



Alliance Française

Oxford

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COMPLAINTS POLICY OF ALLIANCE FRANÇAISE D'OXFORD

Alliance Française Oxford views complaints seriously.

Our policy is:

- To provide a fair complaints procedure which is clear and easy to use for anyone wishing to make a complaint
- To publicise the existence of our complaints procedure so that people know how to contact us to make a complaint
- To make sure everyone at Alliance Française Oxford knows what to do if a complaint is received
- To make sure all complaints are investigated fairly and in a timely way
- To make sure that complaints are, wherever possible, resolved and that relationships are repaired
- To gather information which helps us to improve what we do

Definition of a Complaint

A complaint is any expression of dissatisfaction, whether justified or not, about any aspect of Alliance Française Oxford.

Where Complaints Come From

Complaints may come from any person or organisation who has a legitimate interest in Alliance Française Oxford. A complaint can be received by email or in writing. This policy does not cover complaints from staff, who should use s Alliance Française Oxford Discipline and Grievance policies.

Confidentiality

All complaint information will be handled sensitively, telling only those who need to know and following any relevant data protection requirements.

Responsibility

Overall responsibility for this policy and its implementation lies jointly with the Board of trustees and the management.



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Review

This policy is reviewed regularly and updated as required. Adopted on 1st September 2015

Last reviewed Sept 2018

COMPLAINTS PROCEDURE OF ALLIANCE FRANÇAISE D'OXFORD

Publicised Contact Details for Complaints

Christine Plews
Morgan Blake Solicitor
Oxford
OX2 0FB
trustees@af-oxford.org

Receiving Complaints

1. Stage One

In many cases, a complaint is best resolved by the person responsible for the issue being complained about. If the complaint has been received by that person, they may be able to resolve it swiftly and should do so if possible and appropriate. Whether or not the complaint has been resolved, the complaint information should be passed to Christine Plews within two weeks. On receiving the complaint, Christine Plews will record it in the complaints log. If it has not already been resolved, they delegate an appropriate person to investigate it and to take appropriate action. If the complaint relates to a specific person, they should be informed and given a fair opportunity to respond. Complaints should be acknowledged by the person handling the complaint within a week. The acknowledgement should say who is dealing with the complaint and when the person complaining can expect a reply. A copy of this complaints procedure should be attached.

Ideally complainants should receive a definitive reply within four weeks. If this is not possible because for example, an investigation has not been fully completed, a progress report should be sent with an indication of when a full reply will be given. Whether the complaint is justified or not, the reply to the complainant should describe the action taken to investigate the complaint, the conclusions from the investigation, and any action taken as a result of the complaint.

2. Stage Two

If the complainant feels that the problem has not been satisfactorily resolved at Stage One, they can request that the complaint is reviewed at Board level. At this stage, the complaint will be passed to:

Isabelle Barber
Rhodes House South Parks Road
Oxford, OX1
isabelle.barber@rhodeshouse.ox.ac.uk

The request for Board level review should be acknowledged within a week of receiving it. The acknowledgement should say who will deal with the case and when the complainant can expect a reply.

Isabelle Barber may investigate the facts of the case themselves or delegate a suitably senior person to do so. This may involve



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reviewing the paperwork of the case and speaking with the person who dealt with the complaint at Stage One. If the complaint relates to a specific person, they should be informed and given a further opportunity to respond.

The person who dealt with the original complaint at Stage One should be kept informed of what is happening. Ideally complainants should receive a definitive reply within four weeks. If this is not possible because for example, an investigation has not been fully completed, a progress report should be sent with an indication of when a full reply will be given.

Whether the complaint is upheld or not, the reply to the complainant should describe the action taken to investigate the complaint, the conclusions from the investigation, and any action taken as a result of the complaint.

The decision taken at this stage is final, unless the Board decides it is appropriate to seek external assistance with resolution. The complainant can complain to the Charity Commission at any stage.

Information about the kind of complaints the Commission can involve itself in can be found on their website at:
www.charitycommission.gov.uk/publications/cc47.aspx

CHILD PROTECTION POLICY

Introduction

This document is the Child Protection Policy for Alliance Française d'Oxford, which will be followed by all members of the organisation and followed and promoted by those in the position of leadership within the organisation.

The purposes of the Alliance française d'Oxford are:

- to advance the education of the general public in the subject of the French Language and French culture in Oxford and the surrounding area;
- to bring together those who desire to contribute towards the understanding and enjoyment of French culture and language;
- to foster greater mutual understanding between England and France by encouraging linguistic and cultural interactions.

The purpose of this policy:

We know that being a young person makes them vulnerable to abuse by adults. The purpose of this policy is to make sure that the actions of any adult in the context of the activities carried out by the organisation are transparent and safeguard and promote the welfare of all young people.

