

HRS Group UK Health and Safety Policy.

1.0 Introduction

This policy is designed to contribute to the business of the HRS Group UK as commitment to continuous improvement in health and safety performance. The policy reflects the legal obligations placed upon the HRS Group UK by the Health and Safety at Work etc. Act 1974 and the Management of Health and Safety at Work Regulations 1999 (as amended).

Our objectives are to maintain zero accidents and incidents. To achieve this HRS Group will commit the required financial and physical resources. Additionally, we require the commitment, support and action from everyone working within the HRS Group UK, as this is central to the ongoing effective management of the Health and Safety system.

HRS Group UK is the collective name for the following companies:

HeatExchangerSpares.com Ltd.
Company Registration No. 4000211

HRS Heat Exchangers Ltd.
Company Registration No. 7145693

HRS Hevac Ltd.
Company Registration No. 3401820

HRS Hevac Engineering Ltd.
Company Registration No. 7145693

HRS International Ltd.
Company Registration No. 4599023

HRS Investments Ltd.
Company Registration No. 3737053

Registered Office:

10/12 Caxton Way
Watford Business Park
Watford
Hertfordshire
WD18 8JY

2.0 Health & Safety Policy Statement

HRS Group UK consider that the health and safety of their employees and the impact they have on the workplace environment is of paramount importance to the Company in achieving the consistent high standards it sets itself in all its activities. It is therefore the policy of HRS Group UK to develop a health, safety and environmental awareness culture throughout the Company. This will involve taking all reasonable precautions for the prevention of injuries and ill health to our employees, sub contractors and others who may be affected by our work activities. We will endeavour to maintain a healthy environment and to prevent any damage or loss to property, plant and equipment. Our aim is to achieve an incident and injury free workplace.

Every employee of HRS Group UK has a role to play in ensuring that these aims are achieved, by acting with due regard for their own and others' health and safety. Sub-contractors will be expected to perform in a similar manner to ensure that their own health and safety, the health and safety of others and that of HRS Group UK is not compromised. HRS Group UK will provide the resources to achieve this aim, so far as is reasonably practicable.

Every employee has a responsibility to co-operate with the Company to enable all statutory duties and obligations to be complied with. The successful implementation of this policy requires total commitment from all levels of employee, from the boardroom to the youngest employee. Each individual has a legal obligation to take reasonable care for their own health and safety and the safety of others who may be affected by his or her acts or omissions.

Adequate facilities and arrangements will be maintained for employee consultation at all levels on health and safety issues, to encourage active participation and feedback.

HRS Group UK will at all times be committed to comply with health and safety legislation, adopt industry best practice and ensure that all aspects of the business take proper account of health and safety requirements. Every effort will be made to set standards that are the highest achievable, consistent with efficiency and technical excellence.

In order to achieve this aim, training, instruction, formal procedures and monitoring systems are provided. The HRS Group UK Health and Safety organisation together with individual responsibilities and arrangements are also set out in the HRS Group UK Health and Safety Manual which complements this policy.

This policy will be regularly monitored to ensure that these aims are achieved. It will be reviewed and, if necessary, revised in the light of legislative or organisational changes and communicated to all employees and those associated with our business in accordance with our programme of continuous improvement.

The Company is committed to maintain zero accidents and incidents and the success of this policy.

Signed:



Steven Pither Managing Director Date: 15/04/2013

3.0 Distribution

The Policy will be drawn to the attention of all staff. A statement will be issued annually reminding all staff about the policy statement, its principles and the Management Team's commitment to it.

4.0 Review

This policy will be reviewed on an annual basis.

