

OXFORD NIGHTLINE
Policy Booklet

4th Edition

June 2023



Introduction

This document is intended to be a definitive statement of what the policies of Oxford Nightline are. It differs from the Constitution because the Constitution is necessarily rather general, leaving space for more specific policy statements “to be decided by the Co-ordinators in consultation with the Committee” in most cases. Any substantial changes to any of Oxford Nightline’s policies, all of which are included in this document, should be approved by committee – they cannot simply be made by the Coords. It is not intended to be a practical guide to these topics – these guides can be found in our operational procedures.

All policies outlined in this document are compliant with Version 4 of the Nightline Association’s Good Practice Guidelines.

Each policy outlines clearly in its introduction its aims, and whether or not it is suitable for external sharing. This should continue to be the case for all future policies, to ensure consistency.

It is the responsibility of the Coordinators to ensure that this document is updated as changes are approved. Generally speaking, whenever a motion is passed at committee, either a policy, the constitution or an operational procedure will require review.

Contents

[Introduction](#)

[Contents](#)

[Confidentiality Policy](#)

[Safeguarding Policy](#)

[Data Protection Policy](#)

[Appropriate Policy Document on Handling of Special Category Data](#)

[External Complaints Policy](#)

Confidentiality Policy

At Oxford Nightline, we take our responsibility to protect the confidentiality of callers incredibly seriously. This policy exists to ensure that we adopt a consistent approach to confidentiality across the organisation, to explain the limited number of situations in which confidentiality may be broken, and the protocol for dealing with breaches in confidentiality. This policy is to be shared externally, and may be amended by a simple majority vote of the committee, providing that any such amendments do not conflict with the organisation's responsibility in law. All Nightline trainees and volunteers must sign this Confidentiality Policy as they join the organisation, in which they confirm that they understand their responsibilities regarding confidentiality and the repercussions for breaching them.

This policy is to be shared externally. This policy was last amended/reviewed in Trinity Term 2023 and is to be reviewed by Trinity Term 2025.

Definitions

A 'call' refers to any contact taken by Oxford Nightline from a caller through any of our support channels (e.g. by telephone, or through our Instant Messaging (IM) system).

'An abusive call' refers to any call when the caller behaves in an aggressive, manipulative, rude or obscene manner. This also refers to calls where the caller is inappropriately relying on the service beyond Nightline's ability to help, not respecting the personal boundaries of the volunteer, or otherwise not using the service as it is intended.

'Confidentiality' refers to our commitment to ensuring that the content of calls and information regarding callers are not shared beyond the individuals outlined in this policy.

'Breaking confidentiality' refers to the act of sharing call content or information regarding a call or caller with anybody other than those who would ordinarily have access to the information as outlined in this policy, including with external services.

'Third Party Contacts' are calls made to Oxford Nightline by one individual on behalf of someone else.

The relevant 'stakeholders' of Oxford Nightline include the Nightline Association, and Oxford University.

Call Confidentiality

The content of all calls from callers who contact Oxford Nightline are confidential to the volunteer who takes the call, any other volunteer on duty that night and the two coordinators, except when:

- a) The caller is abusing the service;
- b) The caller's life is in direct danger;
- c) The caller expressly requests us to break confidentiality;
- d) We are required to do so by law.

This policy also applies to messages left on our answering machine. As a caller, you can request that your call is not discussed with the other volunteers on duty that night. However, you cannot request that your call is not discussed with the coordinators. This is to ensure appropriate welfare support can be given to our volunteers.

Confidentiality of Abusive Calls

We do not recognise any duty of confidentiality to callers who abuse the service. We routinely discuss these calls with volunteers, other Nightlines, and would break confidentiality with other bodies in regards to abusive calls should there be a good reason for us to do so.

We acknowledge our responsibilities under the General Data Protection Regulation (GDPR) which limits the exchange of personally identifiable information. This means that, in the instance of an abusive caller, we will never exchange information from which the caller can be identified, such as name or email address. It should be noted that, in-line with our Data Protection Policy, such information is not routinely stored by Nightline about any of our callers.

