



## Data Protection Policy and Privacy Notice

### WHO WE ARE

*Le Petit Club Français d'Oxfordshire* (also referred to as '*Petit Club*') is a registered charity (No.1168486) with the aim to advance the education of children and their families, living in Oxford and the surrounding area, in the subject of the French culture and language. We aim to provide affordable French classes and enriching events for children whose families live in Oxfordshire. We seek to provide a structured educational environment that develops our pupils' capabilities, competencies and skills.

### WHAT THIS PRIVACY NOTICE IS FOR

This Privacy Notice is intended to cover *Le Petit Club* activities during regular classes (as part of our educational programme) and our various events/cultural programme.

This policy is intended to provide information about how *Le Petit Club* will use (or "process") personal data about individuals including: its staff and teachers; its current, past and prospective pupils; and their parents, carers or guardians (referred to in this policy as "parents") and the wider public subscribing to our mailing list to stay in touch with our cultural programme which is open to all.

This information is provided because Data Protection Law gives individuals rights to understand how their data is used. Staff, teachers, parents and pupils are all encouraged to read this Privacy Notice and understand the club's obligations to its entire community. The Data Protection Act 1998 (**DPA**) and General Data Protection Regulation (**GDPR**) (EU) 2016/679 describe how organisations, including ours, must collect, handle and store personal information.

This Privacy Notice applies alongside any other information *Le Petit Club* may provide about a particular use of personal data, for example when collecting data via an online or paper form.

This Privacy Notice also applies in addition to *Le Petit Club's* other relevant terms and conditions and policies, including:

- Our child protection policy and procedure
- This revised data protection policy – we are registered with Information Commissioner's Office (ICO) to meet our responsibilities under the Data Protection Act.
- Teachers Manual/Handbook
- Complaints Policy & Procedure.

Anyone who works for, or acts on behalf of, *Le Petit Club's* (including staff, volunteers, trustees and service providers) should also be aware of and comply with this Privacy Notice and *Le Petit Club's* data protection policy for staff, which also provides further information about how personal data about those individuals will be used.

### RESPONSIBILITY FOR DATA PROTECTION

*Le Petit Club* has appointed the headmistress as Privacy and Compliance Officer who will deal with all your requests and enquiries concerning *Le Petit Club's* uses of your personal data.

(see section on Your Rights below) and endeavour to ensure that all personal data is processed in compliance with this policy and Data Protection Law.

The headmistress can be contacted via email at [marlene@petitcluboxford.org](mailto:marlene@petitcluboxford.org).

### **WHY LE PETIT CLUB NEEDS TO PROCESS PERSONAL DATA**

In order to carry out our ordinary duties, we need to process a wide range of personal data about individuals (including current, past and prospective staff, pupils or parents) as part of our daily operation.

### **TYPES OF PERSONAL DATA PROCESSED BY LE PETIT CLUB**

The rules in this document apply regardless of whether data is stored electronically, on paper or on other materials. To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully.

We store the following data in relation to **pupils and/or parents/guardians**:

- registration forms;
- payment details provided by parents;
- photographs/videos (as per Photography/Filming Consent under our Terms and Conditions);
- observational notes on performance/progress of the pupils;
- safeguarding concerns, if applicable.

We store the following data in relation to **staff and contractors including teachers**:

- Personal information – Name and email addresses
- information obtained during recruitment including CV;
- contract agreed between *Le Petit Club* and the teacher, employee and other supporting staff including for one-off provision of services for special event organised by *Le Petit Club*;
- HR and contractual records (payroll information, invoices etc)
- Confirmation that the individuals are suitable for working with children in line with our Child Protection Policy (we do not keep a copy of the individual DBS but keep a record of when the document was viewed and by who).

We store the following data in relation to **people attending events and included in our mailing list**:

- Full name, email address
- Records of payments made to us via bank transfer.

We also hold personal information about the **trustees** in line with the Charity Commission requirements.

We do not typically need to keep any other types of data for volunteers, who generally are parents and are always in the presence of vetted teaching staff.

