



BSS Hire Boat Requirements 2017

Training Course

(Pre-learning document 1 of 3)

Essential information about the changes to BSS Hire Boat Requirements

Document overview

This document forms part of the BSS Hire Boat Requirements 2017 Training Course learning material. Examiners should read through and become familiar with the information contained within this document before completing the online Pre-learning assessment and attending their Training Event. Examiners should also print off this document to take to their Training Event.

This document provides the essential information supporting the changes to BSS Hire Boat Requirements. The index below outlines the importance of reading through the information.

Note that the information provided will not be covered in any detail at the forthcoming Training Event as the day will focus on the practical application of the 16 new/amended requirements specific to hire boats. However, the Pre-learning and Post-learning assessments will have questions associated with the content.

Document contents

	Page
1. What are hire boats (... for the purposes of the BSS)?	2
2. Hirer safety - the part BSS Examiners play	3
3. Why BSS requirements for hire boats can be different to those for private boats?	4
4. How the revised BSS Hire Boat Requirements will look and how they were arrived at?	4
5. Applying the 2015 Examination Checking Procedures (private boat requirements) to hire boats	5
6. Applying the 16 new/amended requirements specific to hire boats	7
7. Where does this leave the BSS 2002 Standards?	7

1. What are hire boats (... for the purposes of the BSS)?

For the purposes of the BSS 'hire boat' means any powered boat such as weekly and day hire craft. For example, those:

- let or hired under an arrangement, whether or not on a pre-contract basis;
- the subject of a bare boat charter arrangement;
- the subject of any form of third-party managed shared-use arrangement (including timeshare or shared ownership).

The term 'hire boat' does **not** include privately owned or privately managed boats, or any of the non-private classes of boats listed below:

- boats operating commercially with a skipper or crew, and which carry passengers;
- workboats;
- emergency service boats and rescue boats;

- hotel boats;
- ‘roving traders’ selling goods or services (i.e. cafés and shops);
- boats let as residential accommodation;
- shared-ownership boats managed jointly by the private owners.

In order that the correct BSS requirements are applied, it is essential that examiners establish the class of the boat at the time the agreement to examine it is entered into. It follows that the information above is essential knowledge.

Note that the non-private classes of boats not included as hire boats will remain subject to the BSS 2002 Standards. The BSS Hire Boat Requirements 2017 Training Course will not qualify examiners to examine boats against the BSS 2002 Standards. Only those examiners who have undertaken training and assessment to the BSS 2002 Standards will be qualified to examine non-private classes of boats not included as hire boats.

Neither will the 2017 Training Course qualify non-Gas Safe Registered BSS Examiners to undertake LPG tightness testing on hire boats using a manometer. See [this link](#) for more information.

2. Hirer safety - the part BSS Examiners play

Those examiners who successfully complete this BSS Hire Boat Requirements 2017 Training Course will have a key part to play in keeping hirers safe.

A thorough and robust review of the risks associated with hiring self-drive boats on the inland waterways, combined with an equally thorough and robust review of the existing BSS requirements for hire boats took over 2 years to complete. The review culminated in a set of revised BSS Hire Boat Requirements which, from 1 April 2017, BSS Examiners will have a responsibility to implement in a professional and consistent way.

As set out in more detail below, the risks associated with hiring a boat are often different to those of private boat owners. Hirers may be new to boating, they may not be intimately familiar with the layout of a particular hire boat or how to use it safely, and in particular hirers will not generally be able to control the risks associated with the condition, equipping or construction of the boats they use. As such, navigation authorities, including the BSS and BSS Examiners have a broader responsibility to ensure hire boat and hirer safety than for private boats.

The part BSS Examiners play is set out as follows:

- a) correctly establish at the time the agreement to carry out a BSS examination is made that the boat is a hire boat;
- b) consistently apply the BSS Hire Boat Requirements as published and in line with the training received; including, for example, recognising the responsibilities of hire operators and liaising with them concerning designated Crew Areas, etc;
- c) accurately report examinations to hire operators and record examinations on Salesforce as instructed.

3. Why BSS requirements for hire boats can be different to those for private boats?

Since 2005 the BSS requirements for privately owned and privately managed boats have been 'risk-based' ensuring that 'real and accepted' risks are identified and managed effectively, by way of employing the BSS Risk Management Process.

In 2013 the navigation authorities undertook a Hirer Safety Review (see Section 4 below for further information). This Review recognised that the BSS requirements concerning non-private classes of boats must also become fully risk-based, and take account of the users of such classes of boat who may not be responsible for the full control of the risks to which they may be subjected.

It follows that BSS requirements for hire boats will invariably be mandatory, and that the scope of such BSS requirements may be wider or different than for privately-owned and privately managed boats, as determined by the application of the BSS Risk Management Process.

