

# KITWELL PRIMARY SCHOOL

## CONSENT PROCEDURE

### 1. Scope

The consent of the Data Subject is one of the conditions for the processing of his or her personal data and is within the scope of this procedure. Kitwell Primary School needs to obtain consent when no other lawful basis applies.

Consent of the Data Subject is defined by the GDPR as “any freely given, specific, informed and unambiguous indication of the Data Subject’s wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her”.

Explicit consent is required for the processing of sensitive personal data. Specific conditions apply to the validity of consent given by children in relation to information society services, with requirements to obtain and verify parental consent below certain age limits.

### 2. Responsibilities

- 2.1 As a Data Controller, Kitwell Primary School is responsible under the GDPR for obtaining consent from the Data Subject under advisement from the Data Protection Officer.

### 3. Consent procedure

- 3.1 Kitwell Primary School provides a clear privacy notice wherever personal data is collected to ensure that consent is informed and that the Data Subject is informed of their rights in relation to their personal data.
- 3.2 Kitwell Primary School demonstrates a Data Subject’s consent to the processing of his or her personal data or explicit consent for sensitive personal data.
- 3.3 Kitwell Primary School demonstrates a Data Subject’s consent to the processing of his or her personal data for one or more specific purposes.
- 3.4 Kitwell Primary School demonstrates a Data Subject’s consent is clearly distinguishable from any other matter relating to the Data Subject (whether recorded in paper or electronic file format).
- 3.5 Kitwell Primary School demonstrates a Data Subject’s consent is intelligible and accessible using clear and plain language.
- 3.6 Kitwell Primary School demonstrates Data Subjects are informed of their right to withdraw consent before giving consent.
- 3.7 Kitwell Primary School demonstrates processing of data is limited to that stated in the contract, bound by the explicit consent given by the Data Subject.

### 4. Child consent procedure

- 4.1 Where processing relates to a child under 16 years old, Kitwell Primary School demonstrates that consent has been provided by the person who is the holder of parental responsibility over the child, in instances where Kitwell Primary School offers services online targeting children.
- 4.2 Kitwell Primary School demonstrates reasonable efforts have been made to verify the age of the child and establish the authenticity of the parental responsibility taking into consideration available technology.

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### Document Owner and Approval

The Data Protection Officer is the owner of this document and is responsible for ensuring that this policy document is reviewed in line with the review requirements stated above. A current version of this document is available to all members of staff.

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Signature:  
Chair of Governors  
Kitwell Primary School

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Date: