



CONSTANT AIR SYSTEMS LIMITED

COMPANY HEALTH & SAFETY POLICY



PART OF THE CONSTANT AIR SYSTEMS LTD GROUP OF COMPANIES

Issue Date: MARCH 2009

GENERAL STATEMENT of HEALTH AND SAFETY

Constant Air Systems Limited are a Building Services Engineering Company providing Mechanical, Electrical and Prefabricated Plant Solutions.

Our statement of general policy on Health & Safety is:-

- To adequately control any Health & Safety risks arising from our work activities;
- To prevent accidents and maintain safe and healthy working conditions;
- To ensure that all employees and sub-contractors are adequately experienced and trained to enable them to carry out their work safely;
- To consult with our employees regarding Health & Safety matters and regularly review our policies to ensure continuous improvement;
- To ensure that safe plant and equipment are provided and maintained, and to ensure safe handling, storage and use of any hazardous materials.



R.T. Roberts
Chief Executive Officer

Date: September 2008

Anticipated Review Date: November 2009

RESPONSIBILITIES

Constant Air Systems Limited are Manufacturers and Design, Install and Commission Contractors.

1. R. T. Roberts has overall and final responsibility for Health & Safety.
2. Day to day responsibility for ensuring this policy is put into practice is delegated to N. Krolik and M. P. Wigginton.
3. The following key employees have responsibility in the following areas:-
 - Paul Burch - Workshop Manager (responsible for Health & Safety matters in the Hillbottom Road Factory).
 - Project Engineers)
 - Project Managers) – Responsible for Health & Safety matters on installation sites
 - Foreman) and for managing sub contractors.
4. All employees are expected to comply with the following duties:-
 - Co-operate with supervisors and managers on grounds of Health & Safety;
 - Take reasonable care of their own Health & Safety and that of their fellow workers;
 - Not to interfere or tamper with any item provided for their safety; and
 - Report any Health & Safety concerns accidents or near misses to their Supervisor or Manager.

CONTROL OF RISKS TO HEALTH & SAFETY ARISING FROM OUR WORK ACTIVITIES

- Risk Assessments will be undertaken by the Project Engineer responsible for each installation project at the time of preparing Method Statements. Assistance can be sought from the Health & Safety Committee.
- Findings of the risk assessments on site will be reported to the main contractor and/or customer for each project. Actions to remove/control the risks will be proposed by the projects engineer and should be approved by the main contractor/customer.
- Findings of Risk Assessments within our premises will be reported to the Day to Day person responsible for Health & Safety.
- The person responsible will check proposed actions are suitable to remove or reduce the risks and if necessary can check with the Health & Safety Committee if required.
- The Project Engineers/Foreman will then be responsible for ensuring that the prevention methods are implemented.
- Risk Assessments will be project specific.

CONSULTATION WITH EMPLOYEES

Constant Air Systems Limited is the parent Company of the Constant Air Systems Ltd Group of Companies. Mr N. Krolik and Mr. M. P. Wigginton are members of the Group Health & Safety Committee, which consists of senior Directors and Managers of the other subsidiaries. This committee meets at regular intervals (every 6 weeks) and provides opportunities for all Health & Safety matters to be openly discussed, including issues raised by employees and sub contractors. Mr N. Krolik and Mr. M. P. Wigginton, or any member of the Health & Safety Committee are available to all employees, on site or in the factory, for any reporting of such issues and to all sub contractors either directly or via the Project Engineers.

SAFE PLANT AND EQUIPMENT

The Project Engineers/Supervisor/Foreman are responsible for ensuring safe plant and equipment is used by employees and sub-contractors on our installation sites and own premises, and for ensuring its inspection and maintenance is up to date. This also involves hired-in items for short term use. All records of initial inspections, tests and certificates are to be kept in the project files and are to be readily available on site for presentation to the customer/main contractor if requested.

Project Engineers/Supervisor/Foreman are responsible for ensuring the maintenance of work equipment in the factory and keeping servicing records, etc.

Project Engineers/Supervisor/Foreman will check that any new plant and equipment meets Health & Safety standards before it is purchased.

Any problems found with plant and equipment should be reported to the Project Engineers/Supervisor/Foreman or to N. Krolik/M. P. Wigginton.

Information, Instruction, Training:

Each employee will be provided with comprehensive information on risks, preventative measures and emergency procedures. They will be given tasks in accordance with their capabilities and adequately trained.

