

Consent Authorisation Policy GDPR



1. Objectives

1.1 To ensure that Xander Recruitment Group obtains appropriate and UK General Data Protection Regulation (UK GDPR) compliant consent from data subjects, including those service users we support through our clients, where consent is necessary for processing of personal data

2. Policy

2.1 Xander Recruitment Group understands that it may be able to rely on a legal basis for processing other than consent under UK GDPR, such as legitimate interest, fulfilment of a contract, or the processing of special categories of data for the provision of health and social care or treatment, or the management of health and social care systems and services. Xander Recruitment Group will refer to the Data privacy Policy and Procedure for more information about the grounds for processing under UK GDPR.

2.2 Xander Recruitment Group understands that if it is required to seek consent from data subjects, including those service users we provide to through our clients, such consent should be freely given and Xander Recruitment Group will clearly explain the processing that it intends to carry out in respect of the personal data. Consent must be informed to be valid.

2.3 Xander Recruitment Group understands that under UK GDPR, consent has to be:

- Explicit – consent requires a very clear and specific statement of consent
- Separate from other terms and conditions
- Specific and ‘granular’ so that Xander Recruitment Group gets separate consent for separate things. Vague or blanket consent is not enough

2.4 Xander Recruitment Group understands that it must take extra care when processing personal data about children. Xander Recruitment Group recognises that UK GDPR does not specify an age at which children are deemed to be able to consent to their personal data being processed under UK GDPR (except where online services are being provided to a child, in which case a child can provide their consent at the age of 13).

2.5 Xander Recruitment Group shall seek consent in line with any relevant provisions in the data protection legislation and shall ensure that the ways in which it obtains consent from a child are appropriate. For example, Xander Recruitment Group will obtain consent using language that is appropriate and easily understood by the child, taking into accounts the child’s age and ability and the type of personal data being processed.

2.6 Xander Recruitment Group recognises that where surveillance systems are used it is difficult to obtain consent from individuals when processing their personal data in public spaces. A legitimate interest assessment can help to demonstrate lawfulness of the processing and should be completed.

If Xander Recruitment Group uses surveillance as authorised by our clients to help keep those we support safe or to monitor their wellbeing, the CQC treats it as part of their care. This means it must meet the regulations under the Health and Social care Act. But any recordings Xander Recruitment Group makes of people also counts as information about them. Collecting information about people is regulated by the Information Commissioner’s office (ICO)...

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Alex Stockley - Managing Director – XANDER RECRUITMENT GROUP LIMITED

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