officer [REDACTED]. The receipt of funding from the SU is contingent on the receipt of an up-to-date Safety Statement.

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**SECTION 3 - Hazards and Control Measures
- Water Based Activities**

Appendix 7.14 University of Limerick Kayak Club Safety Statement 2014 Edition**3.1 Kayaking/Canoeing Hazards**

- Drowning
- Injury from equipment or capsizing (concussion, etc)
- Separation of person from kayak / canoe
- Manual handling injury
- Capsizing & entrapment
- Slips, trips and falls
- Collisions
- Weather and conditions
- Hypothermia
- Bacterial and viral infections (i.e. leptospirosis)

3.2 Risk Assessment

Kayaking/canoeing is deemed a high risk activity.

3.3 People at Risk

All involved.

3.4 Control Measures

1. All participants must wear appropriate clothing on a kayaking/canoeing session. The pre-requisites include a correctly fitted CE393 50 Newton buoyancy aid with reflective strips, a wetsuit and a helmet. Spray decks may be worn where the instructor is satisfied with the participant's proficiency (being able to perform a calm and capable capsize drill). It is compulsory that all kayakers/canoeists from the Club wear the Club buoyancy aids, alternatively they may wear their own personal buoyancy aid as long as it meets the club's minimum standard.
2. An experienced member will supervise all canoeing/kayaking sessions.
3. All kayaking/canoeing participants will be assessed by the Instructor/senior member after launching and only participants of capable abilities will be allowed to continue.
4. If a canoe/kayak has capsized, the person/persons in charge will carry out necessary capsize rescue techniques, e.g. X-Rescue.
5. If a canoe/kayak is drifting with people on board, the person/persons in charge will immediately instruct or tow this canoe/kayak back to safety.
6. All on-water canoeing/kayaking activities should occur only during official daylight hours as set by the National Almanac.
7. The Club adheres to all Canoeing Ireland recommendations regarding teaching ratios (1:8 – Beginners, 1:6 – Improvers)

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8. Care should be taken to avoid prolonged exposure in the water to avoid the hypothermia.
9. Depending on the cause and the severity of the accident, first aid will be provided by appropriately trained club members. If further medical assistance is required, the person/persons in charge will ensure this is provided
10. The possibility of infection from the water and riverbank will be brought to the attention of participants and water and soap or antibacterial gel should be always available in the first aid kits.

3.5 The Instructors

The kayaking/canoeing instructor has an important role in ensuring the safety of clients. The club aims to have a certain number of qualified CI instructors amongst their members. Trainee instructors or experienced members will be encouraged to follow REC 3 training. In addition to his/her responsibilities under Section 2.3 of the ULKC Safety Statement the kayaking/canoeing instructor should:

- a. Be trained and be sufficiently competent to coach members to the appropriate level.
- b. Define a safe operational area on the water taking account of the nature of the activity, the ability of the group, water and weather conditions and the equipment available. Brief participants to stay at or within it.
- c. Ensure that safety and rescue equipment appropriate for the activity is available.
- d. Modify or curtail the activity if prevailing conditions are inappropriate for the customers or the planned activity.
- e. Ensure that all on-water activities occurs only during official daylight hours.

3.6 Water Activities Criteria

In Summary all Water Activities require the following criteria:

1. A CE approved PFD with minimum of 50 Newton with reflective tape must be worn.
2. Appropriate standard of equipment & adequate safety equipment to provide cover
3. The skill level of the participant & the dynamics of the group shall be considered when planning a session. The environmental conditions and potential changes shall also be taken into account when planning sessions.
4. U.L.K.C. implements a policy of "Challenge by Choice" & "Sport for All", thus allowing full participation at the discretion of the participants own knowledge of the risks involved. U.L.K.C. must be informed of all disabilities/illnesses prior to the commencement of the activity

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5. In the event of lightening all water activity must be terminated immediately.
6. All on-water activities should occur only during sufficient daylight hours. Paddling outside of sufficient daylight hours can only happen when there is adequate lighting from streetlights or other installed light sources , members must also get the expressed permission of either Captain or Safety , Training and Development Officer.
7. Personal trips using Club equipment can only take place if following the safety requirements stated under 2.8.3.

3.7 Pool Safety

When members are participating in pool training, they shall adhere to all pool rules without exception.

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**SECTION 4 - Hazards and Control Measures -
Off-Site Activities**

Appendix 7.14 University of Limerick Kayak Club Safety Statement 2014 Edition**4.0 Off-Site Activities**

As the sports participated in by the club are outdoor activities they occur in various outdoor locations. This section deals with the risks involved in doing so.

4.1 Road Safety.

All vehicles shall be parked considerably and safely. When changing due care should be taken not to obstruct the roadway, and be carried out a safe distance from the roadway. When crossing the road the 'safe cross code' should be used and crossing should be carried out as quickly as is safely possible.

4.2 River Ingress.

When entering the river members should do so from a safe position, that is a position where they can enter their boat safely and enter the water safely. This includes 'seal launches' if no other option is present and it is safe to do so. All seal launches shall be carried out at one's own risk.

4.3 River Egress.

When exiting the river members should do so from a safe position, that is a position where they can exit a boat safely.

4.4 Steep Ground Traversing.

When traversing steeply inclined ground members should use appropriate precautions, if necessary an anchor point should be set up and appropriate rope systems used.

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**SECTION 5 - Hazards and Control Measures - Boat
House**

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5.1 Fire Risk Assessment

Hazards	<ul style="list-style-type: none"> LPG Tank: Fire, explosion Boiler Room: Fire, explosion
Risk High Assessment	
People at Risk	All
Control Measures	<ul style="list-style-type: none"> Fire escape routes must be kept free of obstruction at all times. All fire equipment should be kept up to date and in good working order (this responsibility is placed on the management of the building). In the event of a fire members should evacuate the building immediately and contact the emergency services. Members should only attempt to fight the fire if they feel it is safe for them to do so.

5.2 Electrical Safety

Hazards	<ul style="list-style-type: none"> Electric Shock Fire Trips or falls from loose cables
Risk High Assessment	
People at All Risk	
Control Measures	<ul style="list-style-type: none"> All electrical fixtures have been installed by qualified electricians and are deemed suitable for use in the relevant area – i.e. indoor or outdoor. If for any reason there is an electrical fault an electrician should be immediately contacted to remedy the matter. Under no circumstances should employees attempt to carry out repairs either temporary or permanent to the electrical supply system or to any of the electrical appliances. Portable or temporary equipment will be connected by means of switched socket outlets suitable for the environment. Cables used for outdoor equipment will be to a heavy duty protected or armoured design. Portable 220 volt AC power tools and equipment if used out of doors (preference is to be given to 110 volt AC equipment to avoid this), must only be used in conjunction with a 30mA residual current device. Frayed and damaged cables shall be replaced immediately. Flexible cables should not be run across floors. Where damage at floor level to cables is possible, protection by ramps, conduit or armoring must be used.

5.3 Slips, Trips and Falls

Hazards	Slips, Trips and Falls
Risk	Low to Medium

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Assessment	
People at Risk	All
Control Measures	<ul style="list-style-type: none"> • The showers and changing rooms are kept clean and dry when possible. When the floor is wet however slipping is unlikely due to non-slip floor tiles. • The slipways are all kept clean and are monitored and scrubbed / power hosed regularly to reduce the likelihood of a slip. There is also a sign at the end of the slipway warning people of the danger. • The floors of the lecture room and reception area are kept dry as much as possible and if they cannot be dried there are signs to mark wet areas. Alternatively these areas may be closed until the floor can be dried completely. • It is not permitted to stand on desks, benches, cupboards or chairs to reach high places. Always use high cleaning extension poles or steps. • The pier in wintertime can become slippery from a build up of algae, when it reaches a noticeable amount it is power hosed and scrubbed with a deck brush to return the grip to its original state.

5.4 Cash Handling

Hazards	Violence to members in a robbery situation
Risk Assessment	Medium
People at Risk	All
Control Measures	<ul style="list-style-type: none"> • ULKC will endeavour to minimise the amount of cash being held by the Club • Members must not put their own safety in danger in order to deter thieves • If a Member is threatened with violence during a robbery they must cooperate fully with the thieves. Do not try to act heroically. • In the event of a robbery or assault contact the Gardai immediately. The C & S officer, Club Captain and Treasurer should also be notified.

5.5 Manual handling

Hazards	Manual Handling Injuries
Risk Assessment	Medium
People at Risk	Kayak/canoe participants
Control Measures	<ul style="list-style-type: none"> • All members will lift correctly <ol style="list-style-type: none"> 1. Stand close to the boat 2. Bend your knees and keep your back straight 3. Grasp the boat firmly 4. Lift with your legs and not your back 5. Never lift a boat that is too heavy – get help

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	<ul style="list-style-type: none">• Boats on high racks must not be removed by oneself (No climbing on racks)• Only lift a boat that is within your lifting capacity
--	---

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**SECTION 6 - Hazards and Control Measures
- Vehicles**

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6.1 Vehicles

The ULSU Vehicles that can be used by ULKC are the Mercedes Sprinter Van, Toyota Landcruiser & Mercedes Sprinter Mini Bus.

6.2 Vehicle Risk Assessment

Hazards	<ul style="list-style-type: none"> • Accident • Breakdown • Fire
Risk Assessment	Low
People at Risk	Members
Control Measures	<p>The vehicle may only be driven by a the following named drivers:</p> <div style="background-color: black; width: 150px; height: 60px; margin: 5px 0;"></div> <p>Additional drivers may be added to this list if they possess a suitable driving licence and fulfil the criteria required by the vehicle insurers and will be listed on the drivers list at the Student's Union administrator.</p>

6.3 Vehicle emergency equipment

The vehicle should be equipped with suitable emergency equipment. The equipment should include:

- reflective warning triangle and basic tools;
- fire extinguisher and torch, and;
- first aid kit

6.4 Visual Inspection

The driver will ensure that the vehicle is in good condition prior to starting a trip. A visual inspection will be made of:

- tires (to ensure that the tyres are in good condition without obvious cuts, that there is adequate thread, and that they are properly inflated)
- windscreen (cracked windscreens could fail)
- oil/water/brake fluid
- Engine, upon starting the engine the driver will listen for unusual sounds that may indicate damage to the engine

6.5 Breakdown

In a situation that a breakdown occurs, the vehicle occupants should only exit the vehicle when it is safe to do so

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6.6 Rules of the Road

Drivers will adhere to the 'Rules of the Road' and should treat other road users with appropriate courtesy and respect. In particular drivers will:

- adhere strictly to speed limits, and maintain appropriate distances to the vehicle in front
- not overload the vehicle or attach trailers that could adversely effect the roadworthiness of the vehicle
- ensure that loads are properly distributed and secured prior to starting a journey. The use of ropes, ratchet straps and blocks to secure items, shall be used where necessary
- not use a mobile phone while on the move
- not permit passengers to travel in the back of the vehicle, under any circumstances and
- not drive the vehicle if under the influence of alcohol
- the driver shall be responsible for the payment of any fines for speeding, parking, etc.

6.7 Goods transport

- When loading the van the person will take extra precaution in lifting equipment into the rear of the vehicle. When needed the driver will require the assistance of another person to help load heavy or bulky goods.
- The use of the roof rack shall only be used in the case where an item cannot be transported within the vehicle.
- When necessary the item will be strapped down using ratchet straps and a bright flag shall be placed at the end of the particular item when over hanging of the vehicle occurs.

6.8 Trailer

When towing a trailer the use of the jockey wheel shall be used for all manoeuvring of the trailer onto the tow hitch of the vehicle. A lighting board displaying the registration number of the vehicle will be used whenever a trailer is being used. The loading and unloading of the trailer shall be carried out or supervised by a senior member.

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SECTION 7 - Appendices

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7.1 Appendix 1 - SU Accident Report Form

(to be filled on by an officer of the club and the person suffering the injury, copy to be sent to SU as soon as possible)

1. Club	ULKC
2. Name of injured person:	
3. Student id no;/Staff id	
4. Term time address	
5. Home address	
6. Phone no.	
7. Date of accident:	
8. Location of accident	
9. in UL (state where)	
10. on trip (state where)	
11. State the nature of the injury.	
12. What first aid was provided?	
13. Did the patient attend hospital?	<input type="checkbox"/> Yes <input type="checkbox"/> No
14. State name and address of hospital.	
15. Date patient attended if not day of accident.	
16. What treatment was received?	
17. How did accident occur? (to be completed by patient)	
18. Witness 1 Name	
19. Term Address	
20. Home address	
21. Phone	
22. Witness 1 statement	

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23. Witness 2 Name	
24. Term Address	
25. Home address	
26. Phone	
27. Witness 2 statement	
SU Use only	
Insurance company notified: yes no	<input type="checkbox"/>
Date:	
Signed:	

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7.2 Appendix 2: Fire Safety Declaration of compliance

I declare on behalf of _____ that the venue is in compliance with Fire Safety in Places of Assembly (Ease of Escape) Regulations, 1985 and with the Code of Practice for the Management of Fire Safety in Places of Assembly. Numbers entering the premises will be controlled by the venue management.

Manager or authorized person

Date __/__/__

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7.3 Appendix 3: Log book entry form

Name(s)				
Date	Returned (to appropriate storage area)	Location		
Boat(s)				
BA <input type="checkbox"/>	Paddle <input type="checkbox"/>	Wetsuit <input type="checkbox"/>	Deck <input type="checkbox"/>	Helmet <input type="checkbox"/>
Other:				
Safety Checklist				
1: If leaving the campus, which safety committee member have you contacted? *				
2: Have you brought safety equipment* (if appropriate)?				
	Throwbag & knife	Own equipment <input type="checkbox"/>	Yes <input type="checkbox"/>	
	Rescue kit & first aid kit	Own equipment <input type="checkbox"/>	Yes <input type="checkbox"/>	
	Phone*		Yes <input type="checkbox"/>	
3: Have you observed the safety regulations regarding water levels, weather, qualifications and ratios? *				Yes <input type="checkbox"/>
Signed:				
Have a great paddle!				

*see safety statement

Optional: notes on equipment condition/repair needed
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7.4 Appendix 4: Forms RE the C&S Vehicles I

Vehicle Protocol (Re C&S Vehicles)

1. All drivers must fill out the "Additional Drivers Form" **annually**. This must be accompanied by a photocopy of the proposed drivers, driving license (front AND back cover)
2. A Statement of Insurance is required from applicant drivers from their Insurance Company for a minimum period of 12 consecutive months (this may incorporate time as a provisional license holder but a full license required for inclusion on ULSU vehicles)
3. The information as per (1) & (2) is to be presented to the Clubs & Societies Development Officer (CSDO/CSLO) by a member of the core committee of the relevant club/society with an **annual** letter from the committee to verify in writing that you as a committee are putting forward your nominee's for the vehicles on behalf of your club/society for that particular year. The letter must contain the signatures of the core committee on the bottom.
4. If the vehicle(s) are taken away overnight – they have to be cleaned (i.e. power washed) on the outside AND the inside (i.e. vacuumed/polished) before being returned
5. If the vehicle(s) are taken away on a day trip only the inside has to be cleaned unless the vehicle(s) are very noticeably dirty on the body of the vehicle (perhaps due to being off-road in a field)
6. The "Driver Checklist of Clubs & Societies Vehicles" book must be returned with the keys and completed in full to the Clubs & Societies Development Officer or the Students Union before close of business or within the first two hours of start of business (9am-11am).
7. In the event of damage to the vehicle the Clubs & Societies Development Officer must be notified in person or via email immediately on return
8. The fuel tank must be returned full
9. Failure to comply with all points (3), (4), (5), (6) & (7) will result in an automatic disqualification of your club/societies very next booking and that date will be made available to other Clubs & Societies
10. Notice of Cancellation of bookings requires a minimum of a full working days notice failure to comply will incur a fine of €50 on each occasion
11. Failure to return the bus to campus after an event will incur a fine of €50 on each occasion, except where prior permission from CSDO has been obtained.
12. Vehicles must be returned to the Schrodinger Car Park or the staff car park immediately opposite the Schrodinger and placed as close to CCTV camera as possible. Do NOT park the Vehicles in obscure area's and/or behind obstructions
13. Expulsion/Suspension/Annual approval of drivers and or clubs/societies will be determined by the Clubs & Societies Executive. Speeding and/or reckless driving and/or persistent poor driving may result in Expulsion or Suspension of driver and/or club/society. The Clubs & Societies Executive will determine on a case by case basis.
14. Proficiency Letter Provided by Nessan School of Motoring to ULSU for all drivers of Mercedes Sprinter. Those involved in any incident or accidental damage subject to Clubs & Societies Executive Approval may also be required to undergo further proficiency testing.
15. Requirement for the clubs/societies to progress to the D license category limit the number of B license holders per C&S. Cap the B license and unlimited D license.
16. Damage to vehicles through bad driving/negligence will be at 100% cost to the offending club/society
17. All new drivers must sign the vehicle protocol
18. Club/Society Committee Approval of Drivers is required annually

Signature of Driver:

Date:

Name: _____

_____/_____/_____

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7.5 Appendix 5 Forms Re the C&S Vehicles 2

C&S Committee Letter of Endorsement (as per Vehicle Protocol)

Date **XX-XX-XX**

To the Clubs & Societies Executive:

The University of Limerick **NAME OF CLUB OR SOCIETY** committee wish to endorse the following person(s) as our nominated drivers for the Academic Year **XXXX** to drive on behalf of our **CLUB OR SOCIETY**

- 1. Mr/Ms [Please stipulate which of the vehicles they are qualified to drive or if it's all three i.e. Ford Transit 15per – Mercedes Sprinter – Toyota Land Cruiser]
- 2. Mr/Ms [Please Stipulate which of the vehicles they are qualified to drive or if it's all three i.e. Ford Transit 15per – Mercedes Sprinter – Toyota Land Cruiser]


We agree to abide by the Vehicle Protocol Policy as specified by the Clubs & Societies Council.

