

Self-Assessment Against Housing Ombudsman Spotlight report on Knowledge and Information Management

October 2024

Governance and Culture	
R1 Define the oversight role of governance for knowledge and information management	Governance should seek assurance that the landlord knows its products, services and residents well, and that it uses this data to inform business and financial planning.
<p>Overall responsibility for the Landlord Service sits with the Cabinet Member for Residents’ Services. An officer level Landlord Board meets on a monthly basis, the purpose of which is to ‘act as the strategic and operational management team for the delivery of housing services to the Council’s tenants and leaseholders and the Housing Revenue Account (HRA) housing stock, including making recommendations to Cabinet or Cabinet Member as appropriate’. The LBH Landlord Board is responsible for reports to the Cabinet Member for Residents’ services and providing six monthly updates to the Council’s Corporate Management Team. The governance framework includes a number of sub boards and operational groups that report to the Landlord Board.</p> <p>The role of Landlord Board is shown in full below as Knowledge and Information Management (KIM) is relevant to all of these functions. The terms of reference are scheduled for review in January 2025, this will now be brought forward and will include specifically referencing responsibility for KIM including development of a KIM Strategy.</p> <p>Role</p> <ul style="list-style-type: none"> ● Advice to the portfolio holders regarding future planning and strategy for Landlord Services including direction of travel, vision and values, objectives and priorities ● Establish and deliver appropriate strategies, policies and procedures to achieve these objectives including the HRA Business Plan, Asset Management Strategy, and Resident Engagement and Involvement Strategy. ● Oversee the HRA budget including annual review of the draft Business Plan and associated Capital and Revenue Budgets ● Contribute to the delivery of the Council’s Housing Strategy and wider corporate objectives ● Maintain a risk management register and make recommendations on all matters that create a significant risk to HRA landlord services ● Establish and oversee delivery boards i) Housing Management Board, ii) Assets and Compliance Board and iii) Fire Safety Board; and task and finish groups as necessary ● Monitor performance and outcomes of landlord housing functions and delivery by other services within the Council and by external contractors in relation to HRA funded services ● Have sight of any relevant scrutiny reports that are produced from any service audits or reviews that are carried out and be responsible for improvement plan delivery ● Assure itself and the portfolio holders of compliance with all relevant legislation and regulatory requirements relating to HRA services 	

- Sign off of all regulatory submissions
- Ensure effective business continuity for the HRA services is in place
- Ensure that tenants and leaseholders are actively and meaningfully engaged in the effective delivery, shaping policy and the review of services and in.
- Promote equalities and the diverse interests of residents and leaseholders
- Receive and consider complaints data to inform service delivery
- Ensure appropriate levels of information regarding performance and service delivery is made available to tenants, leaseholders and tenant groups
- Be responsible for the content and channels of information made available to tenants and leaseholders including the annual report to tenants

A Cross Departmental group has been established to consider KIM for the Landlord Service and a KIM strategy for the Landlord Service will be developed by September 2025. There is currently a wealth of data available and there are regular data reports to Landlord Board and other groups which inform strategy development, service planning and delivery. The Landlord Service KIM Working Group and KIM Strategy will bring a more formalised structure to this activity.

At a corporate level there is a Hillingdon Information Assurance Group (HIAG) which meets monthly. HIAG is responsible, on behalf of the Corporate Management Team (CMT) and the Council Leader and Cabinet Members for co-ordinating information governance IG across the council. Responsibilities include periodic review of policies, procedures and guidance; IG, data protection and cyber security risks and co-ordination of actions to mitigate; periodically assess how well services are managing information in line with policies and guidance; identify and promote staff and member training; promote and communicate effective IG across the council; work with Social Care Caldicott Guardians; updates to CMT.

Current work of the group includes: Data Protection; Records Retention and Destruction Policy; Record of processing activities; the FOI Publication Scheme; Implementation of a new digital process for Freedom of Information requests (FOIs) and Subject Access Requests (SARs); Record of Processing Activities (ROPA); Training and communication requirements for staff and Members; Cyber Security; Data Security and Protection; Privacy Notices; Working Abroad Policy.

