

# ALMOST TANGIBLE

## Working With Almost Tangible

### Company Policies

Reviewed by senior management  
23 September 2022

**These policies and procedures...**  
Are fully supported by senior management of Almost Tangible

Will be monitored periodically to judge their effectiveness  
Will be updated in accordance with changes in the law  
Apply to all employed and freelance staff.

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# Code of Conduct for Employees and/or Freelancers

This policy applies to all our employees and freelancers regardless of employment agreement or rank. Company employees and freelancers are bound by their contract to follow our Employee Code of Conduct while performing their duties.

We promote freedom of expression and open communication. But we expect all employees and freelancers to follow our code of conduct. You should avoid offending, participating in serious disputes and disrupting our workplace. We also expect you to foster a well-organized, respectful and collaborative environment.

The Code of Conduct policy outlines our expectations regarding your behavior towards your colleagues, supervisors and overall organization.

## **GUIDING PRINCIPLES**

We Work:

- Collaboratively - with everyone as contributors and colleagues
- Experimentally – with open minds, playfulness and permission to fail
- Innovatively – with new techniques and technology
- Professionally – with integrity and high standards for quality

We work with:

- Courage – to break boundaries, challenge the norm and avoid stereotyping
- Sensitivity – to respect individuality but avoid egocentricity
- Honesty – to discern good from bad and champion quality over quantity
- Diligence – to resist rushing the work or wallowing in the process
- Humility – to always learn and avoid being a moral megaphone
- Humor – to find light in the dark and make the process enjoyable and fun

## **COMPLIANCE WITH LAW**

All employees and freelancers must protect our company's legality. You should comply with all environmental, safety and fair dealing laws. We expect you to be ethical and responsible when dealing with our company's finances, products, partnerships and public image.

## **EQUAL OPPORTUNITY & DIGNITY AT WORK**

All employees and freelancers should respect their colleagues. We won't allow any kind of discriminatory behavior, harassment or victimization. You should conform with our Equal Opportunity and Dignity At Work policy in all aspects of your work, from recruitment and performance evaluation to interpersonal relations.

## **PROTECTION OF COMPANY PROPERTY**

All employees and freelancers should treat our company's property, whether material or intangible, with respect and care.

You shouldn't misuse company equipment or use it frivolously.

You should respect all kinds of incorporeal property. This includes trademarks, copyright and other property (information, reports etc.) You should use them only to complete their job duties.

You should protect company facilities and other material property (e.g. company cars) from damage and vandalism, whenever possible.

#### **PROFESSIONALISM**

All employees and freelancers must show integrity and professionalism in the workplace.

#### **CORRUPTION**

We discourage employees and freelancers from accepting gifts from clients or partners. We prohibit bribes for the benefit of any external or internal party.

#### **JOB DUTIES AND AUTHORITY**

All employees and freelancers should fulfill their job duties with integrity and respect toward customers, stakeholders and the community. Supervisors and managers mustn't abuse their authority. We expect them to delegate duties to their team members taking into account their competences and workload. Likewise, we expect team members to follow team leaders' instructions and complete their duties with skill and in a timely manner.

We encourage mentoring throughout our company.

#### **TIME KEEPING**

Employees and freelancers are responsible for attending punctually for work in accordance with the hours stipulated within your main statement of terms and conditions of employment.

Persistent lateness, unacceptable levels of absence and/or unauthorised absence will be considered to be a breach of procedure and may result in disciplinary action being taken.

#### **HEALTH & SAFETY**

Employees and freelancers must take care of their own health & safety at work and that of colleagues and/or other people who may be affected by your actions at work. You are expected to co-operate with management and/or other employees in observing statutory duties as well as Almost Tangible policy and procedures relating to Health & Safety.

#### **DATA PROTECTION**

If the job involves handling personal information, employees and freelancers must ensure that it is kept securely. Inappropriate use or disclosure of such information is a criminal offence.

#### **DRESS AND APPEARANCE**

The personal appearance of employees and freelance staff makes an important contribution to Almost Tangible's reputation and image. For this reason, it is important that your dress and appearance is professional and reflects the environment in which you work. Your dress should be suitable and safe for any activity undertaken.

