



**Alder Advice Policies (as at 1<sup>st</sup> July 2018):**

1. Health and Safety Policy
2. Health and Safety Risk Assessments
  - a. Client Premises, Public Buildings and Travel
  - b. Home Office and Surroundings
3. Equality and Diversity Policy
4. Environmental and Sustainability Policy
5. Quality Policy
6. Information Governance and Confidentiality Policy

*These policies apply to all Alder Advice assignments.  
They are also the policies for Highbroom Consultancy Limited and New Path Consulting Limited for which Alder Advice is the trading name*



## Alder Advice Health and Safety Policy

Alder Advice is a consortium of independent advisers; each working as sole traders or through limited liability companies employing less than three staff. Together we have agreed that each consortium member will commit to Alder Advice's Health and Safety policy, as well as having and working to our own individual/company Health and Safety policies.

The purpose of this policy is to:

- Prevent accidents and cases of work related ill health and provide adequate control of health and safety risks arising from Alder Advice work activities
- Provide adequate training to ensure Alder Advice members are competent to do their work on consortium assignments.
- Engage and consult with Alder Advice members on day to day health and safety conditions and provide advice and supervision on occupational health
- Implement emergency procedures – evacuation in the event of a fire or significant incident whilst engaged on Alder Advice projects.
- Maintain safe and healthy working conditions, provide and maintain plant, equipment and machinery, and ensure safe storage/use of substances

Alder Advice's peer network will act as a vehicle for increasing our awareness of the Health and Safety risks associated with our activities, both as individuals and in our work together.

Oversight of compliance with Alder Advice's Health and Safety performance is the responsibility of our two founders and coordinating members, Rob Griffiths and Dan Short.

Our work is carried out in our customers' premises, public buildings, such as hotels, or in our own home offices. Our work also involves extensive travel.

- In customer premises and public buildings we are reliant on the site's health and safety policies and arrangements. We will comply fully with these and familiarize ourselves with emergency procedures, taking directions from local staff as necessary.
- In our home offices we will ensure that we follow the guidance in the Health and Safety Executive publication, "Homeworking: Guidance for Employers and Employees". These include:
  - Completing a risk assessment
  - Manual handling of loads
  - Using electrical equipment for work at home
  - Slips, trips and falls
  - Using work equipment at home
  - Using substances and materials for work at home
  - Working with VDUs
  - First Aid
  - Compliance with Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR 95)
- Whilst travelling or staying away from home comply with our actions identified to manage the risks identified in our risk assessment.

Alder Advice will periodically review this policy and all associated risk assessments





### Alder Advice Health and Safety Risk Assessment – Home Office and Surroundings

What are the hazards?	Who might be harmed and how?	What are you already doing?	What further action is necessary?	Action by who?	Action by when?	Done.
Slips and trips	Advisers, family members and visitors may be injured if they trip over objects or slip on spillages.	General good housekeeping. All areas well lit, including stairs. No trailing leads or cables. Advisers to keep work areas clear of tripping hazards, office tidied regularly.	Continue as described.	Adviser	Ongoing	Monitor
Fire	Advisers, family members and visitors and neighbours if fire starts in the office or domestic accommodation.	All non-essential plugs removed at night. Office plugs and cables rationalised	Continue as described.	Adviser	Ongoing	Monitor
VDU equipment	Staff may be injured through using poorly designed workstations.	Set up and maintain all workstations in line with recommended safe practice.	Continue as described.	Adviser	Ongoing	Monitor
Electrical equipment	Advisers, family members and visitors may receive electric shock from malfunctioning equipment.	Replace or repair any equipment or cables not found to be in safe working order. Until then, mark clearly as out of order and do not use. Do not attempt repair by user other than as directed in the user manual.	Continue as described.	Adviser	Ongoing	Monitor



## Alder Advice Equality and Diversity Policy

- Alder Advice is consortium of independent advisers, each working as sole traders or through limited liability companies employing less than three staff. Together we have agreed that each consortium member will commit to Alder Advice's equalities policy, as well as having and working to our own individual/company equalities policies.
- Each of us as individuals, and collectively as part of Alder Advice, is committed to challenging discrimination and encouraging diversity. Our aim is to celebrate the differences between people and the strengths that diversity brings. We aspire to demonstrating our respect for all people in our dealings with each other and also with everyone we come into contact with in our personal and professional lives.
- We will not discriminate on grounds of gender, marital status, race, ethnic origin, colour, nationality, national origin, disability, sexual orientation, religion or age. We oppose all forms of unlawful and unfair discrimination and comply will all relevant legislation.
- Alder Advice's peer network will act as a vehicle for increasing our awareness of the equality issues in our activities, for learning about how we better work towards creating a more equal society, free from the effects of damaging discrimination.
- Alder Advice will periodically review this policy and our commitment.