Names	Title of Core Committee Position
1.	
2.	
3.	
4.	
5.	

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7.6 Appendix 6 Forms Re the C&S Vehicles 3

Additional Drivers Form



Additional Drivers Form

Supplementary proposal form for additional drivers. To be incorporated in the proposal for policy No. []

Broker []

Insurer [] Agency No. []

Name and address of insured []

questions 1 to 13 to be answered by additional driver

1. Name and address of driver []
2. Date of Birth []
3. Occupation (include part time) []
4. Do you hold a full or provisional driving licence? []
State class(es) of vehicle(s) covered by licence []
Date of issue of licence [] Issuing Authority []
5. Date on which Driving Test was passed []
6. Date of issue of first licence []
7. Will you use the vehicle in connection with your own business? Yes No
8. Will you be the main driver of the vehicle? Yes No
9. Do you own your own vehicle? Yes No
10. Have you ever held insurance in your own name in the last 3 years? Yes No
11. Have you ever been refused Motor insurance or had a policy cancelled or special rates or conditions applied? Yes No
12. Do you suffer from defective vision or hearing, diabetes, epilepsy, heart condition or any other physical or mental infirmity? Yes No
If "YES" please give details []
13. (a) Have you been involved in a traffic accident during the past five years? Yes No
(b) Have you been convicted by a court of any offence in connection with a Motor Vehicle? Yes No
(c) Is there any motor prosecution pending? Yes No

If the answer to a, b, or c is "YES" please give full details and submit your licence for inspection []

Declaration:
I declare that to the best of my knowledge and belief the above statements made by me or on my behalf are true and complete and that nothing materially affecting the risk has been concealed.
Signature of driver [] Date []

Declaration:
I/We declare that to the best of my/our knowledge and belief the above statements made by me or on my/our behalf are true and complete and nothing materially affecting the risk has been concealed. I/We agree that this Declaration shall in conjunction with my/our original proposal, be incorporated in and taken as the basis of the contract between me/us and THE COMPANY.
Signature of Policyholder [] Date []

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7.7 Appendix 7 Clubs and Societies Vehicle Information

Licence Category	Description	Minimum Age & Other Requirements	ULSU C&S insurance requirements	Full driving licence - required	History previous accidents, penalty points	Insurance	Pro les req
B	Vehicle with seats for up to 8 passengers and max weight of 3500kg	17 by law,	20 by ULSU insurers	YES	Full honest declaration – must inform C&S liaison officer of any accidents &/or penalty points	Provide evidence of 2 years insurance	Mu co pro les sup evi pre exp dri aut veh app dri lan or ins dri sim siz veh the
D1	Minibus, Maximum Passenger accommodation 16 seats	21 / Full B Licence	23 by ULSU insurers	YES	Full honest declaration – must inform C&S liaison officer of any accidents &/or penalty points	Provide evidence of 2 years insurance	See
EB	Combinations of vehicles with Drawing vehicle in category B and	17 years	20 by ULSU insurers	YES	Full honest declaration – must inform	Provide evidence of 2 years insurance	See

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	where the design gross vehicle weight of the trailer is greater than 750kg.				C&S liaison officer [redacted] of any accidents &/or penalty points		
ED1	Combination of vehicles with drawing vehicle in category D1 having a combined design gross vehicle weight not exceeding 12,000kg and where the design gross vehicle weight of the trailer is greater than 750kg.	21 years	23 by ULSU insurers	YES	Full honest declaration – must inform C&S liaison officer [redacted] of any accidents &/or penalty points	Provide evidence of 2 years insurance	Se

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Toyota Landcruiser	██████████	Full B Licence	Dimensions: width 2.2m, height 1.95m & length 4.9m
Mercedes Sprinter	██████████	Full B Licence	DGVW 3500kg ULW 2620KG Dimensions: height 2.85m, width 2.4m length 7.2m
Ford Transit minibus	██████████	Full D1 Licence	

Towing a Trailer Legislation

<http://www.rsa.ie/en/RSA/Vehicles-and-Legislation/Vehicle-Standards/Trailers/>

Trailers

Trailers are classified by their weight when they are carrying a load, which is called the Design Gross Vehicle Weight (DGVW) or maximum mass.

Trailer categories:

- **O1 Trailers** = DGVW less than 0.75 tonnes. This includes small car trailers.
- **O2 Trailers** = DGVW between 0.75 and 3.5 tonnes. This includes larger trailers, horseboxes and most caravans.
- **O3 Trailers** = DGVW between 3.5 and 10 tonnes.
- **O4 Trailers** = DGVW over 10 tonnes. This includes heavy trailers and articulated or semi-trailers.

Driving Licence requirements

The licence required will depend on what type of towing vehicle you are driving, i.e., whether you are using a car, a truck or a bus.

Towing an O1 or an O2 trailer with a car, 4x4 or a small van
With an ordinary category B licence, a person can

- tow a trailer of up to 0.75 tonnes DGVW, with a vehicle with a DGVW of up to 3.5 tonnes and seating for up to eight passengers (apart from the driver). The combination weight cannot exceed 4.25 tonnes.
- Tow a trailer exceeding 0.75 tonnes DGVW, provided that the DGVW of the trailer does not exceed the un-laden weight of the towing vehicle, and the maximum combination weight does not exceed a total of 3.5 tonnes.

With an EB license, a person can

- tow a trailer exceeding 0.75 tonnes DGVW, with a vehicle with a DGVW of up to 3.5 tonnes and seating for up to eight passengers

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(apart from the driver) provided that the manufacturer's rated towing capacity for the towing vehicle is not exceeded.

Brake requirements

For O1 Trailers (DGWV not exceeding 0.75 tonnes)

O1 trailers with a single axle are not obliged to have brakes provided that their DGWV is less than half the DGWV of the towing vehicle.

O1 trailers that have a DGWV greater than half of the DGWV weight of the towing vehicle or that have two or more axles must have brakes fitted.

For O2 Trailers (DGWV between 0.75 & 3.5 tonnes)

All O2 trailers must also have brakes fitted. The braking system must include a parking brake.

If the O2 trailer does not have an automatic breakaway device that activates its brakes should it become detached from the vehicle, then it must be fitted with a secondary coupling consisting of a chain or wire rope.

Towing a trailer with the Ford Transit Minibus 02 LK 2256 (Representative Vehicle if registered before 01/01/2004)

A combination made up of a category ED1 test vehicle with a trailer, capable of a speed of at least 80km/h. The trailer used shall have a gross vehicle weight of at least 1,400 kg. and have internal dimensions of at least 2.4metres by 1.2 meters

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Safety Guidelines

It is advised that everyone read the safety statement. A copy is available from the Safety, Training and Development Officer. A shorter guideline here is a summary of the practicalities in this safety statement.

Use of club equipment

To use club equipment, you have to comply with the safety policy. This is not to restrict anyone from paddling, but to ensure safety of club members and maintain the good state of the club equipment.

It's an easy 4 step plan

1: Make sure you have *observed the following safety regulations:*

- The river is running **within its grade** (not too low, not in spate: if in doubt, consult safety committee)
- The **weather** is not likely to increase the grade of the river drastically
- The group members have the appropriate **proficiency levels**
- The appropriate **ratios** have to be observed

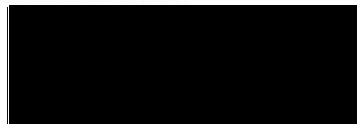
2: Ring a safety (core) committee member to **confirm** your trip. If going outback and you are level 3 **and** have RSR or higher, just text a safety committee member or post up on the message board

3: Bring the right safety equipment. There is a section in the drying room with rescue kits, throw bags first aid kits and phone cases. Always bring your phone.

4: Sign out all the equipment in this book

Safety (Core) Committee 2010

Safety, Training and Development Officer
 Captain
 Secretary
 Treasurer



Proficiency levels

Level 2	ability to safely kayak on grade 1	i.e. out-back
Level 3	ability to safely kayak up to grade 2 back, Castleconnell in low water	i.e. rapids out-
Level 4	ability to safely kayak up to grade 3 Deel, Clare Glens in low water	i.e. Castleconnell,
Level 5	ability to safely kayak advanced whitewater i.e. Glens in higher levels	

For information on ratios, safety equipment etc. see the equipment use policy (available online and in the back of the equipment log book).

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7.8 Appendix 8 Clubs & Society's Bullying & Harassment Policy

The Clubs and Societies are voluntary social, recreational and leisure clubs that run activities for students and staff of the University of Limerick and other membership's categories to enjoy in their leisure time. We envisage that those in the Club/Society will treat each other with respect and dignity at all times. All members are expected to conduct themselves in appropriate manner at all times and must not engage in any form of bullying or harassment.

All members of the University of Limerick Clubs and Society's must comply with this policy and appropriate measures will be taken against members who disregard this policy and act in an inappropriate manner. Appropriate disciplinary action, including termination of membership, will be taken against any member who violates this policy.

The policy applies to all members of clubs and societies, members of the Student's Union and any other parties involved in the clubs/societies whether in the University of Limerick or off site whilst engaged in the activities of Clubs & Societies. The policy applies to harassment not only by fellow members but also by a customer or other club/society/University contact to which a member might reasonably expect to come into contact within the course of their club/society membership. Bullying / harassment within the clubs and societies will not be tolerated by the University of Limerick Student's Union under any circumstances. This policy provides for prompt, fair, confidential and effective redress for targets of bullying/harassment.

Definitions:

Harassment

Harassment is defined as any act of conduct which is unwelcome and offensive, humiliating or intimidating on a discriminatory ground including spoken words, gestures, or the production, display or circulation of written material or pictures. Harassment in relation to the nine discriminatory grounds (race, religious belief, age, sexual orientation, disability, marital status, membership of the Traveling community, gender and family status), is prohibited within the Clubs and Societies. Harassment of any kind will not be condoned by the Clubs and Societies Executive. Any members who are found to have engaged in harassment on any of the grounds will face disciplinary action up to and including expulsion from the Club/Society.

Sexual Harassment

Sexual Harassment is defined as all unwelcome and sexually, or otherwise on the gender ground, offensive, humiliating or intimidating actions involving acts of physical intimacy, spoken words, gestures or the production, display or circulation of written material or pictures, or requests for sexual favours. Sexual harassment is prohibited by the Clubs and Societies Executive. Any members who are found to

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have engaged in sexual harassment will face disciplinary actions up to and including expulsion from the Club/Society.

Bullying

Bullying is repeated inappropriate behaviour, direct or indirect, whether verbal, physical or otherwise, conducted by one or more persons against another or others, at the Club/Society and/or in the course of club activities, which could reasonably be regarded as undermining the individual's right to dignity. An isolated incident of the behaviour described in this definition may be an affront to someone's dignity but, as a once off incident, is not considered to be bullying. Bullying can include conduct offensive to a reasonable person, e.g. oral or written slurs, physical contact, gestures, jokes, displaying pictures, flags/emblems, graffiti or other material which state/imply prejudicial attitudes which are offensive to fellow members.

Procedures:

There is both an informal and formal procedure to deal with the issue of bullying/harassment within the clubs and societies. It is our aim that any investigation that takes place will be completed as quickly as possible.

Informal Procedure:

It is often preferable for all concerned that complaints of bullying or harassment are dealt with informally whenever possible. While in no way diminishing the issue or the effects on individuals, an informal approach can often resolve matters more effectively. As a general rule therefore, an attempt should be made to address an allegation of bullying/harassment as informally as possible by means of an agreed informal procedure. The objective of this approach is to resolve the difficulty quickly and effectively, with the minimum of conflict and stress for the individuals.

- a) Any member who believes he or she is being bullied/harassed should explain clearly to the alleged perpetrator(s) that the behaviour in question is unacceptable. In circumstances where the member finds it difficult to approach the alleged perpetrator(s) directly, he or she should seek help and advice, on a strictly confidential basis, from a fellow member of the Club/Society. The fellow club member can be a support for the complainant in approaching the alleged perpetrator to explain the reasons they feel they are being bullied or harassed.

It is recognised that it may not always be practical to use the informal procedure, particularly where the harassment / bullying is of a very serious nature.

Formal Procedure:

If an informal approach is inappropriate or if, after the informal stage, the bullying/harassment persists, the following formal procedures should be invoked: -

- a) The complainant should make a formal complaint, in writing, to the Club/Society committee detailing precise details of actual incidents of bullying/harassment; for example, state the name of the alleged perpetrator,

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the nature of the complaint, dates and times of when the incidents occurred, witnesses, and any action that the complainant may already have taken, if any.

- b) The alleged perpetrator(s) should be notified in writing that an allegation of bullying has been made against them. They should be given a copy of the complainant's statement as soon as is practicable and advised that they shall be afforded a fair opportunity to respond to the allegation(s), within specified time limits. No outcome regarding the complaint will be made until a full and fair investigation has taken place.
- c) Before commencing an investigation, the Club/Society committee may take the decision to exclude the alleged perpetrator from any Club/society activities while the investigation is ongoing if it is deemed appropriate. This in no way implies any wrong doing on the part of the perpetrator but will be taken as a cautionary measure to prevent exacerbating the situation between the complainant and the alleged perpetrator.
- d) The Club/Society committee will appoint two members of the committee who will be tasked with investigating the complaint. They will prepare clear terms of reference which outline the background to the complaint, who should be interviewed through the course of the investigation and the timeline in which to resolve the complaint.
- e) Meetings will be arranged with the complainant, the alleged perpetrator and any named witnesses. All will be asked to respond to the complaint and detail their version of events. Both parties and witnesses have the right to be accompanied by a representative at all meetings. Meeting notes will be taken and once committed to type must be signed by the relevant person who was interviewed as a true and accurate reflection of the discussion.
- f) Those investigating will prepare a report of their findings and submit it to the Clubs/Societies committee for a final decision. The two committee members who have taken part in the investigation should not make a decision regarding the outcome.
- g) Once a decision has been made, the complainant and the alleged perpetrator must be informed as soon as is practicable.
- h) If the complaint is upheld, the Club/Society committee will instigate the Clubs and Societies Disciplinary Procedures. Actions taken can include expulsion from the Club/Society.
- i) If the complaint is not well found, both parties should be brought together by the Club/Society committee and a mediation process should be implemented to ascertain whether both members can move on and continue to partake in the club/societies activities.

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- j) If the complaint is discovered to be malicious or vexatious, the Club/Society committee may instigate the Clubs and Societies disciplinary procedures against the complainant.
- k) Retaliation of any kind against the member for complaining may also constitute bullying/harassment and is a serious disciplinary offence.

Appeals Process

If either party is unhappy with the outcome of the investigation, both parties have the right to appeal to the Clubs and Societies Executive Committee within 5 working days of the findings being issued. A party, who wishes to appeal the outcome, should put the reason for the appeal in writing and address it to the Student's Union President.

Upon receiving the appeal letter, the Clubs and Societies Executive Committee will appoint two members of the Committee to hear the appeal. They may choose to conduct further investigations or implement a new investigation. A decision regarding the outcome should be taken within ten working days of receiving the appeal.

Statutory Rights:

Members are obliged to exhaust all internal procedures prior to making a complaint to a third party. Using the above complaints procedure, does not affect a member's right to make a complaint under the relevant legislation, i.e. Employment Equality Act 1998, Health and Safety Legislation, or other appropriate industrial relations legislation.

Confidentiality:

All individuals involved in the procedures referred to above should maintain strict confidentiality on the subject. All involved will be reminded of this throughout the investigation process.

Appendix 7.15 University of Limerick Kayak Club Trips Policy and Procedure (April 2018)

Trips Policy & Procedure

Version Control:

Version	Author	Date
Draft for Committee	[REDACTED]	27th January 2018
Revised for Committee	[REDACTED]	5th February 2018
Revised based on [REDACTED] advice	[REDACTED]	10th March 2018
Final Revision Passed by Committee	[REDACTED]	5th April 2018

Background 2

Applicable Trips 3

Participant Selection Policy 3

Payments 3

No Shows & Drop Outs 4

Operational Guidelines 4

Trips Policy & Procedure

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Applicable Trips 3

Participant Selection Policy 3

Payments 3

Appendix 7.15 University of Limerick Kayak Club Trips Policy and Procedure (April 2018)

[No Shows & Drop Outs 4](#)

[Operational Guidelines 4](#)

Background

UL Kayak Club has in excess of 400 registered members in any given academic year, the club provides routes and options for training and developing skills whether locally on the river Shannon or on some of its international trips such as The Alps, Scotland, Wales or further afield.

Due to capacity limits on these trips it's not possible to take every member of the club that wants to go. These trips are limited by safety ratios on rivers, spaces in vehicles and general logistics of a trip organised by volunteers. It is also important to note that these trips are usually subsidised by capitation provided by UL Students' Union and this subsidy must be used effectively.

