

Data Protection Impact Assessment Policy and Procedures



1. Objectives

1.1 Xander Recruitment Group considers the potential data protection and UK GDPR implications of any new processes or systems it introduces, or of any changes that impact on its processing of personal data.

1.2 By reviewing and utilising the form set out in this policy, Xander Recruitment Group will be able to provide evidence of the decision it has taken and changes it has made that may impact on the processing it carries out

2. Policy

2.1 Xander Recruitment Group understands that a data protection impact assessment (DPIA) will enable it to identify and minimise the risks of any project it wishes to carry out.

2.2 Xander Recruitment Group understands that a DPIA must be conducted for specified types of processing (listed in the Procedure section below) as well as for processing that may result in a risk for affected individuals

Xander Recruitment Group will also follow good practice principles and complete a DPIA for any other major project which requires the processing of personal data.

2.3 Xander Recruitment Group understands that a DPIA should:

- Describe the nature, scope, context and purposes of the processing
- Assess whether the processing is necessary and proportionate and in compliance with UK GDPR
- Identify and assess risks to affected data subjects; and
- Identify the measures it will take to mitigate those risks

2.4 Xander Recruitment Group understands that if a DPIA identifies that processing may be high risk and it is unable to take steps to mitigate those risks, it must notify the ICO (Information Commissioner's Office) and seek advice from the ICO as to whether it should carry out the processing.

3. Procedure

3.1 Xander Recruitment Group will implement a process for deciding whether a DPIA is necessary and, if so, the steps that it will take to conduct it. Xander Recruitment group will use the form attached to this policy when conducting a DPIA

3.2 Xander Recruitment Group will provide training to its employees about when a DPIA is necessary and how to conduct a DPIA.

3.3 Xander Recruitment Group will conduct DPIAs in the following scenarios:

- Where Xander Recruitment Group intends to use profiling, automated decision making or special category data to help make decisions on someone's access to a service, opportunity or benefit

**Xander Recruitment Group LTD – Unit 10, Brewery Yard Deva Centre, Manchester M3 7BB
0161 6768822 – www.xandergroup.co.uk**

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- Where profiling is carried out on a large scale
- Where personal data relating to children will be processed for profiling, automated decision making, for marketing or to offer online services directly to the children
- If special categories of data or criminal offence data is processed on a large scale
- If Xander Recruitment Group intends to monitor a publicly accessible place on a large scale
- Where new technologies are introduced that may impact on its processing activities
- Where Xander Recruitment Group intends to process biometric or genetic data
- Where Xander Recruitment Group intends to combine, compare or match personal data from multiple sources
- Where personal data is processed without providing a privacy policy directly to the affected data subject
- Where the processing will involve tracking individuals' behaviour (whether online or offline)
- Where the processing could result in physical harm if there is a breach in security

3.4 Xander Recruitment Group will consider carrying out DPIA's in the following circumstances, as well as in any other circumstances which it considers to be potentially high risk:

- Where Xander Recruitment Group processes special categories of data or personal data of a highly personal nature
- Where Xander Recruitment Group conducts large-scale processing; and
- Where the processing concerns vulnerable data subjects

Xander Recruitment Group acknowledges that because of the types of services it provides, it may need to conduct DPIAs on a regular basis to ensure that data subjects, including Service Users are protected.

3.5 Xander Recruitment Group will also conduct a DPIA if the nature or purpose of the processing it carries out changes

3.6 Xander Recruitment Group will document the steps taken as part of the DPIA and the outcomes in line with the form attached to this policy.

3.7 Xander Recruitment Group will take any steps it identifies as being necessary to mitigate risks associated with the processing and will document the steps taken and the outcome of those steps.

3.8 Reviewing DPIAs

All DPIAs will be reviewed regularly to ensure they remain up to date.

Alex Stockley - Managing Director – XANDER RECRUITMENT GROUP LIMITED



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