#### **CONFLICT OF INTEREST**

We expect employees and freelancers to avoid any personal, financial or other interests that might hinder their capability or willingness to perform their job duties.

#### **COLLABORATION & COMMUNICATION**

Employees and freelancers should be friendly and collaborative. You should try not to disrupt the workplace or present obstacles to your colleagues' work. All employees and freelancers must be open for communication with their colleagues, supervisors or team members.

**POLICIES**

All employees should read and follow our full company policies.

**DISCIPLINARY ACTIONS**

Our company may have to take disciplinary action against employees or freelancers who repeatedly or intentionally fail to follow our code of conduct. Disciplinary actions will vary depending on the violation but includes various levels of warning, up to and including dismissal.

# Health & Safety Policy

## **OUR COMMITMENT**

Almost Tangible is committed to the protection of the health, safety and welfare of its employees and freelancers whilst they are at work. This protection also extends to invited visitors and contractors whilst on company premises or production premises. Almost Tangible recognises that effective management systems and procedures have an important role in the prevention of accidents/injuries and incidents of ill health.

Almost Tangible will ensure that all reasonable steps are taken to:

- Safeguard the physical and psychological health, safety and welfare of all employees and freelancers.
- To protect non-employees, property and the environment from any hazard created by Almost Tangible's operations.

To meet these responsibilities Almost Tangible will assess health & safety risks within its operations and productions and develop, implement and monitor the effectiveness of suitable working standards to minimise such risk, as far as it is reasonably practicable.

All management and health and safety responsible production personnel (HSRPP), including those who are freelancers, are required to be involved in achieving these objectives.

## **MANAGEMENT RESPONSIBILITIES**

Management is committed to and responsible for the achievement of the following objectives in order to prevent accidents and cases of work related ill health:

- Accept ultimate responsibility for the health, safety and welfare standards within Almost Tangible. Standards prescribed by legislation will form the minimum basis for operating.
- Regularly review and revise, where necessary, Almost Tangible's health & safety policy.
- Maintain safe and healthy working conditions and provide adequate resources to ensure that standards are implemented effectively and that competent advice on health & safety matters, including psychological health, is available to management and health and safety responsible production personnel (HSRPP).
- Carry out, and communicate to all production personnel, production-specific risk assessments prior to production commencing and implement any necessary and reasonably practicable measures to ensure hazards are negated or minimised.
- Ensure that all employees and freelancers are aware of any health & safety risks connected with their duties and have received adequate training to enable them to perform and agree standards or work procedures.
- Consult with employees and freelancers on matters affecting their Health & Safety as necessary.
- Monitor the effectiveness of standards and work procedures, and regularly reassess the health and safety risks.

## **EMPLOYEE AND FREELANCER RESPONSIBILITIES**

All employees and freelancers must accept responsibility to:-

- Take reasonable care of their own and colleagues' physical and psychological health & safety and that of other people who may be affected by their actions at work.

- Cooperate fully with management in ensuring that all health and safety standards and working procedures adopted by Almost Tangible are adhered to.
- Report immediately to management (Health and Safety Officer or Health and Safety Responsible Production Personnel) any working situation which they consider to be a danger to the health, safety or welfare of themselves or others.

#### **HEALTH AND SAFETY OFFICER (HSO)**

The person who has ultimate responsibility for overseeing Health and Safety is Charlotte Melén, CEO and Executive Producer at Almost Tangible, contactable at charlotte.melen@almost-tangible / 07715115264.

#### **HEALTH AND SAFETY RESPONSIBLE PRODUCTION PERSONNEL (HSRPP)**

The people who have responsibility for overseeing production Health and Safety, including completing production risk assessments, are producers and production managers or heads of production. Relevant person(s) and contact details will be included in the production-specific risk assessment.

#### **TRAINING**

All Health and Safety Responsible Production Personnel (HSRPP) must hold a Production Safety Passport completed within the last 3 years and have completed (at minimum) a Risk Management Level 2 course to ensure they can adequately carry out a risk assessment and identify any measures required. Almost Tangible will fund PSP and/or Risk Management training to any HSRPP who may require it.

