



Alliance Française

*Oxford*

## OUR POLICIES

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**We are the Alliance française d'Oxford**

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

30 Polstead Rd, 1<sup>st</sup> Floor, Oxford, OX2 6TN

[www.af-oxford.org](http://www.af-oxford.org)

Charity Registration No. 1163206



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Child protection policy, Safeguarding Policy, General code of conduct with children and young people and code of conduct for online classes

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## CHILD PROTECTION POLICY

### Introduction

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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.

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## The purposes of the Alliance française d'Oxford

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

## The purpose of this policy

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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

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

## We recognise that

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- 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

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- 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.

## SAFEGUARDING POLICY

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### **BEGINNING/END OF CLASS:**

- At the beginning of class, a parent or other adult guardian must accompany each student under the age of 11 into the building to the door of the 1<sup>st</sup> Floor where a staff member will welcome them.
- A parent or other adult guardian (if not parent or guardian on the registration form, we will need a written permission, please see below) must pick up each student under the age of 11 shortly after the end of the class. If for any reason there may be a delay in collecting a child at the end of the class, please let us know. We can only provide supervision for children during and shortly after course times
- Any derogation to this policy will have to be made in writing to the manager [director@af-oxford.org](mailto:director@af-oxford.org) AND the courses manager [courses@af-oxford.org](mailto:courses@af-oxford.org)
- We assume your child, once in their first year of secondary school **and/or over 11 years old**, is authorised to arrive at and leave the AF de Oxford unaccompanied, please let us know by ticking the appropriate box in the registration box to confirm this.

### **SUPERVISION DURING CLASS:**

- The teacher in charge of the class will record student attendance and will supervise students at all times for the duration of the scheduled class.
- If you wish your child to leave early, please let us know in advance (to [courses@af-oxford.org](mailto:courses@af-oxford.org) or by phone). Please also let us know about any absences.
- Any concerns about the behaviour of other students should be reported to the teacher or to Louise Richard [courses@af-oxford.org](mailto:courses@af-oxford.org)

### **SUPERVISION DURING BREAKS:**

- Where there is a break in the middle of a class, we advise that students under the age of 18 remain on the premises and cannot accept any responsibility for any incident which occurs if the student exits the Alliance française d'Oxford premises.
- Where a child does not have parental consent to arrive/leave alone, we will not permit them to leave the premises during a break.

### **TOILET FACILITIES:**

- There are separate staff and students toilets in the Alliance Française de Oxford. Only one person can use one toilet at a time. Please note that children may have to go to the student toilets unaccompanied whilst on the premises and staff are not able to supervise them during this time.

### **ALLERGIES / SPECIAL DIETARY NEEDS:**

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- The parent/guardian should let the Alliance française d'Oxford know, using the form above, about any allergies, intolerances or special dietary restrictions.
- Where the student wishes to bring their own snack onto the Alliance française d'Oxford premises, we request **no nuts**.
- Students should not share snacks around the class without the prior authorisation of the teacher, who will be aware of the dietary information provided by parents/guardians.

## General code of conduct with children and young people

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### Responsibility of staff and volunteers

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You are responsible for:

- prioritising the welfare of children and young people
- providing a safe environment for children and young people
  - o ensuring equipment is used safely and for its intended purpose
  - o having good awareness of issues to do with safeguarding and child protection and taking action when appropriate.
- following our principles, policies and procedures
  - o including our policies and procedures for safeguarding and child protection, whistleblowing and online safety
- staying within the law at all times
- modelling good behaviour for children and young people to follow
- challenging all inappropriate behaviour and reporting any breaches of the behaviour code to the director
- reporting all concerns about abusive behaviour, following our safeguarding and child protection procedures
  - o this includes inappropriate behaviour displayed by an adult or child and directed at anybody of any age.

### Respecting children and young people

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You should:

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- listen to and respect children at all times
- value and take children's contributions seriously, actively involving them in planning activities wherever possible
- respect a young person's right to personal privacy as far as possible
  - o if you need to break confidentiality in order to follow child protection procedures, it is important to explain this to the child or young person at the earliest opportunity.

