

Overview

A privacy notice is intended to help you understand how Look Ahead will use your personal data and what your data rights are. How we use your data will vary depending on your relationship to us. For example, there will be differences with personal data processing if you are a Care and Support customer or an employee.

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About us

Look Ahead is registered under the Co-operative and Community Benefit Societies Act (registration number 21004R) and with the Information Commissioner's Office registration number is Z7946688.

Contact Us

Our address is:

Look Ahead
Kings Buildings
16 Smith Square
London SW1P 3HQ

Our main contact number is **0333 010 4600**

But if you want to speak about this privacy notice, your personal data or your data rights, please contact our Data Protection Officer either by writing to the above address or emailing: myinforequest@lookahead.org.uk.

Personal Data we process

Look Ahead is a provider of Care, Support and Housing specialising in delivering mental health, learning disabilities, homelessness and young people services.

We process personal data for several reasons and below is a high-level overview of the personal data we process and our lawful basis for doing so.

Please refer to the various tables in this Privacy Notice which contain more detailed information based upon your relationship with Look Ahead e.g. whether you are a Tenant or Job Applicant etc. We have standalone Privacy Notices such as for Job Applicants and Employees (includes volunteers and Board Members as well).

Categories of personal data

Categories of personal data	What we do with it	Our lawful bases
Care and support	<p>We deliver care and support services. We need to maintain customer records to meet our contractual and legal obligations.</p> <p>We capture some information to ensure staff can effectively manage risk relating to customers and meet their support needs.</p>	<p>Look Ahead relies on either Legitimate Interests or Public Task depending on the specific type and area of provision.</p> <p>In some circumstances, we may rely on consent where third parties are involved in support and care.</p> <p>When someone's life is at risk, we rely on the 'Vital Interests' legal basis.</p>
Covid Vaccination Status	We are obliged to verify the vaccination status of those working in, or visiting registered care homes in a professional capacity.	Legal Obligation
Covid Vaccination Status	We ask staff and customers to provide their COVID vaccination status to help Look Ahead to manage the risk of infection.	Legitimate Interest
Electoral Register	Look Ahead has a legal obligation to inform the Electoral Registration Officers (ERO) of our customers' name, date of birth and nationality when requested to ensure customers are enabled to vote.	Legal Obligation
Tenancy details	<p>Manage your tenancy</p> <p>For new tenants we need to share details with the government. Please refer to the CoRE Privacy Notice in the appendices for further details.</p>	We rely on our contract with you to process information about you relating to Tenancy agreements but have a legal obligation to share with the government.

Categories of personal data	What we do with it	Our lawful bases
Repairs, property maintenance and investment data	We need to book appointments for repairs, have historical information to best manage our assets and to provide breakdowns for service charges.	This will either be part of managing your tenancy if it is inside your home or our legitimate interest in maintaining and improving our properties.
Waiting lists	We administer waiting lists for applicants to become our customers.	This is information we process for you to enter into a contract. Where Look Ahead manages this service of behalf of others this will be either Legitimate Interests or Public Task depending on the specific type and area of provision.
Images	We use images in our publications or on our website.	We will seek your consent before publishing images of you.
Financial information	Collect rent and manage arrears	Contract, where this is relating to fraud then this will be legal obligation.
Employment related information	<p>We will need to process employment information to fulfil our obligations as an employer.</p> <p>For volunteers we may need to undertake a DBS check depending on the activity. We will need to know your name, what volunteering you are interested in taking part in as well as contact details.</p> <p>More detailed information is set out in our separate Privacy Notice for job applicants on our website.</p>	<p>There is a mixture of contractual and legal obligations for us to manage our employees.</p> <p>Processing volunteers' information is based on consent.</p>
Research data	Look Ahead will carry out a range of research that is aligned to our mission. This is either commissioned or self-funded.	We will rely on Public Task or Legitimate Interests to conduct the research. Where we ask people to participate, we will seek their consent.

