

Consent Procedure



May 2018

Review Date: May 2021

Consent Procedure

Scope

in at the deep end Ltd as a company includes the Training Wave brand. Therefore, throughout all of our policies where we refer to in at the deep end it also applies to any bookings or courses undertaken within the Training Wave brand.

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. in at the deep end 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.

Responsibilities

As a data controller, in at the deep end is responsible under the GDPR for obtaining consent from the data subject under advisement from the Data Protection Officer (DPO).

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in at the deep end provides a clear privacy notice wherever personal data is collected (3— *Privacy Procedure*) to ensure that consent is informed and that the data subject is informed of their rights in relation to their personal data.

in at the deep end demonstrates data subject(s) consent to the processing of his or her personal data or explicit consent for sensitive personal data on all of its enrolment forms and signup methods (e.g. online or via BACs) with follow up via email for the swim school lessons. For courses the information is detailed on the registration forms and employees have the information within their Employee Handbook.

in at the deep end demonstrates data subject(s) consent to the processing of his or her personal data for one or more specific purposes via the methods detailed above.

in at the deep end demonstrates data subject(s) consent is clearly distinguishable from any other matter relating to the data subject by using multiple sign up and tick boxes with each option relating to one specific signup/consent notice.

in at the deep end demonstrates data subject(s) consent is intelligible and accessible using clear and plain language.

in at the deep end demonstrates data subject(s) are informed of their right to withdraw consent before giving consent (*10—Withdrawal of Consent Procedure*).

However, should a data subject withdraw consent they will be unable to continue lessons or training with in at the deep end.

in at the deep end demonstrates processing of data is limited to that stated in the contract, bound by the explicit consent given by the data subject.

Child consent procedure

in at the deep end does not accept enrolments from children under the age of 16 **except** where the child is enrolling their own child in to the swim school. At this point the data subject would therefore be the child being enrolled for lessons and not the parent.

Monitoring and Review

We will monitor all of the feedback that we receive in relation to the issues affected by the Policy and will amend the policy as necessary.

The Policy will be updated with any amendments to existing legislation or new legislation.

In any event, all policies are reviewed annually although updates to versions etc. will only take place every three years should there be no other changes to the policy.

Document Owner and Approval

The Data Protection Officer (DPO) 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 on BaseCamp.

This policy was approved by the Company Directors on 2nd March 2018 and is issued on a version controlled basis under the signature of Managing Director.

Date	Version	Author/Contributor	Amendment Details
December 2017	1.00	Mark Mc Nichol	Implementation
May 2018	1.10	Mark Mc Nichol	Addition of Training Wave branding

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