## Diversity and inclusion

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You should:

- treat children and young people fairly and without prejudice or discrimination
- understand that children and young people are individuals with individual needs
- respect differences in gender, sexual orientation, culture, race, ethnicity, disability and religious belief systems, and appreciate that all participants bring something valuable and different to the group/organisation
- challenge discrimination and prejudice
- encourage young people and adults to speak out about attitudes or behaviour that makes them uncomfortable.

Find out more about:

- safeguarding children who come from Black, Asian and minoritized ethnic communities
- safeguarding d/Deaf and disabled children and young people
- safeguarding LGBTQ+ children and young people
- safeguarding children with special educational needs and disabilities (SEND).

## Appropriate relationships

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You should:

- promote relationships that are based on openness, honesty, trust and respect
- avoid showing favouritism
- be patient with others
- exercise caution when you are discussing sensitive issues with children or young people
- ensure your contact with children and young people is appropriate and relevant to the nature of the activity you are involved in
- ensure that whenever possible, there is more than one adult present during activities with children and young people. The only persons allowed to be alone with one child are staff members with DBS clearance.

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- o if a situation arises where you are alone with a child or young person, ensure that you are within sight or can be heard by other adults
- o if a child specifically asks for or needs some individual time with you, ensure other staff or volunteers know where you and the child are
- only provide personal care in an emergency and make sure there is more than one adult present if possible
  - o unless it has been agreed that the provision of personal care is part of your role and you have been trained to do this safely.

## Inappropriate behaviour

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When working with children and young people, you must not:

- allow concerns or allegations to go unreported
- take unnecessary risks
- smoke, consume alcohol or use illegal substances
- develop inappropriate relationships with children and young people
- make inappropriate promises to children and young people
- engage in behaviour that is in any way abusive
  - o including having any form of sexual contact with a child or young person
- let children and young people have your personal contact details (mobile number, email or postal address) or have contact with them via a personal social media account
- act in a way that can be perceived as threatening or intrusive
- patronise or belittle children and young people
- make sarcastic, insensitive, derogatory or sexually suggestive comments or gestures to or in front of children and young people.

## Upholding this code of behaviour

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You should always follow this code of behaviour and never rely on your reputation or that of our organisation to protect you.

If you have behaved inappropriately, you will be subject to our disciplinary procedures. Depending on the seriousness of the situation, you might be asked to leave Alliance française d'Oxford.

We might also make a report to statutory agencies such as the police and/or the local authority child protection services.

If you become aware of any breaches of this code, you must report them to Florence Rossignol.

If necessary, you should follow our whistleblowing procedure and safeguarding and child protection procedures.

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## Code of conduct for online classes

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The Alliance française d'Oxford provides a service to the public by allowing children and adolescents to access its classes. Persons under 18 years of age must be **supervised by a parent or guardian**, who must ensure the following:

- The child understands that although they are at home, **they must behave in a manner similar to what would be expected at school**, in terms of behaviour, appropriate language, and respect for teachers and classmates.
- **The child's image will be visible to the teacher and other students:** they must be **appropriately dressed**, attend the online classroom from a location where the parent can maintain supervision, and ensure that the **background to their image is reasonably neutral** and that no items or elements appear in the image which violate their privacy or could offend other participants.
- **All other householders should be aware that the child is in an online classroom** and should try to avoid appearing in the image or the audio.
- Children should be aware that they are in public and should **observe basic internet safety guidelines:** they should not share personal information such as their address or social media profile information. The teacher will at no point request this information.
- Microphones and cameras should be disabled once the class has concluded and during break times.

## Supervision during Class

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The teacher in charge of the class will record student attendance and will directly supervise students for most of the duration of the scheduled class as long as they remain in the online classroom. The parent/guardian will receive an email notification from the Alliance in the event that their child does not attend class or attends only a portion of their class.

The safeguarding lead and the administrative team will have access to the online classroom and will check in on the classes periodically, like they would in a school-based class.

Although they may not take part in the class, parents/carers should also feel free to sit in with the students or observe periodically if they like, refraining from intervening, just as they would with a tutor visiting their home.

A "record" function is available within the educational software to the classroom moderator (teacher) – for privacy and data protection reasons we will not be using this function.

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## Connecting to the class

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When downloading the software, to protect the child's privacy, **we recommend that parents of children aged 12 and under use their own contact details, and not the child's.** The email address given during the registration will be used to send the online software information.