SAFE HANDLING & USE OF SUBSTANCES

- The Project Engineer/Supervisor/Foreman will be responsible for identifying any substances which need a COSHH assessment on their projects, and will be responsible for carrying out these COSHH assessments;
- The Project Engineer/Supervisor/Foreman will be responsible for obtaining information about the hazards from the manufacturers, ensuring any controls are put into place, and informing all employees about the assessments;
- The Project Engineer/Supervisor/Foreman will check that any new substances can be used safely before they are purchased;
- COSHH assessments will be reviewed as circumstances change;
- The Project Engineer/Supervisor/Foreman is responsible for any COSHH assessments within the factory.

INFORMATION, INSTRUCTION & SUPERVISION

- The Health & Safety Law posters are displayed at the entrance to each office floor and the entrance to the Hillbottom Factory;
- Constant Air Systems Ltd have retained Safety Services (UK) Ltd to act as our external Health & Safety advisors. They are a professional firm of Health & Safety consultants.
- Safety Services (UK) Ltd operate in conjunction with the group Health & Safety Committee and individual project engineers, as required, to advise on any matters relating to Health & Safety;
- Constant Air Systems Limited have an extensive Health & Safety reference library. Each Group Company have access to this and each other's Health & Safety Documents.
- The Project Engineers are responsible for ensuring that all employees working on customers' premises, construction sites or own premises, receive adequate and site specific induction training from our customers or the main contractors representative.

When placing orders with sub-contractors or suppliers it is the responsibility of the contracts engineer to ensure that, if appropriate, a disclaimer with regard to safety forms a part of our order.

COMPETENCY & TRAINING

- Induction training for employees/sub contractors working on construction sites will normally be provided by the main contractor or our customer. If this is not provided, the Project Engineers will be responsible for ensuring all information regarding HEALTH & SAFETY is obtained and communicated to our operatives.
- Job specific training (factory) will be provided by P. Burch;
- Job specific training records (construction sites) are stored on the group central training register which is kept at our parent company offices. Mr N. Krolik and Mr M. P. Wigginton are members of the Group Training Committee.
- All Project Engineers and Managers are suitably qualified for the tasks involved and where required are CSCS registered.

ACCIDENTS, FIRST AID & WORK RELATED ILL HEALTH

- At CAS House Offices & Factory the First Aid box is kept on the wall by the office door entrance from Reception; The First Floor Office First Aid box is kept in the Kitchen.

- The appointed First Aiders are:

Paul Burch (Hillbottom Road Factory)
CAS House Offices – Mr Paul Burch

- All accidents and cases of work related ill health are recorded in the company's accident books.

The Ground Floor Office and Factory Accident book is kept on Mr P. Burch's desk.

If an accident occurs on a customers' site, the site accident book should be filled in and a duplicate record entered in Constant Air Systems Limited's Office accident book as soon as possible thereafter.

- N. Krolik/M. P. Wigginton are responsible for reporting accidents, diseases and dangerous occurrences to the enforcing authority.

