



**water safety**  
Scotland

# Drowning and Incident Review (DIR) – Guidance

**Water Safety Scotland**

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This document was written by Carlene McAvoy and James Sullivan with help from Water Safety Scotland's Data Subgroup, which includes RoSPA, SFRS, RNLI, Scottish Canals, and Police Scotland.

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# Acronyms

<b>DIR</b>	Drowning and Incident Review
<b>IEA</b>	Information Exchange Agreement
<b>MCA</b>	Maritime and Coastguard Agency
<b>MoU</b>	Memorandum of Understanding
<b>NWSF</b>	National Water Safety Forum
<b>PAWS</b>	Partnership Approach to Water Safety
<b>PHS</b>	Public Health Scotland
<b>PRE</b>	Public Rescue Equipment
<b>RNLI</b>	The Royal National Lifeboat Institution
<b>RoSPA</b>	The Royal Society for the Prevention of Accidents
<b>SAR</b>	Search and Rescue
<b>SOR</b>	Scene and Outcome Review
<b>SDPS</b>	Scotland's Drowning Prevention Strategy
<b>SFRS</b>	Scottish Fire and Rescue Service
<b>WAID</b>	WAter Incident Database
<b>WSS</b>	Water Safety Scotland

# 1. Introduction

In recent years, water safety in Scotland has attracted increased attention, both politically and publicly, due to the 2018 release of [Scotland's Drowning Prevention Strategy \(SDPS\)](#).

SDPS has two main targets:

- To reduce accidental drowning deaths in Scotland by 50 per cent by 2026 and reduce risk among the highest-risk populations, groups and communities.
- To contribute to the reduction of water-related suicide.

Following the publication of [Preventing Future Fatalities](#), Water Safety Scotland (WSS), the Scottish Fire and Rescue Service (SFRS) and The Royal Society for the Prevention of Accidents (RoSPA) developed a voluntary Drowning and Incident Review (DIR) process for accidental water-related fatalities in Scotland.

The process aims to ensure a comprehensive review of each accidental water-related fatality in order to gather all relevant data and intelligence that may help prevent future incidents.

## 1.1 Water-related fatalities in Scotland

SDPS notes that on average, there are 96 water-related fatalities every year in Scotland. Around 50 of these are classed as accidental water-related fatalities. Each year however, around 20 fatalities are classified as “unknown causes” or have limited data and information.

DIR was created to help improve this data through a specific process that will be detailed throughout this guidance document. Appendix 1 provides a pictorial overview of the process.



## 1.2 Drowning and Incident Review

DIR aims to ensure a comprehensive review of each accidental water-related fatality in order to gather relevant data intelligence that may help to prevent future incidents. WSS leads the DIR, however, SAR organisations and other national organisations have endorsed DIR and a full governance framework can be found in Appendix 2. DIR will provide some information on emergency service response to the incident but should not be used as an operational debrief or as a means to address operational learning.

## 1.3 Purpose of this guidance

This guidance covers the full DIR process for any accidental water-related fatality in Scotland.

It details the process for progressing a DIR and how it ties in to national drowning prevention efforts. The guidance aims to ensure that all DIR's follow the same systematic process so that lessons can be learned and water-related fatalities can be prevented.

## 1.4 Status of this guidance

DIR is a voluntary process and this guidance document should be used in conjunction with any lead Search and Rescue (SAR) organisation or local PAWS (Partnership Approach to Water Safety) group that wishes to progress a DIR meeting.

PAWS groups have been designed to fit with DIR and are therefore particularly well suited to using DIR in conjunction with WSS.

A PAWS group is a local group that aims to build upon existing good practices currently undertaken by partner organisations across a geographical area. This co-ordinated and proactive approach aims to assist in the delivery of Prevention, Improved Response, and Review of water emergency incidents, and is consistent with SDPS targets.

PAWS equivalent water safety groups can also use DIR.

## 1.5 Who is this guidance for?

This guidance should be followed by all professionals involved in drowning prevention in Scotland. SAR and local PAWS groups, in particular, should follow this guidance, as should any organisation that is likely to attend a DIR meeting. This may include:

- Local – and national-level SAR organisations
- Health sector
- Local authorities and land owners
- National drowning prevention experts.

WSS is available for support and guidance in using the DIR and a full training package is available.