Categories of personal data	What we do with it	Our lawful bases
Information about people working for organisations we interact with	Look Ahead works with various partners, agencies, client organisations and suppliers. We will need information such as contact details and communication records to work with other organisations.	We rely on a mixture of Legitimate Interests, Public Task and Contractual obligations depending on the exact nature of the organisation’s relationship with us.
Special Category and sensitive personal data	<p>The nature of Look Ahead’s business mean that we regularly process health data. We will process all other types of special category data (Ethnic or racial origin, sexual orientation, health details religion sexual life, genetic data, political beliefs and trade union membership). Exactly what we do depends on your relationship to Look Ahead.</p> <p>We may also hold information on criminal offences (allegations of offences, outcomes and sentences) or details of harassment or abuse.</p>	<p>There are conditions for processing this kind of personal data.</p> <p>For employees we rely on “Employment”.</p> <p>For Care and Support customers we rely on “Health and Social Care Purposes”.</p> <p>Where we are working to help address public health needs, we will rely on “Public Health”. Please refer to our Legal Basis for further details on the laws that Look Ahead must comply with.</p> <p>For monitoring diversity and inclusion, we rely on “Equality of Opportunity or Treatment”.</p> <p>For Safeguarding we rely on “Safeguarding of children and individuals at risk”.</p> <p>For Safeguarding an individual’s economic wellbeing, we rely on “Safeguarding of economic well-being of certain individuals”.</p>
CCTV	Most of our properties have CCTV in public areas to deter crime and antisocial behaviour and to promote public safety by helping to identify and prosecute criminal offenders.	Depending on the area there is a mixture of Legitimate Interests and Public Task. Where there is a threat to life CCTV may be deployed relying on Vital Interests.

Categories of personal data	What we do with it	Our lawful bases
Corporate communication	<p>Look Ahead may provide newsletters and updates about forthcoming events.</p> <p>Where there are suitable products or services offered by Look Ahead, we may market these to you.</p>	<p>It is in our legitimate interest to provide you with information on forthcoming events.</p> <p>Where we are marketing, we will rely on your consent.</p>

How Look Ahead processes personal data

Query	Detail
Where do we get your data?	<p>It depends on your relationship to Look Ahead.</p> <p>We will get much of the information directly from you.</p> <p>For customers, we may receive initial information by referral from local authorities, NHS or your former housing association.</p> <p>For employees who are transferring from another provider we may get some information from your previous employer.</p> <p>If you are a job applicant, we may also receive your information from recruitment agencies or from referees.</p>
Who might we share your data with?	<p>We only disclose your personal information to third parties where we have a legitimate and lawful reason for doing so. This might be providing your contact details to a repairs contractor if you have a leak or to inform a catering provider of your dietary requirements.</p> <p>Where we are commissioned to provide care and support, usually by a local authority or the NHS, we will share whatever relevant information is specified by the contract.</p> <p>We may occasionally share personal data with organisations such as the police where it is lawful or a legal requirement to do so.</p> <p>We do not sell your personal data.</p> <p>For more information please refer to the “Partners who we share data with” section.</p>

Query	Detail
<p>How will your data be kept and processed securely?</p>	<p>Your data is treated with the utmost confidentiality and security.</p> <p>Your data will be stored in a secure Cloud environment with various technical safeguards such as password protection, encryption and firewalls.</p> <p>Any paper files will be secured in lockable cabinets in safe working environments.</p> <p>We have secured applications that enable us to share personal data with a robust degree of security via their encryption.</p> <p>Where Special Category Data or criminal offence data is processed and stored, we ensure that there are appropriate security parameters in place.</p>
<p>How long will your information be kept?</p>	<p>This varies depending on your relationship to Look Ahead and the reason we need it. If you are a current customer then we will keep your personal data for the duration that you remain a customer usually with an additional six years.</p> <p>We have a Retention and Disposal Schedule and related policy in place, which outlines how long we keep different types of information. It also details how your personal data will be securely disposed of. The policy regularly reviewed.</p>
<p>Transfer</p>	<p>We will not transfer or store your personal data outside of Europe (the European Economic Area), outside of the control of the UK/European regulations.</p> <p>We will ensure that binding rules are present in agreements with third parties around the transfer and storage of your personal data that prevent this or ensure an equivalent level of protection if a technology platform uses applications based in other territories.</p>