- Oversight of Alder Advice's equality and diversity policy is the responsibility of our two founders and co-ordinating members, Rob Griffiths and Dan Short.

### **Our commitment:**

- We will strive to create an environment in which individual differences and the contributions of Alder Advice members are recognised and valued.
- Each of us is entitled to a working environment that promotes dignity and respect to all. We will not tolerate any form of intimidation, bullying or harassment.
- We will comply with our clients' own policies on matters of equality and diversity, and actively support and promote those policies as appropriate.
- We will challenge attitudes, behaviour and practices that are not consistent with statutory duties, local policies or our own values where this is necessary.
- We will seek to ensure our services to meet the needs of different groups, including racial, social and faith based groups and people who have mental or physical disability



## Alder Advice Environment and Sustainability Policy

Alder Advice is a consortium of independent advisers, each working as sole traders or through limited liability companies employing less than three staff. Together we have agreed that each consortium member will commit to Alder Advice's environmental policy, as well as having and working to our own individual/company environmental policies.

At Alder Advice we believe that we have a responsibility to care for and protect the environment in which we operate. We are fully committed to improving environmental performance across all of our business activities, and will encourage our business partners and members of the wider community to join us in this effort.

Our tree logo reflects our concern for the environment.

Alder Advice's peer network will act as a vehicle for increasing our awareness of the environmental impact of our activities, for learning about sustainable activity and improving the environmental performance of our collective works, as well as those of individuals within the consortium.

Our environmental policy objectives will be published on our website

Alder Advice has developed a series of action plans to supplement each of our environmental policy objectives.

Oversight of Alder Advice's environmental performance is the responsibility of

our two founders and co-ordinating members, Rob Griffiths and Dan Short.

Alder Advice recognises our key impacts to be in the areas of

- Transport
- Raw material use (principally office supplies)
- Waste generation (principally disposal of office supplies)

We will strive to:

- Adopt the highest environmental standards in all areas of operation, meeting and exceeding all relevant legislative requirements.
- Assess our organisational activities and identify areas where we can minimise impacts
- Minimise waste through careful and efficient use of all materials and energy
- Purchase sustainable products wherever feasible [e.g. recycled, FSC or low environmental impact products and energy from renewable sources]
- Publicise our environmental position
- Encourage Alder Advice consortium members to learn about good environmental practice and encourage employee involvement in environmental action.
- Reduce risks from environmental, health or safety hazards for employees and others in the places we work and live.
- Adopt an environmentally sound transport strategy.
- Aim to include environmental and ethical considerations in investment decisions where appropriate.

- Assist in developing solutions to environmental problems.
- Continually assess the environmental impact of all our operations.

Our environmental policy objectives are:

1. Minimise the adverse environmental impact of our business travel. We will do this by:
  - Reducing avoidable travel through use of ICT and other technologies
  - Seeking to maximize our use of public and other sustainable modes of transport

Our target is for 75% of business journeys to be made by public transport.

2. Recycle office supplies, for example, ink/toner cartridges, waste paper and batteries whenever possible
3. Choose and use environmentally friendly office supplies wherever possible
4. Use suppliers committed to sustainability where possible

Alder Advice will periodically review performance and publish these results.



## Alder Advice Quality Assurance Policy

### Our Quality Policy

1. We give the highest priority to ensuring that we deliver only the highest quality of services and advice.
2. We expect every team member to take personal responsibility for the standard of their own work and for the performance of the overall project.
3. Rob Griffiths and Dan Short, however, have overarching responsibility for quality and are accountable to our customers for the standards achieved in every part of our engagement.
4. We will not accept any assignment that is outside the knowledge, skills and competencies of our team members. We will use only team members with proven excellence and reputation in areas relevant to the project.
5. We will not accept any assignment unless we have the capacity and team named in our proposal available for the agreed indicative timetable of the project.

### Assuring Quality on our team assignments

- The nature of the services and advice we offer is highly dependent on the calibre of the staff providing the service. We therefore take great care in selecting the right people for the job.

### Reporting on performance and quality

- We will select team members will for a project because of their experience, knowledge and skills. We will check this is appropriate to the project and accurately described in our written and verbal communications, and
- We will never plan to vary our project team and if circumstances beyond our control e.g. illness, staff turnover etc. make it necessary we would seek prior agreement from our customer.