For more information contact  
[DIR@watersafetyscotland.org.uk](mailto:DIR@watersafetyscotland.org.uk)

## 1.6 How does DIR tie in with other Reviews?

### • Fatal Accident Inquiries (FAI)

DIR data will be made available for ongoing death investigations and FAI's at the request of the Procurator Fiscal.

### • Child Death Reviews

The DIR process covers children under the age of 18, but is a separate process to the National Hub for Reviewing and Learning from the Deaths of Children and Young People.

WSS has a partnership agreement in place with Healthcare Improvement Scotland to ensure that any relevant information regarding the drowning of a child is made available for a Child Death Review.

### • Marine Accident Investigation Branch

The DIR process does not cover boating and commercial incidents as these are covered by the Marine Accident Investigation Branch.

- **Suicide Process**

The DIR process will not cover deaths by suicide as these will be covered through the work of the National Suicide Prevention Leadership Group.

- **Fatalities in employment**

The DIR process does not cover any fatalities related to employment as this is covered by the Health and Safety Executive.

### **1.7 Police Procedures**

The DIR process will not take precedence over any ongoing investigations or procedures by Police Scotland. DIR is a voluntary process that is separate to any police protocols and is to be implemented after Police Scotland's incident phase.

### **1.8 Families and DIR**

Due to the timescales involved, as well as the factual nature of DIR, participation is not recommended for family members or for people who have recently experienced a water-related trauma.

### **1.9 What happens to the DIR data?**

DIR data is captured in two phases: SOR data and DIR form data. SOR data is stored by both SFRS and RoSPA. DIR form data is stored by SFRS and accessed by WSS (via RoSPA). It is anticipated that some of the DIR may feed data into WAID (where appropriate). WAID is a database specifically developed by the National Water Safety Forum (NWSF) to collate water-related incident data for the UK. WAID is not currently set up in a way that is fully compatible to incorporate all DIR data.

Individual case data may also be shared confidentially with the National Hub for Reviewing Learning from the Deaths of Children and Young People, and the Procurator Fiscal.

Every five years, WSS will audit the DIR data to look for trends and patterns. This will be published in an aggregated form. Interim audit reports may be possible at the discretion of WSS.



## 2. Overview of the full process

This section details the overview of the full DIR process. The main stages of the process are shown in Figure 1. An in-depth diagram is shown within Appendix 1.

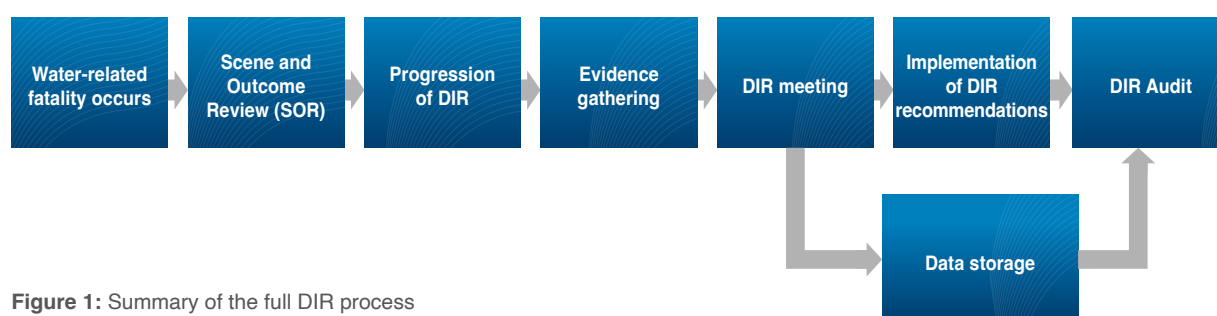


Figure 1: Summary of the full DIR process

### 2.1 Scene and Outcome Review – SOR

After a water-related fatality occurs, lead SAR organisations should submit a SOR form within 72 hours - except in exceptional circumstances or where Police Scotland advise otherwise.

The SOR should be the product of a short discussion between the local SAR partners that attended and, if relevant, the landowner. This joint approach will allow for the identification of the suspected outcome based on the information available.

To submit the SOR form, the lead SAR organisation needs to ascertain basic details about the incident including the suspected outcome. No personal information of the deceased/rescuee should be included.

Other SAR organisations or the landowner can be involved at the discretion of the lead SAR organisation.

