

Privacy and Data Protection Policy

Jedidiah UK

Version 2.0 · Effective from 18 September 2026 · Review due September 2027

1. About this policy

This policy explains how Jedidiah UK (“Jedidiah”, “we”, “us”, “our”) collects, uses, shares, stores and protects personal information about the people who come to us for help.

It applies in particular to our free family law advice service, which provides legal advice on the financial consequences of relationship breakdown to people in Buckinghamshire who cannot afford to pay for a lawyer. It also applies to any other contact you have with us, including general enquiries, signposting, court support from a trained McKenzie friend, volunteering, donations, and visits to our website.

Many of the people who use this service are financially vulnerable, and some are experiencing controlling or abusive behaviour. We recognise that the way we handle information can directly affect a person's safety and their financial position. This policy is written with that in mind.

“You” means any individual whose personal data we hold.

2. Who we are, and who is responsible for your data

Jedidiah UK is a registered charity, number 1190382. Our registered address is Janelle House, 6 Hartham Lane, Hertford SG14 1QN.

Appointments are held online, and joining details are sent to you directly when your appointment is confirmed. Where an appointment is held in person, we will tell you the location privately and we do not publish it.

We are registered with the Information Commissioner's Office under reference ZC142122.

Jedidiah is the data controller for all processing described in this policy. We engage legal advisers and trainers to deliver parts of the service. Where an adviser is a practising barrister or solicitor, that adviser is independently regulated by their own professional body and is separately responsible for their own professional records. We will tell you at your appointment who is advising you and in what capacity.

Day to day questions about this policy should be sent to legalsupport@jedidiah.org.uk.

If we appoint a Data Protection Officer or designated contact, that person's details will be published here. At present, the named contact for data protection matters is Uchenna Emmanuel.

3. The personal data we collect

We collect different categories of information depending on how you interact with us. We try to collect only what we genuinely need.

3.1 Information you give us when you ask for an appointment

When you book an appointment we typically collect:

- your name, or a name you ask us to use;
- your address or the area of Buckinghamshire you live in, so that we can confirm you are eligible;
- a contact route that is safe for you to receive messages on (an email address, a phone number, or, if those are unsafe, a trusted third party who can pass messages on);
- confirmation of whether you have applied for legal aid and, where you have, a copy of the decision. If you have not applied, we will explain how to do so and help you with it;
- brief information about your financial circumstances, so that we can confirm you cannot fund representation privately;
- a short description of your matter, in your own words, so that the adviser can prepare;
- any information you choose to send us in advance, including documents.

3.2 Appointments held online

Most appointments are held by secure video link. We use a video platform that processes data on our behalf under a written contract. We do not record your appointment. If you would prefer to speak by telephone instead of video, or to keep your camera off, please tell us and we will accommodate that without needing a reason.

3.3 Information collected during your appointment

During your appointment we may record:

- the nature of the legal issue you are seeking advice on;
- the advice given, in note form, so that we have a record of what was said;
- any documents you bring with you, only to the extent we need to consider them;
- what happens next, including any onward referral or any decision about further support.

3.4 Information collected if you receive McKenzie friend support

If a trained volunteer supports you at court, we will hold a record of the hearings attended, the support provided, and any fee charged or waived. Volunteers are trained, supervised and bound by confidentiality, and they do not give legal advice.

3.5 Special category and sensitive information

Because of the nature of our work, the information we hold about you is likely to include what the UK GDPR calls “special category data”, such as information about your health, your family circumstances, your sexual life or orientation, your racial or ethnic origin, or your beliefs. It may also include information about criminal allegations and proceedings. We treat all such information with extra care and only process it where we have a lawful basis under Article 9 of the UK GDPR and a condition under Schedule 1 of the Data Protection Act 2018.

3.6 Information we collect automatically through our website

When you visit jedidiah.org.uk, our servers may log basic technical information such as your device type and approximate location derived from your IP address. We do not use advertising cookies. Where we use any analytics, we do so in a way that is privacy preserving and that you can decline.

3.7 Information we receive from third parties

We may, with your knowledge, receive information about you from referring agencies (for example, a refuge, a GP, a social worker, Citizens Advice or another lawyer), or from public sources where this is relevant to advising on your matter.

4. Why we use your data and the lawful basis for doing so

UK data protection law requires us to identify a lawful basis for everything we do with your data. The main bases we rely on are set out below.

4.1 To assess eligibility and provide advice

We use your data to confirm that you are eligible for the service, to manage your appointment, to prepare for and conduct it, to record the advice given, to arrange any McKenzie friend support, and to follow up where appropriate.

Our lawful basis is your consent (Article 6(1)(a)) and, where the data is special category data, your explicit consent (Article 9(2)(a)).

