

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. White Rose Academies Trust 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, White Rose Academies Trust is responsible under the GDPR for obtaining consent from the data subject under advisement from Data Protection Officer / GDPR Owner.

3. Consent procedure

- 3.1 White Rose Academies Trust provides a clear privacy notice wherever personal data is collected ([GDPR REC 4.1](#)) to ensure that consent is informed and that the data subject is informed of their rights in relation to their personal data.
- 3.2 White Rose Academies Trust demonstrates data subject(s) consent to the processing of his or her personal data or explicit consent for sensitive personal data ([GDPR REC 4.6](#) – Data Subject Consent Form).
- 3.3 White Rose Academies Trust demonstrates data subject(s) consent to the processing of his or her personal data for one or more specific purposes (GDPR REC 4.6 – Data Subject Consent Form).
- 3.4 White Rose Academies Trust demonstrates data subject(s) consent is intelligible and accessible using clear and plain language.
- 3.5 White Rose Academies Trust demonstrates data subject(s) are informed of their right to withdraw consent before giving consent ([GDPR DOC 2.7A](#) - Right to withdraw Consent Procedure).
- 3.6 White Rose Academies Trust demonstrates processing of data is limited to that stated in the contract, bound by the explicit consent given by the data subject.

CONSENT PROCEDURE (TIER 2)

Document Control

Reference: GDPR DOC 2.7

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4. Child consent procedure

- 4.1 Where processing relates to a child under 16 years old, White Rose Academies Trust demonstrates that consent has been provided by the person who is the holder of parental responsibility over the child ([GDPR REC 4.7](#)), in instances where White Rose Academies Trust offers services online targeting children.

The ICO have published guidance 'GDPR Consent Guidance for Consultation' listed here <https://ico.org.uk/media/about-the-ico/consultations/2013551/draft-gdpr-consent-guidance-for-consultation-201703.pdf>

http://ec.europa.eu/justice/policies/privacy/docs/wpdocs/2011/wp187_en.pdf

- 4.2 White Rose Academies Trust 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.

Document Owner and Approval

The Manager/Executive (generic/line) is the owner of this document and is responsible for ensuring that this procedure is reviewed in line with the review requirements of the GDPR.

A current version of this document is available to all members of staff and students on the White Rose Academies Trust academy intranets.

This procedure is issued on a version controlled basis.

Change History Record

Issue	Description of Change	Approval	Date of Issue
1	Initial issue	<Manager>	Xx/yy/zz