**Children over 12 may use their own email addresses for the software connection.** Children should feel free to write their first name only when entering the classroom, but must use their real first name so that they can be identified by the teacher.

**Please be aware that your teacher will send a meeting link by email to the parents' email address for the first connection at least, which you should not share, since it could allow unauthorised persons to temporarily enter the classroom.**

## Communication outside class

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A parent and child over 12 years old may decide whether the teacher may use the child's email address to send class materials such as exercises and the class plan, in which they should inform the teacher. If they do use the child's address, they will place the parent in copy in all communications. Otherwise, the teacher will communicate materials directly with the parent by email.

Where we have a concern about a child, we will follow this up using our safeguarding framework (the teacher will consult with the safeguarding lead and they will decide together on an appropriate course of action). If we do have any concerns, you can expect that we will communicate with you or report to the relevant authorities as necessary.

July 2024

## Data Protection Policy and Privacy Notice

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Updated 31/01/2024

### 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

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## 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.

This policy is intended to provide information about how we will use (or "process") personal data about individuals including: staff and teachers; 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 community.

The UK's Data Protection Act 2018 (DPA) and General Data Protection Regulation (GDPR) (EU) 2016/679 describe how organisations, including ours, must collect, handle and store personal information.

We are registered with Information Commissioner's Office (ICO) to meet our responsibilities under the Data Protection Act

This Privacy Notice applies alongside any other information the Alliance française d'Oxford may provide about a particular use of specific categories 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 including online code of conduct
- Internal rules Handbook
- Complaints Policy & Procedure

The information in this document applies regardless of whether the personal data is stored electronically, on paper or on other materials.

This Policy will be regularly reviewed and updated as necessary.

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## 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 endeavours 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](mailto:director@af-oxford.org)

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

## WHY THE ALLIANCE FRANCAISE D'OXFORD NEEDS TO PROCESS PERSONAL DATA

In order to carry out our ordinary activities, 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.

## TYPES OF PERSONAL DATA PROCESSED BY THE ALLIANCE FRANCAISE D'OXFORD

- To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully.
- There are various legal grounds on which we are permitted to process personal data:
- Processing necessary to enter into a contract with you, or for the performance of the contract
- Processing necessary to comply with our legal obligations
- Processing necessary for our (or a third party's) legitimate interests, such as managing and administering our activities effectively
- Where you have given specific consent to processing your data – in which case we will ask specifically if you consent to the particular processing.
- The types of personal data we process, what we use the data for, and our legal grounds for processing differ depending on our relationship with the individual in question.
- For students and their parents/guardians – please see further detail in Appendix 1.

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- For staff, teachers and contractors – please see further detail in Appendix 2.
- For mailing list subscribers and attendees at our events – please see further detail in Appendix 3.
- For trustees – please see further details in Appendix 4.

## HOW THE ALLIANCE FRANÇAISE D'OXFORD COLLECTS 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).

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 sources.

## WHO HAS ACCESS TO YOUR DATA

The only people able to access data covered by this Policy will be those who need it in order to administer the activities of the Alliance française d'Oxford.

We do not share personal data with third parties.

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

- Teachers are given email addresses of students and telephone numbers and medical conditions if provided to us by the students or parents of the students for normal communication of homework and progression. Teachers are required to delete email addresses and other personal data as soon as their contractual arrangements with the Alliance française d'Oxford come to an end or they cease to teach the student(s) in question.
- The Manager as person responsible for data protection should be contacted by the teachers about any aspect of data protection.

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. ONCORD, OneDrive, Intuit Quickbooks). Where this involves a transfer of data outside the EEA, appropriate steps will be taken to safeguard the data (eg for data processing by external providers in the USA, Alliance française d'Oxford has verified that those providers have signed up to the Privacy Shield.) Please refer to the privacy notices of the providers referred to above for further details.

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Personal data collected by us will remain within the Alliance française d'Oxford, 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 any safeguarding files.

The Alliance française d'Oxford 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, we will **keep ordinary staff and student records for up to 7 years following departure from the Alliance française d'Oxford**. 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 that the we may have lawful and necessary reasons to retain some personal data even following such a request.

## 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 about you;
- 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.

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## HOW DO WE KEEP YOUR DATA SECURE?

