

Our Privacy Statement & Cookies Policy

At Norwich Nightline, we take confidentiality and privacy seriously. 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 we use your personal information, whether you are using our service, interested in volunteering or just browsing our website.

Who are we?

Norwich Nightline is a student-run volunteer based listening service run specifically for the students of NUA, UEA (and, if and when admissible, any other designated university institutions within Norwich area). It offers a safe place for callers to talk confidentially, 8pm-8am during term time, through a variety of contact methods.

Norwich Nightline is a small organisation that is a member to the international umbrella charity, Nightline Association. The Nightline Association (Charity No. 1112793) provides support and assistance to Norwich Nightline in the form of legal guidance and Good Practice Guidelines, and Norwich Nightline must comply with these to maintain its membership.

Within this Privacy Statement 'we' and 'us' means Norwich Nightline, not to be confused with the Nightline Association or any other member Nightline at other universities. Norwich Nightline, and the Nightline Association by default, can be classified as data controllers under the General Data Protection Regulation and other relevant data protection laws.

Other Nightline branches (such as London) are independent organisations and are separate data controllers for the purposes of the data protection laws. If you are in contact with a particular Nightline only, you should refer to their website to read their data privacy statement. We accept no liability for misunderstanding generated by an application of this statement to services outside of Norwich Nightline itself.

Due to our limited capacity to take contacts, if you are not a university student of the aforementioned institutions then we recommend contacting either your local Nightline (if you are a university student) or the Samaritans. We reserve the right to end calls, and/or signpost to other services, where we have strong belief that the contact does not fall within our area of coverage.

Which laws apply to us?

Your '*personal information*' is information that can be used to identify you. This can include your name, email address, skype profile, telephone number or address as well as '*sensitive personal information*' such as details about your ethnic origin, political opinions, religious beliefs, degree subject, physical or mental health and details of criminal offences. Norwich Nightline collects, stores and handles personal information for a variety of purposes, including to manage our volunteers, to engage with our supporters and to provide our services to the public.

The following laws apply to Norwich Nightline, as an organisation that collects, stores and handles personal information:

- the Data Protection Act 1998
- the General Data Protection Regulation (EU) 2016/679
- the Privacy and Electronic Communications (EC Directive) Regulations 2003

We will handle your information in accordance with these laws.

Changes to this Privacy Statement

As the service we provide changes, we may need to alter this Privacy Statement. If you have any queries about this Privacy Statement please contact the Policy Officer through email: nl.policy.uea@gmail.com

How we use personal information

Select to read more about how Norwich Nightline and its branches uses your personal information:

- [If you use Norwich Nightline's service](#)
- [If you would like to volunteer with us](#)
- [If you want to complain or provide feedback](#)
- [Using our website](#)
- [If you subscribe to Norwich Nightline's emails](#)
- [Right of subject access](#)

If you use Norwich Nightline's service

Norwich Nightline provides a confidential listening and information service through a variety of channels. These include: Phone, Text, Instant Messaging (IM), Skype, Email and our Drop-In Services.

Our services are designed so that Norwich Nightline volunteers most of your personal information is when you contact us. A summary of what data that our volunteers do and do not have access to is listed below.

We can not obtain *personal information* from:

- If you contact us via our phone, our phone system will not display your number and hence you will remain anonymous.
- If you contact us via our listening email service, you will be able to do so 100% confidentially as our systems do not display your email address, and anonymise your IP address.
- If you contact us via IM, your IP is masked and you remain anonymous.
- Any personal information you divulge to us will not be recorded or used.*

We can obtain some *personal information* from:

- Unlike the listening email service, your email will be visible if you contact any of our Committee and Officers via their emails.*
- If you text us, volunteers will be able to see your number. However, your details will be removed from the Norwich Nightline mobile phone at the end of each shift.*
- If you Skype us, volunteers will be able to see your skype profile.*
- If you contact us through any other media that is not our designated listening services, including but not limited to Facebook and Twitter, Norwich Nightline volunteers will be able to see your messages.* These are sent willingly and will not be removed.