## HOW LE PETIT CLUB COLLECTS DATA

Generally, *le Petit Club* receives personal data from the individual directly (including, in the case of pupils, from their parents). This may be via a form, or simply in the ordinary course of interaction or communication (such as email).

## WHO HAS ACCESS TO PERSONAL DATA AND DATA SHARING

The only people able to access data covered by this Policy should be those who need it for their work. We do not share data with other third parties.

- Data should not be shared informally. When access to confidential information is required, teachers can request it from the headmistress. Personal data should not be disclosed to unauthorised people, either within *Le Petit Club* or externally.
- Data should be regularly reviewed and updated as necessary by the Headmistress.
- Teachers are given email addresses of parents so that appropriate notices can be issued to parents. Teachers are requested to delete email addresses as soon as their contractual arrangements with *Le Petit Club* is terminated.
- The Headmistress as Compliance Officer should be contacted by the teachers about any aspect of data protection.

Finally, in accordance with Data Protection Law, some of *le Petit Club's* processing activity is carried out on its behalf by third parties, such as IT systems, web developers or cloud storage providers. (e.g. dropbox, jotform, mailchimp, wordpress) Please refer to their privacy notices for further details.

## HOW DO WE KEEP PERSONAL DATA AND FOR HOW LONG

*Le Petit Club* will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason.

Typically, we do not intend to keep personal/confidential data once a pupil is no longer attending our clubs although we can keep statistics about each club for a number of years (up to 7 years). However, we do offer parents the option by signing up to be on our mailing list for future events and they can unsubscribe at any time if they no longer wish to be contacted.

In the case of teachers or staff terminating their activities with *le Petit Club*, we will keep all necessary data required by law for the prescribed period and delete any other personal data not legally required.

If you have any specific queries about our retention process, or wish to request that personal data that you no longer believe to be relevant is considered for erasure, please contact the headmistress via email at [marlene@petitcluboxford.org](mailto:marlene@petitcluboxford.org).

However, please bear in mind that *le Petit Club* will often have lawful and necessary reasons to hold on to some personal data even following such a request.

## YOUR RIGHTS

## **Rights of Access**

Individuals have various rights under Data Protection Law to access and understand personal data about them held by le Petit Club and in some cases ask for it to be erased or amended or have it transferred to others, or for le Petit Club to stop processing it, but subject to certain exemptions and limitations.

Any individual wishing to access or amend their personal data or wishing it to be transferred to another person or organisation, or who has some other objection to how their personal data is used, should put their request in writing to the headmistress.

## **Requests that cannot be fulfilled**

You should be aware that the right of access is limited to your own personal data, and certain data is exempt from the right of access.

## **DATA ACCURACY AND SECURITY**

*Le Petit Club* will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Individuals must please notify *Le Petit Club* of any significant changes to important information, such as contact details, held about them.

An individual has the right to request that any out-of-date, irrelevant or inaccurate or information about them is erased or corrected (subject to certain exemptions and limitations under Data Protection Law): please see above for details of why *le Petit Club* may need to process your data, of who you may contact if you disagree.

All staff, individuals providing their services to *le Petit Club* and trustees will be made aware of this policy and their duties under Data Protection Law and receive relevant training, where relevant.

## **THIS POLICY**

*Le Petit Club* will update this Privacy Notice from time to time. Any substantial changes that affect your rights will be provided to you directly as far as is reasonably practicable.

*Le Petit Club* has formulated an internal action plan and has carried out a detailed mapping of the information it holds. We will carry on working on our privacy notice as we progress through our action plan.

## **QUERIES AND COMPLAINTS**

Any comments or queries on this policy should be directed to the headmistress via email at [marlene@petitcluboxford.org](mailto:marlene@petitcluboxford.org).

If an individual believes that *le Petit Club* has not complied with this policy or acted otherwise than in accordance with Data Protection Law, they should follow *le Petit Club's* complaints procedure. You can also make a referral to or lodge a complaint with the Information Commissioner's Office (ICO),

although the ICO recommends that steps are taken to resolve the matter with the organisation before involving the regulator.