4.2 To meet our legal and regulatory obligations

Advisers who are regulated professionals are bound by conduct rules that require certain records to be kept. We may also need to comply with court orders, safeguarding duties, charity law, and tax law. The lawful basis for this processing is compliance with a legal obligation (Article 6(1)(c)) and, for special category data, the conditions in Schedule 1 of the Data Protection Act 2018 relating to legal claims, judicial acts, and safeguarding.

4.3 To safeguard you or another person from serious harm

Where we reasonably believe that you, a child, or another person is at risk of serious harm, we may need to share information with the police, social services, or another agency. Our lawful basis under Article 6 is your or another person's vital interests (Article 6(1)(d)) or our legitimate interests (Article 6(1)(f)).

Where the information is special category data and we are acting without your consent, we rely on whichever condition fits the circumstances. These are the vital interests condition

(Article 9(2)(c)), the safeguarding condition at Schedule 1, Part 2, paragraph 18 of the Data Protection Act 2018 where a child or an adult with care and support needs is involved, and the condition on preventing or detecting unlawful acts at Schedule 1, Part 2, paragraph 10 where we are reporting a suspected criminal offence. The appendix to this policy explains how we apply each of them.

Where it is safe to do so, we will tell you in advance what we are doing and why.

4.4 To report to our funder

This service is funded by Buckinghamshire Council through Heart of Bucks Community Foundation. We are required to report on how the funding has been used. We report in anonymous or aggregate form only: for example, how many people we advised, the areas they came from, and the types of issue raised. We do not give our funders your name, your contact details, your documents, or anything you told your adviser. The lawful basis is our legitimate interests in securing and accounting for funding, balanced against your rights.

4.5 To run the charity

We use limited information to run our operations: communicating with volunteers and donors, training, supervision and quality assurance, financial accounting, fundraising, and reporting on our work to regulators. The lawful basis is our legitimate interests in operating as a charity, balanced against your rights.

5. Confidentiality

Confidentiality sits alongside data protection rather than being replaced by it. Anything you tell your adviser during an appointment is treated as confidential. We will not share what you say outside the small group of people who need to know, except in three circumstances:

- where you give us your consent to share;
- where we are required to share by law, including by court order, or by the professional rules that bind a regulated adviser;
- where we have a serious safeguarding concern about you, a child, or another person at risk of harm.

Where we share for safeguarding reasons, we share only what is necessary, with the agency best placed to help, and we tell you in advance unless doing so would itself increase the risk to you or someone else.

Legal advice given to you by a qualified lawyer acting in a professional legal capacity may also attract legal professional privilege. Privilege belongs to you, not to us, and we will not waive it on your behalf. Support provided by a McKenzie friend is confidential but is not legally privileged, and we will explain what that means before any court support begins.

6. Who we share your information with

We share your information only with people and organisations who need it for one of the purposes set out above. These can include:

- the adviser working on your matter, and where relevant their chambers' or firm's staff, but only where strictly necessary;
- staff and trained volunteers of Jedidiah, on a strict need to know basis;
- safeguarding partners (police, children's social care, adult social care, and similar bodies) where we have a duty or pressing need to involve them;
- regulators such as the Charity Commission, the Information Commissioner's Office, HM Revenue and Customs, and the regulator of any adviser working with us;
- our IT and infrastructure providers, who process data on our behalf under written contracts that meet the requirements of the UK GDPR (these are processors, not independent users of your data);
- courts, tribunals, and the other parties to legal proceedings, where this is necessary to advise on or support your case.

We do not sell your data. We do not share your data with advertisers or marketing companies. We do not share identifiable data with our funders. We do not share your data with anyone outside the United Kingdom unless we are satisfied that it will be protected to a standard equivalent to UK law, and we will tell you about any such transfer.

7. Where and how we store your data

Information you give us in writing or electronically is stored on systems that are encrypted in transit and at rest. Access is restricted by role and protected by strong authentication. Hard copy notes taken during your appointment are kept in a locked location and are transferred securely when no longer needed.

We do not store your information on volunteers' personal devices. Where a regulated adviser keeps a working file relating to your matter, that file is held in line with their professional rules on confidentiality and data security.

We back up our systems regularly. Backups are encrypted and kept for no longer than is necessary.

8. How long we keep your information

We keep your information only for as long as we need it. The default retention periods are set out below. We keep them under review and will not keep your information for longer than is necessary for the purpose for which we hold it.

- Enquiries that do not lead to an appointment: three months from the date of the enquiry, unless you ask us to delete the record sooner.
- Records of appointments and advice given: six years from the date of the appointment, in line with the limitation period for professional negligence claims. We may keep records for longer where there is good reason, for example where a matter is ongoing.

- McKenzie friend support records: six years from the date of the last hearing attended.
- Safeguarding records: for the period required by relevant statutory and regulatory guidance, which may be longer than the periods above.
- Financial records, including any fees charged: for seven years from the end of the financial year to which they relate.
- Funding and grant records: for the period required by our funding agreement, and in any event for seven years.