Confidentiality of Suicidal Calls

We do not trace any of our calls and we do not have the ability to do so. Suicide calls are no exception.

If a caller has explicitly given us their contact details, we reserve the right to break confidentiality if we believe that they are in immediate danger of taking their own life.

However, callers have every right not to share their contact details with us, and we will not take any further steps to find them should a caller make the decision not to share contact details with us.

Legally Mandated Breaches of Confidentiality

In certain instances, the law may require us to break confidentiality. This means that details will be shared without the prior consent of the individual. In these circumstances, Oxford Nightline will provide the data requested, but only once the validity of the request has been confirmed. Examples of scenarios in which we may be legally obliged to breach confidentiality are outlined below:

- a) To comply with anti-terrorism legislation. If a caller reports a terrorism threat, the caller will be informed of our legal obligation to report this to law enforcement agencies. The coordinators will then make this report.
- b) To comply with child safeguarding legislation. We have an obligation to report a child at imminent risk of harm or abuse. This applies to anyone under the age of eighteen, and more details can be found in our Safeguarding Policy. We will seek the consent of the child first, but if they do not give consent we will inform them of our legal obligation to share any information that they may provide us with to appropriate agencies such as law enforcement agencies or the NSPCC.
- c) To comply with safeguarding legislation for adults at risk. More details can be found in our safeguarding policy.
- d) To comply with a court order. We are legally obliged to provide information relating to a crime in the event of a court order being issued to order us to provide such information.

Non-legally Mandated Breaches of Confidentiality

Nightline volunteers will take every possible action to reduce the risk of a breach in confidentiality. This includes:

- Informing the caller if their confidentiality is to be broken, whenever possible.
- Seeking consent from the caller to break their confidentiality, wherever possible and appropriate.

There may be exceptional circumstances where a volunteer reasonably believes that informing a caller of their intention to break confidentiality would itself lead to the commission of a serious criminal offence, suicide, or some other serious danger. In such circumstances, a volunteer may choose not to inform or seek permission from the caller. When disclosing confidential information, this will be done by the Coordinators whenever possible. If this is not possible, the Coordinators will be informed at the earliest opportunity and all actions should be recorded.

However, in the event of a non-legally mandated breach of confidentiality (i.e., other than the circumstances described above):

- If possible, the caller or affected individual will be informed of the breach of confidentiality.
- Disciplinary action may be taken against the volunteer who has breached confidentiality at the discretion of the Coordinators. Details of any disciplinary actions taken will not be passed on to external parties.

Confidentiality of Third-Party Contacts

In the event of a caller contacting Oxford Nightline on behalf of another person, volunteers will maintain confidentiality of both the caller and the person they are calling on behalf of, except in cases where breaching confidentiality is appropriate as described above. Volunteers will never ask for personal details of the caller or the person they are calling on behalf of. A caller will not be contacted if they have not been in contact with Nightline themselves and provided permission to be contacted.

Confidentiality of Non-Telephone-Based Contacts

Contacts made to Oxford Nightline through channels other than telephone (e.g., Instant Messaging) are afforded the same confidentiality conditions as telephone-based contacts. As with telephone-based calls, Instant Messaging (IM) calls are handled confidentially by one volunteer only. 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.

Information Shared with Stakeholders

Call statistics (e.g., number of calls, types of calls, broad category for the 'issues' presented in calls) is regularly shared with stakeholders, but this is anonymised and will not include any identifying caller data, except that information about repeat inappropriate callers or illegal activity may be shared with stakeholders to secure legal advice or guidance.