### Quality Assurance of deliverables

- Our team approach allows us to add value by combining different skills, knowledge and expertise and routinely using both co-operation, co-production and challenge in our interactions with each other.
- We will ensure that all major elements of each assignment, for example workshop designs, major communications and reports, are co-produced or subject to review by at least one other team member.
- Rob Griffiths and/or Dan Short will reviewed all final deliverables.
  
- We will respond promptly to enquiries from our customer's designated project sponsor/project manager in respect of all performance and quality matters.

- We will report on project performance and delivery at agreed milestones.
- We will not amend our method and approach without prior agreement of our customer.

- We will maintain suitable and effective project records necessary for verifying project performance and that we have met our quality standards.



## Alder Advice

### Information Governance and Confidentiality Policy

In order to carry out our business activities and undertake assignments for our customers Alder Advice needs to gather and use certain information about individuals. These may include our own clients, people attending events or training courses organised by people in our network, suppliers and sub-contractors, business contacts, associate staff and also people who are clients of our customers, for example, users of adult social care services, young people in transition from children's services, tenants of supported housing landlords and patients of health services.

Independence and integrity are essential to what we do and it is therefore necessary for us to be able to demonstrate how we maintain the confidentiality of all privileged information, whether personal or organisational information or commercially sensitive matters, that is shared with us as part of our work.

This policy describes how this personal data **must** be collected, handled and stored to meet the Alder Advice data protection standards – and to comply with the law.

#### General Policy Statement

Alder Advice and each of our advisers are committed to providing a confidential service to its clients. No information given to any member of Alder Advice as part of our professional services will be shared with any other organisation or individual without the client's expressed permission.

For the purpose of this policy, confidentiality relates to the transmission of personal, sensitive or identifiable information about individuals or organisations (confidential information), which comes into the possession of the Alder Advice and its members through its work.

Where Alder Advice holds confidential data about its members or clients or confidential information about third parties who are themselves clients of organisations that we have contracted with, this will only be used for the purposes for which it was gathered and will not be disclosed to anyone outside of the organisation without prior permission.

All personal data will be dealt with sensitively and in the strictest confidence internally and externally.

Most Alder Advisers are members of professional associations and/or regulatory bodies. The requirements of these bodies for professional standards, also impose responsibilities in respect of data protection and confidentiality.

#### Why this policy exists

This data protection policy ensures that Alder Advice and anyone who delivers work on its behalf:

- Complies with data protection law and follow good practice,
- Protects the rights of staff, customers, clients of our customers, learners and partners,
- Is open about how it stores and processes individuals' data, and
- Protects itself against the risks of a data breach and mitigates the consequences if a breach did ever occur.

## Data protection law

The General Data Protection Regulations (GDPR) forms part of the data protection regime in the UK, and together with the Data Protection Act 2018 (DPA 2018) describes how organisations must collect, handle and store personal information.

These rules apply regardless of whether data is stored electronically, on paper or on other materials.

To comply with the law, personal information must be collected and used fairly, stored safely and not only disclosed in line with the law.

The GDPR and DPA 2018 are underpinned by six important primary principles. These say that data must be treated in a way that is:

### 1. Lawful, fair and transparent

There has to be legitimate grounds for collecting the data and it must not have a negative effect on the person or be used in a way they wouldn't expect.

### 2. Limited for its purpose

Data should be collected for specified and explicit purposes and not used in a way someone wouldn't expect.

### 3. Adequate and necessary

It must be clear why the data is being collected and what will be done with it. Unnecessary data or information without any purpose should not be collected.

### 4. Accurate

Reasonable steps must be taken to keep the information up to date and to change it if it is inaccurate.

### 5. Not kept longer than needed

Data should not be kept for longer than is needed, and it must be properly destroyed or deleted when it is no longer used or goes out of date.

## 6. Integrity and confidentiality

Data should be processed in a way that ensures appropriate security, including protection against unauthorised or unlawful processing, loss, damage or destruction, and kept safe and secure.

A further principle, the accountability principle, requires each individual to take responsibility for what is done with personal data and compliance with the other principles and to have appropriate measures and records in place to be able to demonstrate your compliance.

## Policy scope

This policy applies to:

- All staff, sub-contractors, associates and partners of Alder Advice
- All contractors, suppliers and other people working on behalf of Alder Advice

It applies to all data that Alder Advice holds relating to identifiable individuals, even if the information technically falls outside of the Data Protection Act 1998. Data may include:

- Names of individuals
- Postal addresses
- Email addresses
- Telephone numbers
- AND any other information relating to individuals

### Data protection risks

This policy helps to protect Alder Advice from some very real data security risks, including

- Breaches of confidentiality. For instance, information being given out inappropriately, and
- Unauthorised access to sensitive data.