#### **RISK ASSESSMENTS**

Risk assessments are carried out for each production and communicated to all production personnel prior to production commencing. If you have not received a risk assessment prior to production start, please notify our Health and Safety Officer immediately.

Please review the production risk assessment carefully and familiarise yourself with any hazards identified and measures in place to negate and/or minimise these. If you have any questions or concerns please speak to your producer and/or production manager, or notify the Health and Safety Officer.

#### **FIRE SAFETY**

The HSRPP will act as fire safety officer. The HSRPP is responsible for familiarising themselves with the fire safety procedures of all production locations prior to production commencing and informing all production personnel on the first day of recording on any location, as part of the health and safety briefing..

#### **PERSONAL PROTECTIVE CLOTHING & EQUIPMENT**

Where safety regulations require items of protective clothing or equipment to be worn or used, they will be provided and failure to comply with a request to wear personal protective clothing and equipment in violation of this policy will result in disciplinary action and may lead to dismissal.

#### **DRUGS AND ALCOHOL**

It is the responsibility of Almost Tangible to ensure, so far as is reasonably practicable, the health, safety and well being of all employees and freelancers. Employees or freelancers who are under the influence of drugs and or alcohol whilst at work may adversely influence their own safety and that of their colleagues and will be escorted off production premises. (Please refer to the Drugs and Alcohol Policy).

#### **ACCIDENTS**

Any work-related accident or injury should be reported immediately to the Health and Safety Responsible Production Personnel and/or our Health and Safety Officer and will be investigated. Full records are kept of



accidents and these are reported to the RIDDOR database as appropriate. Our accident book is held by our Health and Safety Officer.

**FIRST AID**

The HSRPP will ensure there is a First Aid box available on all production locations. Please notify them immediately if an injury has occurred.

**EMERGENCY PROCEDURES**

The Producer or HSRPP is responsible for providing the production team with a health and safety briefing on the first day of any location. In the event of an emergency, please follow the instructions of your HSRPP who will advise you what to do and where to go. In the event the HSRPP is unavailable, contact details for local emergency services are within the production risk assessment or please contact First Option Safety Services on 0845 500 8484 (24hrs a day).

**INFECTIOUS DISEASES**

All production personnel should wash hands regularly and maintain reasonable distance from others to minimise the risk of spreading infectious diseases. Any occurrence of ill health should be reported to the HSRPP and onward action agreed. In the event of a public health emergency i.e. Covid resurgence, we will adjust our working practices accordingly.

# Equal Opportunities & Dignity At Work Policy

It is unlawful to discriminate directly in recruitment or employment because of age, disability, sex, gender reassignment, pregnancy, maternity, race (which includes colour, nationality and ethnic or national origins), sexual orientation, religion or belief, or because someone is married or in a civil partnership. These are known as "protected characteristics".

## **THE SCOPE OF THIS POLICY**

This policy covers equal opportunities in the workplace as well as dignity at work and in any work-related setting outside the workplace, e.g. business trips and work-related social events. This policy applies to employed and freelance staff.

## **OUR COMMITMENT**

Almost Tangible is committed to providing equal opportunities in employment, to avoiding unlawful discrimination in employment and against customers, and to providing a workplace free from harassment and bullying (dignity at work). This policy is intended to assist Almost Tangible to put this commitment into practice. Compliance with this policy should also ensure that employees do not commit unlawful acts of discrimination.

## **EQUAL OPPORTUNITIES IN EMPLOYMENT**

Almost Tangible will avoid unlawful discrimination in all aspects of employment including recruitment, promotion, opportunities for training, pay and benefits, discipline and selection for redundancy.

Person and job specifications will be limited to those requirements that are necessary for the effective performance of the job. Candidates for employment or promotion will be assessed objectively against the requirements for the job, taking account of any reasonable adjustments that may be required for candidates with a disability. Disability and personal or home commitments will not form the basis of employment decisions except where necessary.