Safeguarding Policy

At Oxford Nightline, we take our responsibility to protect children, young people and vulnerable adults extremely seriously. This policy exists to ensure that children, young people and vulnerable adults who contact Oxford Nightline are safeguarded, and to ensure that volunteers are appropriately equipped to deal with safeguarding concerns that may arise when taking a call. This policy is to be shared externally, and may be amended by a simple majority vote of the committee, providing that any such amendments do not conflict with the organisation's responsibility in law.

This policy is to be shared externally. This policy was last amended/reviewed in Trinity Term 2023 and is to be reviewed by Trinity Term 2025.

Definition

'Abuse' refers to any action by another person that causes significant harm, including but not limited to physical, emotional or sexual harm, or harm caused by neglect.

A 'call' refers to any contact taken by Oxford Nightline from a caller through any of our support channels.

'Breaking confidentiality' refers to the act of sharing call content and information from a call with people other than the individuals outlined above, including with external services.

'Child' refers to any person under the age of eighteen.

'Imminent risk' refers to the possibility that the callers life is under imminent threat, either as a result of suicidal intent or a third-party.

'Safeguarding' refers to the protection of children or adults at risk from abuse, neglect and harm.

'Adult at risk' is an adult who has needs for care and support, is experiencing, or is at risk of, abuse or neglect and as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of, abuse or neglect.

'Coordinator' refers to the role held by the two elected volunteers who are responsible for the overall quality and delivery of the service. This is the most senior rank of volunteer within the organisation.

'On-Call Coordinator' refers to the individual who holds overall responsibility for the shift that evening, whether that be one of the coordinators or any volunteer appointed to serve as a Deputy Coordinator for that evening, either because one of the Coordinator positions is vacant or as an elected Welfare-On-Call volunteer.

Calls from Children

Nightline is a service intended for use by students.

If it becomes clear that a caller is both a child and under the age of eighteen, the call taking volunteer will signpost the caller to Childline (0800 1111), and then to Samaritans (116 123).

If the callers wishes to continue the call after this point, the call taking volunteer will reassure the caller that they are happy to continue the call, but continue to signpost the caller to Childline at regular and appropriate intervals.

At the point of continuing a contact with an under eighteen, the child should be informed that, if they disclose information that identifies them or any other child at immediate risk or at risk of abuse then this

information will be “passed on” to the appropriate bodies. i.e. that the call taking volunteer will be required to break confidentiality.

If the child has already disclosed information that would require the volunteer to break confidentiality then the child should be immediately informed unless the volunteer believes doing so would put the child at imminent risk.

Adults at Risk

If a user of the service falls into the category of an adult at risk, the call-taking volunteer will alert the coordinators. The volunteer will continue taking the call as normal, unless they gain information that tells them the caller’s life is at imminent risk.

Identification of Imminent Risk

If a call taking volunteer believes that a child’s life is at imminent risk, they should seek consent to report this risk, and inform the caller that they will have to break confidentiality by sharing any information that is disclosed with external services.

At this point, the call taking volunteer should immediately alert one of the coordinators while proceeding to gather as many personal details as possible, such as the name and current location of the caller. Once all possible information has been gathered, this should be passed on to the emergency services. If the caller is not willing to provide these details, any information which has already been disclosed regarding the imminent risk must still be passed on, and the caller should be made aware of this.

The call taking volunteer may continue the conversation with the caller if the caller would like to do so, but it should be made clear to them that their information has been shared with an external service. Once this has been done, you may continue the call as per the guidance in the above section, ‘calls from children’, or, in the case of an adult at risk, following normal call taking policy.

Identification of Child Abuse

If the caller, either as a child themselves or as a third party, mentions previous or current child abuse, or provides information that leads the call taking volunteer to believe that a child is at risk of abuse, then they should seek consent to break confidentiality by reporting this risk, and inform the caller that they will have to share any information that has already been disclosed with the NSPCC Child Protection Helpline.

At this point, the call taking volunteer should immediately alert the on-call coordinator, while proceeding to gather as many personal details as possible, such as the name and address of the caller. Once all possible information has been gathered, this should be passed on to the NSPCC Child Protection Helpline.