We can obtain some *sensitive personal information* from:

- Any details you provide to us throughout the duration of the call.*
- If you drop in to our office, volunteers will be able to identify you through personal features. Our volunteers will, however, never reveal your identity or attempt to make contact with you outside of a shift.* As our volunteers are anonymous, we expect you to do the same. What happens on shift, stays on shift.

*Exceptions to data retention may apply in specific circumstances where a contact reveals details of a crime, direct suicidal intent (not to be confused with suicidal ideation), child neglect or terrorism. Details of these circumstances can be found in our Confidentiality Policy. In such circumstances, we may be authorised (or legally obligated) to pass on this information to local authorities and/or the UEA Security Team. Where we are not legally obliged, but authorised, to disclose information, this is done at the discretion of the volunteer taking the contact. 'Authorisation' is granted through permissions described in our Confidentiality Policy.

In general, we try to keep as little information about you as possible. Volunteers may take notes when they talk to you to assist in the conversation. These notes are shredded at the end of the call immediately. We don't record your phone calls or other means of contact via our services, but committee and volunteers may listen in to calls in order to provide volunteer support. IM and Skype Messaging services may be operated by 2-3 volunteers working together collectively.

We record some statistical information on each contact we receive, to report on and improve our service. This includes non-identifiable information, such as the categorical content of the call and the night in which the call was made. After a call, a volunteer will select details from a general list of around 20 categories, i.e. 'mental health', 'accommodation', etc, and submit it to our Committee. This information can not be used to identify you or the exact content of your call, but it may be used in producing annual and bi-annual reports on the type of contacts we receive. These may be used publicly.

Other information collected that may relate to *sensitive personal information* may be recorded and passed to specific members of committee at the end of each contact, in a brief volunteer call report. This information is accessible only to the Internal Coordinator(s) and the Secretary; no one else. *Personal information* will never be recorded (subject to rare exceptions permitted in the Confidentiality Policy) and thus any *sensitive personal information* collected is non-identifying. If a volunteer believes the *sensitive personal information* to be too identifying, then the volunteer is expected to leave out these details

from the report. Under no circumstances in this report should it be possible for a volunteer to identify the contact or narrow down their identity to a small group of people.

Exceptions to confidentiality of personal information

Norwich Nightline will never pass any of your information on to any other organisation, except in the following situations:

- We receive a call about acts of terrorism or bomb warnings
- We receive details of child neglect
- We receive details of a serious crime
- We receive a court order requiring us to share information
- You reveal an intention to end your life or have taken/are taking steps to accomplish this, regardless of intention, and during the contact have given us your address and/or contact details (See Suicide Policy for more information)
- You threaten the safety of our volunteers
- You misuse or compromise the delivery of our service, for example by making it difficult for other people to get through, or by obstructing access to our office

Limiting or withdrawing access to our services

From time to time we have to take decisions to limit an individual's access to our services. For example:

- If you contact us a lot in a short period of time we may need to manage your access to our service to ensure that others are able to get through to us. If this happens to you, we will send you a message explaining why we have made this decision and any limitations in place.
- If we believe you are abusing our service or are abusive towards volunteers, we reserve the right to terminate the call at any point.

In both of the above examples, we will not usually block you from our services but reserve the right to create a non-identifiable caller profiles that will allow our volunteers to recognise you as a regular caller during a contact.

If you are abusive or threaten our volunteers, we may report you to the police and the UEA Security team. The UEA Security team and Police may take action as appropriate using their own means of data collection, for example campus CCTV, over which we have no control and the appropriate data processors of these may act individually and exclusively of us.