Trips are also limited by the availability of Experienced River Leaders and Advanced Intermediate Paddlers known as Seconds. River Leaders are defined as a person who is competent to instruct and lead a group of intermediate/beginner paddlers down a river suited to their skill level. Leaders should have the relevant qualifications and experience as outlined (here and or in our Safety Statement). A Leader is to be a Level 4 standard as accredited by Canoeing Ireland or equivalent. A Second is defined as a person who is competent to look after themselves in Grade 3+ Water and be capable of assisting in a group with beginners present . A Second is to be a Level 3 standard as accredited by Canoeing Ireland or equivalent.

While every club trip offers the opportunity to develop one's kayaking skills international trips are most definitely set out with the intention of developing every member that goes on one. The purpose of the trips overseas are to build on the development of the members that have committed to the UL Kayak club in its domestic program . Beginners & Seconds are assessed on their commitment to the club, have they shown a genuine interest in the sport, will they benefit from the oversea experience. Beginners & Seconds past club involvement in its domestic trips program is examined on application of international trips.

Experienced River Leaders are an essential component of oversea trips. Leaders are assessed on their commitment to the club over the past 12 months in its domestic & international programs. Has the River Leader been actively engaging with club members in the context of teaching, instructing or assisting on domestic river trips or during pool time training.

The intention of this policy and guidelines is to make the application and selection process for larger trips easier and provide a fair chance to all members that wish to go on a trip.

Appendix 7.15 University of Limerick Kayak Club Trips Policy and Procedure (April 2018)

Applicable Trips

This policy is applicable to all trips by the club that has competitive applications from its members and aims to develop those on it.

Participant Selection Policy

1. The ultimate decision whether a member is allowed to go on a trip, or portion of a trip, lies with the committee of the University of Limerick Kayak Club.
2. The membership types of those going on a trip should reflect the memberships of the club. E.g. percentage of undergrad students, percentages of external members.
3. Members should show that they've made the best of their opportunities locally with the club.
4. Those going on a trip should be of a suitable level of proficiency to make the most of the trip.
5. Members going on the trip must have contributed to the club in a suitable way (teaching, packing, cooking, cleaning etc.) in its day to day operations or on previous trips.
6. In the event of a member applying to go on an annual trip for their second or subsequent time they must show a suitable level of improvement and / or effort between trips.
7. Due to the time sensitive nature of organising international trips if a candidate is deemed unsuccessful in their application they must submit an appeal in writing to the committee within 5 days of being informed.

Payments

- Payments for trips must be made promptly in order to get the best value.
- A deposit must be paid on application for the trip or within a reasonable time of the trip selection being completed. The choice between these two options should be made by the committee and communicated in the trip announcement as well as the amount of the deposit.
- The amount of the deposit should cover any expected non-recoverable costs should a person drop out.
 - E.g. flights, ferry bookings, accommodation or extra fuel costs as a result of an empty seat.
- Deposits may be returned when the costs are recovered by the club.
- In the event of a participant choosing not to go on a trip after applying they will be held liable for the full deposit for the trip.

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- If a person owes the club money either due to not paying fully for a trip or not attending they may not be allowed on any other club trips until payment of the balance is arranged.
- Payments for our annual international trips need to be received in full by the following timeline (timeline may be subject to change at the discretion of the current Captain & Treasurer)
 - - Winter Trip (Scotland/Wales) – Payment due by Week 12 of Semester 1
 - Summer Trip (Italian/French Alps) – Payment due by Week 13 Semester 2

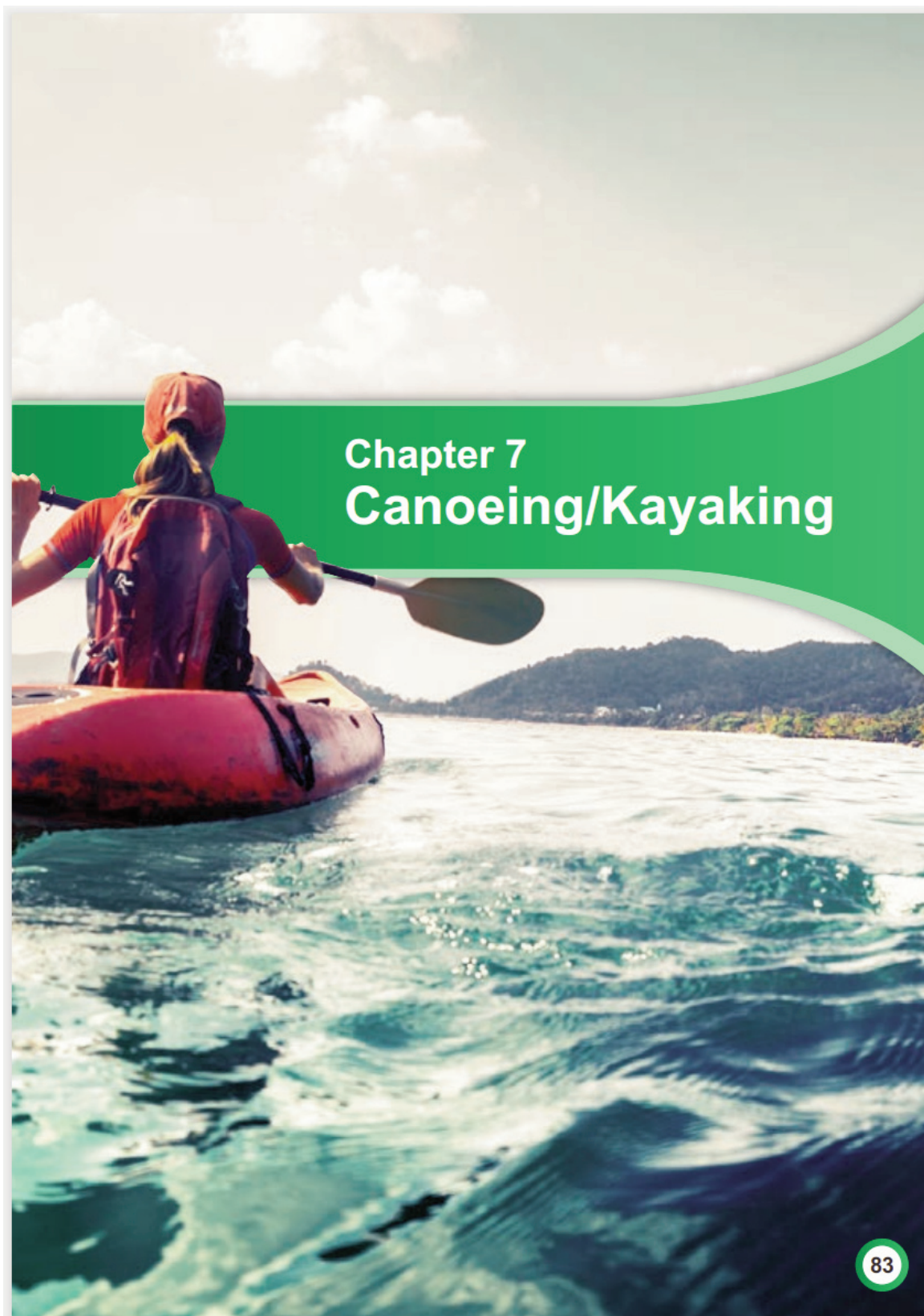
No Shows & Drop Outs

- In the event of a person dropping out of a trip the trip organiser needs to be given as much warning as possible. This will allow:
 - Members from waiting lists to be offered a place.
 - An opportunity to cancel bookings or recover costs.

Operational Guidelines

- To best manage the process a sub-committee should be established for each trip where this policy applies. The recommendation of this committee should given to the committee of the club to approve or give feedback.
- Generally, for May/June Alps trips it would be expected that all members going on the trip would be at a Level 3 Kayak skills standard as defined by Canoeing Ireland or equivalent.
- Applications for a trip should close with enough time to enable an appeals process before making bookings that will be cost / individual sensitive (e.g. plane tickets) this is to ensure that all members going on a trip share the cost fairly.
- This document should be provided in the application for a trip where it applies.

Appendix 7.16 Code of Practice: The Safe Operation of Recreational Craft (2017)
Chapter 7 - River Grades



Appendix 7.16 Code of Practice: The Safe Operation of Recreational Craft (2017)
Chapter 7 - River Grades

7
Canoeing/Kayaking

Canoeing covers a wide and diverse range of disciplines including sea kayaking, white water kayaking, surf kayaking, polo, slalom, marathon, sprint, freestyle and touring.

A **canoe** is a lightweight narrow boat, typically pointed at both ends and **open** on top, propelled by one or more seated or kneeling paddlers facing the direction of travel using a single-bladed paddle.

A **kayak** is a small, narrow boat which is propelled by means of a double-bladed paddle.

In this Code of Practice, the term **canoe** when used also refers to a kayak.

There are a number of basic safety precautions that should be applied to any canoeing activity, regardless of its speciality.

7.1 Training

Undertake a recognised training course in the correct use of the specific type of canoe you wish to use. Be completely familiar with relevant rescue/recovery drills, self-righting techniques, e.g. Eskimo roll, etc. Practice such drills with fellow members of your group. Canoeing Ireland have a comprehensive training and accreditation scheme, which covers river, sea kayaking and open

canoes (see Appendix 9 for details of course providers).

7.2 Prior to entering the water

- Ensure you are a competent swimmer and capable of surviving in the water in the areas you operate in.
- Undertake a First Aid course and a life-saving course.
- Never operate alone, always canoe in company.
- Do not operate a canoe if under the influence of alcohol or drugs.
- Inspect your craft and equipment thoroughly. Check it is fitted with adequate buoyancy material and that such buoyancy is correctly distributed and secured within the hull.
- Ensure that the bung is fitted correctly.
- Do not use the canoe unless you are certain it is watertight. Boats with temporary repairs should not be used.
- If carrying additional equipment, ensure that the canoe is never overloaded.
- Use a spray deck, with quick release where relevant, and be completely familiar with its use.
- When using a spray deck, ensure that the grab loop is in good condition and is within reach.
- Always ensure that your name/contact address are permanently marked on the hull.

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The addition of strips of retro-reflective tape to the hull is recommended.

- Check the hull is fitted with grab loops/towing lines. Kayaks over 270 cm in length should have declines fitted fore and aft. Kayaks less than 270 cm in length should have cowtails fitted.
- Ensure that a responsible person is aware of your intended departure, locations and return details.
- Ensure that you carry a mobile phone or Marine VHF radio in a suitable watertight cover for use to summon assistance in emergency situations.
- Open canoes are not suitable for the sea.

- All kayaks should have suitable footrests.

7.3 Personal Safety Equipment

- PFD/lifejacket (see Appendix 5).
- The PFD should be fitted with a whistle to attract attention, be in a Hi-Visibility colour and fitted with retro-reflective strips.
- Ensure you are suitably attired for the type of activity, area of operation and time of the year.
- Be aware of the dangers of hypothermia when wet and exposed to the elements.
- If paddling where the risk of head injury exists, a suitable helmet should always be worn.
- When making descents on remote rivers of Grade 3 and

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Canoeing/Kayaking



higher, and while sea-kayaking, you should carry a registered Personal Locator Beacon (PLB). This will enable early alerting of the rescue services in the event of an emergency.

7.4 Sea Kayaking

Sea kayakers should observe the following additional precautions:

- Be aware of the weather forecast and sea area forecast. Only operate within your limits and ability. Canoeing in a windforce 4 or above should only be considered for the very experienced.
- Be aware of the tidal conditions for the areas that you are operating in.
- Be aware of the effects of interaction between wind and tide on sea states.
- Carry a chart for the area of operation. These can be laminated and attached to the kayak deck.
- Carry a hand held compass.
- Ensure a nominated person ashore is aware of your itinerary, departure and return times.

- Have a passage plan and alternative emergency plans, e.g. safe landing area down wind, etc.
- Do not operate alone – kayak in company.
- If capsized and floating outside your craft, remain with it. It offers a better target to rescuers and has a high buoyancy factor. Do not attempt to swim for shore unless adjacent to the shore.

The following additional equipment should be considered:

- Flares
- Towrope/throw bag
- Torch
- Suitable knife
- Portable waterproof VHF radio
- Portable GPS unit
- Personal EPIRB
- First Aid Kit
- Spare food/drink
- Paddle float/leash
- Sun cream and sun hat.

Essential equipment should be carried on the person or in an easily recoverable buoyant grab bag.

7.5 River Kayaking/Canoeing

River kayaking ranges from touring on slow moving Grade 1 water in either open canoes or recreational kayaks, to the more extreme white water river running, which can include whitewater rapids, waterfalls and features such as

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Canoeing/Kayaking

stoppers and undercuts. Freestyle kayaking is at the more extreme end of the canoeing spectrum. Trained and competent persons only should attempt this activity.

In addition to the basic safety precautions mentioned previously, operators should observe the following additional checks and advice:

- Hulls are examined for damage each time prior to entering the water;
- Potential courses should be studied for hidden dangers, snags, currents, etc., prior to putting boats in the water;
- Boats should never operate alone on a stretch of water;
- In extreme and difficult locations, shore based rescue/recovery personnel should be in attendance, trained and equipped in the rapid recovery of persons in distress;

- Contact numbers for medical assistance/rescue authorities/lockkeepers should be available on site;
- Kayaks should have adequate buoyancy;
- Get First Aid training and carry a First Aid Kit on river trips;
- If carrying a throwbag, also carry a knife;
- Depending on the difficulty of the river, consider carrying some of the following:
 - Split paddles;
 - Webbing slings and carabiners;
 - Duct tape;
 - Dry clothes;
 - Group shelter;
 - Food and money;
 - Matches/lighter.
- Be aware of the river's grading and of the water level before committing. The different grades are listed in the Table on the following page.

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Canoeing/Kayaking

Grade I: Flat Water	Water is stationary or extremely slow moving and without any obstructions.
Grade II: Moderately Difficult	The way down a river is clear but simple obstructions do exist. Small stoppers and small drops can be present. There are places where the flow accelerates. There is a choice of routes.
Grade III: Difficult	There is a route that is easily recognisable from the water. Waves can be irregular. Boulders and obstructions can be numerous. Stoppers and small eddies exist. Inspection is advisable.
Grade IV: Very Difficult	The route is not always clear and inspection is advisable. Rapids are continuous and breakouts are few and small. Stoppers are powerful. Continual manoeuvring with precise control and good decision making is required.
Grade V: Extremely Difficult	Inspection is essential because serious dangers can exist. Large drops, narrow passages, very complex boulder fields, ever changing water and difficult holes are characteristic of this grade. Difficulties are continuous.

The Canoeing Ireland website has more detail on the levels of river grading (<http://canoe.ie/river-grading-and-area-definitions>).

- Be particularly cautious during flood water conditions.
- Inspect unknown drops before running them; be aware that drops may change or that new hazards may have formed (e.g. fallen trees, etc.). Set up bank based rescue, where appropriate.
- Consult Waterways Ireland Marine Notices and lockkeepers for local information.
- Kayaking groups making descents on remote rivers of Grade 3 and higher should carry

registered Personal Locator Beacons (PLBs). This will enable early alerting of the rescue services in the event of an emergency.

- In rivers of a high flow rate, with extended periods of rapids, it is recommended that kayaking groups should consider using waterproof radios to allow communication between group members when line of sight is not possible.

7.6 National Association

Canoeing Ireland is the national association for canoe and kayak based activities in Ireland (see Appendix 10 for contact details).

Appendix 7.17 Canoeing Ireland Kayaking Skill Levels and Awards - Level 1 to 4 - Requirements and Syllabi



Appendix 7.17 Canoeing Ireland Kayaking Skill Levels and Awards - Level 1 to 4 - Requirements and Syllabi

Canoeing Ireland – Kayaking Skill Levels

Level 1	Fundamental kayaking skills on flat water.
Level 2	Basic Kayaking skills for Grade I water.
Level 3	Intermediate Kayaking skills on Grade II water as part of a group.
Level 4	Advanced Kayaking and Safety skills on Grade III rivers with a group of peers.
Level 5	Advanced Kayaking and Safety & Rescue skills on Grade IV and advanced white water.

The Level 1 Kayaking Skills Level Award – aims to enable participants to:

1. Perform fundamental Paddling Skills.
2. For Paddlers U-18 it is recommended that these paddlers be supervised by a person over the age of 18 who has suitable experience.

Requirements

To obtain the Level 1 Kayak Skills Award, a participant must successfully explain and/or demonstrate the following techniques and skills:

1. Forward Paddle.
2. Reverse Paddle.
3. Emergency Stop.
4. An ability to turn while stationary using Forward Sweep Stroke and a combination of Forward and Reverse Sweep Strokes.

Theory

An understanding of the Basic Safety Rules of canoeing.

Assessment

1. There is no formal assessment for the Level 1 Skills Award, however, a participant must be able to demonstrate the required skills in the presence of a registered Canoeing Ireland Instructor before being given the award.
2. All strokes must be demonstrated on both sides.
3. The Level 1 Skills Award is not a compulsory pre requisite for any subsequent Canoeing Ireland Skills award.
4. No age restriction applies to this award.

The Level 2 Kayaking Skills Level Award – aims to enable participants to:

1. Kayak safely and competently on flat water, Grade I rivers, very sheltered coastal areas as a member of a group of peers.
2. Be able to carry out basic safety techniques with the assistance of another member of the group or the person in the water.
3. Be able to safety plan and carry out a trip in a flat-water environment considering all relevant factors.
4. For level two skills holders U-18 it is recommended that these paddlers be supervised by a person over the age of 18 who has suitable experience.