If the caller is not willing to provide these details, any information which has already been disclosed regarding current or previous child abuse, or a child who is at risk of child abuse, must still be passed on to the NSPCC Child Protection Helpline, and the caller should be made aware of this.

The call taking volunteer may continue the conversation with the caller if the caller would like to do so, but it should be made clear to them that their information has been shared with an external service. Once this has been done, you may continue the call as per the guidance in the above section, ‘calls from children’, otherwise following normal call-taking policy.

Safeguarding during Visits

It should be noted that, in line with our visits policy, visits to the office are only permitted in the event of suicide calls, and with the prior permission of a coordinator.

Should a visitor who is also a child attend the office, the coordinator should be present in the office for the duration of the visit. Two volunteers should be in the visit room with the child visitor, with one volunteer taking the call as normal and the second simply acting as an observer for safeguarding purposes. The visit room door should also be left open.

In consultation with the visitor, the volunteers may offer to arrange a taxi to a place that can appropriately support a child at night (such as their place of residence or a local police station), with the cost of the taxi being covered by Oxford Nightline. Only with permission from both the caller and the coordinator, it may be deemed appropriate for both volunteers to accompany the caller to their final destination.

Volunteer Training

In order to keep up with the safeguarding responsibilities, volunteers will have to undergo 1 hour of yearly safeguarding training every year, starting in the term they train.

Data Protection Policy

Oxford Nightline is dedicated to safeguarding the privacy and confidentiality of individuals who use our services. In compliance with the United Kingdom General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, this Data Protection Policy describes the procedures and measures that are in place for the lawful and secure handling of personal data and special category data.

This policy can be amended by a simple majority vote at a General Meeting, so long as it remains compliant with the Good Practice Guidelines of Nightline Association and with any requirements in law.

This policy is to be shared externally. This policy was last reviewed in Trinity Term 2023, and must be reviewed by Trinity Term 2025. In the event of any discrepancy between this policy and applicable law or regulation, the latter shall prevail.

Definitions

'Personal data' refers to any information relating to an identified or identifiable individual.

'Data subject' refers to the individual whose personal data is being processed.

'Processing' refers to any operation performed on personal data, such as collection, storage, use, or deletion.

'Special category data' refers to sensitive information, such as records of previous criminal offences.

Data Collection and Processing

Oxford Nightline collects and processes personal data only when necessary for providing our services, ensuring the smooth operation of our organisation, and maintaining the quality of support for our users.

Volunteer Recruitment and Management

Personal data collected from prospective volunteers during recruitment and training is used to assess their suitability for volunteering; and update our internal volunteer management system.

During this process, Oxford Nightline also collects special category data, specifically unspent criminal convictions. Please refer to the Appropriate Policy Document on Handling of Special Category Data for further information.

Personal data will be collected, stored, and handled in accordance with this policy's guidelines. Oxford Nightline retains prospective volunteers' personal data for one year, after which it will be destroyed. Selected volunteers' information is stored on our internal volunteer management system. Volunteers can update their personal data to maintain accuracy. This information is retained for one year after graduation, after which it will be destroyed.

Users of the Service

The personal data of users of the service is handled with care and discretion. Personal data is retained only in limited circumstances, either formally or informally, to ensure the safety and well-being of our volunteers and users. Please refer to our Confidentiality Policy for more details on how we handle user data.

Donors and Financial Supporters

Data about donors and supporters may be collected and processed to respond to requests, track income, and enhance their experience with the charity. This information is stored indefinitely for financial record-keeping unless the data subject requests its withdrawal.

Publicity and Events

Upon registration for an event or participation in publicity activities, Oxford Nightline may collect personal data (for example: name, email address, and physical address). This information is stored for communication purposes regarding the event or publicity activity and will be destroyed after the event or campaign ends.

Alumni

Oxford Nightline maintains an alumni network for former volunteers. Upon opting in, Oxford Nightline collects personal data (for example: name and email address) to send updates through an alumni newsletter. This information is stored until the data subject opts out of these updates.

