

# NOTTAGE MARITIME INSTITUTE POLICY STATEMENTS

## A: Overview

Located on Wivenhoe's Old Quay, the Nottage Maritime Institute (NMI) is a Registered Charity, established in 1896, specialising in teaching RYA Shorebased Courses and other courses, mostly with a nautical flavour. The NMI is run entirely by volunteers, who make up the board of trustees and the management committee, the members of which also carry out many practical roles. There are also a small number of self-employed, part-time specialist role-holders, comprising the tutors teaching the courses and an administrator and a warden; these are considered to be NMI staff.

As well as delivering classes in a wide range of subjects, the NMI houses an extensive library of books on maritime history, yachting and technical subjects related to all aspects of ship and yacht design, construction and operation. The NMI is also a local maritime museum, with a fine collection of paintings, photographs and models, all with local connections and recording the maritime heritage of the local community. The NMI is open to the public on Saturday and Sunday afternoons from May to September, when there are also exhibitions by local artists and specialist exhibitions from our own collection. Entry is free.

### The Aims of the NMI are:

- a. To continue to follow the original remit of the bequest from Captain Nottage – “*to instruct yachtsmen and other sailors in the science of navigation*”;
- b. To extend this activity as required to best align with the skills and expectations of modern “*yachtsmen and other sailors*”;
- c. To make appropriate use of the premises for other educational and community-centred purposes to contribute to the maintenance of the fabric of the building and its contents;
- d. To maintain a collection of artefacts, books and museum exhibits that preserve the maritime history and heritage of the river Colne, its riverside communities and the local region;
- e. To seek and accept donations of items for the museum and library that align with (d) and to develop these collections, within the limitations of space and financial constraints.

The NMI is home to the “Friends of the Nottage”, a group of supporters and volunteers, who help with the running of the NMI.

## B. Governance

The governance of the NMI is carried out by the board of trustees and the management committee.

### B.1 Trustees

The board of four trustees comprises the chair and three board members. The areas within which their role can be defined are:

- a. Oversight of the NMI as a charity and its policies;
- b. Investments;
- c. Management and overall operation of the NMI.

The NMI policy statements below guide them in the undertaking of their role.

### B.2 Management committee

The management committee comprises the chair and between eight and eleven committee members. The committee members undertake organisational roles and areas of responsibility that contribute to the successful operation of the NMI. These roles are:

- a. Chair
- b. Secretary
- c. Treasurer
- d. Course coordinator
- e. Librarian
- f. Archivist

The NMI policy statements below guide them in the undertaking of their role.

## **C. Nottage Maritime Institute Policy Statements**

<b>1. Investment</b>	<b>p. 2</b>
<b>2. Health and Safety</b>	<b>p. 2</b>
<b>3. Equal Opportunities</b>	<b>p. 3</b>
<b>4. Volunteer Management</b>	<b>p. 4</b>
<b>5. Complaints Handling</b>	<b>p. 5</b>
<b>6. Conflict of Interest</b>	<b>p. 5</b>
<b>7. Trustee Code of Conduct</b>	<b>p. 6</b>
<b>8. Risk Management</b>	<b>p. 7</b>
<b>9. GDPR</b>	<b>p. 10</b>
<b>10. Safeguarding</b>	<b>p. 12</b>
<b>11. Cancellation/fee refunds</b>	<b>p. 12</b>

### **1. Investment Policy**

#### **1.1. Introduction**

- a. The NMI is a registered charity established by a legacy in 1896;
- b. The aims of the charity are to provide maritime-related educational courses and to safeguard and curate its collection of marine artefacts and art, preserving the maritime heritage of the region;
- c. The NMI has fixed assets in the form of its buildings, and cash assets, which are invested in charity-specific investment funds to ensure the long-term future of the NMI and to provide additional working capital, in response to unexpected increases in expenditure;
- d. The trustees are governed by the Trustee Act 2000 which sets out the general power of investment.

#### **1.2. Investment Objectives**

- a. The NMI seeks to produce the best financial return within an acceptable level of risk;
- b. The NMI's investment objective is to for capital growth, if possible in excess of inflation (RPI) and a stable, growing income stream.