If you would like to volunteer with Norwich Nightline

‘Norwich Nightline offers a confidential and non-advisory listening service, primarily for UEA and NUA students. We don't lecture or judge our callers, our job is to listen and help them reach their own conclusions. Whether you want to talk about something that's upsetting you or one of your friends, or want some information of any kind, we are here to listen. No problem is too big or too small.’ – *Norwich Nightline website*

Norwich Nightline needs to collect, use, store and share certain information about applicants and volunteers to manage their application and involvement with the organisation. The need

to use applicant and volunteer information in this way is known as a ‘legitimate interest’ of Norwich Nightline and is the lawful basis upon which we handle personal data for these purposes.

This section sets out how your personal data will be used by Norwich Nightline in order to administer and coordinate your application and volunteering with us.

If you want to learn more about volunteering with Norwich Nightline

If you are interested in volunteering with Norwich Nightline, you can contact us through our Training Officer (norwichntraining@gmail.com) or talk to us at one of our events. You can only apply with us as a volunteer, not as a direct committee member, as being a volunteer (with actual Nightlining experience) is a pre-requisite for all ‘Committee’ roles.

You will be asked to give us your personal details so that we can contact you in relation to your enquiry. Norwich Nightline will also use the information you have provided to assist you with any queries you might have regarding your volunteering application and to ask you about your experience of applying to volunteer with us.

As part of the application process we may ask for information regarding to your course, your year of study, date of graduation, and any year abroad/year in industry you may undertake. This is so that we can assess whether it would be beneficial to the service and to you to undertake Nightline Training, especially as once you cease to be a student you will no longer be able to remain part of Norwich Nightline. Each individual will, however, be considered first and foremost on the quality of their application, and that only having one semester left should not deter applicants.

Applicants are required to have a high level of English proficiency, due to the nature of the service we operate. As such, applications from candidates that have below standard levels of English both verbally and/or written may be refused a place. Though this is regrettable, and where applicable we will try to provide support, we operate a listening service where you need to be able to understand and communicate clearly with the contact.

Prior to, during and after the training process we may ask for information about your age, any disabilities, dietary requirements, gender, course, graduation date, email addresses, and date of birth, as well as requesting that you upload a face picture to our internal data system. Most of this data will be uploaded yourself to our internal data system after training, but some may be required at or during the training stages. This data is collected so that we can serve the purpose of:

- Meeting any access and/or dietary requirements on the Training Weekend.
- Identifying you as a Norwich Nightline applicant at the door at the Training Weekend, so that we do not admit people whom are not part of the service and would infringe on the anonymity of other volunteers.
- Making group and organisational arrangements prior to the Training Weekend.
- Sending volunteers training materials, volunteer management messages and updates correspondence from committee.
- Constructing internal data systems, to be held in ‘legitimate interest’ of the volunteer whom in accepting the role of Nightliner also accepts the service operations,

identification procedures, volunteer management systems and policies of Norwich Nightline.

- Sending invitations to socials, the AGM and other events.

Disclaimer: Your records will be kept in your own 'legitimate interest' for up to 3 years after your departure from the Norwich Nightline service. This is for the purposes of retaining records for employer references (supplied only via our Internal Coordinators), for potential returns to the service, or for volunteer record requests from other Nightlines should you go on to study at another university and apply to the Nightline there.

If you wish to apply for volunteering positions in either the Nightline Association or other Nightlines you should contact these directly and not through us. The above is indicative only of Norwich Nightline and is not associated with any other Nightline training procedure.

Your Application

The information you provide on your application will be used to decide whether you will be accepted on to a Norwich Nightline Training Weekend. Please note that due to limits of service operation we may get many more applications than we can accept, and that we only offer two training intakes a year; one in October and one in February. If you are unable to make the designate weekend, we will be unable to take you as a trainee.

Norwich Nightline will keep any *personal information* or *sensitive personal information* you provide to us during the application process confidential, unless we are required to disclose it in connection with a police investigation and/or we have reason to believe that you may present a risk of harm to others.