Signed:



Steven Pither Managing Director Date: 15/04/2013

5.0 Organisation and Responsibility

5.1 Overall Responsibility

The Managing Director has overall legal responsibility for health and safety in the organisation, accountable to the HRS Group UK for ensuring compliance with the requirements of the Health and Safety at Work, etc. Act 1974 and all other subordinate legislation. The Managing Director is also responsible for:

Ensuring that the health and safety policy is implemented at HRS Group UK at all levels; Visibly demonstrating management's commitment towards developing a positive health and safety culture by promoting and encouraging high standards of health and safety performance; Ensuring that the performance of HRS Group UK is maintained with respect to compliance with statutory health and safety requirements nationally accepted safety standards and best practice; Health and safety objectives are defined annually and that the success of employees in meeting these objectives is formally measured; and Ensuring Board members are kept informed of health and safety issues, as appropriate.

Whilst retaining overall responsibility for matters as set out above, practical responsibility is delegated to the following persons in respect of the areas under their management control:

5.1.1 General Responsibility

Day-to-day responsibility for ensuring this policy is put into practice is delegated to Scott Beecham, with backing from the British Safety Council.

Main responsibilities will be as follows:

- Monitoring the implementation of the health and safety policy throughout the company and reviewing its appropriateness by regular safety audits/inspections carried out in various workplaces
- Investigating accidents and implementing corrective action
- Reviewing health and safety legislation and implementing any new requirements pertaining to the company's undertaking
- Liaising with managers, employees, sub-contractors and specialists as and when appropriate
- Collating and reporting any accidents reportable under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (R.I.D.D.O.R.) 1995

5.1.2 Specific Responsibility

To ensure health and safety standards are maintained and improved, the following people are designated Safety Coordinators and have responsibility in the specific areas:

Scott Beecham	Office / Workshop / Site Working (South)
James Robinson	Workshop / Site Working (South)
John B Cox	Office (South)
Louise Smith	Office / Workshop / Site Working (North)

5.1.3 General Management Level Responsibility

Managing Director	Overall responsibility for the H&S Scheme Ensure all H&S documentation is completed and current.
Senior Management	Ensure all required documentation relating to their section is completed and current.
Management	Safe working of employees under their charge Safe working of employees under their charge

5.2 Employees

Each employee is responsible for their own acts or omissions and the effect that these may have upon the safety of themselves or any other person. Whilst HRS Group UK accepts the main responsibility for the implementation of this policy, individuals are legally obliged to co-operate to ensure a healthy and safe working environment.

In addition all employees must:

- a. Avoid taking unnecessary risks.
- b. Not interfere with anything provided to safeguard their health and safety.
- c. Set a good example to others, especially young or inexperienced workers.
- d. Work in accordance with any health and safety instruction or training that has been given.
- e. Bring to the attention of a Safety Coordinator any health and safety issues they may have; and
- f. Familiarise themselves with HRS Group UK Health and Safety Policy and any local arrangements.

6.0 Emergencies

It is HRS Group UK policy to take account of fire hazards in the workplace. All employees have a duty to conduct their operations in such a way as to minimize the risk of fire. This involves compliance with the company's no smoking policy, keeping combustible materials separate from sources of ignition and avoiding unnecessary accumulation of combustible materials.

Safety coordinators are responsible for keeping their operating areas safe from fire, ensuring that their staff are trained in proper fire prevention practices and emergency procedures.

6.1 Fire Safety Register

This is used to identify who is in the building or shop floor, in the event of a fire. Please change your status when entering and exiting the building, for any period of time, this includes lunchtime but does not include visits to the shop floor.

It is important that this procedure is adhered to, for the following reasons:

- a. The board will be used as a muster point register, by the fire marshal.
- b. With both the ground and first floor offices it will be difficult to identify who is in the building, at any one time.
- c. The last person to leave, each night, will know the building is empty before setting the intruder alarm.

6.2 Visitors Book

All visitors should sign the visitor's book if they intend to stay in the building / shop floor for any period of time. This is especially important if they are to be left unattended.

Visitors do not have to sign the visitors book if they are in the building for a very short period of time e.g. for hand deliveries.

6.3 Emergency Plans

6.3.1 Fire and Evacuation Information

Drawings indicating fire exits, fire extinguishers and alarm points are now located at the front door and notice board. This information should be pointed out to all visitors who sign the visitors book.

A detailed "Fire Evacuation Plan" will be issued to each employee.