Almost Tangible will consider any possible indirectly discriminatory effect of its standard working practices, including the number of hours to be worked, the times at which these are to be worked and the place at which work is to be done, when considering requests for variations to these standard working practices and will refuse such requests only if Almost Tangible considers it has good reasons, unrelated to any protected characteristic, for doing so. Almost Tangible will comply with its obligations in relation to statutory requests for contract variations. Almost Tangible will also make reasonable adjustments to its standard working practices to overcome barriers caused by disability.

Almost Tangible will monitor the ethnic, gender and age composition of the existing workforce and of applicants for jobs (including promotion), and the number of people with disabilities within these groups, and will consider and take any appropriate action to address any problems that may be identified as a result of the monitoring process.

## **CUSTOMERS, SUPPLIERS AND OTHER PEOPLE NOT EMPLOYED BY ALMOST TANGIBLE**

Almost Tangible will not discriminate unlawfully against customers using or seeking to use goods, facilities or services provided by Almost Tangible. It is unlawful to fail to make reasonable adjustments to overcome barriers to using services caused by disability. The duty to make reasonable adjustments includes the removal, adaptation or alteration of physical features, if the physical features make it impossible or unreasonably difficult for disabled people to make use of services. In addition, service providers have an obligation to think ahead and address any barriers that may impede disabled people from accessing a service.

## **DIGNITY AT WORK**

Striving to ensure that the work environment is free of harassment and bullying and that everyone is treated with dignity and respect is an important aspect of ensuring equal opportunities in employment. Almost Tangible is committed to creating a work environment free of harassment and bullying, where everyone is treated with dignity and respect, whether in the workplace or in any work-related setting outside the workplace, e.g. business trips and work-related social events.

Almost Tangible will not tolerate bullying and harassment of any kind. All allegations of bullying and harassment will be investigated and, if appropriate, disciplinary action will be taken. Almost Tangible will also not tolerate victimisation of a person for making allegations of bullying or harassment in good faith or supporting someone to make such a complaint. Victimisation is a disciplinary offence.

This includes bullying and harassment of and by managers, employees, contractors, agency staff and anyone else engaged to work at Almost Tangible, whether by direct contract with Almost Tangible or otherwise. If the complainant or alleged harasser is not employed by Almost Tangible, e.g. if the worker's contract is with an agency, this policy will apply with any necessary modifications such as that Almost Tangible could not dismiss the worker but would instead require the agency to remove the worker, if appropriate, after investigation and disciplinary proceedings.

## **WHAT IS BULLYING AND HARASSMENT?**

**Bullying** is offensive, intimidating, malicious or insulting behaviour, and/or an abuse or misuse of power that is meant to undermine, humiliate or injure the person on the receiving end.

**Harassment** is unwanted conduct related to relevant protected characteristics, which are sex, gender reassignment, race (which includes colour, nationality and ethnic or national origins), disability, sexual orientation, religion or belief and age, that:

- has the purpose of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person; or
- is reasonably considered by that person to have the effect of violating his/her dignity or of creating an intimidating, hostile, degrading, humiliating or offensive environment for him/her, even if this effect was not intended by the person responsible for the conduct.

Other harassment may occur outside the control of Almost Tangible where an employee or freelancer is subjected to unwanted conduct from a third party, such as a client or customer. If an employee or freelancer feels that he/she has been bullied or harassed by customers, suppliers, vendors or visitors, he/she should report any such behaviour to Almost Tangible who will take appropriate action. Bullying or harassment of customers, suppliers, vendors or visitors or others by employees will be dealt with through the disciplinary procedure.

Bullying or harassment will constitute unlawful discrimination where it relates to one of the protected characteristics, which are sex, gender reassignment, race (which includes colour, nationality and ethnic or national origins), disability, sexual orientation, religion or belief and age. Serious bullying or harassment may amount to other civil or criminal offences, e.g. a civil offence under the Protection from Harassment Act 1997 and criminal offences of assault.

Employees and freelancers should report any bullying or harassment by customers, suppliers, visitors or others to senior management who will take appropriate action.

**TRAINING**

Almost Tangible will provide training in equal opportunities to managers and others likely to be involved in recruitment or other decision-making where equal opportunities issues are likely to arise.

