

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 French language and culture. We also aim to provide affordable French classes and cultural 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 safeguarding and anti-bullying 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's Trustees are responsible for the Club's compliance with GDPR and 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.

Any concerns in relation to data processing, data breaches or data requests can be directed to governance@petitcluboxfordshire.org.

WHY LE PETIT CLUB NEEDS TO PROCESS PERSONAL DATA

In order to carry out our 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 (including personal, date of birth and school year, contact details of both parents, any medical or educational information about the child which *Le Petit Club* needs to be aware of) and bank details in case of online payment;
- 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 including teachers**:

- Personal information such as full names, contact details (email and postal address and phone number),
- information obtained during recruitment,
- contract agreed between *Le Petit Club* and the teacher, employee and other supporting staff including for one-off provision of services during specific events,
- payroll, tax and national insurance information,
- job duties and responsibilities,
- absence and holiday records,
- Invoices with relevant information for payment purposes
- Training certificates for compulsory and essential training (including safeguarding, first aid, fire marshall, etc.) as required for our duty of care, health and safety and for auditing by schools who host us (as per the national safeguarding directives).
- 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 and bank details in case of online payment - deleted after the event is completed.

We also hold personal information about the **trustees** such as date of birth and full contact details 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.

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, members of staff can request it from the Trustees. Personal data should not be disclosed to unauthorised people, either within *Le Petit Club* or externally.
- Members of staff should keep all data secure by taking sensible precautions and following *Le Petit Club's* guidelines including using only their professional email address and drives provided by *Le Petit Club* for communication and storage purposes.
- Data should be regularly reviewed and updated as necessary.
- Staff should request help from the Compliance Officer if they are unsure 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).

HOW DO WE KEEP PERSONAL DATA AND FOR HOW LONG

Most sensitive or personal data (e.g. data from registration form, invoices, payroll data) is kept in a confidential Google Drive which is only accessible by permitted Trustees, the Administrator and bookkeeper as a way of safeguarding. Not all have access to all folders, depending on their roles and responsibilities to minimise access to those only who require it.

When data is stored on paper, it should be kept in a secure place where unauthorised people cannot see it.

We are seeking contractual assurances that personal data held by the third parties described above is kept securely to the best of our knowledge.

We are maintaining an Action Plan to ensure full compliance with GDPR and traceability of data until such data is destroyed. Any revised guidelines will also apply to data that is usually stored electronically but has been printed out for whatever reason:

- When not required, the paper or files should be kept in a locked drawer or filing cabinet.
- Staff members should make sure paper and printouts are not left where unauthorised people could see them (e.g. on a printer).
- Data printouts should be shredded and disposed of securely when no longer required.
- Further guidance about the use of personal laptops or other mobile devices (such as tablets or smart phones) is part of our Action Plan to deal with encryption, firewall, etc.

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).

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 Trustees via email at governance@petitcluboxfordshire.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.

QUERIES AND COMPLAINTS

Any comments or queries on this policy should be directed to the headmistress via email at governance@petitcluboxfordshire.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](#) and fill in a [complaints form](#). 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.