Legal framework

This policy has been drawn up on the basis of law and guidance that seeks to protect children, namely:

- Children Act 1989
- United Convention of the Rights of the Child 1991
- Data Protection Act 1998
- Sexual Offences Act 2003
- Children Act 2004



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- Protection of Freedoms Act 2012
- Relevant government guidance on safeguarding children

We recognise that:

- the welfare of the child is paramount, as enshrined in the Children Act 1989
- all children, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have a right to equal protection from all types of harm or abuse
- some children are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues
- working in partnership with children, young people, their parents, carers and other agencies is essential in promoting young people's welfare.
- We will seek to keep children and young people safe by:
- valuing them, listening to and respecting them
- adopting child protection practices through procedures and a code of conduct for staff and volunteers
- developing and implementing an effective e-safety policy and related procedures
- providing effective management for staff and volunteers through supervision, support and training
- recruiting staff and volunteers safely, ensuring all necessary checks, including DBS checks, are made
- sharing information about child protection and good practice with children, parents, staff and volunteers
- sharing concerns with agencies who need to know, and involving parents and children appropriately.

This policy is implemented through the following procedure policy and will be reviewed and updated at every AGM.

Sept 2018

CHILD PROTECTION PROCEDURE

Purpose and aim of the procedures

This procedure applies to everyone who works or volunteers for Alliance Française d'Oxford. Abuse or neglect of a child is caused by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting, by those known to them or more rarely by a stranger.

Recognizing signs of abuse

Signs of abuse can be are physical, emotional, sexual abuse, and neglect.

Individuals within the organisation need to be alert to the potential abuse of children both within their families and also from other sources including abuse by members of that organisation.

The organisation should know how to recognise and act upon indicators of abuse or potential abuse involving children. There is an expected responsibility for all members of the organisation to respond to any suspected or actual abuse of a child in accordance with these procedures.

These can include:

A child may be experiencing abuse if he or she is:



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- frequently dirty, hungry or inadequately dressed
- left in unsafe situations or without medical attention
- constantly "put down", insulted, sworn at or humiliated
- seems afraid of parents or carers
- severely bruised or injured
- displays sexual behaviour which doesn't seem appropriate for their age
- growing up in a home where there is domestic violence
- living with parents or carers involved in serious drug or alcohol abuse.

It is good practice to be as open and honest as possible with parents/carers about any concerns.

How to respond to signs or suspicions of abuse

Immediate action may be necessary at any stage in involvement with children and families. If any parent or young person/child has any concerns about the conduct of any member of the organisation, this should be raised in the first instance with Florence Rossignol director@af-oxford.org or Christine Plews trustees@af-oxford.org

In all cases it is vital to take whatever action is needed to safeguard the child/ren, ie:

- If emergency medical attention is required this can be secured by calling an ambulance (dial 999) or taking a child to the nearest Accident and Emergency Department.
- If a child is in immediate danger the police should be contacted (dial 999) as they alone have the power to remove a child immediately if protection is necessary, via Police Protection Order.

How to respond to a child telling you about abuse

It is recognised that a child may seek you out to share information about abuse or neglect, or talk spontaneously individually or in groups when you are present. In these situations you must:

- Listen carefully to the child. DO NOT directly question the child.
- Give the child time and attention.
- Allow the child to give a spontaneous account; do not stop a child who is freely recalling significant events.
- Make an accurate record of the information you have been given taking care to record the timing, setting and people present, the child's presentation as well as what was said. Do not throw this away as it may later be needed as evidence.
- Use the child's own words where possible.
- Explain that you cannot promise not to speak to others about the information they have shared.
- Reassure the child that:
 - you are glad they have told you;
 - they have not done anything wrong;
 - what you are going to do next.
- Explain that you will need to get help to keep the child safe.
- Do NOT ask the child to repeat his or her account of events to anyone.

Consulting about your concern

The purpose of consultation is to discuss your concerns in relation to a child and decide what action is necessary.



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You may become concerned about a child who has not spoken to you, because of your observations of, or information about that child.

It is good practice to ask a child why they are upset or how a cut or bruise was caused, or respond to a child wanting to talk to you. This practice can help clarify vague concerns and result in appropriate action.

If you are concerned about a child you must share your concerns. Initially you should talk to one of the people designated as responsible for child protection within your organisation. In this organisation this person is Florence Rossignol, director@af-oxford.org 07724243687 or Christine Plews trustees@af-oxford.org . If one of those people is implicated in the concerns you should discuss your concerns directly with Social Services.

You should consult externally with your local Social Services Department in the following circumstances:

- when you remain unsure after internal consultation as to whether child protection concerns exist
- when there is disagreement as to whether child protection concerns exist
- when you are unable to consult promptly or at all with your designated internal contact for child protection
- when the concerns relate to any member of the organising committee.