Partners we share data with

Type of Partner	What we might share
The Government and Regulators	There are many legal obligations that Look Ahead has to provide data to various parts of the government. Please refer to the “Our Legal Obligations in processing personal data” for further details.
Local Authority (Council)	Where the Local Authority is the commissioning authority (which means that they are paying for the care and support provision) then we will share whatever relevant information is specified by the contract. With other Local Authorities we will engage in various partnership working to participate in groups to help address anti-social behaviour and for safeguarding issues.
NHS	Where the NHS is the commissioning authority (which means that they are paying for the care and support provision) then we will share whatever relevant information is specified by the contract.
Auditors	Look Ahead appoints auditors who will have access to relevant personal data to perform their functions. Similarly, where our Commissioners contract with us to provide a service to our customers, they will audit relevant customer and staff records to ensure we are fulfilling the terms of our contract.
Police and other law enforcement agencies	We will share information with the police and other law enforcement agencies as per our Legal Obligations, a task in the Public Interest or Legitimate Interests. Where we receive a valid request from the police we provide personal data.
Other Housing or Care and Support Providers	Look Ahead work in partnership with a number of other Housing and/or care and support providers. We will seek to ensure that we have a data sharing agreement in place before sharing any personal details. This could be related to customers or properties that are shared between the organisations.
Suppliers	We will need to tell suppliers relevant information for them to fulfil our requirements for them. This could be to provide a repairs service (and tell them your name, address, contact details and other necessary information to facilitate the repair) or for a caterer to know your dietary requirements (e.g. intolerances and allergies as well as your personal requirements like kosher or vegan).

Type of Partner	What we might share
Third party organisations related to care and support	We work with third party organisations to provide specialist expertise in meeting the support goals of our customers. Depending on the context we may seek customer consent to share any personal data; or may rely on an alternative lawful basis for sharing.

The National Opt-Out

In 2018, the government introduced a ‘national opt-out policy’ to enable NHS patients and those in CQC registered adult care services to choose whether their confidential patient information is used for anything beyond their individual care and treatment, for example for research and planning purposes.

Some of Look Ahead’s services are registered with the CQC but it does not currently use any data for planning or research purposes covered by the national data opt-out. We review all the confidential patient information we process on an annual basis to check whether it is used for research and planning purposes. If it is, then individuals can decide to stop their information being shared for this purpose. You can find out more information at <https://www.nhs.uk/your-nhs-data-matters/>.

Our Legal Obligations in processing personal data

Look Ahead is subject to many laws that affect how we process your personal data. The table below is intended to provide you with a good level of detail on these to inform you to the best of our ability of our legal obligations, but does not cover every single law.

No	Law	Personal data implications	Relates to
1	Medical Reports Act 1988	Medical reports that have been provided for employment or insurance purposes.	For employment, employees; for insurance potentially anyone.
2	Care Act 2014	This affects care assessments, support plans, personal care advocacy. This also adds a duty to protect the vulnerable and engage in safeguarding.	Individuals receiving or seeking care.

