

Edinburgh Nightline

Confidentiality and Privacy Policy

Last updated: January 2022

1. Introduction

- 1.1. This policy has been developed in accordance with the guidance set out by the Nightline Association.
- 1.2. This policy is in line with the General Data Protection Regulation (GDPR) which came into effect on the 25th May 2018 and replaced the Data Protection Act 1998.
- 1.3. Edinburgh Nightline endeavours to keep all data from both volunteers and callers safe and secure.
- 1.4. Edinburgh Nightline ensures that any data that is held about callers is anonymised and only accessible by those who need to do so.
 - 1.4.1. Edinburgh Nightline will only pass on this information to third parties in specific situations, all of which are outlined in this policy below.
- 1.5. In future, the Edinburgh Nightline Committee may amend this policy, should such amendments be required to better meet these aims.

2. Aims of the Policy

- 2.1. This policy covers:
 - 2.1.1. Cover how this information is stored by Edinburgh Nightline;
 - 2.1.2. Specify who has access to this information;
 - 2.1.3. When this information is shared and with whom.

3. Definitions

- 3.1. In this policy “calls” and “callers” may refer to all uses of Edinburgh Nightline’s student support and information service whether in spoken or written communication.
- 3.2. All of Edinburgh Nightline’s policies are in accordance with the Good Practice Guidelines (GPG v3, 2019), which constitutes accreditation criteria for the Nightline Association. The full, current guidelines can be obtained from the Nightline Association GPG Team (gpg@nightline.ac.uk)

4. Collecting Data

- 4.1. Edinburgh Nightline collects data from both its volunteers and its callers in an anonymised format.
- 4.2. Edinburgh Nightline only collects the data needed for the operation of the service.
 - 4.2.1. This data helps Edinburgh Nightline to identify areas of demand, assess our current service, and improve upon aspects which are highlighted from the data.

4.3. Data from callers

- 4.3.1. All calls are documented using a standardised system.
 - 4.3.1.1. The data collected about calls is anonymised and callers cannot be identified.
 - 4.3.1.2. The data that is collected includes the time and duration of the call and the purpose of the call.
 - 4.3.1.3. This data is stored in a secure, password-protected system,
 - 4.3.1.4. Only the Coordinators and Welfare Coordinators have access to this data.
- 4.3.2. In exceptional circumstances, additional identifying information may be collected.
 - 4.3.2.1. These circumstances include terrorist threats, concerns relating to safeguarding, or by the caller's request in the case of imminent risk of death.
 - 4.3.2.2. This additional data is passed to the relevant authorities, such as the emergency services, and then destroyed immediately.
 - 4.3.2.2.1. Edinburgh Nightline does not store any identifying information about callers.
- 4.3.3. Edinburgh Nightline operates a phone call service.
 - 4.3.3.1. Edinburgh Nightline does not have access to callers' phone numbers.
- 4.3.4. Edinburgh Nightline operates an Instant Messaging service.
 - 4.3.4.1. Anonymous personal data, such as IP addresses, may be stored in secure databases.
 - 4.3.4.2. Edinburgh Nightline volunteers, including the Coordinators and all Committee members, do not have access to this information.
- 4.3.5. Edinburgh Nightline does not collect quotes from callers.
- 4.3.6. Edinburgh Nightline does not record calls.
- 4.3.7. All calls are monitored by two Edinburgh Nightline volunteers.

4.4. Data from website visitors

- 4.4.1. Anonymised data from visitors to the Edinburgh Nightline website will be collected.
 - 4.4.1.1. This data includes visitors' interaction with the website and cookies to track which pages are visited.
 - 4.4.1.1.1. This data helps Edinburgh Nightline to analyse how the website is being used and how the website can be improved.
- 4.4.2. Visitors can choose to opt-out of cookies by changing the setting of the internet browser.