Provided that the volunteer fulfils their obligations with us under policy, we will provide a reference for volunteers upon request. This reference must come from our Internal Coordinators. We regret that due to data protection purges, after 2 years of leaving the service, we will be unable to provide references. Upon leaving the service you can request a print summary of your internal systems page signed by the Internal Coordinators.

Sharing your story

Some of our service users and supporters choose to tell us about their experiences to help further our work. This may include sharing sensitive personal information relating to their health and emotional wellbeing.

If we have the explicit consent of the individual, we may use this information in materials promoting our campaigning and fundraising work, or in documents such as our reports. We do so on the assumption that those using our service are 18 and over, and will only ever publicise comments brought to us outside of shift hours with specific request to be used in our publicity materials. Permission and proof of age must be obtained before information is used in this way.

Sharing information outside of Norwich Nightline

Norwich Nightline uses many different online platforms, who may collect, store or process personal information themselves. When we use any type of online system, we test the platforms for trustworthiness and reliability. This may include:

- Carrying out checks on each company/service before we decide to use them, to ensure that they have adequate safeguards in place to keep your data safe;
- Make sure that the company in question is approved as safe to use by the Nightline Association;
- Require them to give us contractual assurances that they will comply with all data protection laws (i.e being GDPR compliant); and
- make sure that your data is transferred to them securely through password back-ups, closed systems, etc.

Examples of the systems we use include those such as Google Drive, Gmail, 3Rings, Evernote and Facebook.

We may disclose your personal information if we are requested to do so by a regulator or law enforcement bodies, or where we are otherwise required to do so by law.

We will never sell or otherwise provide your personal information to other organisations for any purposes.

We never access Nightline systems of any description, including those containing personal information, in public places, in the presence of non-Nightliners or in the presence of the unauthorised Committee Officers.

Fundraising and social media platforms

If you have donated to Norwich Nightline via an online fundraising platform (such as Virgin Money Giving or Just Giving) or have registered for a Norwich Nightline event or challenge through a third party event organiser (e.g. a Society or Club), they may pass your information onto us to allow us to record and process your donation and/or administer your registration. We will contact you to confirm that we have received your donation/register and to see whether you would like to keep in touch in the future. Make sure you read the fundraising platform's/event organiser's own privacy policy, as that will tell you how they use your information for their own purposes.

We will never sell your personal information to other organisations to use for their own marketing purposes.

CCTV

Whilst we do not operate CCTV ourselves, UEA Security do on the outside premises of UEA. Thus, when you visit our office entrance, so you may be recorded. CCTV is installed for security, to protect both you and other students. This said, we do not operate CCTV or recording devices or any kind within our office space itself.

Links to third party websites

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.

Storing your information

Where we store your information

Norwich Nightline operates across from Norwich, UK, though volunteers and committee members may access data relevant to them at any place in the world that is reasonably safe to do so, given this data is stored in 'cloud-based' applications.

We do use 'cloud-based' applications provided by external suppliers to collect, store and handle some types of personal information. These suppliers (e.g. Google) may be based outside of the EEA. Where this is the case, we ask suppliers to provide evidence that they have the appropriate measures in place to ensure that your personal information is kept safe.

Security safeguards

Norwich Nightline uses various technical and organisational measures to keep your data safe. Electronic data and databases are stored on secure computer systems and we control who has access to information, using both physical and electronic means. Our staff and volunteers receive confidentiality training and are provided with guidance that they are required to follow when handling personal information of themselves, other volunteers and contacts (see Confidentiality Policy).

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.

How long we keep your personal information for

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

If you have told us that you don't want to be contacted by Norwich Nightline, we will remove your details from our email systems to make sure that we do not contact you.

Your rights

The data protection laws give you certain rights over your personal information and how we use it. These include:

- the right of access to a copy of the information that we hold about you;
- the right to ask us to correct inaccurate information that we hold about you;
- the right, in certain circumstances, to object to specific uses of your data; and

- the right, in certain circumstances, to request the information that we hold about you to be deleted.

