# Oxford Nightline - Privacy Notice

At Oxford Nightline, we are committed to protecting your privacy and the personal information that we hold. The purpose of this statement is to be clear and transparent about how Oxford Nightline uses personal information. This Privacy Notice applies to our donors, our volunteers as well as to the users of our service. This Privacy Notice was last updated January 2024.

If you have any queries on this notice, contact us by email at <a href="mailto:coords@oxfordnightline.org">coords@oxfordnightline.org</a>

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# **How Oxford Nightline uses personal information**

## When you use our service

Oxford Nightline supports people in distress through its support services. Our service is available by telephone and Instant Messaging (IM).

Our helplines are designed so that Oxford Nightline volunteers can't see your contact details, however, some information that could be used to identify you is collected and can be accessed by some Oxford Nightline volunteers. This includes the time and date of your contact, and the concerns you have discussed with us. This may also include personal identifiers disclosed voluntarily during the course of receiving support, such as a name or contact information.

When you contact us via our telephone service, it is important to note that our number is hosted through the University of Oxford's telecommunications system, known as Chorus. As part of this system's operation, the Chorus IT team has the capability to view phone numbers of incoming calls. However, this access is strictly controlled and is not used for monitoring purposes by Oxford Nightline. We do not collect, store, or process phone numbers of our callers. No information is transferred or received that links phone numbers to caller identities. Any access to phone numbers by the Chorus IT team is governed by the University of Oxford's data protection policies.

When you contact us via IM, IP addresses and messages are stored in the databases of our anonymous instant messaging and email software, which is provided to Nightline by our umbrella organisation, the Nightline Association.

Volunteers at Nightline cannot access any personal data, and the Nightline Association does not access the databases (unless requested by Oxford Nightline as outlined below), except in exceptional circumstances where system administrators must undertake system maintenance. All IM logs, including content and IP addresses, are deleted within 24 hours of the IM unless one of the Legally Mandated breaches of confidentiality occurs, in which case all logs will be deleted as soon as is reasonably practical.

We use this information for the following purposes:

- **To provide you with support:** we use your contact information to connect you with one of our volunteers and provide you with support.
- To protect our volunteers from harm: Where a caller acts in an abusive or threatening manner towards our volunteers, we may disclose personal data of that caller to appropriate third parties. These parties include the police, other Nightlines, the Nightline Association and other authorities with responsibility for the welfare of our volunteers such as the University of Oxford. This is done in order to serve our legitimate interest to protect our volunteers from harm and to keep the service available for genuine users.

In certain circumstances, we may be required to use or share your information for compliance with a legal obligation or to protect your vital interests:

 Terrorism: Any information relating to an act or potential act of terrorism will be reported to the police in order to comply with our legal obligation under the Terrorism Act 2000

- Safeguarding: Any calls where there is a threat to either a child or an adult at risk
  may require us to make a report to the police or to the local authority. This is done to
  meet our responsibilities to protect vulnerable individuals. For more information, see
  our <u>Safeguarding Policy</u>.
- **Court Order:** Personal data may be disclosed to the police if requested under a court order. This is in order to meet our legal obligation to cooperate.

### When you train and become a volunteer with us

When you express interest in training to become an Oxford Nightline volunteer, we collect personal identifiers such as your name, contact information, and any other information you provide in your application. This includes your educational background, your interests, and your motivations for volunteering. We also collect sensitive personal data or special category data, specifically unspent criminal convictions. The collection and processing of this data are carried out with your explicit consent and in accordance with our legal obligations.

We use information about potential trainees, trainees and volunteers for the following purposes:

- To answer your questions: If you contact us through our website, by phone, or by email in relation to volunteering you may be asked to give your personal details in order for us to get in touch. Where appropriate, we may share your information with your trainer to allow them to get in touch to discuss training.
- **To process your application:** The information you provide on your application will be used to process your application and make a decision about whether you will be accepted on to Oxford Nightline training.
- To monitor Equity, Diversity and Inclusion amongst applicants and volunteers: One of our goals is that our volunteer teams are representative of the communities that we live and work in. In order to monitor how well we are progressing against this goal, you may be asked some questions relating to sensitive categories of personal information including your gender identity, ethnicity, sexual orientation and disability status. We will seek your explicit consent to use this data for our purposes, which you can amend at any time by contacting us using the contact details at the top of this notice.
- To add you to our mailing lists: At the application stage we may also ask your permission to add you to our mailing list. From time to time we may send you communications about our work and how you can help us, for example information about our campaigns, volunteering, fundraising activities and how you can donate to us. We will only send you emails if you have specifically agreed to us doing so. You can change your marketing preferences anytime by contacting us using the contact details at the top of this notice.
- To check for relevant criminal history: During the application process, we collect special category data, specifically around unspent criminal convictions. We also collect this data from volunteers should they be subject to an unspent criminal conviction during the course of their volunteering. In the event that an applicant is not accepted for training or is not accepted as a volunteer after completing training, criminal offence data relating to the applicant will be deleted at the earliest possibility. In the event that an applicant is accepted as a volunteer, or a volunteer discloses an unspent criminal convictions gained during their time as a volunteer, criminal offence

