



National Association for the Teaching of English

Email: admin@nate.org.uk Website: www.nate.org.uk charity number 313157

Data Protection & Privacy Policy

This policy was approved by NATE's Development and Management Team (including Trustees) on 25th September 2020 and updated on May 2023.

About NATE

The National Association for Teaching of English, (NATE) established in 1963, is the professional association for English teachers that works regionally, nationally and internationally at all key stages. NATE is an educational charity, led by a Director and a team of volunteers, including: Trustees; committee members; regional representatives and English specialists across the world who support our CPD, publications, research and development. NATE is an unincorporated charitable trust and its Trustees are responsible for ensuring that NATE complies with its data protection obligations. Details of the current Trustees can be found [here](#).

Data Protection Legislation includes the General Data Protection Regulation (EU) 2016/679) (GDPR) and any national implementing laws, regulations and secondary legislation including the Data Protection Act 2018 (DPA 2018) relating to data protection and privacy, as amended or updated from time to time, in the UK, as well as any successor legislation to the GDPR and DPA 2018.

This Policy explains:

- What personal data we receive from you through this website or other means of contact (including phone, questionnaires, social media, email, post and other correspondence, or in person)
- What we do with your personal data
- What your options are to control what we do with your personal data

NATE is committed to safeguarding your personal information. Whenever you provide such information, we are legally obliged to use your information in line with all applicable laws concerning the protection of personal information, including the currently applicable Data Protection Act (DPA) and Privacy and Electronic Communications Regulations (PECR). We are registered with the Information Commissioner's Office as Data Controllers (Reference ZA634240).

Please note that:

- "Personal Data" means any information relating to an identified or identifiable person
- By using our website, you're agreeing to be bound by this Policy
- We may change this Policy sometimes so please check this page occasionally to ensure that you're happy with any changes

Definitions & Contacts

- GDPR means the General Data Protection Regulation.
- DPA refers to the Data Protection Act 2018
- ICO is the Information Commissioner's Office <https://ico.org.uk/>
- NATE Data Protection Officer is Jonathan Morgan, Director of NATE director@nate.org.uk
- Charity details, including financial information, trustees and annual reports are available on the charity commission website. <https://beta.charitycommission.gov.uk/charity-details/?regid=313157&subid=0>

DATA Controller:

NATE is the Data Controller. Our contact details can be found [here](#). This means that we

- decided to collect or process your personal data.
- decided what the purpose or outcome of the processing was to be.
- decided what personal data should be collected.
- exercise professional judgement in the processing of the personal data.
- have a direct relationship with you as the data subject (whether you are a subscriber to our mailing list and/or a NATE member or otherwise)
- have appointed certain processors to process the personal data on our behalf. (see below)

DATA Processors

A Data Processor follows instructions from the DATA Controller (NATE) and is given the personal data and informed what data to collect.

NATE engages several Data Processors who may process your personal data on NATE's behalf, as detailed below.

A Data Processor will always follow the instructions of the Data Controller when processing personal data. A Data Processor operates under a contract with the Data Controller.

A Data Processor **does not decide:**

- to collect personal data from individuals.
- what personal data should be collected from individuals.
- the lawful basis for the use of that data.
- what purpose or purposes the data will be used for.
- whether to disclose the data, or to whom.
- how long to retain the data.

As The Data Controller, NATE will ensure that we have in place appropriate technical or organisational measures, updated regularly, to protect against unauthorised or unlawful processing of Personal Data and against accidental loss or destruction of, or damage to, Personal Data.

Who has access to your information?

NATE's Management team, including Director and Trustees will have controlled access to your information to enable us to provide you with services. We will not sell or rent your information to third

parties. NATE shares the personal data of Institutional and Individual Members (excluding Universities) with the following parties:

- Routledge, Taylor & Francis to provide the English in Education publication (or any other similar provider that we appoint to do this)
- Mailworld who send out *Teaching English* (or any other similar provider that we appoint to do this)
- Eventbrite or other organisers of our events (including Teachmeet events)
- Scratch Creative to administer our website and the NATE Members' Area (or any other similar provider that we appoint to do this)
- our professional advisers acting as processors including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the UK who require reporting of processing activities in certain circumstances. Stripe payment services

NATE's membership is managed internally – it is not outsourced. This means that we will have access to your data in order to:

- manage and update the membership database
- contact NATE members
- process membership orders
- send out publications as requested
- send emails to members (and people on our school database) as requested by the Director (i.e. fill out the survey/ conference updates).