When the retention period ends, we securely delete or anonymise your information. Anonymous information may be kept indefinitely so that we can understand the impact of our work.

9. Your rights under data protection law

Under the UK GDPR and the Data Protection Act 2018 you have a number of rights in relation to your personal data. These rights are not absolute, and there are circumstances in which they will not apply, but we will always consider any request you make and explain our response.

- The right to be informed. This policy is part of how we meet that right.
- The right of access, to ask for a copy of the personal data we hold about you.
- The right to rectification, to ask us to correct inaccurate or incomplete data.
- The right to erasure, to ask us to delete your data, subject to our legal and regulatory obligations to keep certain records.
- The right to restrict processing, to ask us to pause processing while a question about your data is resolved.
- The right to object to processing we carry out on the basis of legitimate interests.
- The right to data portability, to receive certain data in a portable format, where applicable.
- The right to withdraw consent at any time, where we are processing on the basis of consent. Withdrawing consent does not affect the lawfulness of processing carried out before you withdrew it.
- The right to complain to the Information Commissioner's Office (see section 13).

To exercise any of these rights, please contact us at legalsupport@jedidiah.org.uk. We will respond within one month, although in complex cases we may extend this by up to two further months and will tell you if we need to do so.

10. Children's data

The advice service is for adults, and we do not advise on child arrangements, contact, residence or other matters concerning the upbringing of children. We may nonetheless hold limited information about children in the context of a parent's financial matter, for example where housing needs or maintenance are in issue. Where we hold information about a child,

we treat it with extra care and follow our safeguarding procedures.

11. Security and what we do if something goes wrong

We take appropriate technical and organisational measures to protect your data, including access controls, encryption, volunteer and staff training, and regular review of our systems. Despite these measures, no system is perfectly secure, and we cannot guarantee that information sent to us electronically will always be safe in transit.

If we become aware of a personal data breach that is likely to result in a risk to your rights and freedoms, we will report it to the Information Commissioner's Office within 72 hours of becoming aware of it, and we will tell you without undue delay where the breach is likely to result in a high risk to you. Our internal breach response procedure sets out the steps we take to contain, investigate, and learn from any incident.

12. Special considerations where contact may put you at risk

We recognise that for some of the people we help, the way we communicate can carry real risk, particularly where a former or current partner controls the household finances, devices or post. We work to a few specific principles:

- we will only contact you on the route you have told us is safe;
- we will not put substantive details about your matter in messages, voicemails or letters that could be intercepted;
- we will not confirm to a third party that you have contacted us, or that you have an appointment with us, without your express permission, except where we are legally required to do so;
- where your appointment is online, we will not send joining details to a route you have not confirmed is safe, and we will agree with you in advance what to do if you have to end the call suddenly;
- if you cannot find a private place to speak, tell us and we will look at alternatives with you, including a different time or a safe physical location;
- you can ask us at any time to delete your contact details and replace them with a different safe route;
- you can ask us to use a name or initial of your choosing on our records and in any communication.

If at any point you tell us your safety has changed, please say so and we will adjust how we communicate with you.

13. How to complain

If you are unhappy with how we have handled your data, please tell us first by writing to legalsupport@jedidiah.org.uk. We will look into it promptly and reply in writing.

If you remain unhappy, you have the right to complain to the Information Commissioner's Office, the UK's independent regulator for data protection. You can do this online at ico.org.uk, by post to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF, or by phone on 0303 123 1113.

If your complaint is about the conduct of a regulated adviser rather than about your data, we will tell you which regulator to approach.

14. Changes to this policy

We will keep this policy under review and update it where the law changes, our practices change, or we identify ways to do better. Where we make material changes, we will publish the new version on our website and, where it is relevant to you and we have your contact details, we will tell you directly.

15. How to contact us

By email: legalsupport@jedidiah.org.uk

By post: Jedidiah UK, Janelle House, 6 Hartham Lane, Hertford SG14 1QN.

Please mark any correspondence relating to this policy "Data Protection, Private and Confidential".

Appendix: Appropriate Policy Document

Special category data and criminal offence data

Jedidiah UK · Version 1.0 · Effective from 18 September 2026 · Review due September 2027

A1. Purpose and status of this document

This appendix is our Appropriate Policy Document for the purposes of Schedule 1, Part 4, paragraph 39 of the Data Protection Act 2018. Schedule 1, Part 2, paragraph 5 provides that a substantial public interest condition in Part 2 of that Schedule is met only if the controller has such a document in place at the time of the processing.

It sits alongside the privacy policy above and does not replace it. It explains our procedures for complying with the principles in Article 5 of the UK GDPR when we process special category data or criminal offence data in reliance on a Schedule 1 condition, and it sets out our retention and erasure policies for that data.

