

LONDON NIGHTLINE DATA PROTECTION POLICY

Version control:

<i>Policy last reviewed:</i>	<i>August 2025</i>
<i>Summary of changes:</i>	<i>August 2025: Removal of Skype, confirmation that email addresses are not withheld, addition of monitoring questions in the volunteer application form June 2025: Procedure added in case of a potential data breach</i>
<i>Next review date:</i>	<i>August 2026</i>

Privacy is at the heart of our work at London Nightline. We are committed to protecting the data of our service users (callers), volunteers, supporters and website users. The purpose of this policy is to provide information about how we collect, use, and disclose of personal data when you use our service, and to do so in a clear and transparent manner.

The type of personal information we collect

We currently collect and process the following information:

Service users

Nightline is an anonymous listening service. We do not require service users contacting Nightline to disclose any identifiable information (such as name, age, email address, university attended) in order to access the Nightline service.

Callers' phone numbers are not accessible to helpline volunteers. If a service user calls Nightline, their phone number comes up as withheld. If a service user instant messages Nightline, their name comes up as 'Caller' and their IP address is not accessible to the helpline volunteer.

We are unable to hide the email address of an service user who sends an incoming email to the Nightline helpline email address. Anonymous email addresses can of course be used, and we additionally flag this distinction on our website so that service users know to call or email if they would like to remain entirely anonymous.

Our instant messaging service uses a server provided and processed by Three Rings, a secure online volunteer management system that has been supporting Nightlines since 2002. Three Rings accesses these servers only in exceptional circumstances, for example where system administrators must undertake system maintenance.

Volunteers

We recruit student volunteers annually each October and February. During this process, we use application forms to collect information from everyone who registers their interest in volunteering. The information we hold about volunteers includes their full name, date of birth, email address, phone number, and the institution where they study. We ask the applicants general questions about themselves to assess their suitability for the role and any accessibility/access requirements. We ask monitoring questions to ensure that our volunteer

base is reflective of the London student population, but these responses are optional and are not connected to the application to ensure they are not personally identifiable. This information is not shared with anyone outside of London Nightline before, during or after the recruitment drive.

This personal data, plus any additional data provided by volunteers during their time volunteering with us, is stored and processed in order to ensure a high quality experience of volunteering with London Nightline.

Friends of London Nightline

‘Friends of London Nightline’ include former volunteers (known as ‘alumni’), trustees, ex-trustees, donors, event attendees and other supporters of the charity. They can opt-in to receive our regular email newsletter. We retain their name, email address, and dates of their involvement with London Nightline in order to keep them informed of the charity’s latest work, and to verify their time as volunteers to potential employers.

How we obtain personal information and why we have it

The personal information we process is provided to us directly by individuals for one of the following reasons:

- To use the Nightline helpline
- To volunteer with London Nightline
- To remain informed about our latest work

We use the information given to us in order to deliver and continuously improve our helpline service.

Each phone call or instant message we receive remains completely anonymous. We amalgamate broad themes in order to track general call trends, and may share this information with partners including universities and students’ unions, but never any personally identifiable information.

Under the UK General Data Protection Regulation (GDPR), the lawful bases we rely on for processing this information are:

- Consent
- It is necessary for us to perform our contracts
- Our legitimate interests as a charity
- It is necessary for us to perform a task in the public interest
- We have a legal obligation

How we store personal information

All information is securely stored. We store data on Office 365 which is secured and supported by Microsoft, and has been security assessed by independent organizations (including the National Cyber Security Centre: <https://www.ncsc.gov.uk/collection/saas-security/product-evaluations/office-365>). We also use HubSpot as our CRM which is secured and GDPR compliant.

We only keep individuals’ information for as long as is necessary for the relevant purpose. We use a number of criteria for determining the retention period, including obligations under law, our

need to defend or bring any contractual claims within the statutory limitation period, and consideration of the original purpose we collected it for.

Your data protection rights

Under data protection law, you have rights including:

- Your right of access – You have the right to ask us for copies of your personal information.
- Your right to rectification – You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- Your right to erasure – You have the right to ask us to erase your personal information in certain circumstances.
- Your right to restriction of processing – You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- Your right to object to processing – You have the right to object to the processing of your personal information in certain circumstances.
- Your right to data portability – You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

In case of a data breach

Volunteers and staff should report any breaches of data to their line manager, who in turn should escalate to the charity's Director. They will investigate the breach and respond accordingly, considering whether any other parties need to be notified. Any breaches that meet the current reporting criteria to the ICO will be reported within 72 hours of being made aware of it. The Director and board of trustees will consider and take steps to ensure future data breaches are prevented.

If you have any questions about this data protection policy or would like to make a request, please contact us at director@nightline.org.uk. We will respond to you within 10 working days.