Requirements

To obtain the Level 2 Kayak Skills Award, a participant must successfully explain and/or demonstrate the following techniques and skills.

Appendix 7.17 Canoeing Ireland Kayaking Skill Levels and Awards - Level 1 to 4 - Requirements and Syllabi

Theory

1. Be able to list the basic safety rules of canoeing.
2. Describe how to contact the emergency services.
3. Be able to outline weather and environmental factors that affect a kayaking session including be able to identify the following: General weather outlook, wind direction and speed, air temperature and water conditions for inland water or coastal water.
4. Be able to list the aspects of good group management and identify, explain, and give examples of the CLAP concept of group management.
5. Be able to list the most important factors to trip planning.

Assessment

1. The Level 2 Kayak Skills Assessment must take place outdoors on flat water (i.e. water of Grade I difficulty). No part of an assessment can be taken in a swimming pool.
2. During an assessment, all techniques and skills must be demonstrated to an assessor's satisfaction to achieve this award.
3. It may not be feasible for a junior or disabled person to assist fully in rescues, such candidates should, however, have a full understanding of the correct sequence of each of the required rescues and have some role to fulfil in the completion of these rescues.
4. A spraydeck must be worn throughout an assessment.
5. All strokes should be demonstrated in relevant situations i.e., use of a simple draw stroke to manoeuvre the kayak to the bank. Strokes should be demonstrated on both sides of the kayak.
6. Candidates should be familiar with all aspects of theory and should be able to verbally answer questions on theory aspects of the award.
7. The Level 2 Kayak Skills Award is not a compulsory prerequisite for a subsequent Canoeing Ireland Skills award.
8. No age restriction applies to this award.
9. U18 Level 2 skills paddlers should be appropriately supervised by a person who is over 18 and who has suitable experience.

The Level 3 Kayaking Skills Level Award - aims to enable participants to:

1. Kayak safely and competently on rivers up to and including **Grade II** rivers as a member of a group of peers.
2. Be capable of negotiating obstacles likely to be encountered on Grade II rivers.
3. Assist in rescues.

Requirements

Participants must successfully explain and demonstrate the following techniques and skills at a level higher than that required for the Level 2 Kayaking Skills Award. Must be a member of Canoeing Ireland.

Theory

1. Knowledge of Safety Rules
2. An understanding of Eddies, Standing Waves, Upstream & Downstream V's, Stoppers, and Easy River Routes
3. An understanding of river signals and commands.

Assessment

1. The Level 3 Kayak Skills assessment must take place outdoors on water of Grade II difficulty as part of a river trip. No part of an assessment can be taken in a swimming pool.
2. During an assessment a participant must explain and demonstrate all techniques and skills at a level higher than that required for the Level 2 Kayak Skills Award. All techniques, skills and rescues must be demonstrated to an assessor's satisfaction in order to achieve this award.
3. All strokes should be demonstrated in relevant situations i.e. sculling in a small stopper. Strokes should be demonstrated on both sides of the kayak.

Appendix 7.17 Canoeing Ireland Kayaking Skill Levels and Awards - Level 1 to 4 - Requirements and Syllabi

4. Generally, required assessment rescues will be kept until the end of an assessment.
5. Participants for this award must be at least 12 years of age.
6. Must be a member of Canoeing Ireland.

The Level 4 Kayaking Skills Level Award - aims to enable candidates to:

1. Kayak safely and proficiently on rivers up to and including **Grade III difficulty** as part of a group of peers.
2. Be capable of negotiating obstacles likely to be encountered on Grade III rivers.
3. Deal competently with rescue situations that might occur on rivers up to and including rivers of Grade III difficulty.
4. Develop group awareness.

Requirements

To obtain the Level 4 Kayak Skills Award a participant must successfully explain and demonstrate the following techniques and skills at a level higher than that required for the Level 3 Kayak Skills Award and be capable of demonstrating any combination of the strokes competently and efficiently.

Theory

1. An understanding of the following:
2. River Grading
3. River Route Finding
4. Types of GP kayaks and paddles
5. Towing Systems and methods
6. Group Control and Awareness
7. Signals and Commands

Assessment


1. The Level 4 Kayak Skills assessment must take place during a river trip of at least three km on water of Grade III difficulty.
2. During an assessment a candidate must explain and demonstrate all techniques and skills at a level higher than that required for the Level 3 Kayak Skills Award. All techniques, skills and rescues must be demonstrated to the required level in order to achieve this award.
3. All strokes should be demonstrated in relevant situations i.e. sculling in a stopper. Strokes should be demonstrated on both sides of the kayak.
4. All rescues must be executed by the candidate acting as both rescue and rescuer. Generally, required assessment rescues will be kept until the end of the river trip.
5. While it is not compulsory to attend a training course prior to assessment, it is strongly recommended.

Appendix 7.18 Canoeing Ireland - Instructor Level 1-4

The screenshot shows the 'Canoeing Ireland' website with a navigation menu and a section titled 'Instructor and Coach Qualifications'. Below this is a grid showing the relationship between instructor/coach levels and disciplines.

	White Water Kayaking	Sea Kayaking	Canoeing	Stand Up Paddle	Paddle Surf
Advanced Instructor	Level 5 Instructor	Level 5 Instructor	Level 5 Instructor		Level 5 Instructor
Intermediate Instructor	Level 4 Instructor	Level 4 Instructor	Level 4 Instructor		Level 4 Instructor
	Level 3 Instructor	Level 3 Instructor	Level 3 Instructor		Level 3 Instructor
Beginner		Level 2	Level 2	SUP Instructor	
		Level 1	Level 1		

Appendix 7.18 Canoeing Ireland - Instructor Level 1-4

GET PADDLING ▾ ABOUT US ▾ CLUBS & MEMBERS

Click the links to view the syllabi for the range of Canoeing Ireland resources for kayak Instructor qualifi

The Canoeing Ireland Award Scheme is linked to Euro Paddle Pass see www.europaddlepass.com

Kayak Instructor Qualifications

[Kayak Instructor Qualifications](#)

[Level 1 Kayak Instructor](#)

[Level 2 Kayak Instructor](#)

Kayak Instructor Qualifications

Level 1 Kayak Instructor

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General Aims

The Level 1 Kayak Instructor Qualification aims to enable candidates to:

- Become qualified to run static site introductory kayaking sessions on flat water with groups of up to 6 students.
- Train and assess for the Level 1 Kayak Skills Award

A Level 1 Kayak Instructor is specifically not qualified to journey with groups and is restricted to static sessions only (i.e. same entry and exit point). Static site means travelling no more than approximately 300m from the get on point and no more than 50 metres off shore.

Course Outline

The Level 1 Kayak Instructor Qualification requires that a candidate attend a registered Level 1 Kayak Instructor training programme and a half day assessment. There are two types of training programmes available:

1. A 16 hour Level 1 Kayak Instructor training course plus a log of 30 hours practical experience.

or

2. A 32 hour, 8 module training course.

Applying to attend a Training Course

Before applying to attend a Level 1 Kayak Instructor Training Course, a candidate must:

1. Have begun training for the Level 3 Kayak Skills Award
2. Be registered as a [member](#) with Canoeing Ireland.
3. Be at least 16 years of age at the time of application.
4. Have unrestricted access to a fully equipped kayak, personal equipment, and additional equipment as listed for a Level 1 Kayak Instructor Assessment.
5. Submitted your [Garda vetting form](#).

Applying to attend an Assessment

Prior to applying to attend a Level 1 Kayak Instructor Assessment, a candidate must:

- Current member of [Canoeing Ireland](#).
- Hold the Level 3 Kayak Skills Award.
- Be at least 16 years of age.
- Have unrestricted access to a fully equipped kayak, personal equipment, and additional equipment as listed for a Level 1 Kayak Instructor

Appendix 7.18 Canoeing Ireland - Instructor Level 1-4

Assessment.

- Have attended an approved Kayak Level 1 Instructor Training Course or Programme within the 24 months preceding a selected assessment date.
- Completed your [Garda vetting](#) process.

Trainee Instructors who have completed training prior to January 2013

1. Have recorded in a Level 1 Kayak Instructor Logbook following the completion of a Level 1 Instructor Training Course at least 25 hours on the water instructional experience under the supervision of at least two registered Canoeing Ireland Instructors who hold a Level 3 Kayak Instructor qualification.

Trainee Instructors who have completed the two day training after January 2013

1. Have recorded in a Level 1 Kayak Instructor Logbook following the completion of a Level 1 Instructor Training Course
 - a. at least 30 hours of on the water instructional experience under the supervision of at least two currently registered Level 2 Canoeing Ireland Instructors or higher.
 - b. at least 15 hours must be logged in closed cockpit kayaks, the other 15 may be logged in sit on top kayaks.
2. Participate in one Irish Canoeing Competition or hold a Level 3 Skills Award in another discipline.

Trainee Instructors who have completed the 32 hour training course have no requirement to log additional experience.

- Completed an approved First Aid training Course (REC 2 or equivalent).
- Attended an Sport Ireland approved Child Protection Awareness Workshop if over 18 years.
- Be recommended for assessment by a registered Canoeing Ireland Level 3 Instructor.
- Submit a completed Level 1 Kayak Instructor Logbook accompanied by a Level 1 Kayak Instructor Assessment application to a registered Canoeing Ireland Instructor Assessor at least 2 weeks prior to a selected assessment date.

Format of a Level 1 Kayak Instructor Assessment

1. During a Level 1 Kayak Instructor Assessment, candidates must satisfy an assessor that they are competent to provide safe and enjoyable introductory sessions to a beginner group.
2. During assessment, a candidate's personal canoeing skills and First Aid may be assessed. It would be expected that a candidate would have maintained a skills level equivalent to that of the Level 3 Kayak Skills Award and where possible improved on this.

As part of a Kayak Level 1 Instructor Assessment, a candidate will be expected to

3. Draw up a lesson plan lasting up to two hours and to organise an introductory session for a novice/basic level group on water of Grade I difficulty or in a Sheltered Tidal Area.
4. Teach any stroke, technique, or rescue applicable to flat water as outlined in the Level 1 Kayak Skills Syllabus.
5. Prepare a self-appraisal of the lesson plan/water session
6. Demonstrate techniques and skills as required by the Level 3 Kayak Skills Award, if requested to do so.
7. Demonstrate an ability to carry out the following rescues efficiently and effectively: Self-Rescue, X or Assisted X-Rescue, Unconscious Casualty and Eskimo Rescue.
8. Demonstrate an ability to roll competently without any prior set-up.

Appendix 7.18 Canoeing Ireland - Instructor Level 1-4

9. Demonstrate an effective method of towing an empty kayak, a kayak with a participant who has a minor injury or illness, a kayak with a participant who has a major injury or illness.
10. Present a suitable kayak correctly fitted out for instruction and with other appropriate personal equipment (See List of Equipment). It would be expected that a candidate's equipment would be of a standard consistent with the responsibilities likely to be encountered. Examination of equipment will form an important part of the overall assessment.
11. Demonstrate effective group control, group rapport, and instructional ability.
12. Demonstrate an ability to deal competently with a basic First Aid scenario which may include but is not limited to: the cause/effect/treatment of Shock, Hypothermia, EAR, and CPR.
13. Answer questions on aspects of canoeing covered during the Level I Kayak Instructor Training Course.
14. Attend an individual debrief, where the candidate will present their self-appraisal and receive feedback.

Level 1 Kayak Instructor Qualification Guidelines

1. A Level 1 Kayak Instructor Qualification can only be assessed by a member of the Level 1 Kayak Instructor Qualification Assessor Panel.
2. It is recommended that the Level 1 Kayak Instructor Qualification is assessed by an Instructor other than the Instructor who has run the training course leading to the assessment.
3. Clear guidelines should be given in writing should a candidate fail the assessment as to the area/areas they need to improve on.
4. Candidates cannot depend on any assistance (material or practical) during the course of the assessment.
5. No other award may be assessed at the same time as the Level 1 Kayak Instructor Assessment.
6. The candidate/assessor ratio should be maximum of 2:1
7. A Level 1 Kayak Instructor under 18 years must be accompanied on the water by another qualified and registered adult Instructor. In this case each instructor may take up to 6 students on the water.
8. The Level 1 Kayak Instructor award is valid for 3 years. To maintain this award the instructor is required to attend further training or CPD/workshops within the three year period.

List of Equipment required for Assessment

A properly equipped kayak:	Personal canoeing equipment:	Equipment must also include:
<ul style="list-style-type: none"> • Rigid end loops and/or toggles • Suitable buoyancy • Suitable foot rest • A kayak must be of sufficient volume to carry all necessary safety equipment and perform any rescue as required by the Level 1 Kayak Instructor qualification. 	<ul style="list-style-type: none"> • Paddle • Wetsuit or sufficient thermal clothing • Spray Deck • Buoyancy Aid • Cagoule • Helmet • Adequate footwear 	<ul style="list-style-type: none"> • Towing System • Bivvy Bag and/or group shelter • First Aid Kit • Knife • Whistle • Flask and Food • Waterproof Bag or other method of keeping equipment dry • Repair Kit* • Spare Clothes* • Mobile phone or VHF

*Those items marked with an asterisk need not be carried in the kayak during assessment but should be on site.

*Recommended Contents of First Aid Kit:

Appendix 7.18 Canoeing Ireland - Instructor Level 1-4

<ul style="list-style-type: none"> • Rubber gloves • Paramedical shears • Vent aid or resuscitation barrier device • Notebook and pencil • Waterproof container (to keep supplies dry) 	<ul style="list-style-type: none"> • Roller bandages (assorted 3 sizes) • 3 Wound dressings (assorted sizes) • Triangular 3 bandages • Roll of first aid tape 	<ul style="list-style-type: none"> • Assorted plasters • Safety pins • Tweezers • Foil blanket or emergency blanket • Sam splint • Penlight or snap light
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Below is the definition of the flat water operating areas for a Level 1 Instructor (if under 18 years, must be supervised by a level 2 instructor or higher):

Very Sheltered Inland Water	Rivers	Sections of slow moving rivers that do not include rapids or weirs.
	Canals	Canals with bank side access and egress and which have a minimum of commercial traffic.
	Lakes	Shorelines of small lakes which do not have difficult landing areas and which are not large enough for problems to occur if there is a sudden change in conditions.
Sheltered Tidal Areas	Enclosed harbours with a minimum of commercial traffic, enclosed on three sides. Where there is minimal possibility of being blown off shore. Small enclosed flat water bays where there is minimal possibility of being blown offshore. The upper reaches of some suitable, slow moving, flat estuaries.	

Level 2 Kayak Instructor

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General aims

The Level 2 Kayak Instructor Qualification aims to enable candidates to

1. Become qualified to instruct basic kayaking skills and lead kayaking journeys on flat water with groups of up to 6 students.
2. Train and Assess for the Levels 1 & 2 Kayak Skills Award
3. Teach basic Flat Water Safety and Rescue and run RSR 1 Training Courses
4. Mentor Level 1 and 2 Kayak Instructor trainees.
5. The Level 2 Instructor is specifically not qualified to journey across a lake or more than 50 metres off shore

Training Course Outline

1. The Level 2 Kayak Instructor Qualification requires that a candidate attend a registered two day Level 2 Kayak Instructor training course (or a programme of similar duration) and a half day assessment.
2. Candidates who have successfully completed a 32 hour, 8 module, Level 1 Kayak Instructor Training Course and Assessment can apply for Level 2 Instructor Assessment upon completion of the logbook requirements.

Applying to attend a Training Course

Before applying to attend a Level 2 Kayak Instructor Training Course, a candidate must:

1. Hold the Level 3 Kayak Skills Award.

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2. Be registered as a [member](#) with the Canoeing Ireland.
3. Be at least 16 years of age at the time of application.
4. Have unrestricted access to a fully equipped kayak, personal equipment, and additional equipment as listed for a Level 2 Kayak Instructor Assessment.
5. Submitted your [Garda vetting form](#).

Applying to attend an Assessment

Before applying to attend a Level 2 Kayak Instructor Assessment, a candidate must

- Current member of [Canoeing Ireland](#).
- Hold the Canoeing Ireland Level 3 Kayak Skills Award.
- Be at least 18 years of age.
- Have unrestricted access to a fully equipped kayak, personal equipment, and additional equipment as listed for a Level 2 Kayak Instructor Assessment.
- Have attended an approved Level 2 Kayak Instructor Training Course or Programme within the 24 months period preceding a selected assessment date.
- **Completed** your [Garda vetting](#) application.

Trainee Instructors who have completed training prior to January 2013

1. Have recorded in a Level 2 Kayak Instructor Logbook following the completion of a Level 2 Kayak Instructor Training Course at least 25 hours (on the water) of instructional experience and trip leading experience under the supervision of at least two currently registered Level 3 Kayak Instructors.