The lead SAR organisation should classify the likely suspected outcome.

The suspected outcomes are detailed in Table 1.

If a SAR organisation cannot determine the likely underlying cause(s) of a fatality, they should categorise it as “unknown”.

Regardless of the suspected outcome, a SOR form should be completed by a lead SAR organisation and sent to WSS via [DIR@watersafetyscotland.org.uk](mailto:DIR@watersafetyscotland.org.uk).

**The SOR form should not be sent to anyone else.**

Suspected outcome
Accidental or natural causes
Unknown
Crime
Suicide

Table 1: Suspected outcomes

## 2.2 Informing PAWS partners

Once SOR is submitted, the lead SAR Organisation should alert the local PAWS (or equivalent) group Chair of the incident who should await the outcome from WSS.

## 2.3 Progression of DIR

On receipt of the SOR form, WSS will contact the Procurator Fiscal to confirm the progression of DIR.

The Procurator Fiscal will confirm whether the DIR can be progressed based on the available information.

WSS will inform the lead SAR organisations and the the local PAWS (or equivalent) group Chair with the following instruction:

- Accident or natural outcome – Progression of DIR
- Unknown outcome – Progression of DIR (if the Procurator Fiscal advises)
- Suicide outcome – No DIR and refer to Public Health Scotland via the local suicide prevention lead officer.

## 2.4 What to do when DIR is progressed

The local PAWS (or equivalent) Chair will oversee the gathering of evidence, produce the review package, and conduct the DIR meeting. Local PAWS (or equivalent) Chairs can ask the lead SAR organisation to do this on their behalf where required.

In the absence of a local PAWS (or equivalent) group, WSS will help lead SAR organisations to gather local and national partners to conduct the DIR meeting.

Evidence gathering regarding the fatality and its circumstances will be undertaken during this phase. More information on evidence gathering is detailed in section 4.2.

## 2.5 DIR meeting

The water-related fatality will be discussed at a DIR meeting attended by the local PAWS (or equivalent) group utilising a PowerPoint created during the evidence gathering phase.

Where there is no local PAWS (or equivalent) group, WSS will lead the process and will include multiple agencies and professionals who are either involved in the case, are members of WSS, or who have expertise in drowning.

At the conclusion of the meeting, the DIR form must be filled in by a representative from a lead SAR organisation (as outlined in the framework agreed in appendix 2) and sent to SFRS by emailing [SFRS.DIR@firescotland.gov.uk](mailto:SFRS.DIR@firescotland.gov.uk)

**The DIR form should not be sent to any other person or organisation.**

The PAWS (or equivalent) Chair will be responsible for completing the minutes and sending them to all attendees.

Minutes should not contain a narrative of the meeting / incident. Instead they should be a brief record of the attendees and the potential measures identified.

## 2.6 DIR audits

WSS will audit all DIR's every five years in order to look for trends and patterns in drowning fatalities in Scotland which will be reported in an aggregated form. Interim audit reports may be possible at the discretion of WSS.

## 2.7 Near miss

In the event of a significant near miss involving water, the local PAWS (or equivalent) group should consider carrying out a DIR to gain a better understanding of the incident.

A near miss is a significant event in which at least one person is submerged in water and requires medical intervention to prevent loss of life.

The same process and paperwork can be used for the review of a near miss.



## 3. Scene and Outcome Review - SOR

SOR is the first phase of DIR and should be completed within 72 hours. This section details this process.

### 3.1 Who should be involved?

In the event of a water-related fatality, lead SAR organisations (Police Scotland, SFRS or MCA) will ascertain details of the incident. Other SAR organisations and landowners may be invited at the discretion of the lead SAR organisation.

SOR should be completed within 72 hours except in exceptional circumstances or where Police Scotland advise otherwise.

### 3.2 Classification of a suspected outcome

The SAR organisation will provide a classification of the suspected outcome for the incident based on the information that is available from their investigations at that time. No assumptions should be made. Accordingly, where information is not available, an outcome of “unknown” should be recorded.

Table 1 (see page 5) lists the different categories.

Regardless of the suspected outcome, the SOR form should be filled in at this stage by the lead SAR organisation and emailed to [DIR@watersafetyscotland.org.uk](mailto:DIR@watersafetyscotland.org.uk)

**The SOR form should not be sent to anyone else.**

The lead SAR organisation should alert the local PAWS (or equivalent) group Chair of the incident but should not send the SOR form to the local PAWS (or equivalent) group.