Consultation is not the same as making a referral but should enable a decision to be made as to whether a referral to Social Services or the Police should progress.

Making a referral

A referral involves giving Social Services or the Police information about concerns relating to an individual or family in order that enquiries can be undertaken by the appropriate agency followed by any necessary action.

In certain cases the level of concern will lead straight to a referral without external consultation being necessary.

However, inability to inform parents for any reason should not prevent a referral being made. It would then become a joint decision with Social Services about how and when the parents should be approached and by whom.

If your concern is about abuse or risk of abuse from someone not known to the child or child's family, you should make a telephone referral directly to the police and consult with the parents.

If your concern is about abuse or risk of abuse from a family member or someone known to the children, you should make a telephone referral to your local Social Services Office.

Information required

Be prepared to give as much of the following information as possible (in emergency situations all of this information may not be available). Unavailability of some information should not stop you making a referral.

- Your name, telephone number, position and request the same of the person to whom you are speaking.
- Full name and address, telephone number of family, date of birth of child and siblings.
- Gender, ethnicity, first language, any special needs.
- Names, dates of birth and relationship of household members and any significant others.
- The names of professionals' known to be involved with the child/family eg: GP, Health Visitor, School.
- The nature of the concern; and foundation for them.
- An opinion on whether the child may need urgent action to make them safe.



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- Your view of what appears to be the needs of the child and family.
- Whether the consent of a parent with parental responsibility has been given to the referral being made.

Action to be taken following the referral

- Ensure that you keep an accurate record of your concern(s) made at the time.
- Put your concerns in writing to Social Services following the referral (within 48 hours).
- Accurately record the action agreed or that no further action is to be taken and the reasons for this decision.

Confidentiality policy

The organisation should ensure that any records made in relation to a referral will be kept confidentially and in a secure place.

Information in relation to child protection concerns should be shared on a “need to know” basis. However, the sharing of information is vital to child protection and, therefore, the issue of confidentiality is secondary to a child’s need for protection.

Abuse is always wrong and it is never the young person's fault. If you’re worried about a child, please call the NSPCC Helpline on 0800 800 5000 for advice.

This policy is implemented through will be reviewed and updated at every AGM.

Sept 2018

Data Protection Policy and PRIVACY NOTICE

October 2018

WHO WE ARE

We are the Alliance française d'Oxford, the charity whose mission is to promote French language and culture in Oxford situated at

30 Polstead Rd,
1st Floor, Oxford, OX2 6TN
www.af-oxford.org
Charity Registration No. 1163206

WHAT THIS PRIVACY NOTICE IS FOR

This Privacy Notice is intended to cover activities of the Alliance française d'Oxford during French teaching activities and our various events/cultural programme.



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This policy is intended to provide information about how we will use (or "process") personal data about individuals including: its staff and teachers; its current, past and prospective students; 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 students are all encouraged to read this Privacy Notice and understand the Association'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 the Alliance française d'Oxford 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 the Alliance française d'Oxford's other relevant terms and conditions and policies, including:

- Our Child protection Policy and Procedure
- We are registered with Information Commissioner's Office (ICO) to meet our responsibilities under the Data Protection Act
- Internal rules Handbook
- Complaints Policy & Procedure

Anyone who works for, or acts on behalf of, the Alliance française d'Oxford (including staff, volunteers, trustees and service providers) should also be aware of and comply with this Privacy Notice.

RESPONSIBILITY FOR DATA PROTECTION

The Alliance française d'Oxford has appointed the manager as the responsible person for Data Protection and is the point of contact for all your requests and enquiries concerning Data Protection.

The Alliance française d'Oxford 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 manager can be contacted via email at director@af-oxford.org

WHY THE ALLIANCE FRANCAISE D'OXFORD 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, students or parents of students) as part of our daily operation.



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TYPES OF PERSONAL DATA PROCESSED BY THE ALLIANCE FRANÇAISE D'OXFORD

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 students 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 students;
- 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 Alliance française d'Oxford and the teacher, employee and other supporting staff including for one-off provision of services for special event organised by the Alliance française d'Oxford
- 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 necessarily keep a copy of the individual DBS but keep a record of when the document was viewed and by whom)

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

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

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

HOW THE ALLIANCE FRANÇAISE D'OXFORD COLLECTS DATA

Generally, the Alliance française d'Oxford receives personal data from the individual directly (including, in the case of students, from their parents). This may be via a webform, or simply in the ordinary course of interaction or communication (such as email).

How do we collect data?

Generally, we receive personal data from the individual directly (including, in the case of students, from their parents). This may be via a webform, or simply in the ordinary course of interaction or communication (such as email or written assessments).