Trainee Instructors who have completed training after January 2013 & instructors who completed the 32 hour, 8 module, Level 1 Kayak Instructor Training Course and Assessment

1. Have recorded in a Level 2 Kayak Instructor Logbook following the completion of a Level 2 Kayak Instructor Training Course at least
 - a. 30 hours (on the water) of instructional experience and trip leading experience under the supervision of at least two registered Canoeing Ireland Instructors.
 - b. 10 of these hours must be under the supervision of a Level 3 Kayak Instructor, the remaining hours can be logged under the supervision of a Level 2 Kayak Instructor
 - c. 15 hours in a closed cockpit kayak, the remaining hours can be logged in sit on tops

- Have recorded in a Level 2 Kayak Instructor Logbook as part of the above logged hours details of assisting in the preparation of a group for a Level 2 Kayak Skills Assessment. The group must consist of at least three participants.
- Assist on two Level 2 Kayak Skills assessments.
- Assist on two RSR 1 training courses (For training courses run January 2013 onwards only).
- Participate in two Irish Canoeing Competitions or hold a Level 3 Skills Award in another discipline.
- Completed an approved First Aid training Course (REC 2, WFA 2, ISA or equivalent).
- Attended an Sport Ireland approved Child Protection Awareness Workshop.
- Be recommended for assessment by a registered Canoeing Ireland Level 3 Instructor.
- Submit a completed Level 2 Kayak Instructor Logbook accompanied by a Level 2 Kayak Instructor Assessment application to a registered Canoeing Ireland Instructor Assessor at least 2 weeks prior to a selected assessment date.

Format of Assessment

1. During a Level 2 Kayak Instructor Assessment candidates must satisfy an assessor that they are competent to bring a group on a journey and instruct on water of Grade 1 difficulty. As well as teaching and personal canoeing ability, candidates must also demonstrate that they are sufficiently mature and responsible to manage a group.

Appendix 7.18 Canoeing Ireland - Instructor Level 1-4

2. During assessment, aspects of a candidate's personal kayaking skills and First Aid may be assessed. It would be expected that a candidate would have maintained a skill level equivalent to that of the Level 3 Kayak Skills Award and where possible to have improved on this.

As part of an assessment, a candidate would be expected to

3. Draw up a lesson plan lasting up to three hours and to organise an instructional session for a novice/basic level group on flat water.
4. Plan and take the group on a significant journey of at least 2km [BC2]
5. Teach any stroke, technique, or rescue applicable to flat water as outlined in the Level 3 Kayak Skills Award Syllabus.
6. Prepare a self-appraisal of their lesson plan/water session.
7. Demonstrate techniques and skills as required by the Level 3 Kayak Skills Award if requested to do so.
8. Demonstrate an ability to carry out the following rescues efficiently and effectively: Self-Rescue, X or Assisted X-Rescue, Unconscious Casualty and Eskimo Rescue. [BC3]
9. Demonstrate an ability to roll competently without any prior set-up.
10. Demonstrate an effective method of towing an empty kayak, a kayak with a participant who has a minor injury or illness, a kayak with a participant who has a major injury or illness.
11. Present a suitable kayak correctly fitted out for instruction along with other appropriate personal equipment (See Level 2 Kayak Instructor List of Equipment). It would be expected that a candidate's equipment would be of a standard consistent with the responsibilities likely to be encountered by a Level 2 Kayak Instructor. Examination of equipment will form an important part of the overall assessment.
12. Demonstrate effective group control, group rapport, and instructional ability.
13. Demonstrate a thorough knowledge of basic First Aid as well as a thorough working knowledge of the cause/effect/treatment of Shock, Hypothermia, EAR, and CPR.
14. Answer questions on aspects of canoeing covered during a Level 2 Kayak Instructor Training Course.
15. Attend an debrief at which a self-appraisal is presented.

Level 2 Kayak Instructor Qualification Guidelines

- It is recommended that a Level 2 Kayak Instructor Qualification is assessed by an Instructor other than the Instructor who runs the training course leading to assessment. Notwithstanding this, a Level 2 Kayak Instructor Qualification can only be assessed by a registered member of the Level 2 Kayak Instructor Assessor Panel.
- Clear guidelines should be given in writing should a candidate fail an assessment as to the area/areas which need to be improved upon.
- Candidates cannot depend on any assistance (material or practical) during the course of an assessment.
- No other award or qualification can be assessed during a Level 2 Kayak Instructor Assessment.
- The assessment candidate/assessor ratio is a maximum of 2:1

Equipment List required for a Level 2 Kayak Instructor Assessment

A correctly equipped kayak must include:	Personal canoeing equipment must include:	Equipment must also include:
<ul style="list-style-type: none"> • Rigid end loops and/or toggles • Deck lines • Suitable buoyancy • Suitable foot rest • A kayak must be of sufficient volume to carry all necessary safety equipment and perform any rescue as required by the Level 2 Kayak Instructor qualification. 	<ul style="list-style-type: none"> • Paddle • Wetsuit or sufficient thermal clothing • Spray Deck • Buoyancy Aid • Cagoule • Helmet • Adequate footwear • Waterproof Bag or other method of keeping equipment dry 	<ul style="list-style-type: none"> • Towing System • Bivvy Bag or equivalent • First Aid Kit • Knife • Whistle • Watch • Split Paddles • Repair Kit • Flask and Food • Spare Clothes • Mobile phone or VHF

Appendix 7.18 Canoeing Ireland - Instructor Level 1-4

***Recommended Contents of First Aid Kit:**

<ul style="list-style-type: none"> ● Rubber gloves ● Paramedical shears ● Vent aid or resuscitation barrier device ● Notebook and pencil ● Waterproof container (to keep supplies dry) 	<ul style="list-style-type: none"> ● Roller bandages (assorted 3' sizes) ● 3' Wound dressings (assorted sizes) ● Triangular 3 'bandages ● Roll of first aid tape 	<ul style="list-style-type: none"> ● Assorted plasters ● Safety pins ● Tweezers ● Foil blanket or emergency blanket ● Sam splint ● Penlight or snap light
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Below is the definition of the flat water operating areas for a Level 2 Kayak Instructor:

Very Sheltered Inland Water	Rivers	Sections of slow moving rivers that do not include rapids or weirs.
	Canals	Canals with bank side access and egress and which have a minimum of commercial traffic.
	Lakes	Shorelines of small lakes which do not have difficult landing areas and which are not large enough for problems to occur if there is a sudden change in conditions.
Sheltered Tidal Areas	<ul style="list-style-type: none"> ● Enclosed harbours with a minimum of commercial traffic, enclosed on three sides. Where there is minimal possibility of being blown off shore. ● Small enclosed bays where there is minimal possibility of being blown offshore. ● The upper reaches of some suitable, slow moving, flat estuaries. 	

Appendix 7.18 Canoeing Ireland - Instructor Level 1-4



Level 3 River Instructor

General Aims

The Level 3 Kayak Instructor Qualification aims to enable participants to:

1. Become qualified to instruct intermediate kayaking skills and lead kayak trips on Grade II water with groups of up to 6 students.
2. Become qualified to instruct basic kayaking skills and lead kayaking journeys on flat water with groups of up to 8 students.
3. Train and Assess for the Canoeing Ireland Levels 1, 2 and 3 Kayak Skills Awards.
4. Teach intermediate River Safety and Rescue and run RSR 1 and RSR 2 Training Courses.
5. Mentor Level 1, 2 and 3 Kayak Instructor trainees.
6. Have an awareness of the competitive canoeing disciplines.

Attendance Requirements

Before applying to attend a Level 3 Kayak Instructor Training Course, a candidate must:

1. Hold the Level 2 Kayak Instructor Qualification.
2. Hold the Level 3 Kayak Skills Award.
3. Have begun training for the Level 4 Kayak Skills Award
4. Possess a current and Canoeing Ireland approved First Aid Certificate (REC 3, WFA 3 or equivalent)
5. Be registered as a member with the Canoeing Ireland.
6. Be at least 18 years of age at the time of application.
7. Have unrestricted access to a fully equipped kayak, personal equipment, and additional equipment as listed for a Level 3 Kayak Instructor Assessment.
8. Garda vetted.

Course Outline

The Level 3 Kayak Instructor Qualification requires that a candidate attend a registered four-day Level 3 Kayak Instructor training course (or a programme of similar duration), and a two-day Assessment.

The training course is a mixed of indoor and outdoor practical and theory session, exploring various aspects of paddle sports instruction at the intermediate level. While all courses are tailored to the participant group there are a number of knowledges that are cover on the course. These are as follows:

- Personal skills and technical knowledge
- Logistics and planning
- Safety
- Coaching and teaching
- Leadership and guiding
- Mentorship and professional practice

Appendix 7.18 Canoeing Ireland - Instructor Level 1-4

Course Documents**Certification Pathway/Assessment Guidelines*****Level 3 Kayak Instructorship Award*****Applying for an Assessment**

Before applying to attend a Level 3 Kayak Instructor Assessment, a candidate must:

1. Have Maintained your member registration as a Level 3 Kayak Instructor trainee.
2. Hold a Level 2 Kayak Instructor Qualification.
3. Hold the Canoeing Ireland Level 4 Kayak Skills Award.
4. Be at least 18 years of age.
5. Have unrestricted access to a fully equipped kayak, personal equipment and additional equipment as listed for a Level 3 Kayak Instructor Assessment.
6. Have attended an approved Level 3 Kayak Instructor Training Course or Programme as organised by the Canoeing Ireland within the 24 months period preceding a selected assessment date.
7. Possess a current and Canoeing Ireland approved First Aid Certificate (REC 3, WFA 3 or equivalent)
8. Have completed a Sport Ireland approved Child Protection Awareness Workshop.
9. Be a member of Canoeing Ireland.
10. Completed your Garda vetting process.
11. Returned to the Canoeing Ireland Office a completed Level 3 Canoe Instructor Logbook accompanied by all the pre -assessment requirements and a Level 3 Canoe Instructor Assessment application no later than three weeks prior to a selected assessment date.

Other logbook requirements:

1. Recorded in a Level 3 Kayak Instructor Logbook, following the completion of a Level 3 Kayak Instructor Training Course at least 25 hours on the river of instructional experience under the supervision of at least two registered Level 3 Kayak Instructors.
2. Recorded as part of the 25 hours supervised instructional experience on at least three different river trips details of assisting in the preparation of a group for a Level 3 Kayak Skills Assessment. This group must consist of at least three participants.
3. Assist on two Level 3 Kayak Skills Assessments.
4. Assist on two RSR 2 Courses
5. Participate in three Irish Canoeing Competitions or hold a Level 3 Skills Award in another discipline.
6. Be recommended for assessment by a registered Level 3 Instructor.



Appendix 7.18 Canoeing Ireland - Instructor Level 1-4

Canoeing

Format of the Assessment

1. During the Level 3 Kayak Instructor Assessment candidates must satisfy the assessors that they are mature, responsible, and competent to instruct, lead and control a group on water of Grade II difficulty. In addition to teaching and personal kayaking ability, candidates must also demonstrate that they are sufficiently mature and responsible to manage a group.
2. During the period of the Level 3 Kayak Instructor Assessment personal kayaking skills and application of first aid may be assessed. It would be expected that a candidate would at least have maintained a skills level equivalent to that of the Level 4 Kayak Skills and where possible improved on this.

A candidate will be expected to:

1. Organise and lead an instructional session for beginners or intermediates over the course of a river trip.
2. Teach any stroke, technique or rescue applicable to water up to and including Grade II difficulty as outlined in the Level 3 Kayak Skills Award demonstrate effective group control, group rapport, and instructional ability.
3. Prepare a self-appraisal of the lesson plan water session for the Assessor.
4. Demonstrate techniques and skills as required by the Level 4 Kayak Skills Award if requested to do so.
5. Demonstrate an ability to carry out the following rescues efficiently and effectively Self Rescue, X and/or Assisted-X Rescue, All-in-Rescue, Unconscious Casualty, and Eskimo Rescue
6. Demonstrate an ability to roll competently in moving water without any prior set-up.
7. Demonstrate an effective method of towing an empty kayak, a kayak with a participant who has a minor injury or illness and a kayak with a participant who has a major injury or illness.
8. Present a suitable kayak correctly fitted out for instruction along with other appropriate personal equipment (See Level 3 Kayak Instructor List of Equipment). It would be expected that a candidate's equipment would be of a standard consistent with the responsibilities likely to be encountered by a Level 3 Kayak Instructor. Examination of equipment will form part of the overall assessment.
9. Demonstrate effective group control, group rapport and instructional ability.
10. Demonstrate a thorough knowledge of First Aid in the canoeing environment as well as a thorough working knowledge of the cause, effect and treatment of Shock, Hypothermia, EAR, CPR, and the treatment of an unconscious casualty.
11. Answer questions on aspects of canoeing covered during a Level 3 Kayak Instructor Training Course
12. Attend an interview at which a self-appraisal is presented.



Appendix 7.18 Canoeing Ireland - Instructor Level 1-4



Assessment Guidelines

1. It is recommended that Instructors other than the Instructor who has run the training course leading to the assessment assess a Level 3 Kayak Instructor Qualification. Notwithstanding this, a Level 3 Kayak Instructor Qualification can only be assessed by members of the Level 3 Kayak Instructor Assessor Panel
2. Clear guidelines should be given in writing should a candidate fail an assessment as to the areas that need to be improved on.
3. Candidates cannot depend on any assistance (material or practical) during an assessment.
4. No other award may be assessed at the same time as the Level 3 Kayak Instructor Qualification.
5. The candidate/assessor ratio should be a maximum of 6:2
6. A Level 3 Kayak Instructor Assessment must be assessed by a minimum of two members of the Level 3 Kayak Instructor Assessor Panel.



Appendix 7.18 Canoeing Ireland - Instructor Level 1-4



Level 4 Kayak Instructor

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General aims

The Level 4 Kayak Instructor Qualification aims to enable candidates to:

1. Become qualified to instruct advanced kayaking skills and lead safe kayaking trips on Grade III/ + later with groups of up to 4 students.
2. Train and Assess for the Canoeing Ireland Levels 1, 2, 3 and 4 Kayak Skills Awards.
3. Teach advanced River Safety and Rescue and run RSR 1, RSR 2 and RSR 3 Training Courses.
4. Promote safe kayaking standards, foster further participation and improvement in kayaking standards

Course Outline

The Level 4 Kayak Instructor Qualification requires that a candidate attend a registered four day Level 4 Kayak Instructor training course and a one day assessment.

Applying to attend a Level 4 Kayak Instructor Training Course

Before applying to attend a Level 4 Kayak Instructor Training Course a candidate must

1. Be currently registered with the Canoeing Ireland Office as a Level 3 Kayak Instructor.
2. Have completed Level 5 Kayak Skills Training.
3. Have unrestricted access to a suitable kayak, personal equipment and additional equipment as listed for the Level 5 Kayak Skills award.
4. Be at least 18 years of age at the time of application.
5. Be registered as a [member](#) with the Canoeing Ireland.
6. Complete a course application and return to Canoeing Ireland office.
7. Submitted your [Garda vetting form](#).

Applying to attend a Level 4 Kayak Instructor Assessment

Candidates will only be invited to attend an assessment on the satisfactory attainment of Level 5 Kayak Skills award and hold the Level 3 Kayak Instructor qualification for at least one year.

Before applying to attend a Level 4 Kayak Instructor Assessment, a candidate must:

1. Be a Level 3 Kayak Instructor for a minimum of one year.
2. Be currently registered as a [member](#) with Canoeing Ireland Training & Development Unit.
3. Hold the Level 5 Kayak Skills award.
4. Attend two Level 4 Kayak Skills Training Courses.
5. Attended two Level 4 Kayak Skills Assessments.
6. Attend two RSR 3 courses
7. Participate in five Irish Canoeing Competitions or hold two Level 3 Skills Awards in other disciplines, or hold a Level 4 Skills Award in another discipline.
8. Be at least 18 years of age at the time of application.

Appendix 7.18 Canoeing Ireland - Instructor Level 1-4

9. Have unrestricted access to a suitable kayak, personal equipment and additional equipment as listed for the Level 5 Kayak Skills award
10. Possess a current Canoeing Ireland approved First Aid Certificate (REC 3 or equivalent)
11. Have completed a Sport Ireland approved Child Protection Awareness Workshop.
12. Return a completed Level 4 Kayak Instructor assessment application to Canoeing Ireland no later than three weeks prior to the assessment date.
13. Completed your [Garda vetting](#) application.

Format of a Level 4 Kayak Instructor Assessment

The Level 4 Kayak Instructor Assessment will take place over one day and must include a river trip on Grade III+ difficulty over a distance of 2-5 miles (4-8 kilometres)

The Assessment Group on the river trip of the assessment should consist of the following:

Assessors	Minimum of two registered Assessors on the Level 4 Kayak Instructor Assessor Panel
Assesseees	Minimum of two and up to a maximum of four Assesseees
Other River Trip Participants	Minimum of three and up to a maximum of eight participants who must hold at minimum the Level 3 Kayak Skills Award and be working towards Level Kayak 4 Skills standard

During the assessment a candidate must

- Satisfy the assessors that they are mature, responsible and competent to instruct, lead and control a group on a river trip of Grade III+ difficulty.
- Show an ability to instruct a group of students on a river trip of Grade III+ difficulty.
- Have knowledge, both theoretical and practical, of advanced white water techniques, skills and rescues.
- Have knowledge, both oral and practical, of First Aid and CPR as applied in a high grade river environment.
- Have maintained a skills level equivalent to that of the Level 5 Kayak Skills.
- Attend an interview with assessors

As part of the Level 4 Kayak Instructor Assessment, a candidate will be expected to

1. Present a suitable kayak correctly fitted out for instruction and other appropriate personal equipment (See Instructor List of Equipment). It would be expected that a candidate's equipment would be of a standard consistent with the responsibilities likely to be encountered by a Level 4 Instructor. Examination of equipment will form part of the overall assessment.
2. Organise and lead a group of intermediate level paddlers on a river trip of Grade III+ difficulty over a distance of 2-5 miles (4-8 kilometres)
3. During the course of the river trip teach any stroke, technique or rescue applicable to Grade III+ water while demonstrating effective group control, group rapport, and instructional ability. In addition teach any modern river running technique as outlined on Level 5 Kayak Skills syllabus such as boofs, flares etc.
4. Satisfy the assessors that he/she is mature, responsible and competent to instruct, lead and control a group on a river trip of Grade III+ difficulty.
5. Be able to demonstrate white water and deep water rescue techniques on a Grade III+ water
6. As part of an interview give a debrief of the river trip for the Assessors and answer questions, either written and oral, on relevant aspects of kayaking such as modern

Appendix 7.18 Canoeing Ireland - Instructor Level 1-4

kayak design, advanced river grading, feedback techniques, suitable kayaks for students and activity and assessing skills.