5. Protecting Data

- 5.1. Data is only accessed when necessary.
- 5.2. Edinburgh Nightline does not sell any data.
- 5.3. There are specific situations when callers' information may be shared with external organisations; these situations are outlined below.
- 5.4. All of Edinburgh Nightline's data is stored on Google Drive.
 - 5.4.1. This is secured and supported by Google and has been security assessed by independent organisations including the National Cyber Security Centre.
- 5.5. Edinburgh Nightline ensures that this data on Google Drive is only accessible by those who need to access it by ensuring files are password protected.

6. Using Data

- 6.1. Using the data that is collected allows Edinburgh Nightline to improve the service and ensure that both callers and volunteers receive the best information and support that they can.
- 6.2. All data is anonymised and is used for the following purposes:

6.3. Data from callers

- 6.3.1. This data is used to analyse the demand on the Edinburgh Nightline service and any specific needs which may not be met.
- 6.3.2. This data is only accessible by the Coordinators, Welfare Coordinators, and IT Coordinator.
- 6.3.3. This data may be used in a visual format and shown to other volunteers and stakeholders to highlight the progress of Edinburgh Nightline.
 - 6.3.3.1. When Edinburgh Nightline presents the data to volunteers and stakeholders, the data will not be identifiable.

6.4. Sharing Data

6.4.1. All data collected will be shared amongst the Committee members on a need-to-know basis.

6.4.1.1. This data will be anonymised and non-identifiable.

6.4.2. On occasion, this data may also be shared with volunteers of the service if it is deemed helpful.

6.4.2.1. When this occurs, the data will remain anonymous and non-identifiable as highlighted above.

6.4.3. There are only four specific situations when information collected from our callers' will be shared with external organisations. These are:

6.4.3.1. Terrorism

6.4.3.1.1. The Prevention of Terrorism Act 2000 places a legal obligation on all UK helplines to disclose any information related to a terrorist threat.

6.4.3.1.2. Any calls relating to a threat or information of a terrorism act will be forwarded on to the police or the Anti-Terrorism Hotline.

6.4.3.2. Safeguarding

6.4.3.2.1. Any calls where there is a threat to either a child or a vulnerable adult will be forwarded on to the police or the NSPCC Child Protection Helpline.

6.4.3.2.2. Edinburgh Nightline is obligated to report calls which disclose information relating to the risk of harm to children.

6.4.3.2.2.1. Edinburgh Nightline will breach confidentiality when presented with evidence of risk to a child.

6.4.3.2.2.1.1. Edinburgh Nightline does not need the caller's consent to pass on information related to safeguarding children.

6.4.3.3. Suicide/Imminent Risk of Death

6.4.3.3.1. Any calls where there is a serious risk of harm to the caller may, with the caller's permission, be forwarded to the emergency services.

6.4.3.3.1.1. Edinburgh Nightline volunteers will not alert the emergency services without the caller's explicit consent.

6.4.3.4. Persistent Abusive Callers

- 6.4.3.4.1. It is in the legitimate interests of Nightline to protect against abuses of the service to protect our volunteer safety, wellbeing, and ensure that the service remains available for genuine callers.
- 6.4.3.4.2. Where a caller acts in a persistently abusive or threatening manner towards our volunteers, Nightline may disclose personal data of that caller to appropriate third parties. Such parties include the police, other Nightlines, Nightline Association, and other organisations with responsibility for our volunteers' welfare such as our affiliated Universities and Students' Unions. This disclosure may include personal data such as name and phone number.

6.4.3.5. Court Order

- 6.4.3.5.1. Information may be disclosed to the police if requested under a court order by a judge.

7. Registration with the Information Commissioner's Office (ICO)

- 7.1. The Nightline Association published guidance on the 18th August 2020 stating that Nightline services do not need to register with the Information Commissioner's Office independently as long as the Nightline's governing body is registered.
 - 7.1.1. All of Edinburgh Nightline's stakeholders are registered with the ICO.
 - 7.1.2. The Nightline Association is registered with the ICO.

If you have any queries, please contact Edinburgh Nightline at coordinator@ednightline.com.