The Alliance française d'Oxford will take appropriate technical and organisational steps to ensure the security of personal data about individuals, including policies relating to use of technology and devices, and access to our 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 Alliance française d'Oxford will investigate the matter and establish whether a 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](mailto: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 Alliance française d'Oxford 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 Alliance française d'Oxford's complaints procedure.**

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

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## APPENDIX 1

### HOW WE PROCESS YOUR PERSONAL DATA – STUDENTS AND PARENTS/GUARDIANS

We process personal data relating to students and/or parents/guardians as follows:

Type of personal data	What we use it for	Our legal basis for processing
Personal details including name, address, email address and other contact details, date of birth, gender; parent name, address and contact details	We use this data to register you for classes, maintain a record of registration and manage the delivery of our teaching services.	This processing is necessary to enable us to meet our obligations to you under our terms and conditions for classes.
Payment details	We use this data to keep a record of payment and correct class registration.	This processing is necessary to enable us to meet our obligations under our terms and conditions for classes.
	We also use this data to keep in touch with students after they have ceased to have classes with us	This is for the purpose of our legitimate interest in maintaining relationships with former students including direct marketing or fundraising activity
Photographs/videos	We use photographs and videos of students in online and onsite class for internal presentations and external marketing and promotional material.	This processing is for the purpose of our legitimate interest in promoting our activities. In the case of students who are children, the processing is undertaken if consent has been given during the registration process. Processing will cease if consent is withdrawn.
Records of student performance and progress, use of student portal, frequency of engagement with communication from	We use this data to assess students' language level at the start of a course, to ensure they are placed in the correct class, and to monitor progress to identify individual	This processing is necessary for our legitimate interest to deliver a high-quality teaching service.

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

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Charity Registration No. 1163206



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the Alliance	needs, and report to parents and ensure the quality of our classes. We also see the level of engagement with the communication from the Alliance as an indicator of interest for the courses and events offered by the Alliance française d'Oxford.	
Medical information	We keep a record of medical information provided by students or parents for the purpose of ensuring student welfare.	This processing is necessary for the purpose of our legitimate interests in ensuring a safe classroom environment and may also be necessary for us to meet our obligations under health and safety law.
Any safeguarding concerns	We may need to record and report to the local authority any concerns we have about child safeguarding, in accordance with our Child Protection Policy.	This processing is necessary for compliance with our obligations under child safeguarding law.

## APPENDIX 2

### HOW WE PROCESS YOUR PERSONAL DATA - STAFF AND TEACHERS/OTHER CONTRACTORS

We process data in relation to staff, teachers and other contractors as follows:

Type of personal data	What we use it for	Our legal basis for processing
Personal details including name, address, email/contact details, date of birth	We use this data to enter into a contract with you, to maintain a record of and manage your engagement. In the case of employees, we also use it to provide benefits such as a pension.	This processing is necessary to enable us to enter into a contract with you and to meet our obligations under that contract.

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Qualifications, skills, experience and work history

We use this data to assess suitability for carrying out work for us and to decide whether or not to offer you a contract,. We may also use it to provide information either internally or on our website/to prospective students detailing the expertise of our teachers.

This processing is necessary for the purposes of our legitimate interests in operating our processes for engaging staff, teachers and contractors and providing information to students and prospective students.

Your terms of engagement including hours, payments and salary/benefits for employees

We use this data to provide you with payments under our contract with your, or in the case of employees to provide salary and benefits and manage our employment relationship.

This processing is necessary to meet our obligations under the contract we have with you and for the purposes of our legitimate interests in managing the arrangements of those working for us.

Financial details including bank details, invoices and in the case of employees, payroll information, NI number and tax code

We use this data so that we can make payments to you, and where applicable, deduct tax and provide information to HMRC.

This processing is necessary to meet our obligations under our contract with you and, where applicable, under tax law and HMRC requirements.

Information about your entitlement to work in the UK

We use this data such as passport and visa information to check your identity and entitlement to work.

This processing is necessary to meet our legal obligations to check and record right to work in the UK

Information about medical or health conditions

We use health related data that you provide to us to ensure a safe place of work including making adjustments where necessary. We may also process health data in relating to sick pay payments for employees.