data relating to volunteers will be retained for the duration of their time as a volunteer and deleted one year after their period of volunteering is completed. In the event that an unspent conviction becomes spent, the individual is advised to inform the Coordinators at the earliest possibility in order for outdated records of previously unspent convictions to be removed.

• **To monitor training:** We may collect and process personal data relating to your experiences, feedback, and any incidents that occur during your training. Our aim is to create a safe and supportive environment for all our potential volunteers.

Once the training procedure is over, we retain the information of unselected volunteers for one year. The information is not shared with anyone outside of Nightline before, during or after the application period.

If you are successfully selected as a volunteer, throughout the course of your onboarding and volunteering journey we may collect and store additional information about you for the following purposes:

- To maintain our internal volunteer system: Once you become a volunteer, we maintain records of your training, the number of shifts you complete, and any ongoing education you participate in. We also collect and store any communications related to your volunteer role, including scheduling and any specific needs or preferences you have communicated to us. This data helps us to ensure the quality and consistency of our services and supports your development as a volunteer.
- To monitor volunteer continuous training: When releasing mandatory continuous
  training we believe it is within our legitimate interest to monitor the completion of that
  training and take action such as removing volunteers from shifts where this is not
  complete. We may use data from different internal sources to identify when someone
  who is actively volunteering has not undertaken continuous training.
- To investigate caller complaints: Each contact received by volunteers is stored in our call log. The data may be used to support investigation of specific incidents and complaints, for example, it may be used to identify which volunteer handed a call that gives rise to a complaint from a caller.
- To conduct investigations into volunteer conduct: There may be circumstances where we are required to investigate your conduct as a result of a complaint or allegation made against you. This will be dealt with under our Dismissal and Disciplinary Policy. As part of an investigation we may collect information from you and others involved for the purpose of assisting with our investigation of the matter and retain this for an appropriate period in order to evidence appropriate internal investigations into serious matters in line with our obligations to safeguard our callers and volunteers.
- To make referrals to relevant bodies following investigations: In some cases it
  may be necessary for reasons of substantial public interest and under our regulatory
  obligations to share information relating to serious misconduct with third parties, the
  disclosure and barring service or professional associations. Where there is a
  requirement to do this without your consent, we will always ensure that we have
  undertaken the appropriate assessments to ensure that this sharing is lawful.
- **To process expenses:** If you are eligible to reclaim expenses associated with your role, we will process information about any expenditure including amount and type of

expense, as well as your name and bank account details, in order to determine whether your expenses should be refunded and to make any resultant payment to you.

 To maintain our alumni network: Oxford Nightline maintains an alumni network to stay connected with former volunteers. Upon opting into this network, we collect personal data such as your name, contact information, and any updates you wish to share with us. We use this data to send updates, newsletters, or invitations to events and to foster a continuing relationship with our community.

We keep all applicant data for one year in the event of an unsuccessful application, and until one year after graduation as a student if you become a listening volunteer. We consider that it is in our legitimate interests to process your personal data in connection with your volunteering journey with us as described above. Where other legal basis apply we will detail these in our privacy statement. For the alumni network and communications, you have the right to opt out at any time. Upon opting out, your personal data will be removed from our alumni records and securely deleted or anonymised.

### When you support or donate to us

When you donate to Oxford Nightline, we ask you to provide certain information so that we can process your donation (including setting up a direct debit where you choose to do so). Information we may collect includes your name, email address, postal address, telephone number, bank details, taxpayer status, date of birth, history of previous donations, donation amounts, and any preferences or instructions you provide about your contributions.

We use supporter information for the following purposes:

- **To process your donation:** We work with payment processors who process your payment on our behalf. Our payment service providers use international recognized encryption standards and security methods to keep your data safe.
- To manage our financial records: In compliance with financial regulations and transparency obligations, we maintain records of donations and financial support. This includes personal data necessary for processing donations, claiming Gift Aid, and maintaining transparent and auditable financial records.
- To respond to requests, queries and complaints: If you contact us through our website, phone, post or email we may use the information we hold on you to help us to investigate and respond to your query.
- To add you to our mailing lists: From time to time we may send you
  communications about our work and how you can help us, for example information
  about our campaigns, volunteering, fundraising activities and how you can donate to
  us. We will only send you emails if you have specifically agreed to us doing so. You
  can change your marketing preferences anytime by contacting us using the contact
  details at the top of this notice.
- To send you surveys: From time to time we send our supporters surveys to help us
  get to know our audiences better and understand how we can improve our
  communications.