**MONITORING AND REVIEW**

This policy will be monitored periodically by Almost Tangible to judge its effectiveness and will be updated in accordance with changes in the law. In particular, Almost Tangible will monitor the ethnic and gender composition of the existing workforce and of applicants for jobs (including promotion), and the number of people with disabilities within these groups, and will review its equal opportunities policy in accordance with the results shown by the monitoring. If changes are required, Almost Tangible will implement them.

# Diversity & Inclusion Policy

## **OUR COMMITMENT**

Almost Tangible recognises that diversity and inclusion help to support creativity and innovation: they are an essential ingredient in a successful company. We are committed to encouraging diversity and inclusion and to ensuring there is no discrimination in our company. We want our workforce to be truly representative of all sections of society. We want our company to be one in which every employee and freelancer feels respected and able to give of their best.

To that end this policy provides a framework of equality and fairness for all in our employment. It expresses our commitment not to discriminate on the grounds of age, disability, gender, gender reassignment, marital status (including civil partnerships), race, ethnic origin, colour, nationality, national origin, religion or belief and sexual orientation. We oppose all forms of unlawful and unfair discrimination.

## **EQUALITY & DIGNITY AT WORK**

All freelancers and employees will be treated fairly and with respect. Selection for employment will be on the basis of aptitude and ability. Access to opportunities for promotion, training or any other benefit will also be on the basis of aptitude and ability. All employees will be encouraged to develop their full potential and the talents and resources of the workforce will be fully utilised to maximise the creativity and success of Almost Tangible. Further details can be found in our Equal Opportunities & Dignity At Work policy.

## **ENSURING DIVERSITY AND INCLUSION**

We will:

- Actively seek to increase the number of people we work with who are from groups/communities that are under-represented in the television industry as a whole, or in particular job roles in the industry.
- Review all our formal and informal employment/hiring practices and procedures to ensure they are fair and help us to identify the best talent.
- Identify and take opportunities to increase the diversity of casting decisions
- Ensure reasonable adjustments are made to enable disabled people to work in or with our company, both on and off screen.
- Actively seek to increase the diversity of our talent networks.
- Create an environment in which individual differences and the contributions of all our staff and freelancers are recognised and valued.
- Ensure every employee and freelancer is able to work in an environment that promotes dignity and respect for all. We will not tolerate any form of intimidation, bullying or harassment.
- Ensure training, development and progression opportunities are available to all staff.

Almost Tangible cannot lawfully discriminate in the selection of employees for recruitment or promotion, but Almost Tangible may use appropriate lawful methods, including lawful positive action, to address the under-representation of any group that Almost Tangible identifies as being under-represented in particular types of job.

## **MONITORING & RESPONSIBILITY**

We will monitor the success of this policy regularly and review our progress at least once a year. We have developed an action plan to help us implement this policy and achieve our specific diversity goals/targets. The person who is responsible for ensuring this action plan is implemented is Charlotte Melen.

# Safeguarding/Child Protection Policy

Almost Tangible occasionally works with children as actors in their projects. Activities the child may participate in include film making, audio recording, digital or other promotional content creation, and creative workshops. This policy sets out the framework and safeguarding measures that will be followed by Almost Tangible and any employee or freelance staff when working with children.

The purpose of this policy statement is:

- to ensure the protection of children and young people who work with and receive Almost Tangible services
- to provide parents, staff and volunteers with the overarching principles that guide our approach to child protection.

This policy is fully supported by the senior management of Almost Tangible. Breaches of the policy may be regarded as misconduct and could lead to disciplinary proceedings. Each person who works with Almost Tangible will agree to abide by this Safeguarding Policy, including paid staff, volunteers and students. Almost Tangible requires all employees and/or freelancers to read and understand the Safeguarding/Child Protection policy, as well as their role in ensuring the safety and wellbeing of any children they may work with in the course of their employment.

## **OUR COMMITMENT**

Almost Tangible is committed to ensuring a safe working environment for children and to specifically prioritise their wellbeing. This includes making the working environment as safe as possible for children and young people, ensuring children and young people are properly supervised by the right people, and following the relevant legislation and guidance for child performers.