6.3.2 Fire Evacuation Procedure

ACTION TO BE TAKEN UPON DISCOVERING A FIRE

- Do not try to tackle the fire yourself (unless trained to do so)
- Activate the nearest fire alarm to raise the alarm
- Leave the building by the nearest fire exit and proceed to the muster point
- Do not re-enter the building for any purpose until the all clear has been given

ACTION UPON HEARING THE FIRE ALARM

- Stop working and calmly leave the building by the nearest fire exit
- Go directly to the muster point and await instructions
- Do not leave the muster point until the all clear is given
- Do not re-enter the building for any purpose until the all clear is given

6.3.3 Fire Escape Route - Outside Normal Working Hours.

There are two combination padlocks - one on the small shop floor door and the other on the main gates, which during normal working hours will be removed. However, if you evacuate the building, outside of normal working hours, to the shop floor or the rear yard area, the padlocks will need to be unlocked and removed to gain access to the muster point. The code for the padlocks will be issued to you during your induction.

Note: Once the code is entered you need to push down on the "D" shackle to release them.

6.3.4 Fire Marshall Training.

HRS Group will provide suitable fire marshal training including the use of fire extinguishers. So that each work area; office, factory and site has at least one trained person at all times.

7.0 Arrangements

The following requirements will be incorporated into HRS Group UK health and safety arrangements as necessary. They should be expanded or altered to meet the specific requirements of the Service concerned, and developed with the support of the health and safety section.

7.1 Safety Culture

7.1.1 Communication

HRS Group UK recognises that employees have an important contribution to make to the overall organisational health and safety culture. HRS Group UK will ensure that health and safety is an integral part of its management system and seeks to develop a positive attitude to health and safety among employees by:

- a. Visibly demonstrating a clear commitment to improving health and safety performance;
- b. Promoting co-operation and consultation across HRS Group UK;
- c. Ensuring the communication of necessary information throughout HRS Group UK; and
- d. Securing the competence of employees by including health and safety within the recruitment process and systematically identifying health and safety training needs.

7.1.2 Health and Safety Advice

The Health and Safety Section will actively monitor the implementation of HRS Group UK Policy and provide advice on action necessary to ensure the health and safety of HRS Group UK employees and anyone who may be affected by their undertakings.

HRS Group UK health and safety is backed by the British Safety Council and managed by John B Cox and Scott Beecham who are committed to the identification, assessment and management of work related health risks and as appropriate non work related health risks.

The Health and Safety Law Poster is displayed on the Company Notice Board, along with additional health and safety information / literature.

7.1.3 Raising Health and Safety Concerns

Should an employee require to raise a health and safety concern, the procedure detailed below should be followed in line with local procedures:

- STAGE 1. Raise concern with Supervisor. If not resolved:
- STAGE 2. Raise concern with Manager. If not resolved:
- STAGE 3. Raise the concern with Safety Coordinator. If not resolved:
- STAGE 4. Matter is referred to the Management Health and Safety Committee.

At any stage during this process, any employee/safety representative can contact the Health and Safety Section for further guidance.

7.3 Planning and Implementation

7.2.1 Health and Safety Training

Health and Safety training is an important factor in the reduction of accidents and prevention of ill health. HRS Group UK will actively support training by providing the necessary resources and organisation to carry out such training. Training will be provided for the following situations:

- a. Induction training for new employees (health and safety awareness, company procedures etc)
- b. The introduction or modification of new/existing machinery or technology
- c. A change in employee position/work activity or responsibility

Training is also specifically provided for work with hazardous substances, use of PPE and manual handling. Any training provided by the company will be formally recorded with a hard copy kept on file. A programme of refresher training will be undertaken to keep employees up to date with legislation and industry best practice.

Where health and safety training needs are identified by a safety coordinator, suitable training can be arranged through the health and safety section.

7.2.2 Online Training System.

An online training system, managed by Human Focus and Scott Beecham, will be provided for each employee. The training consists of modules relating to all aspects of health and safety. And will be specific to each employee and their role within the HRS Group.