No	Law	Personal data implications	Relates to
3	Children Act 1989	Look Ahead will engage in multi-agency working to promote child welfare. There are various orders that a Local Authority has to comply with that Look Ahead.	Children.
4	Children's Act 2004	Ensure that employees with safeguarding responsibilities have suitable training.	Employees.
5	Companies Act 2006	Records for Directorships need to be stored and retained as well as Board minutes.	Look Ahead's Company Directors and Board Members.
6	Control of Asbestos at Work Regulations 2002	Training records, licences and exposure relating asbestos. Associated medical records.	Employees and relevant tradespersons.
7	Control of Asbestos Regulations 2006	Training records, licences and exposure relating asbestos. Associated medical records.	Relevant tradespersons.
8	Data Protection Act 2018	Sets out organisational responsibilities and individuals rights	Living individuals
9	Equalities Act 2010	Conducting Equality Impact Assessments, records of Equality training.	Employees and Customers
10	Fraud Act 2006	We will need to retain and share with relevant authorities information that has been supplied to gain tenancies or support agreements as well as purchase properties.	Customers
11	UK General Data Protection Regulation 2016	Sets out organisational responsibilities and individuals rights	Living individuals
12	Health and Safety at Work Act 1979	Look Ahead need to create and maintain records of Health and Safety training, incidents and protective equipment.	Employees and relevant tradespersons

No	Law	Personal data implications	Relates to
13	Health and Social Care Act 2008	Ensuring that quality care is provided as per guidance and instructions from the Care Quality Commission.	Care and Support customers
14	Health and Social Care Act 2012	This Act enables social care customers to choose their own provision.	Care and Support customers
15	Homelessness Act 2002	This contains provisions to administer applications for social housing. We will need to process details around your housing needs (which may contain Special Category Data such as information on your health).	Prospective and current tenants
16	Homelessness Reduction Act 2017	This requires Look Ahead to keep a record of customers to are threatened with homelessness.	Customers
17	Housing Act 1985	Look Ahead need to know occupants age, age and gender to ensure that properties are not statutorily overcrowded	Tenants
18	Housing Act 1996	This contains provisions to gather details to gather personal data to manage the anti-social behaviour of tenants.	Tenants
19	Housing Act 2004	This includes provisions to assessing and removing health risks. For example, we may need to collate records of fire hazards left by customers in areas that are meant to be left clear. This act requires the provision of a Tenant Deposit Protection Scheme.	Customers for the health risks. The deposit protection scheme if for Private sector tenants (which Look Ahead do not have at the time of writing this Privacy Notice).
20	Housing and Planning Act 2016	This contains details on the Right to Buy, where Look Ahead will need to maintain details of eligibility as well as for administration purposes.	Tenants

No	Law	Personal data implications	Relates to
21	Housing and Regeneration Act 2008	This changed some of the regulation around how we deliver our services meaning we needed to learn more about our customers.	Customers
22	Human Rights Act 1998	Article 8: which establishes the right to respect for private and family life	Individuals
23	Income Tax (PAYE) Regulations 2003	This involves us processing details around payroll.	Employees
24	Limitations Act 1980	The Limitations Act relates to the period when claims can be made against an organisation. This is the base for the majority of Look Ahead's person data retention.	Everyone
25	Localism Act 2011	This includes various provisions, but it is largely where Look Ahead need to provide funding for developments to community projects. We will need to process personal data of individuals involved in such schemes.	Community Partners
26	Mental Capacity Act 2005	This relates to individuals who do not have the mental capacity to make some or all their own decisions. Look Ahead will need to keep record of these individuals, their needs and who is authorised to make decisions on their behalf.	Customers
27	Mental Health Act 1983	This includes numerous provisions such as giving others powers to make decisions for you, to enabling you to treated for your mental health needs in the community.	Customers and Employees