MONITORING

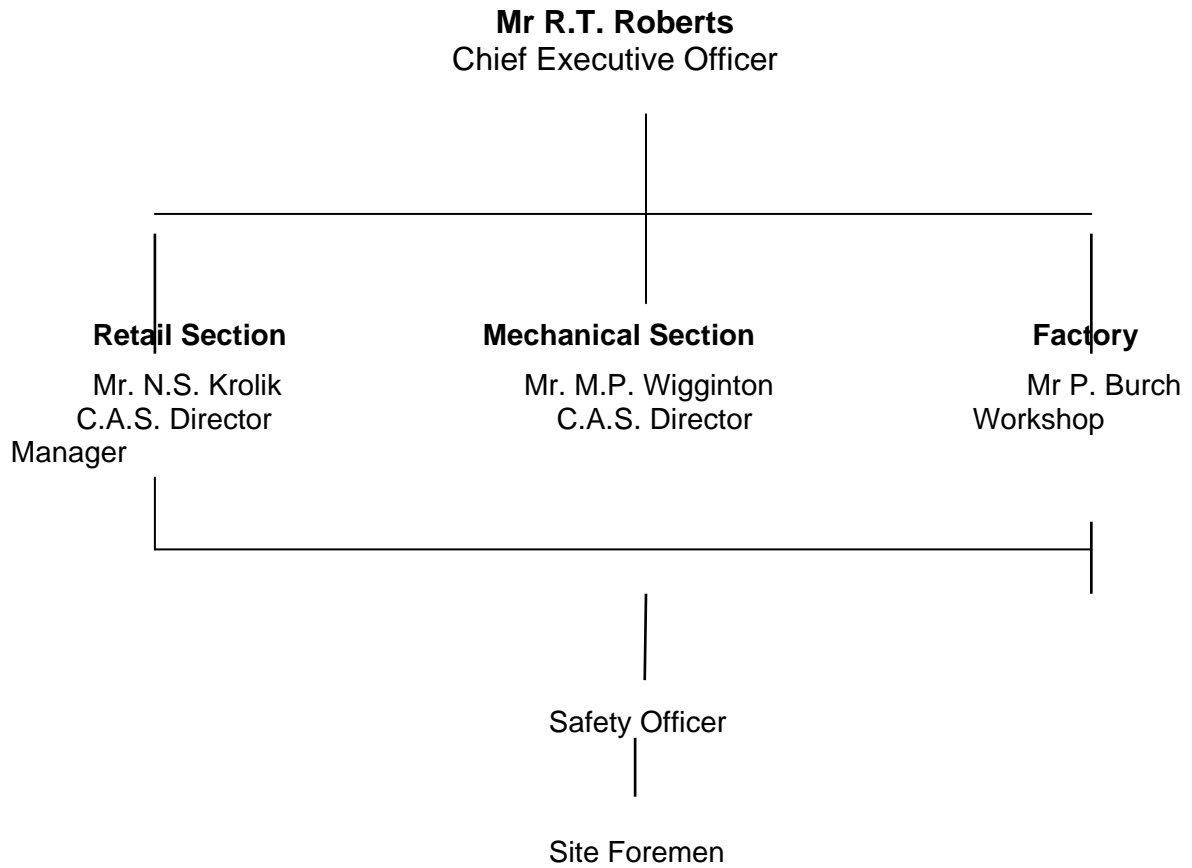
We will continuously review our working conditions and ensure safe working practices are being followed by:-

- Promoting awareness of HEALTH & SAFETY issues amongst our employees and fostering a positive approach at all levels;
- Recording our accident statistics and providing these for review at the Group Safety Committee meetings;
- Investigating all reportable accidents and near misses and holding special meetings of the Group Safety Committee where required, including consultation with our external HEALTH & SAFETY expert advisors;
- Mr. N. Krolik and Mr. M. P. Wigginton will be responsible for investigating accidents, preparing accident statistics and acting upon investigation findings to prevent a reoccurrence.

EMERGENCY PROCEDURES – FIRE & EVACUATION

- The Fire Warden (V. Bartram) is responsible for coordination with the CAS House office building and Factory aided by Fire Monitors from each office and the factory regarding emergency evacuation procedures, fire drills etc. These drills generally occur every 3-6 months;
- Fire alarms are tested regularly by the Fire Warden (V. Bartram).
- Emergency lighting and fire extinguishers are regularly checked. The Fire Warden (V. Bartram) is responsible for keeping records up to date.

SAFETY ORGANISATION



Lines of Responsibility

Communication should generally be in the same direction as that of responsibility but fully flexible where appropriate or urgent.

Workplace Health, Safety and Welfare

The Workplace (Health, Safety and Welfare) Regulations 1992 DO NOT apply to construction sites, reference should be made to **The Construction (Design & Management) Regulations 2007 (CDM 2007) Part 4** already referred to within this Policy. They do however apply to all other work places.

The **Workplace (Health, Safety and Welfare) Regulations 1992** cover the working environment, general safety, and facilities for washing, eating, changing and good housekeeping.

**Standards
Required**

Work at height in the workplace is now covered by **The Work at Height Regulations 2005**

The Company's nominated Safety Consultants will provide advice on the requirements as requested.

All work will take into account the requirements of the above regulations.

**Planning
Procedures**

The Office Manager, or person responsible for the offices, will ensure that the welfare and first aid requirements are provided.

The Office Manager, or person responsible for the offices, will ensure that all the facilities and equipment are maintained to the required standards, through regular inspections.

Supervision

The Company will provide working conditions in accordance with the regulations, in particular:-

**Safe System
of Work**

Temperature

- All offices will be maintained at a minimum temperature of 16°C.
- Workshops will be maintained at a minimum temperature of 13°C.
- The temperature in all work places should be reasonable at all times.

Ventilation

- All workplaces will be effectively and suitably ventilated with sufficient fresh air, or purified air if natural ventilation is not available.