4. How the revised BSS Hire Boat Requirements will look and how they were arrived at?

From 1 April 2017 hire boats will no longer be examined against the standards based BSS 2002 Standards. Instead, from 1 April 2017 the following risk-based BSS requirements will apply to hire boats:

- **The 2015 Examination Checking Procedures (ECP) for privately owned and privately managed boats (but with all relevant Checks being applied as mandatory requirements – for hire boats there will be no Advice Checks);**
- **16 additional new/amended requirements specific to hire boats**

The BSS Hire Boat Requirements have been modernised to reflect the findings of previous private boat requirement risk reviews in 2004 and 2012 and, in particular to take account of the inland waterway navigation authority Hirer Safety Review undertaken in 2013.

The Hirer Safety Review risk-reviewed the following:

- the existing published BSS Private Boat Requirements were assessed for their appropriateness and relevance for hire boats;
- the BSS Hire Boat Requirements published in the BSS 2002 Standards that were in excess of the 2013 BSS Private Boat Requirements were assessed for their continued relevance;
- the coverage of hirer safety published in the published Hire Boat Code (jointly owned by Maritime & Coastguard Agency / Association of Inland Navigation Authorities / British Marine), that were over and above the BSS Hire Boat Requirements were risk-reviewed.

Underpinning the Review was the recognition that the responsibility for the safety of those hiring boats rests jointly with a) the people aboard, b) the hire operators and c) the navigation authorities (including BSS). You'll appreciate this relationship as you go through the Training Course, as some of the checks especially in respect of 'Crew Areas' require the hire operator to determine where they allow hirers to operate, i.e. sit or stand.

As part of the Review, the number of hire boats on inland waterways was estimated to be around 2400 weekly hire boats and 840 day hire boats. Also, accident data from 2007 to 2012 across all inland boating sectors was gathered and analysed, from all the navigation authorities.

In addition, accident and fatality data from the Water Incident Database (WAID) and BSS records were analysed as were reports from the Marine Accident Investigation Branch (MAIB) and press cuttings, to establish, where possible, the circumstances of fatalities.

A group of inland waterway experts convened to review the incident data, to identify the biggest risks to hirers and to consider whether anything further should be done to reduce them. The expert group made some recommendations for change which were subsequently put to hire operators at a series of regional open forums and then, once the BSS committees had conducted a further risk-review, were subject to a full public consultation alongside all the suggested changes to the existing BSS Hire Boat Requirements.

Albeit that for examiners the whole approach to examining hire boats is changing, for the industry it is important to recognise that the overall outcome of the revised BSS Hire Boat Requirements for hire operators is not seen as significant. The review outcome was that all of the main risks are well understood by hire operators and that existing controls, in general, appeared to be both proportionate and effective in managing them down to acceptable levels. Slips, trips and falls were identified as the highest risk to hirer safety, representing over half of all recorded incidents.

In one way, the most significant impact of the review for hire operators (and examiners) concerns applying the private boat requirements (2015 ECP) to hire boats. See Section 5 below for more information.

5. Applying the 2015 Examination Checking Procedures (private boat requirements) to hire boats

From 1 April 2017 all the BSS requirements in Parts 2 -9 of the 2015 Examination Checking Procedures (ECP) will be mandatory for hire boats. For examiners and hire boat operators, the fact that there is no 'advice check' category, is a significant factor. This fact reflects that hirers may not be responsible for the full control of the risks to which they may be subjected, as covered in Sections 2 & 3 above.

In readiness for 1 April, BSS Examination documentation and the Salesforce facility will be updated to allow for this factor.

Albeit examiners will be well used to applying the 2015 ECP, it is important to recognise that this represents a shift in the way hire boats are to be examined. For those who are eligible to apply the BSS 2002 Standards, they will know that they are based upon construction standards and look very similar to clauses in British Standards. From 1 April the BSS Hire Boat Requirements will represent the modernised 'risk-based' approach examiners are used to when applying the 2015 ECP. The difference is, for example, that additional compliance options may be available and that the requirement is more likely to be an assessment of condition rather than an application of a construction standard.

There will be an impact on hire boats (and therefore hire operators) in introducing the 2015 ECP to hire boats as measured against the BSS 2002 Standards. The impact can be described as follows:

- A generally neutral impact, as assessed against the current BSS 2002 Standards, concerning 139 of the 2015 ECP requirements.

- A less onerous obligation for hire boats as assessed against the current BSS 2002 Standards concerning 22 of the 2015 ECP requirements.
- An additional or more comprehensive obligation for hire boats concerning 23 of the 2015 ECP requirements.