If you have donated to Oxford Nightline via an online fundraising platform, they will pass your information on to us to allow us to record and process your donation. We will contact you to confirm that we have received your donation and to see whether you would like to keep in

touch in the future. Make sure you read the fundraising platform's own privacy policy, as that will tell you how they use your information for their own purposes.

## When you take part in an Oxford Nightline event or campaign

When you support us by signing up to take part in an Oxford Nightline event, depending on the event, we may also collect information such as your age, gender identity, social media handle, next of kin information, any accessibility needs, and preferences you indicate related to the event.

We use supporter information for the following purposes:

- To respond to requests, queries and complaints: If you contact us through our website, phone, post or email we may use the information we hold on you to help us to investigate and respond to your query.
- **To facilitate event participation:** Where you have signed up to an event we will use your information to provide you with supporting information and facilitate your participation.
- To create promotional materials: We may collect personal data for the purpose of creating promotional materials. This includes photographs, testimonials, or other content you agree to provide. We ensure that all such data is collected and used with your explicit consent and in line with our commitment to privacy and confidentiality.
- To add you to our mailing lists: From time to time we may send you
  communications about our work and how you can help us, for example information
  about our campaigns, volunteering, fundraising activities and how you can donate to
  us. We will only send you emails if you have specifically agreed to us doing so. You
  can change your marketing preferences anytime by contacting us using the contact
  details at the top of this notice.
- **To send you surveys:** From time to time we send our supporters surveys to help us get to know our audiences better and understand how we can improve our communications.

#### When you take Publicity, Fundraising and Outreach action with us

If you sign up to be a Publicity, Fundraising and Outreach (PFO) volunteer with us, we will add you to our database of PFO volunteers on Facebook and you will be sent information about opportunities to get involved with Nightline work through campaigning, volunteering and donating.

We rely on your consent to process your information as a PFO volunteer and to send you marketing. You can change your marketing preferences in relation to campaigns at any time by using the contact details at the start of this Notice..

All data gathered from you as a Publicity, Fundraising and Outreach volunteer will be deleted securely one year after your last communication with us.

#### When you use our online resources or visit our website

Our website may contain links to the websites of other organisations that we believe may be of interest. We are not responsible for the content of these websites, and we recommend that you read the privacy policy for the relevant organisation before sharing any personal or financial information.

### When you interact with us on social media

We operate accounts and groups across various social media platforms (Facebook, Instagram, etc.) in order to increase awareness of our services and events and engage in conversation with our supporters. We do not provide our emotional support services via any of these platforms.

If you share personal information on our social media posts, your information will be publicly available. Such information can be viewed online and collected by third parties. We recommend that you avoid sharing information that can be used to identify you (such as your age, email address or location) and always check the privacy policy of the platform you are using to ensure you are happy with how they may use your information. We moderate public comments on our social media profiles and we may delete, hide or block content or users in order to keep our online communities safer.

## When you see or interact with an Oxford Nightline ad online

Oxford Nightline may choose to use sponsored advertising on our social media platforms, such as Facebook or Instagram. In this case cookies enable the advertiser to offer customised suggestions to you and to understand the information we receive about you, including information about your use of other websites and apps, whether or not you are registered or logged in.

To show adverts that are relevant to you, the advertiser uses information about what you do on social media and on third-party sites and apps you use. For example, you might see ads based on the people you follow and things you like on Instagram, your information and interests on Facebook, and the websites and apps you visit. This process is managed entirely within the platform and we do not receive any information about you as a result, unless you interact with an ad and provide us with your information directly, for example, if you fill out a training form from us.

We may track overall numbers of interactions with our adverts so that we know how many people have clicked on or viewed an advert. This allows us to measure the effectiveness of our campaigns.

To know more about the information collected by Facebook, Instagram, or other Meta services, please check the following link: <a href="https://www.facebook.com/about/privacy">https://www.facebook.com/about/privacy</a>.

For more information about how targeted advertising works, you can visit the Network Advertising Initiative's ("NAI") educational page at:

http://www.networkadvertising.org/understanding-online-advertising/how-does-it-work.