The above only applies to volunteers, though in case of dismissal procedures the right to request information be deleted may be withdrawn in order to prevent such person returning to the service or from fabricating inaccurate Norwich Nightline experiences for personal or employment purposes.

For contacts, since we do not collect identifiable data, and that most data is deleted at the end of a shift, we will usually be unable to provide you with any information. To release information held, if any, would require us to identify you and relate this to the exact data you provided. We are unable to do this as we do not record exact data, nor identifiable information associated with it.

Information of contacts is never shared publicly and is scarcely circulated within Norwich Nightline itself, with permissions to certain information being held by only one or two people at a time. Even upon starting a new call with us on a different night, we are unable to acknowledge or access any information provided by a previous call since we do not hold information on contacts.

Norwich Nightline is not a 'public authority' as defined under the Freedom of Information Act and we will therefore not respond to requests for information made under this Act.

If you want to provide Feedback

Norwich Nightline aims to provide support to the highest possible standard at all times. To help achieve this, we encourage anyone who used the service to let us know what they thought by filling in the 'Feedback' section on our website.

All complaints will be investigated fully. It is important that you give as much information as possible to enable us to investigate your complaint. Your information will not be passed on to anyone outside of Norwich Nightline. With your prior consent, an External/Internal Coordinator will contact you directly to try to resolve your complaint.

Using our website

Do we use 'Cookies'?

Our website uses cookies, as almost all websites do. Cookies are small text files that are placed on your computer or mobile phone when you browse websites. You can find more information about cookies [here](#).

Our cookies help us to:

- Make our website works as you'd expect
- Improve the speed/security of the site
- Allow you to share pages with social networks like Facebook
- Continuously improve our website for you
- Make our services more efficient

We do not use cookies to:

- Collect any personally identifiable information (without your express permission)
- Collect any sensitive information (without your express permission)
- Pass data to advertising networks
- Pass personally identifiable data to third parties
- Pay sales commissions

Third party cookies

Google Analytics cookies

These cookies tell us how many people have been to the site before, what time people visited the site and what pages were looked at:

- `_utma` stores each user's number of visits, time of the first visit, the previous visit and the current visit. Expires two years after your last visit to the site
- `utmb` and `_utmc` checks how long a visitor stays on the site: when a visit starts and ends. These expire 30 minutes after your visit, or after 30 minutes of inactivity, or when you close your browser.
- `utmz` tracks where a visitor came from (search engine, search keyword, link). Expires six months after it was last set

No personal information is stored. For more information, see Google's help pages and Google's privacy policy [here](#).

Cookies when sharing content

So you can easily "Like", "Tweet" or share our content on Facebook, Twitter and other social media platforms, we have included sharing buttons on our site.

Cookies are set by AddThis, Facebook and Twitter.

Add This provides the sharing mechanism to Facebook and Twitter. Their cookies are:

- `ssc` – records the network you are sharing to
- `ssh` and `sshs` – optimises the appearance of the sharing settings
- `uid` – tracks your login to the service. Expires 2 years after creation.

You can read the Add This privacy policy [here](#). You can opt out of Add This cookies [here](#).

Tweeting a page link automatically creates two cookies on your machine:

- `guest_id` - This cookie is used to identify you to Twitter. This cookie will expire two years' after creation.
- `Twitter_sess` - This cookie remembers changes from page to page

You can read the Twitter privacy policy [here](#).

Facebook sets a number of cookies when you log into its website. For more information, [click here](#).

Removing cookies

If you want to prevent our cookies being stored on your computer in future, you may do so by referring to your internet browser's instructions. You can do this by clicking on the "Help" menu.

[You can find out how to do this on your computer here](#).

If you wish to prevent Google from collecting any information about your presence on our website, they offer a tool [here](#).