

National Association for Environmental Education (UK)

Department of Education

University of Bath

Bath

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naee.org.uk



NAEE Data Storage, Privacy and Protection Policy

Purpose

This Policy sets out how NAEF collects and uses the information which it is given, how it keeps it secure, and when it may disclose it to others. It relates to how the NAEF website handles personal (and other) data, and how NAEF, as an organisation more generally, deals with data that individuals (including members) provide to it.

NAEE

NAEE is an Incorporated Charitable Organisation [Charity No. 1166502]. Its charitable object is to provide a public benefit by advancing environmental education within early years settings, primary and secondary schools, and institutions responsible for teacher education within the UK and elsewhere, in particular but without limitation by

1. facilitating curriculum development through the provision of resources, information and ideas for teachers,
2. providing financial support for pupils to visit outdoor education centres, and
3. collaborating with organisations that have related objectives.

Information collected via the website

The NAEF website does not store any personal information about users; however, certain information that users provide helps NAEF to monitor its website service and provide the services that users are entitled to.

The website collects **non-personal information** such as IP addresses (the location of computers on the internet), pages accessed, and files downloaded. This helps NAEF to determine how many individuals use the website, how many people visit on a regular basis, and which pages are most and least popular. This information doesn't reveal anything about who users are; its purpose is to monitor and improve the service provided. The website uses Google Analytics for these purposes.

The website also allows the processing of **personal information** such as name, postal address, telephone number, e-mail address, and card or bank details. However, none of these are held on-line by NAEF as all payments are taken through secure payment gateways, which include PaySubsOnline and Paypal. NAEF collects and holds this information only in connection with specific activities, such as donations, or journal requests and membership applications. The information is either needed to fulfil requests or to provide a more personalised service by analysing or reviewing the information that has been provided to ensure that we give users access to or send them the information that they are interested in. If they choose to withhold requested information, the website might not be able to provide certain services. If users are under 18, they should obtain a parent's or carer's approval before sending any information about themselves (name, address, e-mail address, etc.) to NAEF or anyone else over the internet. We encourage parents and carers to get involved with their children's use of the internet and to be aware of the activities in which they are participating.

There are links on the NAEF website that take users to other websites. Any such links to third party websites are provided solely for user convenience. Their operation and content are beyond NAEF's control, and NAEF does not endorse in any manner whatsoever or accept any responsibility for the content or other material that may be contained on such websites, the use of such websites, or any products or services advertised on or sold through any such websites. NAEF will not be liable under any circumstances for any damages whatsoever, direct or indirect, resulting

from any use of this website or any other third party website linked to this website, whether or not it is advised of the possibility of such damages.

Like many websites, NAEF uses cookies in order to provide a more personalised web service. Cookies are pieces of information that a website transfers to hard drives to store and sometimes track information. Most web browsers automatically accept cookies, but it is possible to change browser settings to prevent this. However, users might not be able to take full advantage of the NAEF website if they do so. Cookies are specific to the server that created them and cannot be accessed by other servers, which means they cannot be used to track movements around the web. Cookies can be used for a variety of purposes, such as providing personalised pages, and information gathered by the use of cookies is compiled on an aggregate, anonymous basis. At present, NAEF uses them only to work out how many people visit the website. If users prefer not to accept a cookie, they can navigate around the website like any other user. Further information about cookies can be found at the Interactive Advertising Bureau's website allaboutcookies.org.

Personal information submitted through the forms on the NAEF website is held in a non-on-line NAEF database. We promise that NAEF will not share the information given to us with any other organization unless users have specifically given permission to do so. Users can, at any time, ask us for a copy of the personal information that we hold about or request a correction or deletion of information.

By using the NAEF website users consent to the collection and use of information by NAEF in accordance with this policy, and should not do so if they do not agree to this. Any information submitted via the NAEF website is treated in accordance with the Data Protection Act 1998 and the General Data Protection Regulation (GDPR) 2018. To find out more about entitlements under this legislation visit the Information Commissioner's website dataprotection.gov.uk and see Appendix I for specific detail about NAEF's activities and the GDPR.¹

Member information held by NAEF

NAEF is legally obliged to hold some types of personal information to fulfil its statutory obligations (eg, in relation to Gift Aid) and the following are routinely held: member's name / postal address / phone number(s) / email address(es) / notes about relevant personal interests and preferences. NAEF will hold this information securely for as long as is necessary for the relevant activity, in accordance with current legislation, and will regularly review how long it keeps personal information. All personal data will be used and recorded in accordance with current data protection legislation and this policy. NAEF does NOT hold any financial data about members or anyone else.

Under current data protection legislation NAEF ...

