

Overview

Our privacy notice aims to help you understand how Look Ahead will use your personal data and explain your data rights. 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. We have a separate Privacy Notices for job applicants and our employees.

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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 Care and Support Ltd
Cally Yard
439 Caledonian Road
London N7 9BG

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

But if you want to discuss 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: IG@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.

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>

Query	Detail
<p>Who might we share your data with?</p>	<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>
<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>

Query	Detail
Transfer	<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>

Our lawful bases for processing your information

Look Ahead must rely on a valid lawful basis from [UK GDPR Article 6\(1\)](#) to process personal data. There are six lawful bases to choose from and each is equally valid, but the purpose and context of the processing influences which is the most applicable. We explain the lawful bases below with examples of when they might apply.

Consent	<p>You have given us consent to process your personal data for specific purpose(s). For example: you may consent to Look Ahead using a photograph of you on our website.</p> <p>Where we rely on your consent, you can withdraw it at any time. This will not affect the legality of any processing we undertook whilst we had your consent.</p> <p>If you are a customer and wish to withdraw your consent, in most instances you will need to contact your support worker. Where different arrangements apply, we explain how to withdraw your consent, in the section Categories of personal data.</p>
Contract	<p>Processing is necessary for the performance of a contract we have with you; or to take steps at your request prior to entering a contract.</p> <p>For our customers, this will typically be your housing/tenancy agreement; or the information we obtained about you prior to offering you a contract.</p>
Legal Obligation	<p>Processing is necessary to comply with laws that apply to Look Ahead. For example:</p> <p>We have a legal obligation to respond within a given timeframe, if you wish to exercise any of your data protection rights</p>
Vital interests	<p>The processing is necessary to protect someone's life. This means in a life-threatening situation we can share relevant information about you to protect your life or someone else's.</p> <p>For example, if you have a Personal Emergency Evacuation Plan (PEEP), and there was a fire in the building we can share your PEEP with emergency services.</p>

Public task	<p>The processing is necessary for Look Ahead to perform a task in the public interest and the task has a clear basis in law.</p> <p>Look Ahead rarely relies on this lawful basis which is designed for organisations such as government departments and local authorities, whose functions are set out in legislation.</p> <p>However, we may rely on this lawful basis to share personal data with law enforcement organisations where we consider the public or our customers could otherwise be at risk.</p>
Legitimate interests	<p>The processing is necessary to pursue either Look Ahead's or a third party's legitimate interest.</p> <p>To rely on this lawful basis for processing we must demonstrate that:</p> <ul style="list-style-type: none"> • we have legitimate grounds to process personal data • the processing is necessary and proportionate to achieve our purpose; and • provide individuals with an opportunity to object to the processing <p>For example, when we share relevant customer information with another organisation for safeguarding reasons.</p>

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. This information can come from initial referrals and partner organisation. We use this information to manage risks and provide support.</p> <p>We use your information for safeguarding purposes. This information can come from yourself, partner organisation, or initial referrals.</p> <p>We use information to monitor equality of opportunity</p> <p>We provide financial support and prevent homelessness by helping our customers access benefits</p> <p>We help our customers with their medication by distributing or observing medication</p> <p>We may share your information with partnered organisations to support you.</p>	<p>We rely on steps necessary to enter into a Contract when we receive a referral.</p> <p>For Safeguarding we rely on:</p> <ul style="list-style-type: none"> • Contract with customers or staff • Legitimate Interest where we are protecting others neither staff or customers. • Vital interests in an event of emergency. <p>We have a Legal obligation to monitor equality of opportunity.</p> <p>We rely on Contract to support our customers with their finances and benefits.</p> <p>We rely on our Contract with our customers to support with medication.</p> <p>We rely on Consent to share information with partnered organisations unless:</p> <ul style="list-style-type: none"> • it is a safeguarding issue (Legitimate Interest to protect you or someone else from serious harm); or • a Legal Obligation to share your information.