### Responsibilities

Everyone who works for or with Alder Advice has a personal responsibility for ensuring data is collected, stored and handled appropriately.

Each individual and team that handles personal data must ensure that it is handled and processed in line with this policy and data protection principles.

However, Dan Short (Director) and Rob Griffiths (Director) have key areas of responsibility. Jointly, they are ultimately responsible for ensuring that Alder Advice meets its legal obligations.

- The Directors are also responsible for:
- Ensuring all systems, services and equipment used for storing data meet acceptable security standards.
- Checking that staff, associates and partners have installed up to date security hardware and software and to check that it is functioning properly and kept up to date.
- Evaluating any third-party services the company is considering using to store or process data. For instance, cloud computing services.
- Approving any information governance statements attached to communication such as e-mails and letters.

- Addressing any data protection/ information governance queries from clients, journalists or media outlets like newspapers.
- Where necessary, working with others to ensure marketing initiatives abide by information governance principles.

The Information Governance officer for Alder Advice (Rob Griffiths) is responsible for:

- Keeping the Alder Advice staff, associates and partners updated about Information Governance responsibilities, risks and issues.
- Reviewing all Information Governance procedures and policies annually in April each year.
- Arranging Information Governance training / providing advice for the people covered by this policy.
- Handling Information Governance questions from anyone covered by this policy.
- Responding to requests from individuals to see the data Alder Advice holds about them (also called 'subject access requests').
- Checking and approving any contracts or agreements with third parties that may handle the organisation's sensitive data.
- Ensuring that if a breach was to occur the response by Alder Advice is appropriate.

General guidelines for Alder Advice staff, associates and other Partners:

- The only people able to access data covered by this policy should be those who **need it** for their work.

- Alder Advice will ensure **all staff and associates attend training** to help them understand their responsibilities when handling data.
- All data should be **kept securely** by taking sensible precautions and following the guidelines below.
- In particular, strong passwords must be used and they should **never** be shared.
- Wherever possible we will not store any data relating to clients of our customers on our systems. Where it is necessary to view such data this will be undertaken **using secure online systems** that eliminate the need for local storage.
- Personal data should **never** be disclosed to unauthorised people, either within Alder Advice or externally.
- Data should be **regularly** (at least annually) reviewed and updated if it is out of date. If no longer required, it should be deleted and disposed of.
- Staff, Associates, Partner Organisations and any other appropriate persons should **request help from the Directors** if they are unsure of any aspect of data protection/information governance.

#### **Data storage:**

These rules describe how and where data should be safely stored. Questions about storing data safely can be directed to the Director.

#### **When data is stored on paper:**

It should be kept in a secure place where unauthorised people cannot see it. These guidelines also apply to data that is usually stored electronically, but has been printed for some reason:

- When not required, the paper or files should be kept in a **locked place, for example a locked office,** drawer or filing cabinet. Wherever possible the name of the person on file should be separated from the file and stored in another locked place, with a code used for retrieval purposes.
- Advisers should ensure paper and printouts are **not left where unauthorised people could see them** e.g. an unattended desk, on a printer or a photo copier
- Data printouts should be **shredded/disposed of securely** when no longer required.

#### **When data is stored electronically:**

Data must be protected from unauthorised access, accidental deletion and malicious hacking attempts:

- Data should be protected by **strong passwords** that are changed regularly and never shared.
- Data stored on removable media (like a memory stick, CD or DVD) should be kept **locked away securely** when not being used.
- Data should be **backed up frequently**, ideally every few hours to an approved secure Cloud. Those backups should be tested regularly, e.g. at least quarterly.

- The computers of staff and associates working under the Alder Advice umbrella **must** be protected by approved and up to date security and anti-virus software.

### Data use

Personal data is of no value to Alder Advice unless the business can make use of it. However, it is when personal data is accessed and used that it can be at the greatest risk of loss, corruption or theft;

- Our staff and associates computers are **always locked** when left unattended.
- Personal data should **not be shared insecurely** e.g. it should never be sent by email unless it is a secure encrypted e-mail system.
- Data **must be encrypted** before being transferred electronically.
- Personal data should **never** be transferred outside of the EEA.

Identifiable personal data is rarely required for our work. Where it is required **we expect our customers** to provide access to it through a secure web based service such as Egress Switch. Where cohort or population level data is provided, this should be in an anonymised format.

