Overview

The following information outlines Look Ahead’s privacy notice and how we use your personal data as defined in the General Data Protection Regulation and Data Protection Act 2018. The Regulations define a set of rules and guidelines that we must follow when handling your personal information.

Look Ahead is committed to protecting the privacy of your information and we comply with the principles set out in the General Data Protection Regulation and Data Protection Act 2018. We will ensure that any information you give to us is not misused and it is in line with the guidance contained in the regulations. Look Ahead is registered under the Co-operative and Community Benefit Societies Act.

Reason for processing your information

The Data Protection law allows us to process personal data if we have a lawful basis to do so. This includes sharing your information with third parties outside of Look Ahead. The reason we will use your personal information is to enable us to provide you with social housing accommodation and services to fulfil your tenancy agreement. We will also use your data to provide you with the right care and support and for our employees to ensure we meet the requirements of the employment law. The lawful basis, for Look Ahead to process your information will be our legal obligation to you and some processing maybe done through our legitimate interest, where Look Ahead or a third party have a business need or other good reason to use your data. The processing of activities can be summarised as:

- Letting, renting and leasing properties.
- Managing your accounts including arrears.
- Managing repair, maintenance and adaptations of our properties.
- Maintaining our accounts and records
- Providing associated welfare services advice and support and care.
- Supporting and managing our employees, apprentice’s, agents and contractors.
- Administering waiting lists.
- Carrying out research.

We have a legal obligation to provide you with the right care and support service for example under the:

- Care Act 2014.
- Health and Social Care Act 2008 (regulated activities) Regulations 2014
- Mental Health Act 1983
- Housing Act 2004
- Homelessness Act 2002
- Homelessness Reduction Act
- Children’s Act 2004
- Caldicott Principles

We also comply with the Care Quality Commissions standards for quality and safety.
As a Look Ahead employee data is also necessary for payroll and HR reasons including sick leave and other types of leave for which statutory payments are available. We must comply with the HM Revenue and Customs (HMRC) requirements.

There maybe some processing which may not comply to the legal obligation. The law allows us to also process data if it is in our legitimate interests, our legitimate interest would be:

- To ensure that our services meet the needs of our customers
- To ensure we make use of our resources for our customers and employees and understand how we are performing.
- To ensure we provide a safe service and
- To ensure we understand our customer’s and employee’s experiences through feedback and surveys.

### Types of information we process

<table>
<thead>
<tr>
<th>What personal information may we collect?</th>
<th>Name(s), address, age, contact details, next of kin and their contact details, I.D., sex, National Insurance number, education and employment details, address history, details of any support services, financial details, photograph(s) of you, bank details, any complaints against you and supplier details.</th>
</tr>
</thead>
<tbody>
<tr>
<td>What sensitive personal information may we collect?</td>
<td>Ethnic or racial origin, sexual orientation, health details religion sexual life, genetic data, political beliefs and trade union membership We may also hold information on criminal offences (outcomes and sentences) and details of harassment or abuse.</td>
</tr>
<tr>
<td>Where do we get your data?</td>
<td>We will receive your information by referral from local authorities, NHS or your former housing association. We may also receive you information from recruitment agencies</td>
</tr>
<tr>
<td>Who might we share your data with?</td>
<td>We only disclose your personal information to third parties with your explicit consent. However, we may sometimes need to share information without your consent to comply with any legal obligation or to fulfil the purposes for which it was submitted. We will not sell your personal data to third parties or pass on your personal data to unrelated third parties.</td>
</tr>
<tr>
<td>How long will your data be kept securely?</td>
<td>Your data is treated with the utmost confidentiality and security. Your data will be stored on a secure system which is password protected and any paper files will be kept in secure lockable cabinets in locked offices. This is also detailed in our Data Protection and Confidentiality Policy and Procedure.</td>
</tr>
<tr>
<td>How long will your information be kept?</td>
<td>We have a document retention policy in place, which outlines how long we keep different types of information. The policy will also be reviewed annually.</td>
</tr>
</tbody>
</table>
**CCTV**

Most of our properties have CCTV in public areas to deter crime and anti-social behaviour and to promote public safety by helping to identify and prosecute criminal offenders. You can ask for a copy of any CCTV images taken of yourself by making a 'subject access request'. See Rights to Access

**Transfer**

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.

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**Your rights as a customer or employee of Look Ahead**

**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. As a charitable organisation 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 supervisory authority and to a judicial remedy.

**Right to be forgotten**

You have the right to request that your information be deleted where the use of that information would no longer meet the requirements of the General Data Protection Regulation.

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.

**Rectification**

You have the right to have inaccurate and incomplete information about you amended and completed.

**Right to restriction**

You have the right to request restriction if your information is no longer processed (other than it being stored) or is incorrect 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.
Right to object
You have the right to object if you are being profiled. Profiling is where decisions are made about you based on certain things in your personal information, for example health conditions.

Right to data portability
You have the right to receive the personal data in a structured, commonly used and machine readable format.

Rights to complain
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.

Contact us
If you have any questions concerning your information, you can contact the Information Governance Manager at: Myinforequest@lookahead.org.uk.

Look Ahead
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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 24 May 2018.