Level 4 Kayak Instructor Qualification Guidelines

1. It is recommended that Instructors other than the Instructor who has run the training course leading to the assessment assess a Level 4 Kayak Instructor Qualification. Notwithstanding this, a Level 4 Kayak Instructor Qualification can only be assessed by members of the Level 4 Kayak Instructor Assessor Panel
2. Clear guidelines should be given in writing should a candidate fail an assessment as to the areas that need to be improved on.
3. Candidates cannot depend on any assistance (material or practical) during the course of an assessment.
4. No other award may be assessed at the same time as the Level 3 Kayak Instructor Qualification.
5. The candidate/assessor ratio should be a maximum of 4:2
6. A Level 4 Kayak Instructor Assessment must be assessed by a minimum of two members of the Level 4 Kayak Instructor Assessor Panel.

Equipment required for the Level 4 Kayak Instructor Assessment

A correctly equipped kayak must include:

Rigid end loops and/or toggles
 Suitable buoyancy
 Suitable foot rest
 A kayak must be of sufficient volume to carry all necessary safety equipment and perform any rescue as required by the Level 4 Kayak Instructor Qualification.

Personal canoeing equipment must include:

Wetsuit or sufficient thermal clothing Canoe Booties or adequate footwear Cagoule Helmet Buoyancy Aid with integrated harness Spray Deck Paddle	Flask and Emergency Food Bivvy Bag or equivalent Spare Clothes Group Shelter First Aid Kit Repair Kit Throw Bag
Map Split Paddle Whistle Torch Mobile phone Watch	River Knife Slings x 2 Prussic Loops x2 Karabiners x 2 Towing System with quick release Waterproof Bag or other method of keeping equipment dry

Recommended Contents of First Aid Kit:

Appendix 7.18 Canoeing Ireland - Instructor Level 1-4

Rubber gloves Paramedical shears Roll of first aid tape Roller bandages (assorted 3' sizes) Notebook and pencil	Vent aid or resuscitation barrier device Tweezers Triangular 3' bandages Foil blanket or emergency blanket Sam splint	Assorted plasters Safety pins 3' Wound dressings (assorted sizes) Penlight or snap light Waterproof container (to keep supplies dry)
--	---	--

- Candidates must present suitable personal equipment plus any additional equipment deemed to be appropriate to support other members of the group.
- Equipment should reflect such things as the season, the abilities of the group, and the grade of the river being undertaken.
- Borrowed equipment will be assessed as if it were a candidate's own.
- A candidate should be aware that on advanced grade rivers, having too much or inappropriate equipment can nearly be as hazardous as having too little.

Appendix 7.19 Canoeing Ireland River Safety and Rescue Course Description

River Safety & Rescue (RSR) Course - description

-RSR 1, 2 and 3 are Canoeing Ireland accredited courses.

- RSR1 - Basic level river safety and rescue for activities on grade 1 and 2 water which flat non-moving and flat to slow moving water.
- RSR2 - Tailored for paddlers who are paddling at a beginner to intermediate level covering flat to slow moving and slow to moderate moving water, grade 2.
- RSR3 - Tailored for paddlers who are paddling at an intermediate to advance level on grade 3 white water to grade 4.

Appendix 7.20 Canoeing Ireland Rescue and Emergency Care Course Description

Rescue and Emergency Care (REC) Course

Internationally recognised first aid courses from approved providers

REC courses are recognised by NGB, Canoeing Ireland but not accredited by Canoeing Ireland.

REC 3 is designed for the individual that works or enjoys the Outdoors and may not always be in a position of having facilities immediately at hand. The course is the next stage of the REC programme and continues with additional 24 hours of tuition. The course is suitable for staff in outdoor centres in a sheltered location, day trippers or overnight in remote locations such as mountain or forest areas, etc. As you progress through REC qualifications you will gain more confidence and skills in dealing with remote emergencies.

REC 5

REC is recognised by many sports national governing bodies and organisations.

Appendix 7.21 Irish Water Safety (extract): Cold Shock Hypothermia

Irish Water Safety
Sábháilteacht Áise an tSráin

COLD SHOCK

HYPOTHERMIA

Issued in the interests of safety by
Irish Water Safety, The Long Walk, Galway
Irish Water Safety is the statutory, voluntary body established to promote water safety in Ireland.

LoCall 1890 420 202
www.iws.ie
info@iws.ie

Introduction

For people not used to cold water (temp. < 15°C), sudden immersion is associated with two problems, either of which may result in death from drowning.

On initial immersion, the shock of the cold water coming in contact with the skin ("Cold Shock") can result in incapacitation and drowning in the first 2-3minutes. For those who survive this and are unable to get out of the water quickly, progressive body cooling leading to hypothermia will follow in time. The rate of onset will depend on water temperature and the protective measures you have taken to reduce body cooling.

This pamphlet gives advice on how to prevent these conditions in the first instance and what to do if you do find yourself a victim of either.

Cold Shock

The term used to describe the initial response of a victim, unused to cold water after sudden immersion.

Signs and Symptoms:

- Initial deep gasping
- Uncontrollable rapid breathing, with possible dizziness and pins and needles
- Panic
- A large increase in both heart rate and blood pressure.

Dangers:

- Inhalation of water
- Drowning
- Stroke or heart attack

Prevention:

- Use recognised 'man overboard' prevention equipment
- Wear approved lifejackets.
- Wear clothing with good insulating and waterproofing properties.
- Wear Immersion Suits (dry/wet)
- Hold on to some support and do not attempt to swim until symptoms have subsided (approx. 2 - 3min)
- Exit the water as soon as possible

Follow up:

- Monitor airway, breathing and circulation
- Prevent further loss of heat
- Protect from wind
- Get medical help

Appendix 7.21 Irish Water Safety (extract): Cold Shock Hypothermia

Hypothermia

Following immersion, first, the skin and limbs cool rapidly; then the heart, brain, and other deeper parts of the body cool. *Hypothermia* occurs when deep body temperature drops by at least 2°C. Body build, body fat, fitness level and types of clothing worn, all affect its rate of onset.

Signs and Symptoms:

- Early dulling of sensation in hands and impaired muscle function
- Violent shivering with blueness around the lips
- Armpits very cold
- Muscles stiffness
- Lethargy and disorientation
- Slow and laboured breathing
- Pulse weakens but difficult to feel in any case because of cold

Dangers:

- Impaired sensation & muscle coordination may impair some early vital lifesaving actions involving hands
- Loss of consciousness
- Drowning
- Cardiac arrest
- Death

Note: Do not assume a person is dead; they may only be in hibernation.

- Wear approved lifejackets.
- Wear Immersion Suits over warm clothing.
- Learn cold-water survival techniques (stay still with arms by sides and legs together – "HELP" position).
- Get out of water as soon as possible (life raft; upturned hull, or any other refuge in air)

Follow up:

- Prevent further heat loss (enclose in plastic bag)
- Monitor airway, breathing and circulation
- Move victim to shelter and lie flat
- Insulate body and specially the head
- Remove wet clothing if dry replacements are available. If not:
- Enclose body – except face – in large polythene bag or other waterproof material
- Give warm sweet drinks if conscious, DO NOT give alcohol
- Avoid rubbing the victims body

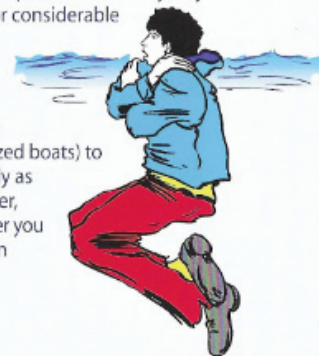
Facts

- a) It takes only 15 to 30 minutes in cold water before the temperature of the heart, brain and internal organs begin to drop but skin and muscle temperatures cool far quicker, which may impair some essential early lifesaving actions.
- b) Children cool much faster than adults because they are smaller and have less fat. Boys usually cool faster than girls.
- c) Swimming may give a feeling of warmth but it accelerates muscle cooling. The body may produce more heat when swimming but it is also more quickly lost from the arm and leg muscles. Once these muscles cool, swimming becomes more difficult or impossible.
- d) Normal clothes will not produce much insulation against cold water, but they will slow down the rate of loss of vital body heat.
- e) Wearing approved Lifejackets, Immersion Suits and properly fitting Wet suits will decrease the likelihood of hypothermia for all water sports enthusiasts.

Conservation of Heat in Water

Retention of heat in water:

- 1) Avoid swimming if possible; floating or treading water increase the chances of survival. Remain still by using trapped air in clothes as a buoyancy aid. Better still wear a lifejacket.
- 2) Clothes will slow down the rate of loss of vital body heat.
- 3) H.E.L.P. (Heat, Escape, Lessening, Position) – This position (legs together elbows to sides), may be adopted if wearing a buoyancy aid. It helps slow body heat loss in calm water.
- 4) Immersion Suits: Wet suits provide extra buoyancy and reduce heat loss for considerable time, but dry suits are better for long-term survival.
- 5) Use of floating objects (e.g. Swamped or capsized boats) to get as much of the body as possible out of the water, even if the air feels colder you will always cool faster in water.



Red Design + Print - www.red.ie

Appendix 7.22 Table 1 - Expected Survival Times in Cold Water. Source; SAR Task Force

Water Temperature	Exhaustion or Unconsciousness in	Expected Survival Time
70–80° F (21–27° C)	3–12 hours	3 hours – indefinitely
60–70° F (16–21° C)	2–7 hours	2–40 hours
50–60° F (10–16° C)	1–2 hours	1–6 hours
40–50° F (4–10° C)	30–60 minutes	1–3 hours
32.5–40° F (0–4° C)	15–30 minutes	30–90 minutes
<32° F (<0° C)	Under 15 minutes	Under 15–45 minutes

Source -Cold Water Survival - SAR Task Force -www.ussartf.org › [cold_water_survival](#)

Appendix 7.23 Synopsis of Kayaking Incidents on Fast Flowing Rivers 2007 to 2019

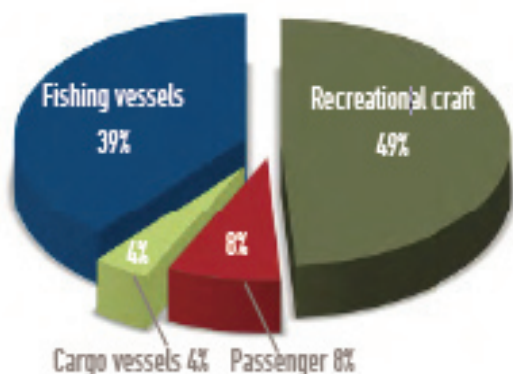
1. Incidents occurred in winter or spring months – this is when there is sufficient water in Irish rivers for white water kayaking. This has implications for the onset of hypothermia.
2. Due to 1 above most rivers were in flood.
3. In three cases the Skills Level of the Casualty kayaker was not sufficient for the grade of river. In particular mixed ability groups did not have sufficiently qualified leaders.
4. In all cases the Casualty capsized and exited their boat and then got caught in an obstruction.
5. In most cases the river was not inspected for the full length of the run on the day and the obstructions were not identified.
6. Safety zones were not set up at exit and difficult points on the run.

Note: In the current investigation (Glencar Kayakers incident (02-11-2019)) observations 1 to 6 apply.

MCIB	Year	Date	River	River Grade	In Flood ?	Fatalities	Skill Level	Club	Details	stage of run when accident occurred	Comment
155	2007	28-Dec	GADDAGH	3 to 5	yes	1	3	UCD Kayak Club	came round bend to find fallen trees. Casualty capsized and was pinned by tree root.	Towards end	One person had run river before, did not survey the whole run to look for obstacles. Well qualified kayakers in group
180	2010	07-Apr	CLODAGH	3+	YES	2	NONE	NO Club	Entered fish weir, capsized and drowned	at end	No planning or surveying of river as to exit point. No safety equipment. Kayakers did not have any kayak skill qualifications.
241	2014	13-Nov	INCHAVORE	1	YES	1	4	No Club	Ran a stopper and became unconscious, later capsized and drowned.	mid run	Well equipped with safety equipment but did not set up rescue zones after stoppers. Well qualified kayakers
275	2017	11-Nov	SUIR (at Cahir)	3	NO	1	2	no club	entered weir and capsized	towards end	appeared to have survived the capsize but found in water afterwards. Insufficient qualifications for activity.
283	2019	04-Nov	ROUGHTY RIVER	3	NO	1	4	No Club	Capsized just before exit and was swept into submerged tree roots	at exit	Casualty caught in unknown hazard; Rescue zone not prepared at takeout point. Very well qualified kayakers.

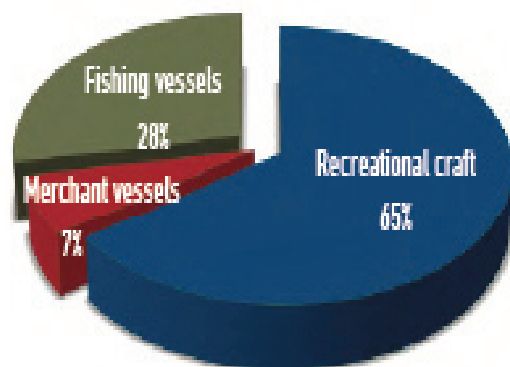
Appendix 7.24 Maritime Safety Strategy 2015 - Statistical Pie Charts Showing Maritime Fatalities and Irish Coast Guard Distress Calls by Sector

Figure 2: Percentages of maritime fatalities arising by vessel type



Source: Based on MCIB reports 2002-2013 and IROG Annual Statistics, combined.

Figure 4: Percentages of IROG Distress/Urgency Calls by Vessel Type 2002-2013

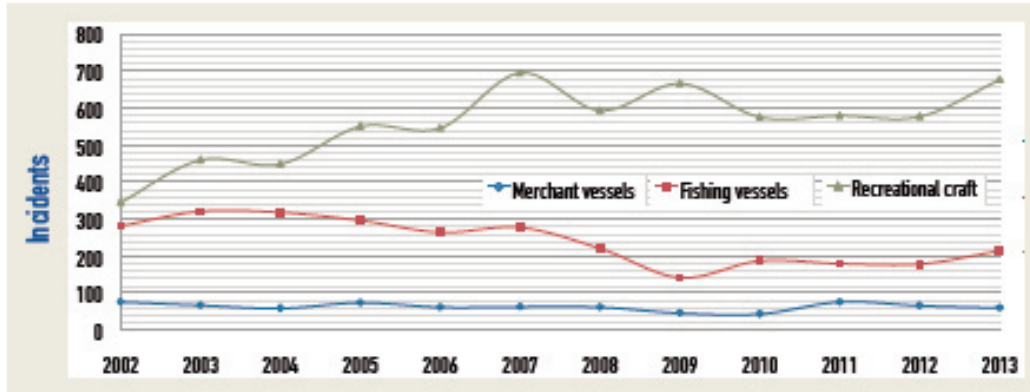


Source: IROG Statistics 2002-2013

Note: Both Passenger Vessels and Cargo Ships are included under the Merchant Vessels category.

Appendix 7.25 Trends in Irish Coast Guard Distress/Urgency Calls by Vessel Type

Figure 5: Trends in IRCG Distress/Urgency Calls by Vessel Type 2002-2013



Source: IRCG Statistics 2002-2013

The trend

SECTION 36 PROCESS

Section 36 of the Merchant Shipping (Investigation of Marine Casualties) Act, 2000

It is a requirement under Section 36 that:

- (1) Before publishing a report, the Board shall send a draft of the report or sections of the draft report to any person who, in its opinion, is likely to be adversely affected by the publishing of the report or sections or, if that person be deceased, then such person as appears to the Board best to represent that person's interest.
- (2) A person to whom the Board sends a draft in accordance with subsection (1) may, within a period of 28 days commencing on the date on which the draft is sent to the person, or such further period not exceeding 28 days, as the Board in its absolute discretion thinks fit, submit to the Board in writing his or her observations on the draft.
- (3) A person to whom a draft has been sent in accordance with subsection (1) may apply to the Board for an extension, in accordance with subsection (2), of the period in which to submit his or her observations on the draft.
- (4) Observations submitted to the Board in accordance with subsection (2) shall be included in an appendix to the published report, unless the person submitting the observations requests in writing that the observations be not published.
- (5) Where observations are submitted to the Board in accordance with subsection (2), the Board may, at its discretion -
 - (a) alter the draft before publication or decide not to do so, or
 - (b) include in the published report such comments on the observations as it thinks fit.'