A2. The conditions we rely on

Most of the special category data we hold is processed with your explicit consent under Article 9(2)(a) of the UK GDPR, which does not require an Appropriate Policy Document. This document is concerned with the narrower set of situations in which we process special category or criminal offence data without consent.

A2.1 Safeguarding of children and of individuals at risk

Schedule 1, Part 2, paragraph 18. We rely on this where we need to protect an individual from neglect or from physical, mental or emotional harm, or to protect their well-being, and that individual is either under 18 or is an adult at risk. An adult is at risk for this purpose only where we have reasonable cause to suspect that they have needs for care and support, are experiencing or at risk of neglect or harm, and are unable as a result of those needs to protect themselves against it. The condition applies only where we act without consent, either because consent cannot be given, or because we cannot reasonably be expected to obtain it, or because seeking it would prejudice the protection we are trying to provide.

A2.2 Preventing or detecting unlawful acts

Schedule 1, Part 2, paragraph 10. We rely on this where we report a suspected criminal offence, including controlling or coercive behaviour, assault, harassment or threats, and it would prejudice that purpose to seek consent first.

A2.3 Vital interests

Article 9(2)(c) of the UK GDPR. We rely on this where there is an immediate threat to life or to someone's physical safety and the data subject is physically or legally incapable of giving consent.

A2.4 Legal claims and judicial acts

Article 9(2)(f) of the UK GDPR, together with the corresponding conditions in Schedule 1 for criminal offence data. We rely on these where processing is necessary for the establishment, exercise or defence of legal claims, or in connection with proceedings before a court or tribunal.

A3. Where none of these conditions applies

We recognise that most of the adults who use our service are not adults at risk within the meaning of paragraph 18. A person who is financially controlled by a partner, but who has no needs for care and support, will usually fall outside that definition even though their situation is serious.

Where we have a concern about such a person and none of the conditions in A2 applies, we do not make a disclosure of special category data without their consent. We work with them to obtain consent, we give them the information they need to approach an agency themselves, and we record the decision and the reason for it. Concern alone does not create a lawful basis, and we do not treat it as if it did.

A4. How we comply with the Article 5 principles

A4.1 Lawfulness, fairness and transparency

We identify and record an Article 6 basis and an Article 9 condition, and where relevant a Schedule 1 condition, before we process. The privacy policy above tells people what we do with their information, and this appendix is published with it. Where we disclose without consent we tell the person what we have done and why, unless doing so would increase the risk to them or to someone else, in which case we record why we did not.

A4.2 Purpose limitation

We process this data only for the purposes set out in the privacy policy. We do not use safeguarding information for fundraising, marketing, research or funder reporting.

A4.3 Data minimisation

We share the minimum necessary with the agency best placed to act, and no more. We do not forward whole files where a summary will do, and we do not include material about third parties unless it is necessary to the concern.

A4.4 Accuracy

We distinguish clearly between what a person has told us, what we have observed, and what we have inferred. Records are made promptly. Where a person tells us something we hold is wrong, we correct it or record the disagreement.

A4.5 Storage limitation

We keep this data for the periods set out in A5 and no longer, and we review those periods when we review this document.

A4.6 Integrity and confidentiality

This data is held on encrypted systems with role based access, and is seen only by those who need it. Volunteers and staff are trained on confidentiality before they begin, and the safeguarding measures in section 12 of the privacy policy apply to every communication about it.

A4.7 Accountability

Our record of processing activities identifies the condition relied on for each processing operation, how it satisfies Article 6, and whether the data is retained and erased in accordance with the policies described in A5. Where it is not, we record the reason.

A5. Retention and erasure

Special category and criminal offence data processed in reliance on a Schedule 1 condition is retained as follows:

- safeguarding records, including records of a decision not to disclose: six years from the date of the concern, or until the person reaches 25 where the concern relates to a child, whichever is later;
- special category data forming part of an advice record: six years from the date of the appointment, in line with section 8 of the privacy policy;
- criminal offence data processed for the establishment, exercise or defence of legal claims: for the duration of the matter and six years afterwards;
- data processed in reliance on the vital interests condition: for as long as needed to address the immediate risk, and then in line with the safeguarding period above.

At the end of the retention period the data is securely deleted or anonymised. Deletion is carried out on both live systems and backups within the backup cycle.

A6. Review and availability

We keep this document under review and update it where our practice or the law changes. We will retain it for at least six months after the processing it covers has ceased, and we will make it available to the Information Commissioner on request, without charge, in accordance with the additional safeguards in Part 4 of Schedule 1 to the Data Protection Act 2018.

Questions about this appendix should be sent to legalsupport@jedidiah.org.uk.

Jedidiah UK · Privacy and Data Protection Policy and Appropriate Policy Document · Version 2.0 · Effective 18 September 2026