#### **1.3. Risk**

- a. The NMI invests to mitigate long term inflation risk;
- b. The NMI's assets are diversified through investment in charity-specific investment funds.

#### **1.4. Management, Reporting and Monitoring**

- a. The NMI's asset value and income are monitored by the trustees, who meet twice a year. Investment decisions are made by the trustees;
- b. The day-to-day operation of the NMI is carried out by its volunteer management committee, which meets quarterly and reports regularly to the trustees;
- c. The operation of the NMI generates an income stream, used to support the day-to-day operation of the NMI and managed by the management committee and its treasurer, who reports to, and liaises with, the trustees, as and when required;
- d. Additional and exceptional expenses are directed to the trustees, who address such outgoings with the investment income;
- e. Trustees and management committee meet annually to monitor the investment performance and the financial management of the NMI's operations.

### **2. Health and Safety Policy**

#### **2.1. Introduction**

The NMI is committed to ensuring that all staff, volunteers, visitors and users of the NMI premises enjoy the maximum levels of safety. This Health and Safety policy statement is in accordance with the Health and Safety at Work etc. Act 1974. The policy aims:

- a. to provide adequate control of the health and safety risks arising from the operation of the NMI;
- b. to consult with the staff and volunteers on matters affecting their health and safety;
- c. to provide and maintain safe equipment;
- d. to provide information, instruction and supervision for employees and volunteers;
- e. to prevent accidents;
- f. to maintain a safe and healthy working environment.

The NMI management committee and trustees will review and revise this policy as necessary and at regular intervals.

## **2.2. Responsibilities**

The overall responsibility for health and safety is that of the chair of the NMI management committee. All staff, volunteers and users of the building are responsible for:

- a. co-operating with the relevant members of the management committee on health and safety matters;
- b. not interfering with anything provided to safeguard their health and safety;
- c. taking reasonable care of their own health and safety;
- d. reporting all health and safety concerns to the management committee.

## **2.3. Consultation with staff and volunteers**

The NMI will consult with staff and volunteers on any new measure which may substantially affect their health and safety whilst they are working at the NMI.

## **2.4. Safety of equipment**

The chair of the management committee will be responsible for:

- a. identifying all equipment needing maintenance;
- b. ensuring effective maintenance procedures are drawn up;
- c. ensuring that all identified maintenance is implemented.

Any problems found with equipment should be reported to the administrator immediately.

The chair of the management committee will check that new equipment meets health and safety standards before it is purchased.

## **2.5. Training and procedures**

- a. A first aid box is kept on each floor of the building;
- b. Any accidents are recorded in an accident book;
- c. Awareness of health and safety and fire and emergency evacuation procedures are delivered to staff, volunteers, students, users of the building and visitors by the following:
  - i. *Staff*: the chair of the management committee;
  - ii. *Museum custodian volunteers*: the relevant member of the management committee;
  - iii. *Students*: the tutors for each course;
  - iv. *Visitors to presentations and talks*: the chair of the management committee, or the member of the committee leading the event;
  - v. *Hirers of the building for private classes or events*: written instructions are provided and referral is made to this policy on the NMI website.

## **2.6. Emergency procedures – fire and evacuation**

- a. The chair of the management committee is responsible for ensuring the fire risk assessment is undertaken and implemented;
- b. Fire extinguishers are maintained and checked annually by Chubb;
- c. Fire exit routes are clearly labelled;
- d. Hirers of the building are provided with written instructions on the fire safety procedures and the fire and emergency escape routes. Instructions on fire procedures and the exit routes are announced at the start of all new courses and large events taking place within the building.

### **3. Equal opportunities policy**

#### **3.1 Introduction**

The NMI complies with the principles and duties imposed by the Equality Act 2010. We embed equality into our planning and the decisions and actions we take in relation to the employment of our staff and to our engagement with our volunteers and students. We value individual attributes, such as skills, knowledge and background, in our staff and volunteers. We respect these differences and seek to nurture these differences for optimal working conditions for the NMI and for the individual. We value and celebrate the diversity that exists in our staff and volunteers and we are committed to creating a working environment in which everyone has the opportunity to take full part, without discriminating on the basis of a person's age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation, or any aspect of an individual's background or heritage which is used as justification for unfair treatment. We believe the NMI will offer a better, more creative and secure place in which to work and volunteer as a result of this policy.