The Board reviews and considers all observations received whether published or not published in the final report. When the Board considers an observation requires amendments to the report, those amendments are made. When the Board is satisfied that the report has adequately addressed the issue in the observation, then no amendment is made to the report. The Board may also make comments on observations in the report.

Response(s) received following circulation of the draft report (excluding those where the Board has agreed to a request not to publish) are included in the following section.

The Board has noted the contents of all observations, and amendments have been made to the report where required.

SECTION 36 OBSERVATIONS

8. MSA 2000 - SECTION 36 OBSERVATIONS RECEIVED

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Note: The names and contact details of the individual respondents have been obscured for privacy reasons.

8.1 Observation from ULKC, Club Members and ULSU

University of Limerick Kayak Club
University of Limerick Students Union
University of Limerick
Castletroy
Limerick

ulkayak@gmail.com



17th December 2021

MCIB Secretariat
Marine Casualty Investigation Board
Leeson Lane
Dublin
D02 TR60

Draft Report of Investigation into a fatal accident on the Upper Caragh River, Glencar, County Kerry on 2 November 2019

Dear Members of the Board,

We refer to Draft Report which you have sent to us under cover of your letter dated 20 October 2021. Together with individual members of the Club who were involved in this incident and also with our umbrella organisation, the University of Limerick Students' Union, we have reviewed the Draft Report and set out our comments and observations in the attached Comments and Observations document.

We can confirm that the attached document includes the comments and observations of the Club, the relevant members, and University of Limerick Students' Union.

The tragic events of 2 November 2021 very obviously demand comprehensive review, due to loss of a dear friend who was an avid club member. We welcome the opportunity to have our observations and comments considered and included in the MCIB final Report. There are aspects of the Draft Report which we do not believe accurately reflect the facts and circumstances of the incident. We hope that our observations and comments will be useful in formulating the final Report and Recommendations.

If you require anything further or wish to discuss anything contained in our comments and observations, please contact us at any time.

Yours faithfully,


Captain 2021/22 Captain 2019/20 Captain 2018/19

University of Limerick Kayaking Club Representatives

8.1 Observation from ULKC, Club Members and ULSU

17th December 2021

COMMENTS AND OBSERVATIONS

of University of Limerick Kayaking Club (ULKC), its relevant Members, and University of Limerick Students' Union Clubs and Societies (ULSU)

on Draft Report by Marine Casualty Investigation Board (MCIB) into a fatal incident on the Upper Caragh River, Glencar, Co. Kerry on 2 November 2019

These Comments and Observations on the Draft Report will be divided into two sections:

- General Comments and Observations
- Specific Paragraphs

SECTION ONE – GENERAL COMMENTS AND OBSERVATIONS

A. University of Limerick Kayaking Club (ULKC)

- ULKC is not part of the University of Limerick. It is an autonomous club which operates under the umbrella of the University of Limerick Students' Union. ULKC operates under its own constitution, the format of which is adapted from the common constitution published by University of Limerick Students' Union Clubs and Societies. The current version of the Constitution of ULKC is 2018.

B. Grading of the Upper Caragh River

- There are many references in the Draft Report to the Upper Caragh being "a Grade 3 or Grade 4 river" and a conclusion is made that it should have been treated as a Grade 4 river on 2 November 2019.
- The river is not "graded a grade 3 or grade 4 river" on the IWW.ie website. It is described as a grade 3 river "with the occasional stretch of grade 4". There was one clearly defined Grade 4 section at the end of the "usual" river course (as seen in IWW guide), we had pre-planned to exit before this section.
- There had been a lot of recent rain and as noted on the IWW posting, "This river requires plenty of recent rain to bring it up". So the assessment posted on IWW website is based on the assumption of plenty of recent rain. The comment in the Draft Report (para 3.20) that "the weather changed the river from mostly grade 3 to grade 4" is incorrect.

8.1 Observation from ULKC, Club Members and ULSU

- The Draft Report makes no attempt to properly analyse the grade of the water with reference to the grading criteria which are set out at para 2.2.2 of the Draft Report. There were overhanging trees and a strong flow of water, but the route was easily recognisable and there were not continuous rapids.
- The river was high after recent rain, but it was not “in flood” (para 5.2). It did not burst its banks. Rivers such as the Upper Caragh are often more dangerous when the river is lower and more obstacles are exposed (although of course, higher water poses its own challenges).

C. Irish White Water website

- It is inaccurate to refer to a “rating made by Irish White Water”. Rather, this is an assessment grading the river posted on the Irish White Water website by an individual named [REDACTED] and another contributor called [REDACTED] last updated on 27 February 2011. This website is very useful, but the Draft Report treats it as an official grading resource, when in fact it consists of assessments made by individual kayakers, rather like Wikipedia.
- The relevant grade is necessarily a subjective assessment made by the kayaking group leaders on the day, depending on the particular conditions and the particular sections of the river being paddled.

D. Instructor qualifications

- The Draft Report includes many references to Canoeing Ireland (CI) instructor qualifications and appears to confuse the role (and qualifications required) of an instructor as compared to a group leader. The ability to lead a group is a quite different thing from an instructor.
- In the UK, British Canoeing conduct quite separate Leader and Coach training (see attached list of BC courses offered by Gene 17). Canoeing Ireland does not conduct leadership courses or have leadership guidelines. (See Draft Report para 3.10 which refers to the quite different objectives of instructor training.) See attached British Canoeing details of one of their leadership courses.
- Although the Group Leaders on 2 November 2019 did not have advanced instructor training they did have considerable skill and experience as group leaders.

8.1 Observation from ULKC, Club Members and ULSU

E. Gene 17 Course

- The Gene 17 course was undertaken by all of the Group Leaders and by 4 of the Seconds. The Draft Report does not include any information about the Gene 17 course which was undertaken by the relevant group leaders and seconds.
- The course was run on Grade 4 rivers in Italy.
- It is the view of ULKC and the relevant members that those who have completed the Gene 17 course have level 4 kayak skills and exposure to leadership skills.

F. ULKC policy

- ULKC policy on the required experience of group leaders and ratios of experienced to less experienced kayakers is set out in the safety Statement, which is quoted at para. 4.21 of the Draft Report.
- This policy was followed at all times. This was done on the basis that the sub-group leaders (and 4 of the seconds) had Level 4 skill levels (as defined in the Safety Statement) and on the basis that the water to be paddled would not exceed Grade 3 and any Grade 4 sections would be portaged or excluded.
- With ULKC, group leaders are chosen not just on their individual skill level, but also on their length of experience and ability to lead and organise a group of kayakers.

G. Trip planning

- There was significant planning for the trip and for the safety of the club's members. The skill levels of the participants were assessed, and they were divided into Sub-Groups led by experienced Leaders. All appropriate equipment was secured. Rivers were chosen which the group leaders believed would suit the skill levels of the participants.
- ULKC has a standard procedure to ensure all paddlers receive proper kayaking equipment before our trips. In the case of this trip, an email was sent to all participants on the 28th of October detailing what they would be required to bring (swimming togs, towels, runners, and non-cotton thermals). Everything else is provided by the club. Before the club departs for a trip such as this, everyone's gear is laid out and checked for suitability and correct fit before being "signed-out". Before our river trips begin, all gear is again checked for correct fit before paddlers get on the water. We also help ensure everyone's kayak is outfitted and footrests are at the correct position.

8.1 Observation from ULKC, Club Members and ULSU

- The Draft Report states (para. 4.3) that there was no “formal risk assessment” carried out. It is correct that planning for the trip was not “formal”, but it was comprehensive and included discussion among the leaders and the club Safety Officer about ratios of experienced leaders in the group, appropriate rivers to suit the skill level of the group, and the required equipment, including safety equipment. A formal risk assessment is not reliable as conditions are constantly changing in kayaking and a dynamic risk assessment which took place is more suited to a trip such as this.
- The senior members of ULKC are experienced and skilled at organising kayaking trips for groups of mixed abilities and put a priority on safety. That includes prioritising having sufficient experienced kayakers on trips, and numbers of participants sometimes have to be limited to ensure that.
- The Draft Report wrongly states that Gearhameen River was the first choice. The Gearhameen was an option for the weekend but we decided that the Upper Caragh was the better choice on the day. The plan was to paddle the Gearhameen on the second day of the trip.
- It is incorrect to state that the plan was for the group leaders to paddle the rapids which the seconds and novices portaged, because in fact some of the leaders portaged as well.

H. Risk assessment on 2 November 2019

- The consensus of the leaders was that they expected a grade 2 / grade 3 trip on the basis that more difficult sections of the river would be portaged. At the outset the leaders observed and discussed the condition of the river and were satisfied that it was safe for this group to kayak on that basis.
- Group 1 led the way as the “scout” group and reported back. This was an important part of the practical and on-going risk assessment on the day and is a well-established and common practice within kayaking. When Group 1 had completed the section above the Glencar Bridge, their report was not simply that the section was easy going as referred to in the Draft Report. There was a more comprehensive discussion, during a phone call with Group 1 leader, that Groups 2 and 3 should stick to the centre of the river, that there was a left-hand bend, that they could get out on the right-hand side, and that the rapid was manageable and easy going.
- The instructions given to the combined Groups 2 and 3 by the leaders were that the rapid had a left-hand bend and the centre line was recommended. There is an eddy on the right-hand side that the group could exit the water from.

8.1 Observation from ULKC, Club Members and ULSU

- On the basis of the report from Group 1, the leaders of the combined Groups 2 and 3 decided how to proceed. Given that Groups 2 and 3 were now together, they decided to “truck and trailer”. This involved pairing the kayakers with one more experienced (“truck”) and one less experienced (“trailer”) kayaker descending together. Several leaders went first, to establish safety along the route, and another leader followed behind the whole group.

I. Causation

- Sections 4 and 5 of the Draft Report refer to various causative factors, but the Draft Report does not identify the real factual reasons for the serious incidents which occurred. As a result, we believe the Draft Report gives undue weight to issues which were not causative and fails to draw the correct conclusions.
- There were three basic factors which had to combine to create the serious incidents which occurred:
 1. The presence of tree obstacles.
 2. High flow of water which made those obstacles more dangerous once encountered.
 3. Kayakers going off course from the middle of the river.
- The most serious incidents involving Casualty 1 and Casualty 2 took place up at the same tree. This was an unusual and unexpected obstacle. The usual obstacle which kayakers face involves overhanging branches. But this was a large bough of a tree which extended out into the river and was mostly submerged. Group 1 had not encountered this obstacle, so there was no warning of it.
- The above causative factors, and especially the unusual and unexpected nature of the tree obstacle encountered, are not properly identified in the Draft Report.

8.1 Observation from ULKC, Club Members and ULSU

SECTION TWO – SPECIFIC PARAGRAPHS

The comments and observations below relate to specific paragraphs in the Draft Report, some of which may be just as important as the general observations above.

- 2.1: Type “B” was an MX 8.0 not a MAMBA 8.0
- 2.2: Grade – see section B above.
- 2.2.2. This paragraph is correct as far as it goes, but refers to the river as a whole and fails to identify which of the hazards were present in the particular spot where the incidents occurred.
- 2.3.1: Here the river is described as “grade 4 river”. See section B above.
- 3.1: ULKC is not part of the University of Limerick. See section A above. The current version of the Constitution of the Club is 2018 (not 2012).
- 3.2: The Safety Statement and Trips Policy and Procedure were never combined. The relevant documents are the 2018 documents. In relation to the Canoeing Ireland observation about “challenge by choice”, of course it is true that novices are unable to undertake a risk calculation themselves because they do not have the knowledge to do so. That is always going to be the case.
- 3.3: It is wrong to pick out five hazards that were present during this trip. All ten hazards were present during this trip as they are during every kayaking trip.
- 3.4: See section F above.
- 3.5: The comment here appears to confuse the role of an instructor as compared to a group leader. See section D above.
- 3.10 and 3.11: See D above.
- 3.15: The ratio of Level 2 instructors was never considered by the leaders of the trip as part of the relevant criteria. See D above.
- 3.16: See D above.
- 3.17: “On a grade 4 river” – incorrect. See B above.
- 3.18: “instructor level” – see D above.
- 3.19: The river is not “graded by IWW”. See C above.
- 3.20: There had been a lot of recent rain and as noted on the IWW posting, “This river requires plenty of recent rain to bring it up”. So the assessment posted on IWW is based on the assumption of plenty of recent rain. The comment that “the weather changed the river from mostly grade 3 to grade 4” is

8.1 Observation from ULKC, Club Members and ULSU

incorrect. The team leaders present on the day assessed the sections being paddled as grade 3. See B above.

- 3.21: Gene17 is not an assessed course, the rivers undertaken on the Gene17 course were of a grade 4 standard. Their whitewater skills would be defined as grade 4 and they would have learned a multitude of skills important for leading kayaking groups - which we would take into account when selecting leaders.
- 3.25: The consensus of the leaders was that they expected a grade 2 – grade 3 trip on the basis that more difficult sections of the river would be portaged.
- 3.29 and 3.30: The description of the decision making between the two rivers here is incorrect. Upper Caragh was chosen for the first day because it was further away. The plan was to paddle Gearhameen the next day.
- 3.32: It is not correct to say that the group expected Grade 2 river conditions. The group expected Grade 3 river conditions with Grade 2 sections in between. There was one clearly defined Grade 4 section at the end of the “usual” river course (as seen in IWW guide), we had pre-planned to exit before this section. Rivers are graded on the most difficult rapid. The very last rapid on the river was the Grade 4 rapid. A decision was made before the trip had begun that the trip was going to end before the last rapid.
- 3.34: The allocation of level 2 instructors is not relevant. See D above.
- 3.35: Level 2 instructorship was not considered as a relevant factor in assigning leaders. What was important was perceived paddling competency and experience to lead the group. See D above.
- 3.37: Casualty number 1 was in sub-group 3, not sub-group 2.
- 3.39: Preventative measures were taken to deal with novices who were cold. Hot flasks, extra thermals, bivvy bags and storm shelters were brought. Suitable precautionary measures were taken.
- 3.40: See D above.
- 3.43: Some leaders paddled these rapids, while other leaders portaged with the rest of the group.
- 3.45: See H above. The discussion with Group 1 was more detailed than what is described here.
- 3.47: Subgroups 2 and 3, not subgroups 1 and 2.
- 3.48: Casualty number 3 was in sub-group 2, not in sub-group 3. Casualty No. 3 was female and references here to “him” and “himself” are incorrect.
- 3.56: Casualty number 1 was wearing a semi dry cag, not a wetsuit. Casualty number 1 became responsive before the fire services arrived, not afterwards.

8.1 Observation from ULKC, Club Members and ULSU

- 3.60: The wording “her head started to sink” gives the impression that casualty number 2’s head was under the water. That is not true, her head remained above water. This should read, “her head started to drop”.
- 3.63: Both were taken to University Hospital Tralee. The equipment was collected the following day by club members who were not involved in the incident.
- 3.64: Casualty number 2 died on 4 November 2019, not 5 November 2019.
- 4.2: This wasn’t the first trip away. There had been at least three others.
- 4.3: ULKC believes that appropriate risk assessment was carried out, even if it was not “formal”. See G, H and I above.
- 4.5: The IWW website does not grade the river. See C above.
- 4.7: The reference to the river Gearhameen is inaccurate, see G above.
- 4.9: It is not correct that the planning group expected grade 2 river conditions. They expected grade 3 rapids with grade 2 river sections in between. The rationale for the last sentence of this paragraph that the river should have been considered grade 4 is unclear – and no reasoning is given for this. We do not believe it is correct and the group leaders assessed and believe that the river conditions were grade 3. See B above.
- 4.10: The group leaders assessed the sections of the river that were being paddled as grade 3. See B above.
- 4.12: Confusion here between instructors’ skill levels and group leader capabilities. See D above.
- 4.15: Once again, “instructor” qualifications are being used as a benchmark. That is quite different from group leader skills. See D above.
- 4.16: It is correct that the Gene 17 Course is not equivalent to level 4 instructor level, however, it is equivalent for level 4 skill level. See E above.
- 4.17: The reference here to “leading/training” is ambiguous and not accurate. The relevant skills here were leading skills, not instructing or training skills.
- 4.18: Once again, instructor/leader confusion is in this paragraph.
- 4.22: Incorrect reference to instructor level, which is irrelevant.
- 4.23: Incorrect reference to instructor level, which is irrelevant.
- 4.24: Incorrect reference here to “a grade 4 river”.
- 4.25: Incorrect and irrelevant reference to “instructor level”.