The 23 additional or more comprehensive requirements being:

- any disused fuel filling points must be disabled.
- fuel tank vent hose connections must be accessible for inspection.
- petrol tank filler connections must enter the tank at the top of the tank.
- the use of wooden bungs to terminate a fuel tank drain facility is disallowed.
- high-pressure diesel fuel lines between injection pumps and injectors must be constructed of metallic pipe and not to be made of hose material
- petrol engine flame traps are now visually inspected to see that any gauze or filter elements are complete.
- structures and surfaces surrounding exhaust system components must be free of signs of heat damage.
- any portable fuel system connection to an inboard engine must be located in the outboard well.
- a check concerning the type, location and condition of 230V a.c. inlet connections.
- a check for the type of 230V a.c. power source lead connections.
- a check of the condition of 230V a.c. power source leads and connectors.
- addressing the fire/electrocution risk associated with using un-synchronised 230V a.c. supplies simultaneously, a check that male pins on power source inlet connections are not 'live' when an alternative power source is connected to the 230V a.c. system.
- a check for the presence of a consumer unit on 230V a.c. systems.
- portable fuel tanks within inboard engine spaces connecting to fixed engines are not permitted.
- spare fuel containers are to be in good condition.
- a maximum capacity of individual portable petrol tanks must permit safe and convenient carrying and removal for refilling outside the vessel, i.e. be a maximum capacity of 27L.
- portable fire extinguishers to be in open view, or their location clearly marked.
- the check of gas locker condition has changed from an assessment of gas-tightness to a check for any path for leaked LPG to enter the interior of the vessel.
- gas locker repairs must meet the thickness and other integrity requirements to match the original construction
- gas cylinder movement whilst in position in the gas locker must not cause any pulling tight of any LPG hose.
- low pressure LPG hoses only to be used to connect regulators or appliances to gas supply pipework and to be a maximum of 1m in length.

- v) a check of any 'bullseye' deck-light for signs of heat damage to the surrounding surfaces and materials.
- w) a check for, unintended gaps or cracks in the outside surface or seams of a solid fuel stove; or, unintended gaps greater than 2mm in the loading door seal or door glass; or, loose, damaged or missing cover plates.

In overview, the above listed 23 requirements are included within the 2015 ECP but they are not included within the BSS 2002 Standards, and therefore will be applied to hire boats for the first time from 1 April 2017. This impact needs to be acknowledged as part of the Pre-learning as you may need to guide hire operators through the changes and provide suitable explanations.

Prior to the Hirer Safety Review, the above 23 additional or more comprehensive requirements had been through two BSS risk-reviews since 2004 which meant that their application to hire boats was accepted without question during the Review.

6. Applying the 16 new/amended requirements specific to hire boats

Of these 16 requirements, 9 originate from Part 10 (Hire Boats) of the BSS 2002 Standards and 7 are new. Of the 9 existing hire boat requirements some have been amended only very slightly while others include more significant changes. The 7 new requirements have all arisen from the Hirer Safety Review and are considered by the navigation authorities to be a reasonable and proportionate mitigation measure to known risks.

You will find reference in Pre-learning Document 2 of 3 to the specific hazards and risk controls underpinning these 16 requirements. The overall impact of introducing the new and amended requirements is seen as reasonable and proportionate and founded on the robust risk-review addressing 'real and accepted' risks.

For each of the 16 requirements you will also find the associated new Examination Checking Procedure included within Pre-learning Document 2 of 3.

Later this year these 16 specific hire boat requirements will be incorporated into the main ECP as a new Part 10 – Hire Boats.

7. Where does this leave the BSS 2002 Standards?

The BSS 2002 Standards will continue to apply to non-private classes of boat other than hire boats after 1 April 2017 and **until further notice**.

The classes to which the BSS 2002 Standards will continue to apply after 1 April 2017 include:

- boats operating commercially with a skipper or crew, and which carry passengers;
- workboats;
- emergency service boats and rescue boats;
- hotel boats;
- 'roving traders' selling goods or services (i.e. cafés and shops);
- boats let as residences or longer term accommodation;

As previously stated, only those examiners who have undertaken training and assessment to the BSS 2002 Standards will be qualified to examine these classes of boat. The BSS Hire Boat Requirements Training Course 2017 will not qualify examiners to examine these classes.

Since the time of the Hirer Safety Review it has always been fully understood that the other non-private classes would continue to be assessed against the BSS 2002 Standards until such time as a risk review had been undertaken relevant to those boat classes.

It is equally accepted that the BSS 2002 Standards are long overdue review in respect of these other non-private classes, and that the risk-review should be undertaken without undue delay. The review has now started and it can be anticipated that it will be completed by the end of this year. Considering the new BSS Hire Boat Requirements are seen as fully supportable, it can be predicted that, once assessed for their relevance, they will be applied to the other non-private classes, except where class-specific variations are identified as more appropriate. It can also be predicted that examiners will be offered training in respect of any changes.

Lastly, it should be noted that the BSS is only one of the means the navigation authorities use to help keep hirers safe. The navigation authorities will likely be consulting on the introduction of a revised Hire Boat Code (published jointly by the Maritime & Coastguard Agency / Association of Inland Navigation Authorities / British Marine), as a licensing condition, including the proposal to introduce stability testing of hire boats. Note that BSS Examiners will have no role here to assess to any Hire Boat Code provisions – examiners will continue to focus on BSS requirements.