Occasionally, Oxford Nightline may need to collect personal data for purposes not listed above. In such cases, the purpose and storage duration for the collected data will clearly be outlined.

Data Retention and Deletion

Oxford Nightline shall retain personal data only for the duration required to fulfil the purposes for which it was collected. Personal data shall be securely deleted or anonymised once it is no longer needed.

Data Subject Rights

Data subjects have the right to access, rectify, erase, restrict, or object to the processing of their personal data, as well as the right to data portability. Oxford Nightline shall respond to any data subject requests in accordance with applicable law.

Data subjects can choose to stop receiving information from us across all channels. Contact coords@oxfordnightline.org to object to future communication.

Data subjects can request a copy of personal data held by Oxford Nightline through a 'Subject Access Request'. The data subject is entitled to be informed about how to update this information, and the steps Oxford Nightline takes to protect personal data.

Data subjects may request the withdrawal of their personal data at any time, and Oxford Nightline will honour such requests unless there is a lawful duty for us to continue holding the data.

Data Breach Notification

In the event of a personal data breach, Oxford Nightline shall report the breach to the relevant supervisory authority within 72 hours, unless the breach is unlikely to result in a risk to the rights and freedoms of individuals. If the breach is likely to result in a high risk to the rights and freedoms of individuals, Oxford Nightline shall also notify the affected data subjects without undue delay.

Appropriate Policy Document on Handling of Special Category Data

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. The purpose of this appropriate policy document is to outline the legal basis upon which we collect this information, the decisions we may take on the basis of it and the ways in which this information will be stored.

All disclosures of unspent criminal convictions made on our training application form are strictly confidential to the Training Organisers, Head of Training, and the Coordinators. All disclosures of unspent criminal convictions from in-service volunteers are strictly confidential to the Coordinators. All decisions on accepting or excluding individuals from training will be made by the Head of Training and the Coordinators, in consultation with appropriate authorities such as the Senior Member and Nightline Association.

This policy is to be shared externally. This policy was last reviewed in Trinity Term 2023, and must be reviewed by Trinity Term 2025. In the event of any discrepancy between this policy and applicable law or regulation, the latter shall prevail.

Grounds for Processing Criminal Offence Data

We process criminal offence data on the following legal basis, as outlined within Schedule 1, Paragraph 1 of the Data Protection Act 2018: **'employment, social security and social protection.'**¹

As is outlined in this act, this condition is met if:

“(a) the processing is necessary for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on the controller or the data subject in connection with employment, social security or social protection, and;

(b) when the processing is carried out, the controller has an appropriate policy document in place (see paragraph 39 in Part 4 of this Schedule).”

As Oxford Nightline has a responsibility to protect the wellbeing and safety of its volunteers under health and safety legislation (the Health and Safety at Work Act 1974, Section 3)², condition (a) is met. This document is the appropriate policy document which addresses condition (b), and so we have sufficient grounds to process criminal offence data.

Compliance with Data Protection Principles

At Oxford Nightline, privacy is at the very heart of what we do. We are committed to protecting your privacy and the personal data that we hold. Please view our data protection policy for information on how we meet the seven principles of data protection as outlined in General Data Protection Regulations.

Decisions if a Volunteer Discloses an Unspent Conviction

The following offences will lead to an automatic exclusion from volunteering for Oxford Nightline:

- Conviction for serious offences – including murder, rape, sexual assault, crimes associated with organising sexual exploitation, serious crimes of violence including convictions for domestic abuse, abuse or exploitation of a child or vulnerable adult. To also include drug, arms and people trafficking and sexual exploitation.