Lighting

- Suitable and sufficient lighting will be provided and where possible this will be natural light
- In situations where the failure of artificial lighting creates a danger, suitable and sufficient emergency lighting will be provided.

Working space

- Sufficient space will be provided in each workplace taking into account furniture, fittings, equipment and machinery.
- Suitable workstations will be provided for each employee according to the nature of the work involved.
- Floors and traffic routes will be kept free from obstructions at all times.
- Effective measures will be taken to prevent persons being struck by falling objects etc.
- Wherever possible, files, boxes etc. will not be stored at high level.
- All windows and transparent areas in doors, gates, walls and partitions will be made of safety material and be suitably protected.

Workplaces

- Consideration will be given to avoiding work at height, where it is necessary arrangements will be implemented to reduce and control the hazards and risks. See Work at Height sections.

Construction Health, Safety and Welfare

The Construction (Health, Safety & Welfare) Regulations 1996 are revoked by The Construction (Design & Management) Regulations 2007 (CDM 2007) although the general principles are still the same and they are now included in Part 4 of the CDM 2007 Regulations

The Construction (Design & Management) Regulations 2007 (CDM 2007) Part 4 set out the principles of protection in relation to excavations, traffic routes, welfare facilities, emergency procedures and protecting the public etc.

**Standards
Required**

The above Regulations also now require that arrangements for dealing with foreseeable emergencies on construction sites include identification of people to implement the arrangements especially with regard to contacts with rescue workers and the fire brigade.

The arrangements for dealing with the various risk areas are contained in the relevant sections of this policy.

The Project/Contract Manager will take into account all the relevant matters contained in these regulations when formulating his plan of works for each project.

**Planning
Procedures**

The Site Manager will ensure that prior to work starting or before a new person starts work on the site, that they receive an induction training session outlining the site specific hazards and control mechanisms relating to their area of working.

Supervision

Project/Contract Management will monitor, with the assistance of Safety Consultants when necessary, the level of compliance to these requirements by both directly employed persons and any sub contractors appointed to the project.

Monitoring

Protective Clothing and Equipment

The following regulations have specific requirements for the provision, maintenance and use of protective clothing and equipment:-

**Standards
Required**

The Personal Protective Equipment at Work (PPE) Regulations 1992
The Construction (Design & Management) Regulations 2007 (CDM 2007) Part 4
The Control of Asbestos Regulations 2006
The Control of Lead at Work Regulations 2002
The Control of Noise at Work Regulations 2005
The Confined Spaces Regulations 1997
The Control of Substances Hazardous to Health Regulations 2002 (COSHH) (as amended 2004)

Other regulations may also apply and are referred to in other sections of this Policy. All safety equipment purchased for use on Company sites will be in accordance with the appropriate British Standard.

Information on provision, maintenance and use of protective clothing or equipment, in accordance with the regulations, Health and Safety Executive (HSE) recommendations and current good working practices, is available from Safety Services (UK) Ltd.

All work will be planned to take the above standards into account.

**Planning
Procedures**

Before work starts, the Contracts Manager will ensure that any special protective clothing, or equipment required is available for use on site.

The Contracts Manager will ensure that adequate supplies of all necessary protective clothing, or equipment, are available on site for issue, as required and that, when issued to employees, a record is kept.

Supervision

The Site Manager will ensure that before sub contractors' employees are set to work, they have been provided with any necessary protective clothing.

Any person on site observed carrying out any process which requires the use of protective clothing, or equipment, will be informed of statutory or Company Policy requirements and instructed not to continue working until protective clothing, or equipment is obtained.

Those persons issuing protective clothing, or equipment, will ensure that it is suitable for the specific process for which it is provided. Information and advice on the correct equipment to be issued will be provided by Safety Services (UK) Ltd, as required.

All supervisory and management staff will set a good example by wearing safety helmets, protective footwear, etc. and will use all protective clothing and equipment where required.

All staff are required to wear suitable footwear while at work or visiting Company Sites.

**Safe System
of Work**

All Personal Protective Equipments shall be:

- Properly stored in a well defined place
- Checked at suitable intervals
- Repaired or replaced if found to be defective
- If contaminated, removed on leaving the work area and kept apart from uncontaminated clothing and equipment
- Equipment that is contaminated must be either decontaminated and cleaned or, if necessary, destroyed.

All persons issued with protective clothing, or equipment, must immediately report to the Supervisor any loss or defect in the equipment.