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However, in some cases personal data will be supplied by third parties (for example another school, or other professionals or authorities working with that individual); or collected from publicly available resources.

WHO HAS ACCESS TO YOUR DATA

The only people able to access data covered by this Policy should be those who need it for their work.

We do not share personal data with third parties.

Data should not be shared informally. When access to confidential information is required, teachers can request it from the manager. Personal data should not be disclosed to unauthorised people either within the Alliance française d'Oxford or externally.

Data policy should be regularly reviewed and updated as necessary.

- Teachers are given email addresses of students and telephone numbers for normal communication of homework and progression. Teachers are requested to delete email addresses and other personal data as soon as their contractual arrangements with the Alliance française d'Oxford terminated or they do not teach the students anymore.
- The Manager as person responsible for data protection should be contacted by the teachers about any aspect of data protection.

Finally, in accordance with Data Protection Law, some of Alliance française d'Oxford processing activity is carried out on its behalf by third parties, such as IT systems, web developers or cloud storage providers (e.g. Dropbox, Intuit Quickbooks, Mailchimp, Colour Rich, Rosemary Accounting) Please refer to their privacy notices for further details.

Personal data collected by us will remain within the school, and will be processed by appropriate individuals only in accordance with access protocols (i.e. on a 'need to know' basis). Particularly strict rules of access apply in the context of medical records and safeguarding files.

Staff, pupils and parents are reminded that the school is under duties imposed by law and statutory guidance (including Keeping Children Safe in Education) to record or report incidents and concerns that arise or are reported to it, in some cases regardless of whether they are proven, if they meet a certain threshold of seriousness in their nature or regularity. This is likely to include file notes on personnel or safeguarding files, and in some cases referrals to relevant authorities such as the police.

HOW LONG DO WE KEEP YOUR DATA?

We will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason. Typically, the legal recommendation for how long to keep ordinary staff and pupil personnel files is up to 7 years following departure from the school. However, incident reports and safeguarding files will need to be kept much longer, in accordance with specific legal requirements.

If you have any specific queries about how our retention policy is applied, or wish to request that personal data that you no longer believe to be relevant is considered for erasure, please contact the Manager, who is the appointed person responsible for overseeing data protection at the school. However, please bear in mind



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that the school may have lawful and necessary reasons to hold on to some personal data even following such a request.

The school will from time to time use the contact details of former staff, alumni and their parents as well as other members of the school community to keep them updated about the activities of the school, or alumni and parent events of interest, including by sending updates and newsletters and by email.

Should you wish to limit or object to any such use, or would like further information about them, please contact the Manager in writing. You always have the right to withdraw consent, where given, or otherwise object to direct marketing or fundraising. However, the school is nonetheless likely to retain some of your details (not least to ensure that no more communications are sent to that particular address, email or telephone number).

WHAT ARE YOUR RIGHTS?

We recognise all the rights individuals have under the GDPR regarding their personal data held by us, including:

- be informed about how we use your personal data;
- request access to the personal data that we hold;
- request that your personal data is amended if it is inaccurate or incomplete;
- request that your personal data is erased where there is no compelling reason for its continued processing;
- request that the processing of your data is restricted;
- object to your personal data being processed; and
- where we rely on consent as a means to process personal data such as certain types of uses of images, withdraw this consent at any time.
- Any requests or objections should be made to the Manager in writing.

HOW DO WE KEEP YOUR DATA SECURE?

The school will take appropriate technical and organisational steps to ensure the security of personal data about individuals, including policies around use of technology and devices, and access to school systems. All staff will be made aware of this Notice and their duties under prevailing data protection laws and receive relevant training.

If a security incident takes place which affects the confidentiality, integrity or availability of data, the school will swiftly investigate the matter and establish whether a personal data breach has occurred and, if so, promptly take steps to address it, including telling the Information Commissioner's Office (ICO) if required.

HOW CAN YOU MAKE A COMMENT OR A COMPLAINT?

Any comments or queries on this Notice should be directed to the Manager: director@af-oxford.org

If you are unhappy with the way in which your personal data has been processed, or if you believe that the school has not complied with this Notice or acted otherwise than in accordance with data protection laws, you may, **in the first instance, contact the Manager and or follow the school's complaints procedure.**



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If you remain dissatisfied, you can apply to the Information Commissioner for a decision. You also have the right to directly make a referral to or lodge a complaint with the Information Commissioner's Office (ICO) at any stage but please be aware that the ICO recommends that steps are taken to resolve the matter with the school before involving the regulator. The Information Commissioner can be contacted at:

Information Commissioner's Office,
Wycliffe House,
Water Lane,
Wilmslow,
Cheshire,
SK9 5AF

We are the Alliance française d'Oxford

the charity whose mission is to promote French language and culture in Oxford

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