Sydera

Policy Scan

Three findings from the source material

Three actual findings from three different organisations. The brief shows what an outside reader can verify in published material, what stays out of view, and the question each finding raises.

Written for

Groups considering a Policy Scan

Management, legal and compliance, HR and HSE

About this brief

Three findings from three organisations show what a Policy Scan finding looks like.

The findings come from the published material of three of the 65 organisations in Sydera's source material. Each one ends in a question the organisation itself can answer.

Mandate

The brief draws on Sydera's source material: 1,193 public sources from 65 selected large organisations with a substantial workforce in Norway, with a cut-off date of 16 August 2026. The three findings come from three different organisations. The brief is not a deliverable to any one client, and the findings cannot be read together as a picture of a single organisation.

No organisation is named. Sector and other identifying features are left out, and the findings are given in Sydera's own words, without quotations from the documents.

The findings describe how verifiable governance is to an external reader of the published material. That something is not described there does not mean it is absent from the organisation. Implementation, control performance, actual practice, legal assessment and unpublished documentation sit with the organisation's own functions. Each finding is therefore framed as a question they can answer.

Three findings

1 **Health information about employees is recorded.** What is written down, and who owns the boundary, is out of view.

Finding 01 · data boundary

2 **The employee survey is designed together with external parties.** The reader cannot see how the responses are handled.

Finding 02 · measurement with an external provider

3 **Pay figures have a published minimum group size.** No such limit is described for working-environment measurements.

Finding 03 · threshold

How a finding is built

Reader sees

What the organisation has published on the matter.

Out of view

Where the trail stops for an outside reader.

The question

One question for functions the organisation already has.

Source material

65 selected large organisations with a substantial workforce in Norway. 1,193 public sources. Cut-off date 16.08.2026.

`The requirement that turns inward · SYD-GB-01-EN`

Sample

The sample is not random. No organisation is named or ranked.

Reader

Management, legal and compliance, HR and HSE in groups considering a Policy Scan.

Finding 01 · data boundary

The organisation states that health information about employees is recorded, and the boundary for what is written down is not described in the published material

Topic: data boundary for individual follow-up
Basis: published material from one organisation

● Reader sees	The organisation records health information about employees in connection with absence, workplace accidents and individual adjustments. It also states which basis for processing it refers to.
○ Out of view	What a manager writes down in a follow-up conversation, where it is stored, who has access, and who owns the boundary.
○ Validation	The boundary may be set in internal routines and can be validated there.
● Question	What boundary applies today to what is recorded when a manager follows up an employee on health or life stage, and who owns that boundary? Can be put to: HR · Data Protection Officer

Finding 02 · measurement with an external provider

The employee survey is designed together with an external partner and a technology provider, and how the responses are handled is not described

Topic: handling of survey responses
Basis: published material from one organisation

● Reader sees	The material shows which function owns the survey, and that external parties take part in designing it. The results are used in decisions.
○ Out of view	Who processes the raw data, and what minimum group size applies. Nor does the material show whether anyone has assessed if responses can be traced back to individuals.
○ Validation	The answer may sit in the agreement with the provider.
● Question	Has an assessment been made of whether working-environment measurement output can be traced back to individuals in small units, including to a manager the responses are about, and who processes the raw data when a provider carries out the measurement? Can be put to: HR · Data Protection Officer

Finding 03 · threshold

The organisation has published a minimum group size for its pay reporting, and no corresponding limit is described for working-environment measurements

Topic: minimum group size in reporting
Basis: published material from one organisation

● Reader sees	Pay figures are reported only for groups above a certain size. The stated reason is confidentiality, and small units are still included in the totals. The organisation also runs an annual employee survey.
○ Out of view	Whether a minimum applies when the survey results are reported per unit.
○ Validation	Whether such a rule exists can be settled internally.
● Question	What minimum number of respondents applies before a result is reported per unit, and is the rule enforced in the tool? Can be put to: HR · Data Protection Officer

What the findings have in common

In all three, the trail stops at the boundary around the measurement

All three organisations have themselves published that the recording or the measurement exists. The trail stops one step further in. In the first finding it concerns what is written down about the individual, in the second who processes the responses, and in the third how small the reported groups can be.

The questions can be answered with what the organisation holds internally, such as a routine or a provider agreement. If the answer shows the matter is covered, what remains is to decide what should be published or referred to.

In the source material

0 of 65

have published a data boundary for individual follow-up or a re-identification assessment of employee data in the reviewed material.

`The requirement that turns inward · sydera.io/en/report`

Limits and next step

The limits of this brief, and what a full Policy Scan adds

Mandate and evidence boundary

The brief is a document-based governance analysis of published material. It is not an audit, certification or legal assessment, and it contains no claim that any requirement has been breached. All findings are hypotheses framed for internal control. Absence from public sources is not evidence of absence in the organisation's practice.

Sources and method

The source material is 1,193 public sources from 65 selected large organisations with a substantial workforce in Norway, with a cut-off date of 16.08.2026. The sample is not random, and no organisation is ranked or named.

The three findings were chosen to show the shape of a finding. They are not a summary of the source material and say nothing about how common the matter is. The documents were read as published on the cut-off date, and later changes are not captured. Document, location in the document and retrieval date for each finding are recorded at Sydera and are not reproduced here, because the organisations are not named.

Use and responsibility

The brief is open and may be shared freely. Sydera's drafts and proposals are for internal development. Final quality assurance and adoption lie with the organisation's own legal advisers and compliance function. If this edition and the Norwegian edition differ, the Norwegian edition applies.

What a full Policy Scan provides

A Policy Scan Enterprise covers one organisation and reviews the whole published governance framework. Each finding then carries document, page and date, so the organisation can check it against its own source. Depending on the organisation and its needs, it can include:

- mapping of relevant governance documents
- prioritised governance findings and control questions
- the link from policy to routine, action and evidence
- a proposed data boundary and privacy-aware handling
- proposed policy updates
- material for internal validation and dialogue with management and the board

The scope is agreed with the organisation. Questions about the brief or a Policy Scan: hello@sydera.io

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