No	Law	Personal data implications	Relates to
28	Prevention of Social Housing Fraud Act 2013	This relates to the prevention of social housing fraud and requires information to be process to this effect. This means that Look Ahead will need to keep records of the various individuals with authority to act on your behalf as well as the associated medical records.	Customers
29	Privacy and Electronic Communications regulations 2003	This relates to rules around direct marketing and cookies and similar technologies that affect individuals	Individuals
30	Safeguarding Vulnerable Groups Act 2006	This puts a duty on Look Ahead to check the suitability of our employees and volunteers working with vulnerable groups. We need to undertake checks such as criminal checks and keep appropriate records.	Employees and volunteers
31	Statutory Maternity Pay (General) Regulations 1986	We need to keep a track of pregnant employees and those on maternity leave to administer the provisions in this Act.	Employees
32	Statutory Shared Parental Pay (Admin) regulations 2014	We will need to keep a track of where employees are having or adopting a child. Look Ahead will need to keep track and administer requests.	Employees
33	Statutory Sick Pay Regulations 1982	We will need to keep track of the amount of sickness absences as well as payments.	Employees

No	Law	Personal data implications	Relates to
34	Taxes Management Act 1970	Details of payments including to employees need to be processed, shared with HMRC and retained.	Employees
35	The Income Tax (employments) Regulations 1993	This relates to the management of expenses and payroll.	Employees and others that are allowed to claim expenses
36	The Statutory Paternity Pay and Statutory Adoption Pay (admin) Regulations 2002	This requires Look Ahead to monitor and manage paternity and adoption pay.	Employees

Your Data Rights

The Data Protection Act 2018 sets out multiple rights that you have as an individual. These are not all absolute rights, which means that in some circumstances your request will be unsuccessful. For example, if you make repeated requests or it is unclear what is being asked then we may refuse. We will also seek to work with you to clarify and explain things so we can ensure that you are able to exercise your rights as you intend. Before we can process these, we will need to ensure that we have confirmed your identity.

Right to Access

You have the right to request a copy of the data we hold about you and we must comply with your request within one calendar month. We may refuse or charge for requests that are manifestly unfounded or excessive. If your request is refused, we will write to you within one month to let you know. You will then have the right to complain to the ICO (contact details are provided in the “Right to Complain” section) and to a judicial remedy.

Right to be forgotten

You have the right to request that we erase your information where the use of that information would no longer meet the requirements of the Data Protection Act 2018. Once the request is made, the information must be deleted within one month. Where the information in question has been made public or transferred to a third party, we must also take reasonable steps to inform those third parties about the request for deletion including any links to, or copies of that personal information. The above does not apply when it is necessary to keep the information in relation to legal proceedings, to comply with a statutory obligation, or to perform tasks in the public interest.

Correcting errors or omissions (Rectification)

You have the right to ask us to correct inaccurate information about you or to add to the information where it is incomplete.

Right to restrict processing

You have the right to request restriction of processing if your information is no longer processed (other than it being stored), is incorrect and/or the processing is unlawful but you object to its deletion and you want us to hold your information as you may need it for legal reasons.

Restricting processing means that Look Ahead would stop actively using or updating your information but would continue to store it.

Right to object

You have the right to object to processing in certain circumstances. You can always object to any direct marketing. You can also object to the processing if Look Ahead uses “Public Task” or “Legitimate Interests” as its basis for processing your personal data, but you need to explain how the processing is affecting you.

Please refer to the relevant section to identify the lawful basis we use for processing your data. You may also object to profiling and automated decision-making. Profiling is where decisions are made about you based on certain things in your personal information, for example health conditions. Automated decision-making is where things have been programmed and a decision is made without a person looking at it.

Right to data portability

You have the right to receive the personal data in a structured, commonly used and machine-readable format if you provided us with your personal data; we are relying on either your consent or a contract with you as our lawful basis; and the data is electronic. For example, you could ask to have your employee file as a PDF so it can be transferred to another employer.

Rights to complain

As mentioned earlier, you have the right to complain to the Information Commissioner’s Office (ICO) if you think there is a problem with the way in which Look Ahead are handling your information. To contact the ICO, please call 0303 123 1113 or visit their website at <https://ico.org.uk>.

Changes to this Notice


The Privacy Notice maybe updated from time to time to reflect any organisation changes or to reflect any changed to the data protection legislation or any other relevant legislation.

The Privacy Notice was last updated on 14 April 2022.