Safety Helmets

The Construction (Head Protection) Regulations 1989 require the provision and use of head protection on sites where there is a risk of injury. Employers must provide safety helmets where a risk of head injury other than by falling exists. Issue instructions on the wearing of helmets and take action if helmets are not worn as required. Personnel issued with safety helmets must wear the helmets as instructed by employer. Turban wearing Sikhs are the only exemption from these regulations.

**Standards
Required**

Safety helmets provided must be to **BS EN 397:1995**
Bump Caps provided must be to **BS EN 812: 1998** (although these are not usually suitable for use on site)

All work will be negotiated in accordance with the above standards.

**Planning
Procedure**

The Contracts Manager will ensure that Site Managers and sub contractors are aware of Company Policy and the requirements of **The Construction (Head Protection) Regulations 1989** of the wearing of safety helmets before the commencement of each new site.

Helmets will be provided to each site for the use of visitors to the site.

Signs warning that safety helmets to be worn will be displayed at access points to working areas and can be supplied to site by Safety Services (UK) Ltd, as required by Site Managers.

Instruction on the provision and use of helmets will be included in training courses provided for staff.

The Site Manager will ensure that signs and helmets for visitors are available and that sub contractors are aware of Company Policy. The Site Manager will ensure that other company staff visiting sites will wear a safety helmet at all times on site.

Supervision

The Contracts Manager will ensure that it is a condition of the Sub Contract Agreement that all contractors will provide safety helmets to all their employees and that they are instructed in the requirements of this Company Policy.

The Site Manager will report any disregard of this policy by sub contractors' employees to the contractor concerned. The contractor will be obliged to remove from site any employee who continually fails to comply with this requirement.

Safety helmets that are damaged, have received a heavy blow, have parts missing, have been weakened by drilling holes or painting must be replaced. The generally recommended lifespan for most safety helmets is three years. Certain helmets have an indefinite life span and need not be replaced in this period.

Safety helmets will be worn by all staff, sub contractors, employees, visitors, purchasers etc. at all times and in all areas of the site.

**Safe System
of Work**

However, helmets need not be worn in the following areas if construction operations are not taking place in the following areas:-

- Site office and welfare facilities
- Sales area
- Areas where houses are occupied
- Inside buildings after second fix complete

All persons working in such "exempt areas" will however, be required to always have their safety helmets with them so that they can wear them immediately they exit such areas.

Manual Handling and Lifting

The following Regulations apply to the manual handling or lifting of materials:-

**Standards
Required**

The Manual Handling Operations Regulations 1992
The Construction (Design & Management) Regulations 2007 (CDM 2007) Part 4

The current Regulations require the following three steps: -

- Avoid hazardous manual handling operations where reasonably practicable. Consider whether the load should be moved at all and, if it must, whether it can be moved mechanically, for example, by forklift truck
- Assess adequately any hazardous operations that cannot be avoided. You should consider the shape and size of the load in addition to its weight. You should also consider the way the task is carried out, for example, the handler's posture, the working environment, e.g. is it cramped or hot, and the individual's capability, e.g. is unusual strength required. Unless the assessment is very simple a written record will be needed
- The General Guidance will include some simple guidelines to help with the assessment and reduce the risk of injury as far as reasonably practicable

A good assessment will not only show whether there is a problem but will also point to where the problem lies.

Where necessary, specific additional training will be provided by the Company, advice and recommendations contained in advisory literature can be provided by Safety Services (UK) Ltd.

The Site Manager will ensure that all operatives have been instructed in the correct handling and lifting of loads, as required.

Supervision

The Site Manager must ensure that a supply of suitable gloves or equipment is available for use, as required, for the handling of materials that could cause injuries.

The Company will ensure that all persons on site wear safety footwear and the Site Manager will caution any sub contractors employee wearing unsuitable footwear.

The Company must not require any operative, particularly a young person, to lift, without assistance, a load that is likely to cause injury.

The main injuries associated with manual handling and lifting are:-

**Safe System
of Work**

- Back strain, slipped disc
- Hernias
- Lacerations, crushing of hands or fingers
- Tenosynovitis
- Bruised or broken toes or feet
- Various sprains, strains, etc.

The selection of persons to carry out manual handling or lifting tasks must be based on the training given, age, physical build etc. Where loads have to be manually handled, the need to ensure that accesses are safe is especially important.

The training provided should be based on the physical structure of the body and the effect of attempting to handle loads in various positions.