If the SAR organisation is uncertain as to whether there is a local water safety group, WSS has a full and current list of all local water safety groups in Scotland.

Where there is no local PAWS (or equivalent) group, WSS, will take the lead role for the next stages of DIR.

### 3.3 SOR form

The SOR form is accessible through the WSS website.

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## 4. Progression of DIR and evidence gathering

This section details the progression of DIR and the evidence gathering phase. A full diagram of the process can be found in Appendix 1.

### 4.1 DIR progression

Once the SOR form has been submitted, WSS will correspond with the Procurator Fiscal to confirm whether DIR should go ahead.

WSS will update the lead SAR organisation and PAWS (or equivalent) Chair by email on whether the DIR will progress.

WSS will inform the lead SAR organisation and the the local PAWS (or equivalent) group with the following instruction:

- Accident or natural outcome – Progression of DIR
- Unknown outcome – Progression of DIR (if the Procurator Fiscal advises)
- Suicide outcome – No DIR and refer to Public Health Scotland via the local suicide prevention lead officer.

If DIR progresses, within the email from WSS, all necessary documentation will be included for evidence gathering. This includes: PowerPoint presentation, DIR form, Partner Information Return template, DIR minute template, this guidance document and training package details.

The local PAWS (or equivalent) Chair should then move into the evidence gathering stage and make preparations to host a DIR meeting.

Where there is no local PAWS group (or equivalent), WSS, with the assistance of SAR organisations, will lead the evidence gathering and host the DIR meeting.

### 4.2 Evidence gathering

Preparation in advance of the DIR meeting will be necessary to gather sufficient evidence to allow an effective review to take place. It is the responsibility of the local PAWS (or equivalent) group Chair to work with SAR organisations to gather sufficient information and create the necessary review resources prior to the DIR meeting. The evidence gathering phase will only commence when confirmation of progression of DIR is received.

As outlined in section 4.1 please note that all evidence gathering will be after the confirmation of progression of DIR by WSS. Evidence gathering **should not** include any Police evidence e.g. photographs of the scene.

The **DIR PowerPoint presentation** provided by WSS must be used in the DIR meeting in conjunction with the DIR form to ensure consistency across the review.

A **Partner Information Return template** should be used within this evidence gathering phase. The Partner Information Return can be sent to lead SAR organisations and should be returned in sufficient time to create the package in advance of the DIR meeting.

These resources are designed to help ensure evidence is gathered both systematically and consistently.

Information that will be required for the PowerPoint presentation includes:

- map of the incident
- photos of the incident location (This should not be Police Scotland photos)
- site visit by the lead SAR or local PAWS Chair to gain understanding of location

Table 2 details the minimum required photographic evidence of the location.

### Photographic evidence

General location
Location of suspected incident
Access/egress points
Lighting
Available Public Rescue Equipment (PRE)
Available signage
Known hazards
Physical barriers

**Table 2:** Minimum requirements

# 5. DIR meeting

The DIR meeting is the opportunity for all agencies and professionals to meet to discuss the incident, and make decisions on recommendations and future mitigations. This section details the DIR meeting.

**The DIR meeting should not progress without a representative of WSS. WSS can be alerted by emailing [DIR@watersafetyscotland.org.uk](mailto:DIR@watersafetyscotland.org.uk)**

## 5.1 Aims of the DIR meeting

The key aims of the DIR meeting are to:

- Review the incident in detail to determine as far as possible, the likely causes of the water-related fatality.
- Consider contributory factors to the fatality, including environmental, behavioural and psychosocial factors.
- Identify any learning, recommendations or actions that may have the potential to prevent any future fatalities in the location.

## 5.2 Who should chair the DIR meeting?

The meeting should be chaired by either the lead SAR organisation or the local PAWS (or equivalent) group chair at their agreement. The chair will be responsible for the following:

- Ensuring a SAR organisation fills in the DIR form during the meeting.
- Creating minutes and sending them to all attendees.