¹ [Data Protection Act 2018 \(legislation.gov.uk\)](https://legislation.gov.uk/ukpga/2018/5/schedule/1/para/1)

² [Health and Safety at Work etc. Act 1974 \(legislation.gov.uk\)](https://legislation.gov.uk/ukpga/1974/23/section/3)

Some offences may exclude an individual from holding a particular role within Oxford Nightline:

- Financial crimes would exclude individuals from roles such as Treasurer or Fundraising Officer.

When other criminal offences are reported:

- Decisions to exclude potential trainees or in-service volunteers from volunteering will depend on the circumstances and severity of the crime.
- Decisions on accepting or excluding potential trainees from training, and on suspending in-service volunteers, will be made by the Coordinators, in consultation with appropriate authorities.
- The coordinators will inform the potential trainee or in-service volunteer of their decision at the earliest possibility.

Reporting Unspent Convictions

All volunteers are responsible for reporting unspent criminal convictions gained during their time as a volunteer to the coordinators. This information will be used and stored as outlined above.

Storage of Criminal Offence Data

In the event that a trainee is not accepted for training or is not selected after completing training:

- Criminal offence data relating to the potential trainee will be deleted at the earliest possibility.

In the event that a trainee 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.

Contacting Oxford Nightline About Your Data

All enquiries relating to this document or your rights should be directed to coords@oxfordnightline.org.

External Complaints Policy

This policy outlines the procedural response to external complaints raised against Oxford Nightline, any volunteering members, or the service provided. Oxford Nightline takes its responsibility to provide a high-quality service to both callers and volunteers extremely seriously and hence must address complaints so as to achieve this aim.

This policy can be amended by a simple majority vote at a General Meeting, so long as it remains compliant with the Good Practice Guidelines of Nightline Association and with any requirements in law.

This policy is to be shared externally. This policy was last amended/reviewed in Trinity Term 2023 and must be reviewed by Trinity Term 2025.

Definitions

'Coordinator' refers to the role held by the two elected volunteers who are responsible for the overall quality and delivery of the service. This is the most senior rank of volunteer within the organisation.

'Senior Member' refers to the role held by a member of congregation.

The 'Proctors' refers to the office within the University of Oxford who are responsible for the registration and regulation of student clubs and societies.

Harassment

Oxford Nightline adheres to both the University of Oxford Harassment Policy ([Harassment Policy | Equality and Diversity Unit \(ox.ac.uk\)](#)) and the Oxford Brookes University Bullying and Harassment Policy (<https://www.brookes.ac.uk/students/report-and-support/bullying-and-harassment/>)

Harassment is regarded by Oxford Nightline as an unacceptable form of behaviour either by or from callers, volunteers, trainees or any other individual to whom the organisation has a responsibility. Allegations of harassment shall be dealt with according to the procedures specified below. However, nothing in this policy shall prejudice the right of any party to pursue the matter through the University of Oxford or the Oxford Brookes University harassment complaints procedures.

Complaints by Non-Members of Oxford Nightline

Any complaint made by a non-member of Oxford Nightline shall be handled by the coordinators in consultation with the senior member.

Complaints and feedback from non-members will be treated as anonymous and confidential. The coordinators or Senior Member will respond to informal complaints within one week during full term, but will not inform the complainant of any actions taken against specific volunteers.

Written complaints must be forwarded to a coordinator or the senior member in writing directly. The identity of the complainant will be treated with the utmost confidentiality. The complaint will be initially responded to within one week during full term and dealt with as the coordinators and/or senior member, deem to be appropriate.

Role of the Senior Member in Complaints

The decision of the Senior Member in complaints shall in all cases be final, except that nothing in this section shall prejudice the status of the Proctors as ultimate arbiters of society disputes, in accordance with the Proctors' Memorandum.

Right of Appeal

If any complainant is dissatisfied with the way a complaint has been dealt with by Oxford Nightline (including the Senior Member) then they have the right to appeal to the Proctors Office at the University of Oxford ([Welcome to the Proctors' Office | The Proctors' Office \(ox.ac.uk\)](#)) who have overall supervisory responsibility of Nightline as a society at the University of Oxford.