#### **3.2 Strategy**

The policy will be put into practice by:

- a. Recruiting, developing and retaining the most talented people as staff and volunteers, valuing the varied skills and experiences people bring to the NMI;
- b. Providing a safe and accessible working environment that values and respects the identity and culture of each person;
- c. Providing support and training to ensure that this policy is communicated, understood and acted on by all our staff and volunteers;
- d. Making sure that all our staff and volunteers understand their rights and responsibilities concerning discrimination, bullying and harassment, including third party harassment.

#### **3.3 Third party harassment**

Third party harassment takes place when a member of staff employed by us, or one of our volunteers, is harassed by someone who doesn't work for us, for example a visitor or contractor. We expect everyone who interacts with us, or who uses our services, or who attends our events or meetings to follow the principles within this Equal Opportunities Policy and to treat our staff and volunteers with respect. We do not tolerate any harassment towards our staff or volunteers. Any complaint of harassment will be promptly investigated and acted upon and may result in the harasser being barred from accessing our services or from visiting or engaging with the Institution.

#### **3.4 Implementation and monitoring of the Equal Opportunities policy**

The chair of the management committee has responsibility for the effective implementation of this policy. In order to implement this policy, we will ensure that:

- a. The policy is communicated to all staff and volunteers through induction training and the placing of the policy on the NMI's website;
- b. Trustees and the management committee will monitor the operation of this policy and agree recommendations for any changes identified;
- c. We will deal with all complaints seriously, promptly and confidentially, and in line with our Complaints Handling policy.

### **4. Volunteer Management policy**

#### **4.1. Introduction**

Volunteers play a vital role in the work of the NMI, contributing to the work of the management committee and to the practical operation of the courses, museum, library and exhibitions. Without volunteers supporting the delivery of these facilities the NMI would not be able to function as an institution. The NMI is therefore committed to using volunteers in ways that are safe, supportive and reflect the value we place upon the contribution made by such volunteers.

#### **4.2. Volunteer roles and recruitment**

Volunteers contribute to the NMI in one or more of the following roles:

- *Trustee.* A trustee of the NMI takes on the overall responsibility for the NMI as an educational and maritime-themed institution within the local community, and as a registered charity. There are four trustees, each of whom takes on the role for no longer than ten years. The trustees seek a replacement role-holder as required, following the guidance and expectations of charity trustees offered by the Charity Commission.
- *Member of the management committee.* The NMI management committee comprises of no more than twelve, and no less than nine, volunteer members. The defined roles are chair, secretary, treasurer and librarian. Other areas of responsibility such as “artefacts”, “courses” and “house and grounds” are taken on by members of the committee. New committee members are sought within the local community, selection being driven by the person’s area of expertise or interest, and their commitment to the NMI and its role within the local community.
- *Custodian and key-holder.* The NMI museum and art exhibitions are open on summer weekends and rely entirely upon a group of volunteer custodians and key-holders, who open and close the building and greet visitors, responding to questions on the artefacts and the history they represent. Custodians and key-holders are selected from volunteers and members of the “Friends of the Nottage” group. These role-holders are led by a committee member, who coordinates their duties and trains them on their roles.

### **4.3. Support for volunteers**

The NMI Health and Safety policy covers the general welfare of all volunteers. The NMI is committed to dealing with any complaints or concerns volunteers may have. Volunteers in any NMI role have the right to discuss any concerns they may have with the relevant committee member, chair of the management committee or trustee. The NMI Complaints Handling policy includes these procedures.

## **5. Complaints Handling policy**

### **5.1. Introduction**

The NMI Complaints Handling policy is mostly relevant to people outside of the Institution, such as students or members of the public, who may wish to make a formal complaint about the NMI or about one of its volunteers or members of staff. The NMI is committed to providing a valued service and working in an open and accountable way that builds trust and respect. The NMI values the opinions and views of all of our stakeholders, which may be expressed as a concern or in the form of a complaint. We encourage feedback and aim to make it easy for anyone to raise a concern or to make a complaint. This policy provides a framework for handling concerns and complaints.