If the local PAWS (or equivalent) group Chair requires support for DIR, they should contact WSS at [DIR@watersafetyscotland.org.uk](mailto:DIR@watersafetyscotland.org.uk)

## 5.3 Who should attend the DIR meeting?

All partners in the local PAWS (or equivalent) group should have the option of attending the DIR meeting. There may be occasions where a specific partner's attendance would be beneficial because of their operational involvement, if they are a subject matter expert, or where they are responsible for the location in which the incident occurred (e.g. stakeholder or landowner). Where this is the case, every effort should be made to ensure that subject matter expert, and anyone else with appropriate knowledge of the incident, attends the DIR.

## 5.4 Where should the DIR meeting be held?

The DIR can be held in person or via online platforms at the agreement of partners.

## 5.5 When should the DIR meeting be held?

The DIR should be held within eight weeks of confirmation of the progression of DIR from WSS as this will allow sufficient time for information gathering.

In certain circumstances, a retrospective DIR may be held later if there are delays in classifying the outcome and progressing DIR.

## 5.6 What should be discussed at the DIR meeting?

The DIR meeting will be a review of all matters relating to the water-related fatality and will facilitate the completion of the DIR form.

The meeting should follow the PowerPoint presentation (see section 4.2 on evidence gathering), and should also go through the DIR form verbally, stage by stage, to gather all relevant information.

It is the responsibility of the local PAWS (or equivalent) group Chair to take minutes of the DIR meeting. Minutes should not detail any specifics of the fatality but should include the suggested recommendations (section 8) as these will be later implemented through the local PAWS (or equivalent) group.

## 5.7 The DIR form

At the meeting, whilst the information is discussed, a lead SAR organisation will be responsible for filling in the form. Where details are unknown, the fields can remain blank.

The form includes the following:

- **Details of the review meeting** – information to complete are as per the arrangements made by the Chair when calling the meeting
- **Incident narrative** – information on the facts known about the incident
- **Incident details** – information such as time, weather conditions etc
- **Casualty details** – including gender, DOB and ethnicity
- **Location** – information on the location of the incident
- **PRE** – information on signage and PRE

- **Contributory factors** – information on specific known factors that are likely to have contributed to the fatality
- **Recommendations** – suggested potential short, medium and long-term measures. This includes the use of a simple, modified Delphi technique, which is a method used to estimate the likelihood of future events happening in order to reach a confidence level on potential recommendations that may make a difference to preventing future fatalities.

The suggestion of recommendations during DIR does not indicate that their absence at the time of the incident attributed to the fatality. These measures, if adopted, may have the potential to prevent a similar incident occurring in the area but their efficacy cannot be guaranteed.

It is important to stress that recommendations should be tangible and realistic for the landowner to implement. Although recommendations should be specific and based on the incident, the experience of local partners and topography of the location should also be taken into account. Table 3 provides suggestions of some potential recommendations for your consideration.

### Potential recommendations

Awareness raising via social media and campaigns

On site engagement

Education/youth group engagement

Landowner risk assessment

Replenishment of existing PRE

**Table 3:** Potential recommendations

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Paper documents or evidence must not be used at the DIR meeting. All evidence and information should be verbal or visual using the PowerPoint presentation package.

### **5.8 Suspected suicide**

If during the DIR meeting it transpires that the incident may be a suspected suicide, the meeting should be adjourned. The Chair of the DIR meeting should then alert the local suicide prevention lead officer (via PHS) to begin the suicide review process.

### **5.9 Data protection during the DIR meeting**

The DIR meeting will follow the data protection measures set out in section 7.

### **5.10 After the DIR meeting**

The lead SAR organisation should send the DIR form to SFRS by emailing [\*\*SFRS.DIR@firescotland.gov.uk\*\*](mailto:SFRS.DIR@firescotland.gov.uk)

SFRS will host the DIR Data. The DIR data will also be accessed by WSS (via RoSPA) via an Information Exchange Agreement.

Where requested, data will also be shared with the Procurator Fiscal and National Hub for Reviewing and Learning from the Deaths of Children and Young People. Water Safety Scotland, via [\*\*DIR@watersafetyscotland.org.uk\*\*](mailto:DIR@watersafetyscotland.org.uk) will manage the request.

No DIR form data should be shared with the local PAWS (or equivalent) group.

The local PAWS (or equivalent) group, as part of their local agenda for water safety, are in charge of monitoring the implementation of the recommendations suggested during DIR meetings which are captured in the minutes.