R2 Implement a knowledge and information management strategy

This should include:

- defining knowledge and information management
- clear definitions of which data repository is to be used for which datasets
- the implementation of an Information Asset Register so you know what data you already have, what you don't have, and what you need

	<ul style="list-style-type: none"> • outcomes-focused data mining: what you are trying to achieve and what do you need the data for? • how it aligns with the overall business strategy and the need for continuous service improvement • what the expected standards are, how they will be monitored, and the consequences of failing to adhere to them
<p>Our Landlord Service KIM Working Group will develop a KIM Strategy for the LBH Landlord service which will cover how data is:</p> <ul style="list-style-type: none"> • Created • Stored • Used • Shared <p>The Strategy will cover all of the areas mentioned in this recommendation. The intention of the strategy is to go well beyond good record keeping, although this is a fundamental requirement; it is also to ensure that the service is well informed to develop evidence-based practice, for there to be effective insight that can inform our risk analysis, strategic decisions and future service planning. Both IM (Information Management – focused on IT, collecting, storing, and accessing information) and KM (Knowledge Management – focused on people and processes, creating, sharing, using and managing knowledge) will be covered by the strategy. We recognise the need for this approach to be embedded in the culture of the organisation. The strategy will be about how we use data, not just how we collect it. Quick wins and longer term activities will be identified.</p> <p>Key areas of data that we will be looking at include data related to our housing stock and its condition and data related to our tenants and leaseholders including Protected Characteristics under equalities legislation and any vulnerabilities relevant to tenancy sustainment. This will include temporary vulnerabilities.</p> <p>There has been recent work underway at the Council both within the Landlord Service and corporately to improve and update the way we approach data and its use. As is common elsewhere the use of digital services is a key area of development and this has meant that much higher profile for data and its use more generally in the council. This includes the presentation of data via tools such as Power BI and better reporting and management oversight of data integrity. Work has been underway on a council wide Digital Strategy.</p> <p>Within the Landlord Service there are two strands of work currently underway which will vastly improve the extent and quality of data related to our properties and residents. A stock condition survey programme covering all of the landlord rented housing stock is due to complete in the current financial year and is well underway. Once complete, this will become an ongoing programme. A rolling programme of ‘tenancy checks’ is being carried out and is being embedded as business as usual to also improve the extent and quality of data held regarding our residents. For both</p>	

housing stock and residents data we will adopt an approach which considers: what we have, what we don't have, what we need and what we need it for.

The programme of work will include developing a data taxonomy detailing what is held and its purpose, and organise the data held to create a structure hierarchy. This will support the Landlord Services ability to categorise data, access it and use it easily.

The following table covers the current high level data and systems used which will be reflected in the planned KIM strategy. We will review the governance structure we have in place in relation to KIM and the current suite of data reporting.

Systems	What the system does?	PBI reporting from the system	Other reportings from the system
NEC/Northgate	Contains tenancy management information	Voids Dashboard - turn around times, void to let pathway, current voids, not availables	Monthly Dashboard - Void to let Tables (2021 2022)
	Contains Rent Account	Voids Reason Dashboard - voids raised and voids reasons	Morning Update - (Lettings All) v1
	Contains void to let information	Temporary Accomadation (In progress) - current tenants in TA, net cost analysis	Mutual Exchange Tenancy Terminations
		Rents Dashboard (In progress) - rent service charges due, arrears and collection process including leasehold properties	Non Routine Voids 2023_24
		Housing Stock/Assest Management (In progress) - Stock numbers, compliance certificates	Overcrowding - people per bedroom
			S&D - Lettings All v1
			Tenancy Terminations
			Current Tenant and household
			Housing Register Profile (scheduled version)
Locata	Contains information on homelessness applications and people on the waiting list	Homelessness Dashboard (In progress) - Applications received and homelessness process	H-CLIC - homelessness case level information collection
		Housing Stock/Assest Management (In progress) - Stock numbers, compliance certificates	This system has a built in reporting function
Keystone	Information on Asset Management	Housing Stock/Assest Management (In progress) - Stock numbers, compliance certificates	This system has a built in reporting function
Oneserve	Information on repairs	Repairs (In progress) - inspections and contractor performance	This system has a built in reporting function
		Housing Stock/Assest Management (In progress) - Stock numbers, compliance certificates	