- ✚ is committed to keeping personal information secure and has robust procedures in place to do this.
- ✚ will not use personal information for any purpose other than in relation to membership of NAEF and the work that it does.
- ✚ will retain a member's information for six months after a next membership renewal, should they not renew their membership at the due date, unless they request otherwise.
- ✚ acknowledges that anyone has the right to ask for a copy of the information NAEF holds about them, none of which is held on-line. NAEF will send anyone the full details that are held about them if they request this by emailing info@naef.org.uk. If there are errors in the data held about individuals, these will be corrected immediately.
- ✚ will not sell or rent information to third parties or share information with third parties for marketing purposes. NAEF will never share or give access to personal information to any third party for any purpose, including direct marketing, without consent, unless properly requested by police or tax authorities. In such a case we will inform the individual immediately about what has been disclosed.
- ✚ acknowledges that anyone has the right not to receive communications from NAEF. If they

¹ ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr

do NOT wish to be contacted, they can let us know by e-mailing info@naee.org.uk If we contact individuals by email, each time they receive a message they will also have the option to decline to receive further information in that manner.

Policy changes

NAEE will make changes to this policy from time to time and the current policy will always be found on the NAEE webpage. If the change in the policy affects the use of personal information NAEE will use its best endeavours to contact members by email to seek consent to the use. If there are any questions relating to this policy, please write to info@naee.org.uk

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Appendix I NAEE and the GDPR

1. The *General Data Protection Regulation* came into force in May 2018² and it applies to NAEE. It builds on the *Data Protection Act 1998*.

2. The GDPR applies to personal data meaning any information relating to an identifiable person who can be directly or indirectly identified. Data include name, identification number, location data or online identifier.

3. The GDPR requires data to be

- ✚ processed lawfully, fairly and in a transparent manner
- ✚ collected for specified, explicit and legitimate purposes
- ✚ adequate, relevant and limited to what is necessary in relation to purposes
- ✚ accurate and kept up to date and for no longer than is necessary
- ✚ processed in a manner that ensures appropriate security, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

4. The GDPR specifies controllers (who determine the purposes and means of processing personal data) and processors (who are responsible for processing personal data on behalf of a controller). As the Consultant National Co-ordinator currently has the most prominent public-facing role within the Association and is already ensures the security of the personal data we hold, it follows that the CNC is NAEE's *data processor*, with the Board of Trustees carrying out the *data controller* role.

5. NAEE has to have a valid lawful basis in order to process personal data. Six³ bases are possible, and the one most applicable to us is **legitimate interest** – in that we can show that data processing is necessary in relation to our role in society, and that we balance data gathering and storage against an individual's interests and rights.

NAEE has a legitimate interest (set out in our charitable objects) to provide a public benefit by advancing environmental education within early years settings, primary and secondary schools, and institutions responsible for teacher education within the UK and elsewhere, in particular but without limitation by [i] facilitating curriculum development through the provision of resources, information and ideas for teachers, [ii] providing financial support for pupils to visit outdoor education centres, and [iii] collaborating with organisations that have related objectives.

In order to fulfil our objects, we need to communicate to individuals and organisations that are both members and non-members of NAEE, which we do specifically by email, and more generally through the website. Further, as a membership organisation (that makes member-specific offers) we hold and processing personal and individual data on members in order to provide benefits and other services.

² knowhownonprofit.org/how-to/how-to-prepare-for-gdpr-and-data-protection-reform

³ ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/#ib3

6. The Trustee Board attests that NAEE

- + has reviewed the purposes of our data processing activities, and selected the most appropriate lawful basis (or bases) for each activity.
- + has checked that the data processing is necessary for the relevant purpose, and is satisfied that there is no other reasonable way to achieve that purpose.
- + has documented the decision as to which lawful basis applies to help us demonstrate compliance.
- + has included information about both the purposes of data processing and the lawful basis for it in our privacy notices ⁴

5. From time to time, NAEE’s Consultant National Co-ordinator will communicate by email with:

- i. *current NAEE members* – about the Association's work, keeping them up to date with what NAEE is doing, informing them of member-specific services, and reminding them of membership renewals. Members have freely given a range of personal data in order to join the Association, and communication with them is by email to an address provided by the member.
- ii. *lapsed NAEE members* – about the Association's work, informing them of what it is now doing, reminding them of member-specific advantages, and asking if they would like to renew their membership. This will take place within 6 months of the membership renewal date and will only be done once.
- iii. *specifically-targeted individual non-NAEE members* – about the Association's work, informing them of member-specific advantages, and asking if they would like to become members.
- iv. *a wide range of like-minded individuals and organisations (who are not members of NAEE but have opted into receiving emails)* – about the Association's work, keeping them up to date with what it is doing. This is information-related professional up-dating, and not a membership drive. NAEE will never, ever solicit financial donations by directly approaching individuals or organisations.

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Approved by the Trustee Board on May 1st 2018

⁴ ico.org.uk/for-organisations/guide-to-data-protection/privacy-notice-transparency-and-control