All employees will be given a unique username and password which allows them to log on from any internet connected computer. Each individual activates, passes and failures, will be monitored to identify trends and weaknesses in specific health and safety training. On successful completion of a training module

7.3 Planning and Implementation

7.3.1 Annual Health and Safety Reports

HRS Group UK will prepare an annual health and safety report that evaluates their health and safety performance. Such reports should include information on the following issues:

- a. Profile of the Health and Safety Department and its main functions and activities.
- b. Management of health and safety within HRS Group UK. This should include a report detailing the progress of the health and safety plan objectives from the previous year.
- c. Occupational health and safety risk management, planning and progress.
- d. Training.
- e. HRS Group UK health and safety objectives for the coming year.

7.3.2 Effective Health and Safety Management

HRS Group UK will pursue progressive improvements which will lead to reduction of injury and ill health. This will be achieved by the implementation and management of an effective health and safety management system, which reflects the objectives set out in the corporate health and safety plan.

7.4 On Site Communication

Employees will always familiarise themselves with client procedures when first attending site, in particular general site access, emergency procedures and high risk work activities including permit to work systems. Clients site procedures and specific instructions will be followed at all times.

Before commencing work, the site supervisor will attend any site meetings or inform other trades working in the direct vicinity of the activities of the company of the specific risks and requirements of the work being undertaken.

7.5 Permit to Work

HRS Group UK does not operate a permit to work system for all in-house activities. However, employees working on site may be governed by the Client's / Primary Contractor's permit to work system. All employees must familiarise themselves and work in accordance with the system.

8.0 Risk Identification

HRS Group UK recognises that risk assessments, method statements and H&S procedures are required to implement an effective risk control strategy to minimise employees' exposure to significant risks.

Safety Coordinators must identify all significant work related risks. The following persons are approved by HRS Group UK to undertake risk assessments.

NAME	POSITION	QUALIFICATIONS	HEALTH & SAFETY ACTIVATES
Scott Beecham	Safety Manager	Over 15 years experience of working on site, which include: i) Servicing ii) Installation iii) Commissioning An in depth knowledge of all equipment supplied by the HRS Group UK.	Advance method statements and risk assessments, which cover complex equipment servicing and installations. General risk assessments covering all day-today work / office activities.
James Robinson	Service Manager	Over 15 years experience of working on site, which include: i) Servicing ii) Installation iii) Commissioning An in depth knowledge of all equipment supplied by the HRS Group UK.	Advance method statements and risk assessments, which cover complex equipment servicing and installations.
Darren Brady	Production Manager	Qualifications and experience in metalwork fabrication.	Advance method statements and risk assessments, which cover complex equipment servicing and installations. General risk assessments covering all production activities.

In addition, risk assessments are carried out continuously by employees throughout their work.

Hazards are considered and work methods established to minimize the risk of injury to themselves and others affected by the work.

Where the employee does not have sufficient knowledge about a specific hazard, such as work in confined spaces, they will take further advice from a Safety Coordinator who, if required, can contact the British Safety Council for more information and guidance.

9.0 First Aid Treatment

Each first aid box shall be suitably marked and be easily accessible to all employees at all times when they are at work. However, first aid treatment should only be performed by qualified personnel, employees must not self administer first aid.

Every employee who suffers personal injury at work, regardless of how small, must report as soon as is practicable to their appointed First Aider.

The First Aider will complete the Accident Book and Incident / Accident Investigation Report Form.

Company appointed First Aiders are:

HRS Group UK (South) - Scott Beecham, James Robinson & Michael Adkins

HRS Group UK (North) – David Tooth and Mark Lister

The first aid boxes are located in the following location:

HRS Group UK (South) – HRS Heat Exchangers Office

HRS Group UK (North) – Works Canteen

When working on site a Safety Coordinator will ensure arrangements are made with Client / Principle Contractors to use their first aid facilities. Where this is not possible, a qualified member of the project team will be nominated as the appointed first aider and a first aid box supplied, which will contain adequate supplies for the total number of employees on site.