## 6. DIR audits

WSS will carry out a five-year audit of the DIR meetings in order to look for trends in water-related fatalities. Additionally, the audit may consider looking at any follow-ups from the original DIR meetings in order to ascertain if suggested recommendations were adopted.

DIR audits will be reported in aggregated form. Interim audit reports may be possible at the discretion of WSS.

## 7. Data protection, storage and Information Exchange Agreement (IEA)

All information relating to a DIR meeting is confidential and must only be shared in verbal form with those invited to the meeting. Minutes of the DIR meeting should not include any specific information about the fatality.

Attendees are expected to treat all information from DIR as confidential and to abide by relevant UK data protection laws. No confidential information on the incident should be discussed outwith the DIR meeting. The lead SAR organisation responsible for completing and transferring the DIR form to SFRS should do so in line with its own organisational Data Protection Policy using a secure transfer method.

### 7.1 Data transfer and storage

SFRS will host the DIR form data which will also be accessed by WSS (via RoSPA). Limited DIR form data may be provided to WAID under a specific Information Exchange Agreement (IEA) with the host organisation.

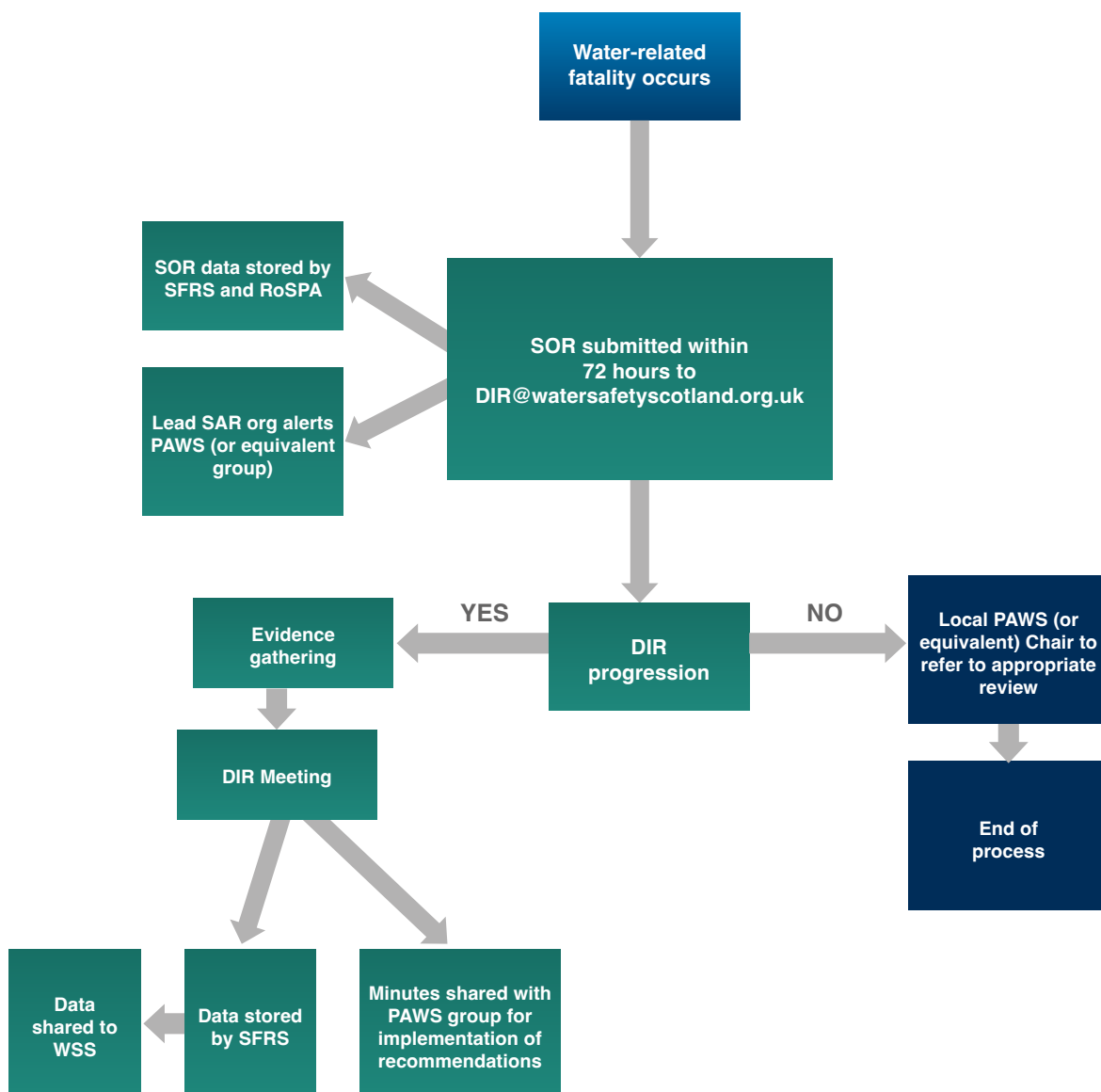
### 7.2 Access to DIR form data

Individual case data may also be shared confidentially with the National Hub for Reviewing Learning from the Deaths of Children and Young People, and the Procurator Fiscal.

WSS will access the DIR data, hosted by SFRS, where required for further aggregated reporting.

# Appendix 1

## In-depth, full-process diagram



# Appendix 2

## Framework Agreement

Lead SAR organisations include:

### Inland

SFRS

Police Scotland

His Majesty's Coastguard

RNLI

### Lead Search and Rescue (SAR) Organisations

A lead SAR organisation will coordinate the SOR and DIR forms in the event of an incident.

#### The Lead SAR organisation should:

- Submit the SOR form and send it to [DIR@watersafetyscotland.org.uk](mailto:DIR@watersafetyscotland.org.uk) for WSS to contact the Procurator Fiscal to see if DIR should progress
- Alert the local PAWS (or equivalent) group
- Contribute and/or coordinate the evidence gathering phase
- Attend the DIR meeting and fill in the DIR form; send the DIR form to SFRS at [SFRS.DIR@firescotland.gov.uk](mailto:SFRS.DIR@firescotland.gov.uk)

### SFRS

#### In addition to the above, SFRS should:

- Be alerted (via the SOR form) on the DIR progression from WSS
- Store all SOR and DIR data in a secure online location