### **5.2. Aims of the policy**

- a. The NMI does not require complaints to be made in any prescribed way. The NMI will respond to formal or informal complaints or concerns however they are raised - verbally, in writing or by email;
- b. The NMI aims to resolve complaints quickly, fairly and effectively;
- c. The NMI will treat all expressions of concern or complaints in confidence;
- d. All complaints will be thoroughly investigated.

### **5.3. Reporting and handling procedure**

- a. Complainants are advised by the NMI administrator, volunteer or member of staff of the procedures and guidance in this policy;
- b. In the first instance the complainant should consider communicating directly with the member of the NMI who has initiated the complaint, possibly in writing;
- c. Full details of the complaint are taken by the administrator, who then records details of the progress of the complaint, and its outcome;
- d. Complaints are referred in the first instance to the chair of the management committee, who will respond to the complainant;
- e. If the complaint is not resolved at this stage, or if the chair considers that the seriousness of the complaint requires further consultation, the complaint will be referred to the management committee for consideration;

- f. Where a complaint is against a member of staff, volunteer or trustee, they will be advised of the support available to them;
- g. Where a complainant remains unsatisfied with an outcome, they are referred to the board of trustees

## **6. Conflict of Interest policy**

All trustees, management committee members, staff and volunteers of the NMI will strive to avoid any conflict of interest between the interests of the NMI on the one hand, and personal, professional, and business interests on the other. This includes avoiding actual conflicts of interest as well as ensuring that there are no perceptions of any conflicts of interest. The purposes of this policy is therefore to protect the integrity of the NMI's decision-making process, allowing all of our stakeholders to have confidence in our integrity, and to protect the integrity and reputation of the NMI's trustees, management committee members, staff and volunteers.

Examples of conflicts of interest include:

- a. A trustee considering an investment in a fund of which he/she is professionally involved or is a beneficiary;
- b. A committee member related to a service-provider or contractor employed by the NMI, or who has business links with a service-provider or contractor;
- c. A committee member involved in another organisation that is competing for the same funding.

The NMI trustees and committee members will adhere to a process of transparency in all such matters of conflict of interest, as advised and expected of them when they are invited to contribute to the NMI in such roles.

## **7. Trustee Code of Conduct**

### **7.1. Introduction**

The trustees of the NMI are volunteers who uphold the values of the NMI, undertaking the duties defined by the Charity Commission:

- a. ensuring that the charity carries out its purpose for the public benefit;
- b. complying with the charity's governing document and with the law;
- c. acting in the charity's best interests;
- d. ensuring the charity is accountable;
- e. managing the charity's resources responsibly;
- f. acting with reasonable care and skill.

### **7.2. Selflessness**

The NMI trustees have a general duty to act in the best interests of the NMI as a whole. They should not do so to gain financial or other material benefits for themselves, their friends or any other organisation they represent.

### **7.3. Integrity**

The NMI trustees:

- a. should not place themselves under any financial or other obligation to outside individuals or organisations that might seek to influence them in the performance of their role;
- b. should, as well as avoiding actual impropriety, avoid any appearance of improper behaviour;
- c. should avoid accepting gifts and hospitality that might reasonably be thought to influence their judgement.

### **7.4. Objectivity**

In carrying out their role, including making trustee appointments, making investment decisions or transacting other business, the NMI trustees should ensure that decisions are made solely on merit.

### **7.5. Accountability**

The NMI trustees:

- a. have a duty to comply with the law on all occasions in accordance with the trust placed in them and in such a way as to preserve public confidence in the NMI;

- b. are accountable for their decisions and actions to the public, funders and service users and must submit themselves to scrutiny as appropriate to their role.

## **7.6. Openness**

The NMI trustees:

- a. should ensure that confidential material, including that about individuals, is handled with due care;
- b. should be as open as possible about their decisions and the action they take, and give reasons for their decisions and restrict access to information only when the wider interest clearly demands.

## **7.7. Honesty**

The NMI trustees:

- a. have a duty to declare any interests relating to their trustee role and to take steps to resolve any conflicts that may arise;
- b. must resolve any conflict between their private interests and their trustee duties in favour of the trustee role;
- c. must make relevant declarations of interest in their different roles both within and outside the NMI.

## **7.8. Leadership**

The NMI trustees:

- a. should promote and support the principles of leadership by example;
- b. must respect the role of staff and volunteers.