We recognise that:

- the welfare of the child is paramount
- all children, regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation have a right to equal protection from all types of harm or abuse
- some children are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues
- working in partnership with children, young people, their parents, carers and other agencies is essential in promoting young people's welfare.

We are committed to reviewing our policy, its implementation and good practice annually.

## **LEGAL FRAMEWORK**

This policy has been drawn up on the basis of legislation, policy and guidance that seeks to protect children in England. A summary of the key legislation and guidance is available from [nspcc.org.uk/childprotection](https://www.nspcc.org.uk/childprotection).

## **SAFE ENVIRONMENT**

Almost Tangible will create an environment that seeks to prevent and deter any actions or omissions, whether deliberate or inadvertent, that places children or adults at risk of any kind of abuse. Therefore, we will:

- Value, listen to and respect children and adults at risk in all our activities
- Creating and maintaining an anti-bullying environment

- Provide a code of conduct for staff and volunteers which links to our capability and disciplinary procedures and volunteer issue resolution policy and procedures respectively
- Provide reporting procedures to follow when anyone identifies a safeguarding concern or allegation
- Use safer recruitment, selection and vetting processes to ensure suitable staff, freelancers and volunteers are recruited to work in premises and activities where there are children or adults at risk
- Establish a safeguarding governance structure with assigned roles and responsibilities
- Provide staff and volunteers with induction, regular training and support appropriate to their safeguarding role and responsibilities
- Risk assess venues, events and activities with respect to safeguarding and ensure that we provide a safe physical environment for our children, young people, staff and volunteers, by applying health and safety measures in accordance with the law and regulatory guidance
- Ensuring that each project we commence has a robust risk assessment carried out in accordance with this safeguarding policy.
- Ensure our online work is conducted safely with appropriate controls in place
- Ensure that licensing requirements for children engaged in performance are adhered to when required
- Prevent our end users being exposed to inappropriate material in exhibitions, events or workshops
- Communicate our safeguarding policy and procedures to all relevant stakeholders and beneficiaries
- Ensure safeguarding requirements are in place for those that work with us including our partners, hirers and freelancers
- Capture, use and store information and images consistent with safeguarding and data protection requirements
- Provide a safe and trusted culture so that staff and volunteers can express any concerns they have about the conduct of others or unsafe working practices
- Quality assure our safeguarding practice to draw out lessons learnt
- Review the safeguarding policy, procedures and code of conduct every three years or sooner if required due to legal changes or learning from safeguarding incidents

#### **SUPERVISION**

Where possible, Almost Tangible will ensure that the child is supervised by their parent or designated guardian. Where this is not possible, Almost Tangible will employ a licensed chaperone for the duration of the employment of the child.

# Alcohol and Drugs Policy

## **CONSUMPTION OF ALCOHOL**

Employees and freelancers are expressly forbidden from consuming alcohol during working hours and/or whilst performing their duties for Almost Tangible. Employees and freelancers are expressly forbidden from bringing alcohol onto any Company or client sites.

## **DRUG POSSESSION, MISUSE OR ABUSE**

Employees or freelancers who are taking medication or herbal remedies that may affect the performance of their duties, or the safety of themselves or others, must inform Almost Tangible as soon as possible of which medication is being taken and the possible side effects.

Employees or freelancers who take, sell, buy or possess non-medicinal drugs whilst performing their duties for Almost Tangible will have their employment terminated.

## **INTOXICATION AT WORK**

An employee or freelancer who is under the influence of alcohol or non-medicinal drugs during the performance of an assignment for Almost Tangible and/or on Company or client sites will be escorted from the premises immediately. Intoxication during the performance of an assignment will normally result in the termination of employment.

## **BREACH OF POLICY**

Any breach of this policy may result in the immediate termination of employment.

# Business Continuity Policy

Business continuity management is the ongoing process of ensuring the continual operation of business-critical processes in the event of any disruption through the evaluation of risk and resilience and the implementation of mitigation measures.

This Business Continuity Policy reflects that Almost Tangible does not operate a centralised office or plant and that our work is largely project-based with working teams of freelancers assembled specifically for each project.

