



CONFIDENTIALITY AND COMMITMENT POLICY

Keele Nightline

Confidentiality and Commitment Policy

1. Keele Nightline volunteers, excluding external/public volunteers, are bound to be anonymous. This means they must keep their involvement with Keele Nightline secret as far as possible from other Keele students.
 - a. Although the end purpose of anonymity is to keep the identity of Keele Nightliners private from Keele students, this does not mean that volunteers are free to disclose their volunteering work to non-students – this should only be done with caution and with the permission of the Service Directors.
 - b. Volunteers may make a small number of other students, such as their housemates, aware of their involvement if it is necessary for their safety. However, volunteers should never make other Keele students aware of the identity of other Nightline volunteers.
 - c. External volunteers are still bound to keep the identity of internal volunteers a secret.
2. For the purpose of this document, “confidentiality” refers to Keele Nightline’s collection and disposal of a caller’s personal information. Confidentiality thus refers to the caller’s relationship with Keele Nightline as a whole, not just with the individual volunteer who spoke to them. “Personal information” refers to information shared during use of the service which is specific to the caller and might be private or personal to them.
3. Statistics relating to the usage levels of the service may be disclosed where doing so is in the interest of Keele Nightline and/or Keele University students (for example, to help to develop welfare provisions at the University). Statistics must be collated such that they don’t refer to any one service user, anonymised, and devoid of any personal information.
4. Service users have the right to request a copy of this policy, or to have its contents explained to them. If asked questions relating to the contents of this policy, volunteers *must* answer truthfully.

5. The importance of confidentiality (this clause serves more for guidance than as a proscriptive policy statement but should be retained for future reference because it's really important!);
 - a. Clearly, confidentiality is one of the 5 major Nightline principles.
 - b. Beyond this, common law assumes a duty of confidence where an individual has divulged information in circumstances where it is reasonable to assume it will be kept confidential. Phoning a helpline advertising itself as confidential is clearly such a circumstance. Ergo, violating our confidentiality policy may actually constitute a criminal act.
 - c. This does *not* apply in certain situations, including (i) calls relating to acts of terrorism, (ii) calls where the caller expressly gives their permission for the volunteer to share their information with an outside agency, e.g. if they ask Nightline to call an ambulance for them, and (iii) if Nightline is compelled to disclose information by a court order.
 - d. Our commitment to confidentiality is immediately suspended if the volunteer taking the call suspects that the caller is engaged in, or has the intention to engage in, or has engaged in, an act of terrorism. The procedure for dealing with a terrorism-related call is found in the Active Listening policy.
6. Calls may be discussed within the wider Nightline community (defined as those Nightlines affiliated to the Nightline Association) for the purposes of training and development. A typical example would be where a regular caller becomes highly abusive and Keele Nightline's committee feels that they need guidance and support on how to handle this caller.
7. Keele Nightline does not break confidentiality (without the caller's permission) in any other situation. This includes but is not limited to a firm commitment that we will never share the details of a call with Keele (or any other) University.
8. Confidentiality can also be suspended to the minimum necessary extent at the request of a caller who requests this under section 16 of the Active Listening Policy.
9. Internally to Keele Nightline, volunteers are not bound by the duty of confidentiality. This is to enable volunteers to openly discuss calls for their own welfare, as well as for training and quality assurance purposes. However, there is a "common sense" responsibility on volunteers to only share an appropriate and necessary level of information.

- 10.** Keele Nightline does not record or monitor calls. Only the volunteer(s) taking the call will be able to hear the caller. Keele Nightline notes the responsibilities we hold in relation to the Telecommunications Regulations Act 2000, and should our policy change in this respect, will consult to ensure we remain compliant with said Act. The only exception to this is with regards to IM calls where multiple volunteers may input into a call.

- 11.** Keele Nightline will ensure that a service user's identity cannot be discerned through the technology used to take their call.

 - a. Ideally, the handsets used to take telephone calls should have no facility for the display or storage of caller ID. However, if this is not possible, then the IT Officer and committee are responsible for ensuring that caller IDs cannot be viewed by volunteers on shift, such as by disabling the screen.
 - b. The online chat system must be completely anonymised. The only identifying tag associated with the caller should read "caller" or similar.
 - c. Email listening facilities must hide the email address of the service user from the volunteers.
 - d. Keele Nightline does retain chat logs for the Online Chat service in order to deal with any complaints. To be compliant with the Data Protection Act 1998, Keele Nightline will not store these logs for any longer than 6 months.
 - e. Email transcripts will be kept for a maximum of 30 days after the last interaction and will then be destroyed.
 - f. Keele Nightline retains call records in a secure, electronic form. These records ask for; A summary details of the call such as time, duration, and the volunteer who took the call; broad category, and brief description of how the call went. Volunteers must not record identifying or personal information here.

- 12.** The main purpose of the call records is to monitor how busy the service is and which topics Nightline is most frequently contacted about, in order to improve our training and publicity.

- 13.** Keele Nightline will retain these logs for a maximum period of 3 years, after which entries must be deleted. Collated, statistical information which is disconnected from any individual caller may be retained indefinitely.

- 14.** If a service user enquires directly about call records, the volunteer taking the call must honestly and accurately explain our policy. Service users have a right to request access to a copy of this policy, which they can obtain through the External Service Director.

- 15.** Information about Keele Nightline's volunteer base is stored on the online Three Rings system, which is secure. Once volunteers confirm that they wish to leave Keele Nightline, they will be set to "sleeper" on the system. If a volunteer cannot be reached for confirmation that they wish to leave, they can be set to "sleeper" if either (1) committee are convinced that they have graduated or (2) they are inactive for a year. Once somebody has been a "sleeper" for 1 year, they will be permanently removed from the 3r system. As volunteer information is also contained on the Confidentiality Agreement which all volunteer sign, these must be kept in a secure location and destroyed when the volunteer's Three Rings account is deactivated.

- 16.** Volunteers are under no obligation to report details of crimes (except for exceptions detailed in this policy) to the police but may do so if they feel morally compelled to do so. However, they should attempt to warn the caller as soon as they realise that they feel this way, in order to allow the caller to decide to cease to share details. In the event that such a decision is taken, the Service Directors should be informed as soon as possible for support.

- 17.** Keele Nightline has a confidentiality agreement which binds signatories to the above concepts. All volunteers (internal and external) must sign this agreement before they can join Keele Nightline. The purpose of this document and the duties it confers on signatories must be adequately explained in training. Any external individual who becomes involved with Keele Nightline, such as members of a Nightline Board, must sign the confidentiality agreement.