Members can unsubscribe at any time from receiving communication from NATE.

Scratch Creative have been appointed to manage the NATE website, which includes the NATE members' area. This means they will have access to your data to

- upload your information to the members' area so you have a members' profile that you can update
- provide you with a username and password to access the members' area
- enable you to renew membership
- provide you with access to NATE's publications and archive

We will not transfer your data outside of the European Economic Area.

In all other circumstances NATE will not share your information with third parties for them to market to you. When we use third parties, we disclose only the personal information that is necessary for them to deliver the relevant service and we require them to keep your information secure and not to use it for their own direct marketing purposes.

Please note as a NATE member you will be offered the opportunity to have a listing within the NATE members' portal. You have the right to amend your details at any time and choose if you would like to have a public or private profile.

How we collect your data

Below are the different ways we obtain data from yourself:

- 1) When you sign up to NATE's mailing list
- 2) When you register to become a member of NATE
- 3) When you submit an enquiry to us or request marketing to be sent to you
- 4) When you interact with us on social media
- 5) When you give us feedback or contact us
- 6) When you register to attend a NATE event

The information we collect about you

We may collect the following information about you, so that we can perform the functions below:

- name
- job title
- organisation
- email address
- contact number
- address
- IP address
- date of birth
- payment information including bank account and payment card details
- account login data such as your username and password
- information about how you use our website and services

We do not collect any special categories of personal data (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, health information, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with membership services). In this case, we may have to cancel the agreement you have with us but we will notify you if this is the case at the time.

Why we collect information about you

We obtain information about you so we can:

- perform or take steps to enter a membership contract with you
- improve our membership offer and services
- send emails about information which we think you may find interesting
- contact you for market research purposes, (i.e. to request that you complete our annual survey or to inform you about a new CPD opportunity)
- customise the website according to your interests •

- provide NATE membership benefits, such as a copy of Teaching English, newsletters, member archive materials.
- provide you with our newsletter and latest news, CPD events, resources, opportunities that will support you in your role.
- send you our termly newsletter, information about our events and to be kept up-to-date with the latest news and views about teaching English.

The legal basis for processing your data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- where we need to perform the contract we are about to enter into or have entered into with you.
- where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests. Legitimate interest means the interest of our charity in conducting and managing our charity to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
- where we need to comply with a legal obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to opt out of any marketing at any time by contacting us (as further detailed below).

How do we protect your data?

We will not sell or rent your information to third parties. NATE are committed to ensuring that your information is secure. To prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect. This includes robust IT security, data protection training for all staff, and secure premises. Where we have contracts with external providers, we require them to protect your information.

Controlling your personal information

If you wish to obtain a copy of your personal data held by us, then please contact us using the details below. You can see this within your personal profile section within the members' area. Please note if you make a request for this data via email you may also be asked to provide proof of your identity and for information that might help to locate the data you are seeking

Removing your data from NATE's mailing list

You can opt of our mailing list or cancel your NATE membership at any time by contacting us membership@nate.org.uk or by using the unsubscribe button on all correspondence. You can also contact our membership office 01619297302.

Controlling your personal information – Subject Access Request (SAR)

If you wish to obtain a copy of your personal data held by us, then please contact us to request a SAR if you require to know the data that NATE has. You can see this within your personal profile section within the members' area. Please note if you make a request for this data via email you may also be asked to provide proof of your identity and for information that might help to locate the data you are seeking.

Other rights that you have in respect of your data

Under certain circumstances, you have rights under data protection laws in relation to your personal data to allow you to:

- request correction of the personal data that we hold about you.
- object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms.
- request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in certain scenarios.
- request the transfer of your personal data to you or to a third party.

How long will we use your data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

We keep basic information about our members for seven years after they cease being members for legal and tax purposes.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review and may update this policy from time to time.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

How we use cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added, and the cookie helps analyse web traffic or lets you know when you visit a site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

IP Address's

We may collect details of your internet protocol (IP) address to allow us to track which organisations visit our webpages. We may use software to plan our services and provide information on what topics specific organisations may be interested in.

Links to other websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, please note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement that applies to the website in question.

For further information, please contact NATE's Data Protection Officer, Jonathan Morgan
director@nate.org.uk