- Provide access to data for WSS (via RoSPA) under IEA agreement
- Provide applicable DIR data to WAID under IEA agreement
- Where requested, share data with the Procurator Fiscal or the National Hub for Reviewing and Learning from the Deaths of Children and Young People using a secure transfer method.

### Police Scotland

Prior to the SOR and DIR processes, in the event of an incident, the following applies;

- Preserving life and locus always remains the Policing priority
- Policing policy and procedures take priority over SOR and DIR processes
- Police Scotland will work with its SAR partners through water related incident priorities – preserving life, promoting safety, recovery
- Police Scotland's incidental updates, maintained by C3, will form much of any DIR and therefore the aforementioned priorities will not prevent SOR or DIR, but on occasion, delay these for operational reasons.

### Water Safety Scotland

#### WSS should:

- Inform SFRS on receipt of a SOR form
- Ask for approval to progress a DIR meeting with the Procurator Fiscal
- Provide DIR forms and templates
- Audit the DIR data to look for trends and patterns every five years. Interim audit reports may be possible at the discretion of WSS
- Attend DIR meetings
- Provide guidance on the DIR process
- Lead the DIR meeting if there is no established local PAWS (or equivalent) group
- Provide ongoing advice for local PAWS (or equivalent) group Chairs and lead SAR organisations on DIR
- Provide access to training on DIR for lead SAR organisations, local PAWS.

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## **DIR attendee**

### **The DIR attendee should:**

- Gather relevant data in advance of the meeting that can be shared during the DIR.
- Comply with all confidentiality in relation to DIR
- Assist where appropriate with implementing recommendations as part of the local agenda for improved water safety.

## **Local PAWS (or equivalent) Chair**

### **The local PAWS (or equivalent) Chair should:**

- Inform all local PAWS (or equivalent) members of the Incident

### **If DIR is progressed:**

- Lead and coordinate with SAR organisations to gather sufficient information and the necessary evidence
- Where agreed with the lead SAR organisation, create the Powerpoint for the DIR meeting (this may include a site visit)
- Where agreed with the lead SAR organisation, chair the DIR meeting, take and distribute appropriate minutes to attendees
- Ensure the recommendations are progressed through the local PAWS (or equivalent) group as part of the local agenda for improved water safety.

Please note: in some cases an organisation may have a dual role e.g. PAWS (or equivalent) Chair and Lead SAR organisation.