## **OUTSIDE OF ACTIVE PRODUCTION**

Outside of active production windows (on-location recording) Almost Tangible operates a distributed working-from-home model for all employees and/or freelancers using secure and backed up online tools for collaboration and communication, document storage and sharing, and remote recording facilities as/when required. Our distributed working model underpinned by cloud-based tools ensures there is no single point of failure or catastrophic loss of premises/equipment in the event of fires, floods or other disasters.

Access to tools and shared drives are permission-based and adheres to data protection guidelines.



**DURING ACTIVE PRODUCTION**

During active productions working teams for the project spend several days on location(s) together. For each individual project, a specific Business Continuity Plan is put in place that identifies critical functions, assesses potential risks, identifies mitigating actions and recovery resources required, and assigns key roles and responsibilities in managing the response to and recovery from any emergency.

# Data Protection Policy

Registration No: 344 6742 86

Our data policy for web-customers: <https://www.almost-tangible.com/privacy>

## **OUR COMMITMENT**

We are committed to following the guidelines on the handling of personal data as set out in the Data Protection Act 1998 and in compliance with GDPR.

## **DISCLOSURE OF INFORMATION**

In the course of their work Almost Tangible employees or freelancers may come into contact with and use confidential personal information about people, such as names and addresses or even information about circumstances, families, health and other private matters. Employees or freelancers will ensure that any data is handled in accordance with recommendations by the Information Commissioner. Inappropriate use or disclosure of such information is a criminal offence. Almost Tangible follows the guidance and data retention periods recommended by the Information Commissioner.

Employees or freelancers will not disclose, either during or after the termination of their employment, any information of a confidential nature relating to Almost Tangible, its customers, suppliers or any third party which may have been obtained in the course of this employment, without first obtaining the written permission of a Company Director.

Employees or freelancers will not make any public statement or any statement to a person employed or associated with the media concerning Almost Tangible, its customers, suppliers or their activities without first obtaining written permission from a Company Director.

Employees or freelancers will not place themselves in a position in which their interests conflict with those of Almost Tangible.

Nothing in this policy prevents an employee or freelancer from giving evidence when required by a Court, or from making any Public Interest Disclosure in good faith to an appropriate person or body.

## **DEFINITIONS**

<b>GDPR</b>	means the General Data Protection Regulation.
<b>Responsible Person</b>	means Charlotte Melén
<b>Register of Systems</b>	means a register of all systems or contexts in which personal data is processed by Almost Tangible.

## **DATA PROTECTION PRINCIPLES**

Almost Tangible is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.”

#### **GENERAL PROVISIONS**

- a. This policy applies to all personal data processed by Almost Tangible.
- b. The Responsible Person shall take responsibility for Almost Tangible’s ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.
- d. Almost Tangible shall register with the Information Commissioner’s Office as an organisation that processes personal data.

#### **LAWFUL, FAIR AND TRANSPARENT PROCESSING**

- a. To ensure its processing of data is lawful, fair and transparent, Almost Tangible shall maintain a Register of Systems.
- b. The Register of Systems shall be reviewed at least annually.
- c. Individuals have the right to access their personal data and any such requests made to Almost Tangible shall be dealt with in a timely manner.

#### **LAWFUL PURPOSES**

- a. All data processed by Almost Tangible must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests ([see ICO guidance for more information](#)).
- b. Almost Tangible shall note the appropriate lawful basis in the Register of Systems.
- c. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- d. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in Almost Tangible's systems.

#### **DATA MINIMISATION**

- a. Almost Tangible shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

#### **ACCURACY**

- a. Almost Tangible shall take reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

#### **ARCHIVING / REMOVAL**

- a. To ensure that personal data is kept for no longer than necessary, Almost Tangible shall put in place an archiving policy for each area in which personal data is processed and review this process annually.
- b. The archiving policy shall consider what data should/must be retained, for how long, and why.

#### **SECURITY**

- a. Almost Tangible shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
- b. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- c. When personal data is deleted this should be done safely such that the data is irrecoverable.
- d. Appropriate back-up and disaster recovery solutions shall be in place.

#### **BREACH**

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, Almost Tangible shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO ([more information on the ICO website](#)).