10.0 Welfare Provisions

10.1 In-House Welfare Provisions

HRS Group UK will provide the following welfare provisions:

Toilet and washing facilities
Eating and rest area, away from the workplace.
Clean drinking water.

These facilities will be cleaned and maintained on a regular basis. However, it is every employee's responsibility to clean and tidy any mess generated by them.

10.2 On Site Welfare Provisions

On site welfare will normally be provided by the Client or Primary Contractor. It is the responsibility of a Safety Coordinator to ensure arrangements will be made with the Client and/or Principal Contractor for the use of welfare facilities at sites under their management. Minimum requirements are as follows:

- Toilets and washing facilities
- Eating and rest area, away from the workplace.
- Clean drinking water.

Where these facilities are not provided by the Client or Principal Contactor, HRS Group UK will provide suitable welfare facilities.

11.0 Personnel Protective Equipment (PPE)

PPE is available to all employees and is provided free of charge. HRS Group UK requires all employees connected with manufacturing or attending client's sites should have the following minimum PPE requirements:

Safety Item	Examples
Protective footwear	Boots, Shoes
Protective Headwear	Hard hat, Bump cap
High Visibility Garment	Vest, Jacket, Coat
Hand Protection	Lightweight gloves, Riggers
Eye Protection	Safety Glasses, Goggles
Clothing Protection	Overalls, Coats

In Addition to the basic PPE all work activities will be risk assessed by a Safety Coordinator and the appropriate personal protective equipment will be issued to employees where necessary.

When issuing any type of PPE, a written record will be recorded on the employee's PPE Issue Record and signed by the employee on receipt. Training will be provided for employees on the safe use, storage and maintenance of the relevant equipment before issue.

Employees have a legal duty to wear PPE as specified in relevant site rules, risk assessments and method statements. Any defects or malfunction of PPE must be reported to their Safety Coordinator

11.1 Personnel Protective Equipment (PPE) Review

PPE equipment will be subject to an annual review. To ensure equipment is not used passed its service life.

12.0 Work Equipment

All work equipment (including electrical equipment) used at work, as part of the company's undertaking will comply with the Provision and Use of Work Equipment Regulations (P.U.W.E.R.).

Before new equipment is introduced into the working environment, an assessment will be made by a Safety Coordinator, in order to ascertain that the equipment is suitable for its intended use.

No employee will use work equipment for which they have not received specific training.

No employee will knowingly misuse work equipment or remove any guards that are in place to minimise a specified risk.

All work equipment will be maintained and inspected at suitable intervals either internally by a competent person or by specialist external companies. The frequency of work equipment maintenance or inspection will be based on manufacturer's guidance and industry best practice.

Any maintenance / inspections undertaken on company equipment will be formally recorded with a hard copy left on file. If any faults or damage are found on any equipment, stop using the work equipment and report the fault to your Supervisor / Safety Coordinator.

13.0 Control of Substances Hazardous to Health (C.O.S.H.H)

An inventory of all substances and materials hazardous to health is held in HeatExchangerSpares.com office.

13.1 Hazard Substances - In House

Before any hazardous substances are used during a work process, a material safety data sheet (MSDS) will be requested from the supplier and an appropriate assessment made of the risks from that substance will be undertaken by the Safety Coordinator, in line with the Control of Substances Hazardous to Health Regulations (COSHH).

Alternative less harmful substances will be used wherever possible.

Assessments will consider storage, handling, aspects of use, exposure, PPE requirements, workers health, and emergency actions. Supervisors will brief staff on any hazard or substance precautions, with written records being located in an accessible location within each HeatExchangerSpares.com Office.

13.2 Hazard Substances - In House Equipment Servicing

Any equipment returned to HRS Group UK for inspection / servicing must have a corresponding material safety data sheet (MSDS) form the customer. An appropriate assessment of the risks, from the substance(s), will be undertaken by a Safety Coordinator, in line with the Control of Substances Hazardous to Health Regulations (COSHH). The Safety Coordinator will then brief all relevant employees on the safe handling, PPE Requirements and emergency actions.