8.1 Observation from ULKC, Club Members and ULSU

- 4.26: Incorrect reference to instructor level.
- 4.27: The reference to sub-groups 1 and 2 in line 3 is incorrect. This should be sub-groups 2 and 3. It is incorrect to state that the leaders would paddle the rapids which the seconds and novices portaged, because in fact some of the leaders portaged as well. It is not correct to say that no assessment was carried out, rather an assessment was carried out the result of which was a decision to continue to Glencar Bridge. The discussion by mobile phone was not simply that “it was easy going”, rather than the general layout and optimum routes for the upcoming rapids was discussed.
- 4.28: Reference to instructors is irrelevant.
- 4.30: Leaders were quickly on the scene in each incident. Each incident was handled quickly by leaders and seconds that were attached to novices/beginner paddlers
- 4.32: None of the capsized events were left unattended by the leaders. It was the serious nature of the events that occurred was the problem.
- 4.36: The reference here to “pop up tents” is incorrect, the group had survival shelters. The reference to “RSR3” should be “REC3”.
- 4.38: Casualty number 1 was already conscious when the fire service arrived.
- 4.39: Maximum 30 seconds (not approximately 30 seconds).
- 4.40: It is known from the Coroner’s report that the death of Casualty 2 was due to organ failure brought on by hypothermia.
- 4.41: The river conditions were taken into account in all planning for the trip. Cold water immersion was considered and provision was made for hot drinks, spare thermals and storm shelters.
- 4.42: The estimate of river grade was that the sections being paddled were grade 3 on the day. See B above.
- 4.43: It is correct that the kayak club trip policy does not refer to instructors’ skills and as noted above that is not the relevant skill involved in leading a group. See D above.
- 5.1: The group leaders assessed on the day and still believe that the sections which were paddled were grade 3 on the day. See B above. The serious incidents were caused by tree obstacle, not capsize as referred to here.
- 5.2: The river was high after recent rain, but it was not “in flood”. It did not burst its banks.
- 5.3: It is incorrect to say there was no risk assessment. See G and H above.
- 5.4: This paragraph is very vague.

8.1 Observation from ULKC, Club Members and ULSU

- 5.5 ULKC Safety Statement was complied with at all times.
- 5.6: Appropriate safety assessment was undertaken. See G and H above. The serious incidents were not capsized incidents. They were caused by an unusual and unexpected tree obstacle.
- 5.7: “instructor qualifications” – see D above.
- 6.1 and 6.2: Given our observations above about instructor qualifications and the importance of leadership (as opposed to instructor) skills, we believe that it is inappropriate for the Recommendations to refer to instructor courses and standards.
- 6.3: The University of Limerick is not involved in auditing the activities of any student clubs. Such an audit would be carried out by an outside person appointed by the Club with the assistance of the University of Limerick Students’ Union Clubs and Societies.

MCIB RESPONSE:
The MCIB notes the contents of this observation.

8.2 Observation from Casualty's Next of Kin

The Secretariat,
Marine Casualty Investigation Board,
Leeson Lane,
Dublin 2,
DO2 TR60

9th November 2021

By Registered Post and Email

Re: Draft Report of investigation into a fatal incident on the Upper Caragh River, Glencar, Co. Kerry

2nd November 2019

Dear [REDACTED]

Thank you for your letter of the 20th October and attached draft report into [REDACTED] incident. Your report is very thorough and as you can imagine heartbreaking to read.

The conclusions and recommendations speak for themselves. The only observation I can make is that thankfully there were not more casualties or fatalities that day.

Recommendation 6.5 in relation to safety in water sports within third level institutions is very welcome given this is now the second incident involving a third level institution that resulted in a fatality (UCD 2007). Circumstances with this case are somewhat similar yet the lessons from 2007 seem not to be learned.

In relation to whether or not hypothermia and immersion in cold water was a contributory factor in [REDACTED] death pg43 (4.40) and pg48 (5.12), my understanding from listening to both the coroner and pathologist at [REDACTED] inquest on 4th August 2021 was that hypothermia was a contributory factor. Perhaps the coroner and/or the pathologist will be able to confirm whether or not this is in fact the case and you might like to include it in your report.

And finally, just a small typo on pg32 [REDACTED] was pronounced dead on Monday 4th November 2019 at 1.30 pm – not Monday 5th November as stated.

Thank you again for sharing this report – hopefully its findings, conclusions and recommendations will serve to prevent kayaking incidents in the future and that no other families will have to endure the heartbreaking loss of someone so dear and so special.

Kind regards,

[REDACTED]

MCIB RESPONSE:
The MCIB notes the contents of this observation.

8.3 Observation from Kerry Fire & Rescue Services



Thank you for allowing us to view your draft report of investigation into this incident.

We have no comments or observations to make.

Regards



Chief Fire Officer



Kerry Fire & Rescue Service

Balloonagh

Tralee

County Kerry

066-7123111

MCIB RESPONSE:
The MCIB notes the contents of this observation.

OBSERVATION 8.4

8.4 Observation from Water Safety Ireland

MCIB RESPONSE:
The MCIB notes the contents of this observation.



[REDACTED]
Chairperson
Marine Casualty Investigation Board
Leeson Lane
Dublin
D02 TR60

29th of November 2021

[REDACTED]

Incident on the Upper Caragh River Section 36 Response

Thank you very much for your letter dated the 20th of October in relation to the DRAFT Report of Investigation into a fatal incident on the Upper Caragh River, Glencar Co Kerry.

Water Safety Ireland (WSI) welcome the recommendations contained within the report and are confident that when implemented will help reduce the likelihood of further tragedies of this kind in kayaks and canoes on our rivers.

Yours sincerely

[REDACTED]
Chief Executive

Is é Sábháilteacht Uisce na hÉireann an comhlacht deonach reachtúil a bhfuil oideachas an phobail faoi uisce sábháilteacht mar príomhaidhm aige.
Water Safety Ireland is the statutory voluntary body established to promote water safety in Ireland.
REGISTERED CHARITY CHY16289

AN BÓTHAR FADA, GAILLIMH, ÉIRE.
THE LONG WALK, GALWAY, H91 F602.
INFO@WATERSAFETY.IE | WWW.WATERSAFETY.IE
091-564 400 | LOCAL: 1890 420 202

8.5 Observation from Coast Guard

[REDACTED] (Transport)

From: [REDACTED]
Sent: Wednesday 27 July 2022 13:00
To: Transport Marine Casualty Investigation Board
Subject: RE: Draft MCIB Report

I wish to revise the below text to correct a grammatical error

Secretariat
MCIB
Leeson Lane.

Ref; MCIB 12/296 Draft Report and MCIB letter dated 12th July 2022

Thank you for the opportunity to review the a/m report.

It may be of interest to consider that when tasking a helicopter to an incident of this type, consideration should be given to a potential requirement for winching a casualty or casualties. The helicopter that was tasked on this occasion did not possess such a capability. This capability was not relevant to the outcome of this incident. MCIB may wish to consider a recommendation that PRAs when tasking a helicopter to similar incidents should consider whether a winching capacity is potentially required, and that PRAs should incorporate same in their planning arrangements.

Coast Guard has no other observation on the report .

Yours sincerely,

[REDACTED]
Irish Coast Guard

—
An Roinn Iompair
Department of Transport

Lána Liosain, Baile Átha Cliath, D02 TR60
Leeson Lane, Dublin, D02 TR60

[REDACTED] www.gov.ie/transport

From: [REDACTED]
Sent: Wednesday 27 July 2022 11:55
To: 'info@mcib.ie' <info@mcib.ie>
Subject: Draft MCIB Report

Secretariat
MCIB

MCIB RESPONSE:
The MCIB notes the contents of this observation.

OBSERVATION 8.6

8.6 Observation from Casualty's Next of Kin

The Secretariat,
Marine Casualty Investigation Board,
Leeson Lane,
Dublin 2,
DO2 TR60

3rd August 2022

By Registered Post and Email

Re: Draft Report of investigation into a fatal incident on the Upper Caragh River, Glencar, Co. Kerry
2nd November 2019

Dear [REDACTED]

Thank you for your letter of the 12th July and attached draft report into [REDACTED] accident. Your report is very thorough and as you can imagine heartbreaking to read.

The conclusions and recommendations speak for themselves. The only observation I can make is that thankfully there were not more casualties or fatalities that day.

Recommendation 6.7 in relation to safety in water sports within third level institutions is very welcome given this is now the second incident involving a third level institution that resulted in a fatality (UCD 2007). Circumstances with this case are somewhat similar yet the lessons from 2007 seem not to be learned.

Thank you again for sharing this report – hopefully its findings, conclusions and recommendations will serve to prevent kayaking incidents in the future and that no other families will have to endure the heartbreaking loss of someone so dear and so special.

Kind regards,

[REDACTED]

MCIB RESPONSE:
The MCIB notes the contents of this observation.

8.7 Observation from ULSU



Student Centre
University of Limerick
Limerick
www.ulstudentlife.ie

9th September 2022

The Secretary

MCIB

Dear Board,

1. Thank you for sending us the draft report and providing us with an opportunity to further comment upon it. We understand that the foremost role of MCIB is to analyse this tragic accident and what might be learnt from it and recommended in respect of water safety. ULSU has no expertise in water safety or kayaking and therefore we will not make any comments about the particular facts of the incident or any technical matters relating to kayaking which have already been subject to comments by ULKC.

However, we do believe it is important to clear up some misconceptions which remain in relation to the respective roles of ULSU, UL, and CI. It is important to get this correct because it affects the recommendations of the Board and how and by whom they are implemented.

2. ULKC has two important affiliations:

- With ULSU in respect of overall governance of the club.
- With CI in respect of kayaking matters.

ULKC has no affiliation with UL and UL has no role in the governance or operations of the Club. This is important because the implementation of changes will be the responsibility of the kayaking club working with supervisory input from its affiliated bodies, ULSU and CI. UL will not be involved in this because it has no role in the governance or operations of the Club. We are concerned that unless this misconception is cleared up in the MCIB report, there will be a resulting confusion which will impede decision making in the implementation of changes.

[UL Student Life trades as University of Limerick Students' Union \(ULSU\)](#)

8.7 Observation from ULSU

3. We wish to refer to some specific parts of the draft report where these issues arise:

a) The last sentence of the summary on page 4 of the draft report is as follows:

The gaps in the Club's safety environment was contributed to by the lack of any supervision, or capacity to effectively supervise, the safety of students engaged in high risk activities by the Students Union, and by the devolution of all such responsibility to the Students Union by the University.

There are two points here. First, responsibility has not been devolved by the University to the Students' Union. This suggests that responsibility originally lay with the University and that they somehow handed that responsibility to the Students' Union. This is false. The University never had any responsibility or any role.

Secondly, this summary fails to mention Canoeing Ireland and their role in supervising and evaluating the safety of members of their affiliated clubs. This role is mentioned in the Safety Recommendations in Section 6 so it is strange that Canoeing Ireland is not mentioned in the Summary on page 4.

b) Paragraph 3.7 on page 22 of the draft report refers to "The UL Trips Policy and Procedure." This is incorrect and should refer to the "ULKC Trips Policy and Procedure". This is a Club policy, not a University policy.

c) At paragraph 4.42 (beginning on page 50 of the draft report), is set out UL's position on governance and operations of the Club and their non-involvement. You go on to state that, "The MCIB does not propose to engage with the positions advanced by UL and the ULSU." It is important that MCIB does engage with this issue. It cannot be ignored. ULKC is affiliated to ULSU and CI. If recommendations are going to be made about additional auditing and control of the operations of ULKC, then that is going to have to be carried out by the affiliation bodies. In assessing the Club's safety environment, it does appear to us that the draft report is somewhat misdirected. For example, at page 50 you say that, "compliance with those requirements does not appear to have been audited by the Club or the University". If there is going to be external auditing and if that is going to form part of your investigation and recommendations, then it is the affiliating bodies (ULSU and CI) who should have an auditing role.

d) We would agree that ULSU does not have the necessary experience and training to audit ULKC safety practices because we are a students' union which provides general support and governance advice to clubs which operate under our umbrella and we are not experts in kayaking or water safety. Auditing of water safety requirements should be carried out by expert affiliating bodies such as CI and there appears to be a gap here as referred to in your recommendations.

e) At paragraph 4.45 you note that "CI express surprise that you profess yourself as having no involvement in University clubs and therefore no role in safety management or audit." We

[UL Student Life trades as University of Limerick Students' Union \(ULSU\)](#)

8.7 Observation from ULSU

are not sure why this comment is included in the draft report. There is no particular reason that CI would have any knowledge or expertise in the way that Universities and Student Unions are operated (which, in any event, varies between institutions). It is obvious from comments throughout the draft report that there has been substantial correspondence and consultation between MCIB and CI and that CI has had a significant input into the draft report and we note that CI is the affiliating body to ULKC which has experience in kayaking and the associated water safety requirements, but we also note that ULSU has had no access to the commentary and consultation between MCIB and CI and therefore we are not in a position to comment fully on these opinions and observations which appear to be coming from CI.

f) Paragraph 5.1 at page 57 is a repetition of the summary at page 4 as to which see (a) above.

g) For the reasons set out above, Recommendation 6.3 in respect of University Limerick is inappropriate. Improvements in safety procedures will be carried out by the Kayak Club in conjunction with its affiliating bodies ULSU and CI and we are confident that a productive partnership will be formed to that end together with outside safety consultants who have already been engaged by ULKC and ULSU. But UL simply has no role in that and it is counterproductive for MCIB to make recommendations involving UL.

h) The recommendations at paragraphs 6.3 and 6.4 of the draft report go beyond the particular incident and beyond the Kayak Club or water safety and make recommendations about all “high-risk” sports and clubs. These recommendations appear to be outside the statutory powers of the Board. Section 25 of the Merchant Shipping (Investigation of Marine Casualties) Act, 2000, states that, “The purpose of an investigation under this part is to establish the cause or causes of a marine casualty with a view to making recommendations for the avoidance of similar marine casualties”. Similarly, Section 35 provides that, “The report shall outline any recommendations that the Board considers to be warranted and feasible for the avoidance of similar marine casualties”. The Board has carried out an investigation into this particular tragic incident involving the kayaking club and not into any other sport or club. The draft recommendations are outside the statutory authority of the Board.

i) Recommendation 6.4 refers to ULSU equipping itself to be able to provide appropriate auditing of safety standards for the Kayak Club. ULSU are not experts in kayaking or water safety and we believe that any auditing process should be set up in conjunction with CI (as CI appears to have recommended itself – see the last paragraph of Section 4.42 on page 53).

j) Following on from that, the recommendation at 6.9 appears to be especially important and Canoeing Ireland should be involved in auditing safety policies of its affiliated clubs including ULKC. If such auditing was not being carried out by CI at the time of the incident, then it appears that should also be referenced in the summary of contributing causes at page 4, in the discussion of the Club’s safety environment at paragraph 4.42, and in the conclusion summary at paragraph 5.1.

UL Student Life trades as University of Limerick Students’ Union (ULSU)

8.7 Observation from ULSU

4. The draft report concentrates on this particular tragic incident, and we understand that is the appropriate statutory role of the MCIB. But by making recommendations which go well beyond kayaking and water safety, the recommendations in the draft report give a false view of the activities of ULSU and the clubs which operate under its umbrella:

a. For over a decade ULSU has focused on the areas where we can be proactive and supportive. We have engaged with numerous external Health & Safety Bodies and Consultants to best advise on minimising risk within the voluntary activities of our Clubs & Societies. This list includes 'Integrated Risk Solutions', 'Cuckoo Events' and their subsidiary company 'Safe Events' and ██████████ of SHEQ Training. Pre 2019, we engaged with Safe Events & ██████████ and entered detailed discussions on a 5-phase approach to enhance the education and awareness and a full review of our process and procedures around Health & Safety, as they pertain to Clubs & Societies and their responsibilities as volunteers. This is currently live and ongoing and at a Phase 3 stage. Phase one and two consisted of creating a suite of standard operating procedures and stage two involved ██████████ travelling to Limerick to meet with committees of what are deemed to be higher risk clubs. While providing various training to our student clubs and societies on an annual basis, we are also constantly striving toward building on the strong foundation that is in place with help of various external experts, in order for our volunteers, particularly those in our clubs, to be sufficiently educated and supported.

b. We have engaged with a leading authority on Kayaking with over 40 years' experience who will be travelling over to Limerick to meet with the Kayak Club. The training will cover but will not be limited to exploring various risks, agreeing the process for authorising/agreeing trips and writing a new policy to reflect this. They will also be exploring leadership and ensuring that there is a new and clear management system put in place and a timeline and plan for transitioning to the new system.

c. It is widely accepted nationally that, when it comes to the administrative system for Clubs & Societies, ULSU is regarded as being to the forefront. This was made clear in May 2019 when ██████████ was invited, at the request of our insurance brokers ██████████ to present at the Higher Education Forum at the IPB Insurances HQ in Grand Canal Square in Dublin to other Third Level Representatives with responsibilities for Clubs & Societies about our approach to Health & Safety: "ULSU were picked as [we] are deemed to be the ones with the best practices in place and it would be of benefit for the others to hear [our] experiences."

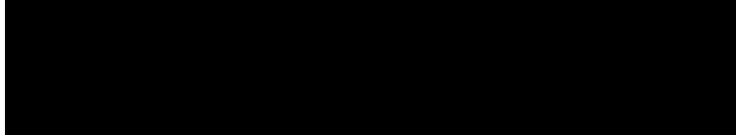
d. Currently, Maynooth University, Dublin City University, GMIT, Letterkenny, Sligo and the Royal College of Surgeons all utilise the system pioneered by the University of Limerick Students Union since 2008 with regard to Clubs & Societies, which includes its Health & Safety processes.

UL Student Life trades as University of Limerick Students' Union (ULSU)

8.7 Observation from ULSU

5. We hope and trust that the above comments are useful. Please contact us at any time if you require any clarification or extra information about any of the points we have raised. We request that these Observations are included in the Appendix to the published Report.

Yours faithfully,



General Manager

Head of Student Engagement

UL Student Life

UL Student Life

UL Student Life trades as University of Limerick Students' Union (ULSU)

MCIB RESPONSE:
The MCIB notes the contents of this observation.



Leeson Lane, Dublin 2.
Telephone: 01-678 3485/86.
email: info@mcib.ie
www.mcib.ie