# **8. Risk Management Policy**

## **8.1. Introduction**

The NMI is subject to certain risks that affect the Institute's ability to operate and protect its assets. These include risks to staff and volunteers, liability to others, and risks to property. The NMI acknowledges that controlling these risks through an effective policy is necessary for the well-being of the Institution and everyone involved with it. The NMI trustees have the ultimate responsibility to control risks, but effective risk management requires the support and participation of all staff and volunteers, including the management committee, all of whom are responsible for reporting any unsafe conditions and who are encouraged to suggest ways in which the NMI can operate more safely. The NMI is committed to the careful consideration of risk management and to taking appropriate action to address and improve it.

## **8.2. Risk Management Statement**

- a. Effective risk management is important to the NMI to help the Institute to operate successfully and safely and to ensure its long-term security;
- b. The NMI is confident that it has identified the major risks that may threaten its long-term security and that it has in place an efficient process for identifying and managing risks;
- c. The NMI acknowledges the role of the trustees in identifying and assessing risks to the overall security of the NMI;

## **8.3. Types of risk identified**

### **8.3.a. Financial risk**

The NMI offers a range of courses, with competitive fees, to varying numbers of students on evening courses and one-day classes, nearly all run over the winter. Its museum and exhibitions are open on summer weekends and are free. It owns its premises, together with an adjoining cottage, which is rented out. Its financial assets are invested and under the control of the board of trustees, whose responsibility it is to identify, assess and manage financial risk to the NMI. The NMI employs a small number of occasional self-employed tutors for teaching its classes, one part-time administrator and one part-time warden/caretaker. Income to the NMI is from the following sources:

- i. Investments from financial assets;

- ii. Fee income from courses;
- iii. Rental income from the adjoining cottage;
- iv. Rental income from artists hiring the premises for summer exhibitions;
- v. Rental income from private classes;
- vi. Rental income from private events held on the premises;
- vii. Sale of items;
- viii. Income from the Film Club;
- ix. Annual subscriptions from "Friends of the Nottage";
- x. Donations including grants and funding from individuals, local government and other charitable sources.

Potential risk	Potential impact	Steps taken to mitigate risk
Fluctuations in investments.	Reduction in reserved assets. Reduction in generated interest, used to pay for unexpected large expenses.	The board of trustees have distributed the financial assets in a number of secure investments.
Drop in student numbers and course fee income.	Overall income falls below running costs. Some courses may have to close.	The committee advertises the courses widely. The committee course supervisor reviews the syllabus to identify new courses that fill a market gap.
Drop in cottage rental income.	Overall income falls below running costs.	The rent is set by the committee to align with the market. The property is kept in good order.
Drop in premises rental income.	Overall income falls below running costs.	The committee advertises the facility, ensuring that the hire fees are competitive.
Competition from other providers of courses.	Overall income falls below running costs.	The committee course supervisor ensures the course fees are attractive in comparison to competitors and promotes that feature. The committee maintains the quality of the courses by using qualified tutors.
Drop in the number of "Friends" and their subscriptions.	Overall income falls below running costs.	The committee maintains efforts to recruit new Friends from the local community.

### 8.3.b. Reputational risk

The NMI is a long-established part of Wivenhoe's Quayside and its maritime history. It has successfully taught nautical skills to generations of local sailors, fishermen, boatbuilders and yachtsmen, adapting its courses and activities to align with changes in demand for those skills and the need to generate enough income to survive. It is this reputation for quality of provision and longevity that the NMI seeks to maintain. The reputation of the NMI is the responsibility of the trustees and the management committee, who ensure that the respective duties they undertake are carried out in a way that supports the long-term reputation of the NMI as a valued and respected charitable institution within its community.

Potential risk	Potential impact	Steps taken to mitigate risk
Student dissatisfaction.	Reduction in student numbers.	The NMI tutors are fully qualified and assessed by the course supervisor, with feedback given to maintain a high standard of delivery.
Visitor dissatisfaction.	Reduction in reputation. Reduction in donations. Threat to recruitment of new Friends.	The committee curators ensure that the quality of the museum, library and exhibitions is high. The committee maintains good facilities for visitor use.