Consultation with Employees

The Health and Safety (Consultation with Employees) Regulation 1996 apply to all employers and employees who are not represented by an appointed Trade Union Safety Representative under **The Safety Representatives and Safety Committees Regulations 1977**, the aim being to ensure that they are consulted by their employers on matters relating to their health and safety at work.

The employer will consult with employees either directly or via representatives nominated by the employees.

Procedure

The consultation with employees will cover the following issues as a minimum:

- introduced measures that may affect employees health and safety
- arrangements for nominating safety representatives
- health and safety information required under this and other regulations
- planning and organisation of health and safety training
- the health and safety consequences of introduced technology in the workplace

The employer will monitor and review all consultation with employees to ensure all employees have the necessary information resulting from the consultations that have taken place.

Employees will be encouraged to attend update meetings held by the company, additionally during toolbox talks and job inductions the opportunity for comment and discussion will be available.

Employees will be encouraged to provide feedback and comment on any health and safety related issue, where appropriate the outcome of such discussions will be communicated to all other employees.

Working Time

The Working Time Regulations 1998 (as amended) DO NOT apply if you are self-employed, running your own business and are free to work for different clients and customers.

The **Working Time Regulations 1998 (as amended)** place limits on the hours that workers can be required to work unless they have opted out. The limits on young workers cannot be opted out from although there are circumstances where they may work longer hours.

**Standards
Required**

Details can be obtained from a DTI guidance document: DTI/Pub 6792/25k/07/03/NP also available from the DTI website: www.dti.gov.uk

The Company's nominated Safety Consultants will provide advice on the requirements as required.

All work will take into account the requirements of the above regulations.

**Planning
Procedures**

The Manager responsible for the workers will plan work so that, as far as reasonably practicable, the average number of hours worked per week is no more than 48 for adult workers and 8 hours a day or 40 hours a week for young workers. (Note: There are certain permitted exceptions for young workers)

Working Time includes travelling, where it is part of the job, working lunches and job-related training.

Working Time does not include travelling between home and work, lunch breaks, evening classes or day-release courses. Also, Working Time limits do not apply if workers can decide how long they work.

Working time should be averaged over a 17-week period (or less if the period is lower) although 52-week periods can be used if mutually agreed.

If an individual worker agrees to work more than 48 hours a week he or she should sign an opt-out agreement, which they can cancel at any time. Giving a minimum of 7-days notice unless otherwise agreed. Records of workers opting out will be kept and updated as necessary.

Night Work

A night worker is some one who normally works at least three hours at night; night-time is normally between 11pm and 6am. Night workers should not work more than an average 8 hours daily. There is no opt out for night work. The period for averaging is 17 weeks as before. A worker who works for more than one third of his time is a night worker. Occasional, or ad hoc, work does not make a worker a night worker.

As an employer, non-compulsory, free health assessments will be offered to night workers before they start working nights. This will take the form of a questionnaire and a medical examination. The latter is only necessary if there is any doubt about the worker's fitness for night work.

The Manager, or person responsible, will ensure that working time is arranged so that workers can take the time off they are entitled to. They will also ensure check whether any exceptions or flexibilities apply and ensure the different provisions for young workers are included.

Supervision

The Company will ensure the following working arrangements are implemented:-

**Safe System
of Work**

Daily rest breaks

- Where a worker is required to work for more than 6 hours at a stretch, he or she is entitled to a rest break of 20 minutes.

Daily Rest

- Each worker is entitled to a rest period of 11 uninterrupted hours between each working day.

Weekly Rest

- A worker is entitled to one whole day off a week.

Days off can be averaged over a two-week period, meaning workers can take two days off a fortnight. Days off are in addition to paid annual leave.

Young worker daily rest breaks

- If a young worker is required to work for more than four and a half hours at a stretch, he or she is entitled to a rest break of 30 minutes.

Young worker daily rest

- A young worker is entitled to 12 hours uninterrupted rest in each 24-hour period of work.

Young worker weekly rest

- Young workers are entitled to two days off each week. This cannot be averaged over a two-week period and should normally be two consecutive days.
- There are exceptions to this that should follow the DTI guidance.

Paid Annual Leave

- Every worker – whether part-time or full-time covered by these regulations is entitled to four weeks' paid annual leave. Increasing to 24 days from 1 October 2007 and 28 days from 1 April 2009 (for workers that work a 5 day week, pro-rata for part time workers)
- A weeks' leave should allow workers to be away from work for a week. It should be the same amount of time as the working week.
- This leave entitlement is not additional to bank holidays.
- Workers must give their employer notice that they want to take leave, employers can set times that workers take their leave.