Appendix – CoRE Privacy Notice

The Ministry of Housing, Communities and Local Government requires Look Ahead to provide their Privacy Notice to all new social housing tenants and sales. This is updated from time to time, but the current version (as of April 2021) is included below. For further details please refer to the Government website [CORE - Learn About CORE \(communities.gov.uk\)](https://www.communities.gov.uk)

Privacy Notice for all social housing tenants of CORE data provider




Ministry of Housing,
Communities &
Local Government

CONTINUOUS RECORDING OF SOCIAL HOUSING LETTINGS AND SALES (CORE)


Information for all social housing tenants

HOW ARE WE USING YOUR INFORMATION?




If your household has entered a new social housing tenancy after 1989, social housing providers would have shared your personal information with the Government for research and statistical purposes.

HOW IS THIS INFORMATION PROVIDED?




The information is provided via CORE (Continuous Recording). CORE was set up in 1989 and initially only recorded data from private registered providers but from 2004 local authority lettings are also recorded. It collects information on the tenants/buyers, tenancy/sale and dwelling itself. The Ministry of Housing Communities and Local Government (MHCLG) has been responsible for the management of CORE since October 2015.

WHY ARE WE SHARING THIS INFORMATION?



Information collected via CORE may be shared with other Government Departments and Agencies, for example the Greater London Authority or the Homes and Communities Agency. CORE data providers can also access data for their organisations via the CORE system. Data is only shared for research and statistical purposes.

HOW DOES THIS AFFECT YOU?



It will not affect your benefits, services or treatments that you get. The information shared is anonymous and handled with care in accordance with the law. We are collecting and sharing your information to help us understand better the social housing market and inform social housing policy.

IF YOU WANT TO KNOW MORE...

CORE Data is collected on behalf of the Ministry of Housing, Communities and Local Government (MHCLG) for research and statistical purposes only. Data providers do not require the consent of tenants to provide the information but tenants have the right to know how and for what purpose your data is being collected, held and use. The processing must have a lawful basis which, in this case, is that the processing is necessary for the performance of a task carried out in the public interest to meet a function of the Crown, a Minister of the Crown or a government department.

You have the right to object and you have the right to obtain confirmation that your data is being processed, and to access your personal data. You also have the right to have any incorrect personal data corrected.

The information collected via CORE relates to your tenancy, the dwelling you are living in or buying, and your household. Some of the information may have been provided by you as a tenant when signing the new tenancy or buying your property; other has been gathered from the housing management systems of social housing providers. Data collected will be held for as long as necessary for research and statistical purposes. When no longer needed, data will be destroyed in a safe manner.

We are aware that some of the data collected is particularly sensitive: ethnic group; previous tenure in hospital or prison/approved probation hostel support; if household left last settled home because discharged from prison/ long stay hospital/ other institution; or if source of referral is probation/ prison, youth offending team, community mental health team or health service. Please rest assured that all the information collected via CORE is treated in accordance with Data Protection requirements and guidelines.

Data is published by MHCLG in aggregate form on an annual basis as part of a report and complementary tables. To access the annual publications on lettings please visit <https://www.gov.uk/government/collections/rents-lettings-and-tenancies>; To see the publications on sales please visit <https://www.gov.uk/government/collections/social-housing-sales-including-right-to-buy-and-transfers>

CORE data is shared with other public sector bodies for research and statistical purposes only. For example, data is shared with Homes and Communities Agency and the Greater London Authority to allow them to exercise their role in providing adequate social housing. The detail level data is anonymised and protected to minimise the risk of identification and deposited with the UK Data Archive for research purposes.

If you are unhappy with how any aspect of this privacy notice, or how your personal information is being processed, please contact Department Data Protection Officer at: dataprotection@communities.gsi.gov.uk and if you are still not happy, you have the right to lodge a complaint with the Information Commissioner's Office (ICO): <https://ico.org.uk/concerns/>