Non-compliance with the expectations of the Charity Commission.	Threat to charitable status.	The trustees ensure that audited accounts and statements comply with the expectations of the Charity Commission.
Accidents on the premises during a class or event.	Claims made against the NMI for damages. Reduction in future income from hiring out the premises.	The NMI Health and Safety policy offers guidance to minimise these risks. Private class tutors and event hirers are advised of this policy.

### 8.3.c. Health and Safety risk

The NMI's Health and Safety policy is in place to minimise the threat to the safety of its staff, volunteers, users and visitors. The main areas of risk to health and safety lie in:

- i. fire risk;
- ii. when the building is hired out for private classes and events;
- iii. when the boatbuilding class takes place, or when students are working on their boats.

Overall responsibility for health and safety lies with the chair of the management committee. Risk to health and safety at the course level or event level lies with the course tutor or the person responsible for organising the event; this is indicated in the table below:

Potential risk	Potential impact	Steps taken to mitigate risk
Fire.	Loss of assets. Closure of the NMI.	The committee employs a reputable company to service the fire equipment and advise on fire safety. Annual PAT test and emergency light test.
Accidents or fire risk at private events.	Claims made against the NMI for damages. Loss of assets. Closure of the NMI.	All users of the building are made aware of fire risk and the fire and emergency escape routes. All students and guests are advised of the fire and emergency escape routes before events and classes.
Accidents during boatbuilding classes.	Claims made against the NMI for damages. Reputational threat.	Students follow strict rules on the use of certain tools. The qualified course tutors give instructions on safe behaviour when working.
Accidents when work is being carried out on boats or during the volunteer maintenance of the building.	Claims against the NMI for damages. Reputational risk.	The safe operation of tools and equipment is encouraged for everyone working within or on the fabric of the building. The NMI Health and Safety policy is actively promoted by the committee.

### 8.3.d. Staffing and volunteer numbers

The NMI functions primarily with the contributions of time and energy from its many volunteers, together with the work carried out by its paid tutors, administrator and warden/caretaker. Responsibility for maintaining sufficient numbers of these role-holders lies mainly with the management committee, led by the chair.

Potential risk	Potential impact	Steps taken to mitigate risk
Lack of tutors for classes.	Closure of courses.	The committee course supervisor maintains links to local tutors to allow the prompt filling of a vacant post.
Loss of one or more trustees.	Threat to the oversight of the NMI operations.	The board of trustees review possible future replacements of trustees when their tenure is over.

Loss of management committee members.	Threat to the organisational activities of the committee and the operation of the NMI.	Replacement committee members are kept in view to fill any gaps in the committee as they arise.
Shortage of volunteers for museum opening.	Inability to open the museum, library and exhibitions for their advertised hours.	The committee encourages volunteer custodians at events and via the NMI newsletter and other local publications.
Reduction in Friends numbers.	Drop in subscription income. Drop in the pool of volunteers for manning the museum and exhibitions.	The committee encourages members of the local community to become Friends at events and via the NMI newsletter and other local publications.

### 8.3.e. Competition from other teaching centres

There are several other institutions offering RYA courses, and many local sailing clubs now deliver their own classes in these subjects. Competition for students therefore threatens the NMI's student numbers and fee income. The committee member responsible for the NMI courses is responsible for reviewing course enrolment numbers and the NMI syllabus.

Potential risk	Potential impact	Steps taken to mitigate risk
Fall in student numbers on RYA courses.	Course fee income falls. Some courses may have to close.	The committee reviews types of courses which may attract participants. The committee advertises the courses widely. The committee course supervisor reviews the market to ensure that the course fees are attractive.
Fall in student numbers on other NMI courses delivered on the premises.	Reduction in room hiring-out income.	The committee advertises the building as being available for private classes and ensures that the hiring fee remains competitive.

## 9. GDPR Policy

### 9.1 Introduction

The NMI may collect, use and store personal data from its staff, volunteers, visitors and students. THE NMI reserves the right to amend this Data Processing Policy from time to time without prior notice. The NMI will make every effort to comply with the General Data Protection Regulations (GDPR) when dealing with any personal data.