You can opt out of targeted advertising by using the links below:

- Facebook: <a href="https://www.facebook.com/settings/?tab=ads">https://www.facebook.com/settings/?tab=ads</a>
- Google: <a href="https://www.google.com/settings/ads/anonymous">https://www.google.com/settings/ads/anonymous</a>
- Bing:
   <a href="https://advertise.bingads.microsoft.com/en-us/resources/policies/personalized-ad-s-">https://advertise.bingads.microsoft.com/en-us/resources/policies/personalized-ad-s-</a>
   <a href="mailto:sep-ad-se

Additionally, you can opt out of some of these services by visiting the Digital Advertising Alliance's opt-out portal at: http://optout.aboutads.info

# How we keep your information safe

## **Security measures**

We store most of our data on Google Workspace (i.e. Gmail, Google Drive etc). It is secured and supported by Google and has been security assessed by independent organisations (including the National Cyber Security Centre:

https://www.ncsc.gov.uk/guidance/g-suite-security-review). We store some personal data on other systems too. For every system we use, we check that it complies with privacy laws and has good privacy and security practices.

We use Three Rings for internal volunteer management], which includes: our volunteer rota; volunteer inactivity information; volunteer email addresses and phone numbers; dates of (additional) training undertaken; and preferred pronouns provided by volunteers. This data is stored for one year after ceasing to be a volunteer. For further details on the data stored on Three Rings, see: <a href="https://www.threerings.org.uk/privacy-policy/">https://www.threerings.org.uk/privacy-policy/</a>

Although we do our best to keep your information safe, the transmission of information over the internet is never completely secure, so please bear this in mind when you share information with us via our website.

#### **Data sharing**

We will never sell your personal information.

Where we work with or share your personal information with another organisation we ensure that these relationships are regulated through appropriate contractual agreements. Where possible and appropriate we will maintain control of data shared with third parties and ensure that processing only takes place on our instruction and in line with our purposes.

From time to time, we may also need, or be required, to share your information with law enforcement, public authorities, regulators and/or our professional advisers. We will only do so where we have a clear lawful basis for doing so, as detailed throughout this privacy statement.

#### **Data retention**

We only keep your personal information for as long as required, depending on what it was collected for, and in accordance with legal requirements.

Most information will be kept until one year after ceasing to be a volunteer, but we would inform you if this is not the case with any particular data. If you have told us that you don't want to be contacted by Oxford Nightline, we will keep your details on a 'suppression' list to help ensure that we do not continue to contact you.

# Your rights

#### The right to be informed

You have the right to be informed about the collection and use of your personal information. We aim to satisfy this right through the provision of this privacy statement. If you have any

questions about how we collect and use your personal information, you can contact us using the contact details at the top of this notice.

## The right to access

You have the right to access and receive a copy of the personal information that we hold about you. This is commonly referred to as a subject access request. You can exercise this right by contacting us using the contact details at the top of this notice.

Please note that if we are unable to verify your identity, for example if you contact the service anonymously or use a different name to do so, it may not be possible to provide you with the information requested.

#### The right to rectification

You have the right to have inaccurate personal information rectified or completed if it is incomplete. You can exercise this right by contacting us using the contact details at the top of this notice. Some categories of information may be exempt from this right.

## The right to erasure

You have the right to request that we delete personal information we hold about you. This is also known as the 'right to be forgotten'. This right may not apply where we still require the data for the purposes for which it was collected, where an overriding legitimate interest or other exemption applies. Erasure requests are assessed on a case-by-case basis. To request this, contact us using the contact details at the top of this policy.

## The right to restrict processing

You have the right to request the restriction or suppression of your personal information. This is not an absolute right and only applies in certain circumstances. These requests will be assessed on a case-by-case basis. When processing is restricted, we can still store your information, but may not use it further. We keep lists of people who have asked for further use of their information to be 'blocked' to make sure the restriction is respected in future. You can exercise this right by contacting us using the contact details at the top of this notice.

## The right to data portability

You have the right to request for us to provide your personal data in a structured, commonly used and machine readable format. You can also request that we transmit this data to another controller. This only applies to personal data you have provided to us. You can exercise this right by contacting us using the contact details at the top of this notice.

## The right to object

You have the right to object to the processing of your personal data in certain circumstances. To request this, contact us using the contact details at the top of this policy. In order to help us process your request, please detail which processing you would like to object to.

## Making a complaint

If you require further information about the way your personal data will be used, or if you are unhappy with the way we have handled your personal data and wish to contact us please submit your concerns by using the contact details at the top of this notice.

You also have the right to lodge a complaint to the UK Data Protection Regulator (the "ICO") about how we have used your personal data. To contact the ICO please use the following details:

Telephone: 0303 123 1113

Website: https://ico.org.uk/your-data-matters/raising-concerns/