### Data accuracy:

The law requires Alder Advice to take reasonable steps to ensure data is kept accurate and up to date. The more important it is that the personal data is accurate, the greater the effort Alder Advice should put into ensuring its accuracy.

It is the responsibility of all within Alder Advice who work with data to take reasonable steps to ensure it is kept as accurate and as up to date as possible. Therefore, data will be held in as few places as necessary and unnecessary new data sets should not be created.

Every opportunity should be taken to ensure data is updated. For instance, by confirming a customer's details when they call. Alder Advice will make it easy for data subjects to update the information it holds about them.

Data should be updated as inaccuracies are discovered e.g. if a customer can no longer be reached on their stored telephone number, it will be removed from our database

### Personal Data - Subject access requests:

All individuals who are the subject of personal data held by Alder Advice are entitled to:

- Ask what information the company holds about them and why.
- Ask how to gain access to it.
- Be informed how to keep it up to date.
- Be informed how the Alder Advice is meeting its data protection obligations.

If an individual contacts Alder Advice requesting this information, this is called subject access request. These should be made by e-mail and addressed the data protection officer: [rob.griffiths@alderadvice.co.uk](mailto:rob.griffiths@alderadvice.co.uk) . He will:

- Aim to provide the relevant data within 28 days
- Always verify the identity of anyone making a subject access request.

### Disclosing data for other reasons:

In certain circumstances, the Data Protection Act allows personal data to be disclosed to law enforcement agencies without the consent of the data subject.

Under these circumstances, Alder Advice will disclose requested data. However, the data protection officer will ensure the request is legitimate, seeking legal advice if necessary.

### **Providing information:**

Alder Advice aims to ensure that individuals are aware that their data is being processed, and that they understand:

- How the data is being used.
- How to exercise their rights.

Alder Advice is a trading name of New Path Consulting Limited and Highbroom Consultancy Limited, both of which are registered with the Information Commissioner's Office. In addition, each individual company or contractor working as part of Alder Advice is also registered with the Information Commissioner's Office.

This policy will be reviewed at least annually (in April each year) by the Directors, or more frequently if needed.

### **In the event of a data/information incident:**

A data/information breach is any event or occurrence that could result in either the disclosure of confidential information to an unauthorised individual, put at risk the integrity of the system or data, or put at risk the availability of the system/services. Some data/information breach incidents may be classified as a Serious Incident Requiring Investigation (IG SIRI).

An IG SIRI is any incident which involves actual or potential failure to meet the requirements of the GDPR, Data Protection Act 2018 and/or the Common Law Duty of Confidentiality. This includes unlawful disclosure or misuse of confidential data, recording or sharing of inaccurate data, information security breaches and inappropriate invasion of people's privacy.

This definition applies irrespective of the media involved and includes both electronic media and paper records relating to any individuals.

### **Managing data/information incidents:**

**Rob Griffiths has lead responsibility for investigating and managing information incidents** with Dan Short acting as a substitute if Rob Griffiths is not available.

**Alder Advice staff and associates are required to report any potential data/information incident to a Director** (Rob Griffiths or Dan Short). Reportable incidents include lost or stolen equipment, actual or suspected breaches of confidentiality and near-misses. Alder Advice staff and associates are then required and support the Director to:

- Investigate further to establish if a breach has, in fact, occurred and its full extent
- Establishing root cause(s) of the breach.
- Evaluate the extent of the damage or risk to the organisation or to the confidentiality/privacy of an individual people.
- Take timely and appropriate remedial action.
- Review procedures to reduce the risk of the incident occurring again, and keeping a record of lessons learned.

### **Recording data/information incidents:**

**Rob Griffiths will record all suspected and actual data/information incidents** (of all severities) in the Alder Advice data/information incident log. This will record:

- The date of the incident (if identifiable).
- The location of the incident (if identifiable).
- Who (staff/associates) involved (if identifiable and applicable).
- A description of the incident.
- Assessed level of risk associated with the incident.
- Any contributing factors.
- The action taken following this incident.
- Suggested actions to be taken to prevent a repeat of the incident.

- The people/organisations notified about the incident e.g. individuals whose data/confidentiality may be affected by the incident, insurers, the police, the Information Commissioner's Office and the client organisation who Alder Advice were working for.

**Reporting data/information incidents:**

Rob Griffiths will consider who it is appropriate to inform about each data/information incident but all SIRI would as a matter of course be reported to the client organisation that has commissioned support from Alder Advice and to the Information Commissioner.

<b>Date of last review/update</b>	April 2018
<b>Signature of reviewer(s)</b>	RG





<i>Print Name</i>	<i>Signature/Date</i>