Categories of personal data	What we do with it	Our lawful bases
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.	This is a Legal Obligation as individuals are required by law to register to vote.
Tenancy details	Manage your tenancy For new tenants we need to share details with the government. Please refer to the CoRE Privacy Notice in the appendices for further details.	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.
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 (Contract) if it is inside your home; or our legitimate interest in maintaining and improving our properties. We also have a Legal Obligation to ensure we provide quality housing for customers.
Waiting lists	We administer waiting lists for applicants to become our customers.	This is information we process prior to entering a contract with you. This is Public Task as we work with local councils to reduce the housing demand.
Images	We use images in our publications or on our website.	We will seek your consent before publishing images of you. If you wish to withdraw this consent, please contact communications@lookahead.org.uk .
Images	We use images in our services to celebrate what our customers are achieving.	We will seek your consent before publishing images of you. If you wish to withdraw this consent, please contact your support worker.
Financial information	Collect rent and manage arrears	Contract , where this is relating to fraud then this will be legal obligation .

Categories of personal data	What we do with it	Our lawful bases
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> <p>You can withdraw consent by contacting: gettinginvolved@lookahead.org.uk however, the impact would likely be we can no longer ask you to volunteer for us.</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 Legitimate Interests to conduct research. Where we ask customers to participate, for example to be interviewed as part of our research, we will seek their consent .
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 and Contractual obligations depending on the exact nature of the organisation's relationship with us.

Categories of personal data	What we do with it	Our lawful bases
CCTV	<p>Most of our properties have CCTV in public areas to deter crime and antisocial behaviour; promote public safety; and assist in investigations.</p> <p>We may share images with law enforcement bodies; or managers conducting investigations where it is lawful, proportionate and justifiable.</p>	<p>We have a legitimate interest in keeping staff, customers and visitors safe and preventing damage to our properties.</p> <p>Sometimes we have a legal obligation to share footage, for example, if we receive a Court Order.</p> <p>In an emergency situation we may rely on vital interests to use images, for example, to establish if a vulnerable person is missing.</p>
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> <p>When Data Use and Access Act 2025 comes into force: if you have expressed interest or shown support for Look Ahead, we can send you marketing communications unless you object. You can object by contacting: communications@lookahead.org.uk</p>
Visitors	<p>If you visit our premises we will record your name, DOB, contact details and time in and out.</p> <p>If you visit one of our services, we require photo ID, take your photograph, record your relationship with customer to create a visitor profile.</p>	<p>We have a Legal obligation to capture this information as we must account for everyone in an emergency.</p> <p>We have a Legitimate Interest in verifying your identity and establishing your relationship with our customer to protect our staff and customers.</p>

Categories of personal data	What we do with it	Our lawful bases
Complaints	If you make a complaint, we will keep a record of your complaint details, your name, and contact details to investigate the complaint.	We have a Legal Obligation to respond to complaints.
Data subject rights requests	If you exercise your data subject rights we need to capture your name, contact details, evidence of ID and information requested to fulfil the request.	We have a Legal Obligation to respond to data subject rights requests.

Special category and criminal offence data

When we process special category or criminal offence data we are required to identify our 'condition for processing' as well as a lawful basis for processing. These conditions are set out in the UK GDPR Article 9.

Categories of personal data	What we do with it	Condition for processing
Special Category and sensitive personal data	<p>The nature of Look Ahead's business means 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 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>

Partners we share data with

Type of Partner	What we might share
The Government and Regulators	There are many legal obligations that Look Ahead must provide data to various parts of the government. Please refer to the "Our Legal Obligations in processing personal data" for further details.

Type of Partner	What we might share
The Ministry of Housing, Communities and Local Government	If you are one of our customers, please note that requires we have to share certain information about new social housing tenants with The Ministry of Housing, Communities and Local Government. This is a legal obligation and you can read about how they use your data in their Privacy Notice: Privacy notice for tenants and buyers of new social housing (CORE)
Local Authority (Council)	<p>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.</p> <p>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.</p> <p>We have a legitimate interest to notify the council regarding rent increases for tenants housing benefits.</p>
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	<p>Look Ahead work in partnership with several other Housing and/or care and support providers.</p> <p>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.</p> <p>We have a legitimate interest to share personal data with other social landlords for safeguarding purposes.</p>

Type of Partner	What we might share
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).
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.

No	Law	Personal data implications	Relates to
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.
3	Children Act 1989	Look Ahead will engage in multi-agency working to promote child welfare. There are various orders that a Local Authority must 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

No	Law	Personal data implications	Relates to
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
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

No	Law	Personal data implications	Relates to
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
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

No	Law	Personal data implications	Relates to
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 be treated for your mental health needs in the community.	Customers and Employees
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

No	Law	Personal data implications	Relates to
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
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

Look Ahead has a complaints procedure to handle information complaints. We have 30 days to acknowledge and respond to them without undue delay.

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 16 July 2025.