This processing is usually necessary to meet our obligations discrimination and health and safety law, and employment law in the case of employees.

Information about your work, performance, attendance and time keeping

In the case of employees, we use this data to assess your performance so that we can address any issues or training/development. In the case of teachers, we use this data to assess the quality of teaching.

This processing is necessary for the purposes of our legitimate interests in ensuring our employees are performing to an appropriate standard, teaching is delivered to an appropriate standard and managing our workforce.

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Information about access to and use of our IT and communications systems	We use data relating to access to access to and use of our IT systems, such as records of use of computers and telephones, to ensure the security and proper use of our systems, and compliance with relevant policies.	This processing is necessary for the purpose of our legitimate interest in ensuring that our systems are secure and not being accessed or used improperly.
Photographs/videos	We use photographs and video of staff/teachers carrying out classroom duties and online classes and at events in our promotional materials.	This processing is necessary for the purpose of our legitimate interest in marketing our language classes and promoting events.
DBS check information	We use and record this information to ensure that individuals are suitable for working with children in line with our Child Protection Policy. We do not usually keep a copy of the individual DBS certificate, but keep a record of when the documents was verified and by which member of staff.	This processing is necessary to comply with our legal obligations under child safeguarding laws.

## APPENDIX 3

### HOW WE PROCESS YOUR PERSONAL DATA - MAILING LIST SUBSCRIBERS AND EVENTS ATTENDEES

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

Type of personal data	What we use it for	Our legal basis for processing
Name, contact details including email address and telephone numbers	We use this data for the purpose of event registration.  We also use this data to ensure receipt of our mailings and newsletters by those who have elected to receive them.  We also use this data to advise subscribers of fundraising opportunities.	Processing for event registration is necessary to meet our legal obligations when individuals have purchased event tickets.  Processing for mailings/newsletters is necessary for the purpose of our legitimate interests in ensure we can deliver updates to interested recipients.  Processing is necessary for our legitimate interests of raising funds for the charity.

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Records of payments made to us by bank transfer	We use this data for the purpose of event registration and ensuring delivery of tickets.	This processing is necessary to meet our legal obligations when individuals have purchased event tickets.
Medical information	We use medical information provided to us voluntarily during event registration to ensure the safety of the particular attendee.	This processing is necessary for the purpose of our legitimate interests in ensuring the safety and welfare of our attendees, and may be necessary to comply with health and safety law.
Photographs/video	We use photographs and video of attendees at events in our promotional materials.	This processing is necessary for the purpose of our legitimate interest in promoting the organisation and our events.

## APPENDIX 4

### HOW WE PROCESS YOUR PERSONAL DATA - TRUSTEES

We process information about the trustees as follows:

Type of personal data	What we use it for	Our legal basis for processing
Personal details including name, address, contact details, other trusteeships, and date of birth	We use this data for the purpose of Charity Commission registration and records. We also use this data for the purpose of being able to contact trustees, provide information to them and arrange meetings.	This processing is necessary for us to comply with Charity Commission requirements. This processing is necessary for the purpose of our legitimate interest in ensuring the trustees are able to fulfil their role and duties.
Details of other trusteeships	We use this data for the purpose of Charity Commission records.	This processing is necessary for us to comply with Charity Commission requirements.

## Complaints policy of Alliance Française d'Oxford

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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

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- 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 with the Board of trustees and the management.

## Review

This policy is reviewed regularly and updated as required.

Adopted on 1<sup>st</sup> September 2015 - Last reviewed 06/08/2024

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## Complaints Procedure of Alliance Française d'Oxford

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### Publicised Contact Details for Complaints

Secretary of the Board of Trustees  
trustees@af-oxford.org  
Please write "COMPLAINT" in the subject heading

### Receiving Complaints

#### 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 The Secretary within two weeks. On receiving the complaint, The Secretary 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.

#### STAGE TWO

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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 the Chairman :

CAITLIN KENNEDY, Chair of the Trustee Board, <a href="mailto:caitlinltk@gmail.com">caitlinltk@gmail.com</a> trustees@af-oxford.org
--

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.

The Chairman of the trustees may investigate the facts of the case themselves or delegate a suitably senior person to do so. This may involve 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](http://www.charitycommission.gov.uk/publications/cc47.aspx)

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