### 9.2. Collection and use of information

The NMI may collect some or all of the following information from its staff, volunteers, visitors and students:

Type of information	Purpose	Legal basis of processing
Name, address, telephone numbers, e-mail address(es).	To assist communication and the management of the NMI.	For the purposes of the legitimate operation of the NMI.
Photographs of events, including people present.	For possible use in press articles and newsletters.	For the purpose of informing readers of the NMI activities and promoting its function within the community.
Instructor's name, address, email addresses, phone numbers and relevant	Managing instruction at the NMI.	For the purposes of our legitimate interests in ensuring that we can contact those offering instruction and provide details of instructors to members.

qualifications and/or experience.		
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### 9.3. Protection of personal data

#### 9.3.1. How we protect your personal data

- a. We will not transfer your personal data outside the EEA without your consent.
- b. We have implemented generally accepted standards of technology and operational security in order to protect personal data from loss, misuse, or unauthorised alteration or destruction. We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk.
- c. Please note however that where you are transmitting information to us over the internet this can never be guaranteed to be 100% secure.
- d. For any payments which we take from you online we will use a recognised online secure payment system.
- e. We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk.

#### 9.3.2. Who else has access to the information you provide us?

- a. We will never sell your personal data. We will not share your personal data with any third parties without your prior consent (which you are free to withhold) except where required to do so by law or as set out in the table above or paragraph 9.3.2.b below.
- b. We may pass your personal data to third parties who are service providers, agents and subcontractors to us for the purposes of completing tasks and providing services to you on our behalf (e.g. to print newsletters and send you mailings). However, we disclose only the personal data that is necessary for the third party to deliver the service and we have an agreement in place that requires them to keep your information secure and not to use it for their own purposes.

#### 9.3.3. How long do we keep your information?

- a. We will hold your personal data on our systems for as long as you are a student on a NMI course, member of the Friends of the Nottage or hirer of the NMI, and for a period of time thereafter. We will review your personal data every year to establish whether we are still entitled to process it. If we decide that we are not entitled to do so, we will stop processing your personal data, except that we will retain your personal data in an archived form in order to be able to comply with future legal obligations e.g. compliance with tax requirements and exemptions, and the establishment exercise or defence of legal claims.
- b. We securely destroy all financial information once we have used it and no longer need it.

#### 9.3.4. Your rights

- a. You have rights under the GDPR:
  1. to access your personal data;
  2. to be provided with information about how your personal data is processed;
  3. to have your personal data corrected;
  4. to have your personal data erased in certain circumstances;
  5. to object to or restrict how your personal data is processed;
  6. to have your personal data transferred to yourself or to another business in certain circumstances.
- b. You have the right to take any complaints about how we process your personal data to the Information Commissioner: <https://ico.org.uk/concerns/> By post to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

For more details, please address any questions, comments and requests regarding our data processing practices to: [admin@nottage.org.uk](mailto:admin@nottage.org.uk) By post to: The Nottage Maritime Institute, The Quay, Wivenhoe, Essex CO7 9BX

## **10. Safeguarding Policy**

The NMI safeguarding policy applies to persons under the age of 18 who may be students on a course or who may attend any event at the NMI, either organised by the NMI or by a hirer of the premises.

### **10.1. Courses**

Any person under the age of 18 enrolling as a student on an NMI course must be accompanied by an adult who will be responsible for their safekeeping.

### **10.2. Hire of the NMI**

Any person under the age of 18 who is attending an event at the NMI that has been organised and run by a person or group who has hired the NMI premises for that event must be accompanied by an adult who will be responsible for their safekeeping.

## **11. Cancellation and refunds**

### **11.1.1. Courses**

- a. If a student wishes to cancel their attendance on an NMI course, they are requested to do so as soon as possible. A full refund of the course fee is available.
- b. If a student wishes to drop out of a course that has started, a 50% refund of the fee is available if the student stops attending after the second class. When personal circumstances require a student to stop attending a course, the student can defer their attendance to the next course for no additional fee.
- c. Very occasionally an NMI course may be cancelled due to a very low enrolment number, risking a poor educational experience for the students. Cancellation of a course in these circumstances will be announced at least two weeks before the start date and a full refund will be given.

### **11.1.2. Room Hire**

If a hirer wishes to cancel a room booking before the booked event, a full hire fee and deposit refund is available.

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