13.3 Hazard Substances - On Site Equipment Servicing

Any equipment which requires inspection / servicing on site must have a corresponding material safety data sheet (MSDS) from the customer. An appropriate assessment of the risks, from the substance(s), will be undertaken by a Safety Coordinator, in line with the Control of Substances Hazardous to Health Regulations (COSHH). The Safety Coordinator will then brief all relevant employees on the safe handling, PPE requirements and emergency actions. This may be in conjunction with the site's own COSHH assessment.

14.0 Manual Handling

Manual handling operations will be risk assessed to determine suitable control measures for the management of risk and the company will endeavour to eliminate manual handling operations where practicable with any remaining risks being controlled by;

- a. Reducing weights
- b. Reducing the frequency of manual handling
- c. The use of additional manpower
- d. Through the provision of suitable equipment to assist in the operation
- e. The selection of persons to carry out manual handling or lifting tasks will be based on the training given, age, physique etc.

15.0 Monitoring

15.1 Accident and Incident Analysis

Accidents and incidents at the following levels of severity will be analysed by the health and safety management team, with a view to determining and where possible, eliminating the causes, of:

- a. Major injury/dangerous occurrence
- b. Lost time accidents of 3 days or more
- c. Work related ill health and disease

15.2 Accident, Incident or Near Miss Reporting and Investigation

15.2.1 Reporting

Every employee who suffers personal injury at work, regardless of how small, must report any accident as soon as is practicable to their Safety Coordinator.

Any employee who witnesses a near miss, unsafe condition or dangerous occurrence, must report it as soon as is practicable to their Safety Coordinator.

15.2.2 Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (R.I.D.D.O.R.)

Certain accidents are reportable to the HSE's Incident Contact Centre. A Safety Coordinator should notify the HSE, as soon as practicable, after incidents causing the following injuries:

- a. Any work related injury that leads to an employee being absent from work for more than 7 working days.
- b. Fracture other than to fingers, thumbs or toes.
- c. Amputation
- d. Dislocation of the shoulder, hip, knee or spine.
- e. Loss of sight (temporary or permanent).
- f. Chemical or hot metal burn to the eye or any penetrating injury to the eye.
- g. Injury resulting from an electric shock or electrical burn leading to.
- h. Unconsciousness or requiring resuscitation or admittance to hospital for more than 24 hours.
- i. Any other injury: leading to hypothermia; heat-induced illness or unconsciousness;
- j. or requiring resuscitation; or requiring admittance to hospital for more than 24 hours

15.3 Investigation

Every accident and incident will be investigated to the degree required to prevent recurrence by the injured person's Safety Coordinator (detailed in section 5) and a report completed on the appropriate report form and submitted to the health and safety section. All accident forms completed shall contain outlined recommendations to prevent a recurrence.

The accident, incident or near miss reporting and investigation is summarised as follows:

- An accident occurs
- Employee receives first aid treatment
- The employee records the incident in the accident book
- A Safety Coordinator completes an accident form
- The HSE are informed (if required)
- Depending on severity the incident is investigated immediately or at the next review meeting.

The accident forms will be held on record and will be used to:

- a. Determine the cause(s) with a view to preventing a recurrence
- b. Gather information for use in any criminal or civil proceedings
- c. Confirm or refute a claim for industrial injury benefit
- d. Prepare notification to be made to the Health and Safety Executive

15.4 Ongoing Monitoring

All investigated incidents will receive periodical monitoring, to ensure all remedial recommended work is in place. This will be in addition to the random spot checks.

15.5 Contractors

HRS Group UK will monitor the activities of contractors to ensure that any risks presented to employees, members of the public or visitors are minimised.

All contractors shall be assessed in terms of health and safety by the employing Service. The Contractor's Health and Safety Policy Statement, safe system of work and risk assessments should be examined prior to awarding the contract. Health and Safety Policies should be exchanged and the contractor must be given details of any specific risks.