R3 Benchmark against other organisations' good practice in knowledge and information management.	This should underpin a continuous improvement approach to service delivery.
<p>The Landlord Service currently benchmarks data against London Local Authorities and ALMOs across a range of Housing data across the Landlord Service. This includes monthly 'Pulse' measures, annual performance summary and cost benchmarking. Moving forward the Authority will additionally be participating in TSM benchmarking. The Council subscribes to Housemark to facilitate this. Housing data and analytics reports are regularly considered by Landlord Board.</p> <p>Across London work is increasing to develop approaches to KIM. Some task and finish meetings were held, led by Waltham Forest earlier this year and attended by a Hillingdon representative and emerging strategies and approaches are being shared. Further opportunities for benchmarking will be considered as part of our KIM strategy development.</p>	
R4 Review safeguarding policies and procedures	To ensure data analysis forms part of a landlord's proactive activities to satisfy their duties.
<p>We aim to improve the breadth and depth of data related to Protected Characteristics and vulnerability to better inform strategy and service development. This will also enable informed decisions on working with individual tenants to make tailored responses and ensure that all services have access to the information they need to do this. This will help to secure better outcomes for our residents. This will also assist in meeting our Public Sector Equality Duty to pay due regard to the need to eliminate discrimination, advance opportunity and good relations. It will also assist in carrying out Equality Impact Assessments when implementing new and reviewing existing policies and other significant changes which could impact our residents.</p> <p>Work is underway to achieve DAHA accreditation. KIM considerations will be integral to this work programme over the next 18 months. In reviewing our safeguarding arrangements for children and vulnerable adults we will specifically cover the role of KIM. Both Safeguarding and DAHA will be part of our KIM strategy.</p>	
R5 Train staff on the requirements of the Equality Act 2010	Particularly with relevance to the importance of knowledge and information management as a tool for compliance
<p>Activities in relation to Equality and Diversity</p> <ul style="list-style-type: none"> • Staff are required to complete a generic online Equality training course as part of their induction. 	

<ul style="list-style-type: none"> • There is a quarterly face to face EDI masterclass for managers which covers topic such as bias, privilege and creating an inclusive environment. • Online training is available for all staff on a variety of topics including neurodiversity, LGBTQ+ awareness, inclusion essentials and working effectively with the Equality Act 2010. • Information about equality characteristics of tenants and leaseholders is collected as part of tenancy sign up and is an integral part of the tenancy check programme • Data is used to inform equality impact assessments of Landlord Strategies and Policies. • Ongoing actions include: <ul style="list-style-type: none"> • Landlord Service review of equality data held about service users • Embedding equality objectives in Landlord Strategy and Service Plans • A programme of refresher training for all staff. • Training for managers. • A programme of regularly reviewing our privacy notice, data retention and destruction, and record of processing activities 	
R6 Review internal guidance around recording vulnerabilities	Particularly to ensure temporary, as well as permanent vulnerabilities are recognised, recorded and then removed from records once no longer appropriate
<p>Work has been underway on developing a Tenant Experience Strategy. It is currently in draft form and subject to consultation. The strategy covers different tenants’ experiences, their vulnerabilities and the type and level of support needed to improve outcomes. Temporary vulnerabilities are addressed. The Housing Ombudsman spotlight report has been a key document in informing the development of the strategy. Adoption is expected before the end of 2024.</p>	
R7 Develop organisational key data recording standard requirements that will ensure good records that support the business and demonstrate compliance with national standards	This should set out the minimum standard to which data must be entered in the various databases owned by the landlord.
<p>There is work underway across the council to bring consistency and enable read across for different data sets. Where there are appropriate national categorisations in place, such as census categories for ethnicity for example, these are being adopted unless there is a compelling reason not to do so.</p>	

As part of our KIM strategy development we will review existing industry standards such as the HACT UK Housing Data Standards and the CIH Professional Standards with a view to the adoption of clear standards in Hillingdon.	
R8 Make adherence to the minimum standard for knowledge and information management part of the service level agreement with third parties	The quality of information sharing should form part of the assessment at procurement stage.
<p>Part of our KIM strategy will be to review all Landlord Service SLAs to ensure adherence to our minimum standard for knowledge and information management once this has been agreed. This will also apply to newly created SLAs moving forward.</p> <p>Procurement contracts have been standardised around GDPR requirements. Our current procurement practice includes information sharing as an integral part of the assessment process and this ongoing practice will be reflected in the KIM Strategy.</p> <p>Contractors working with our repairs service, for example, are required to use our OneServe system which contains quality data including photographs of completed works.</p>	
R9 Have a clear categorisation system for ATIS/FOI requests	This allows quick identification of whether the question has previously been answered and analysis of which systems require refinement to answer questions in future.
<p>FOIs are managed on behalf of the landlord service by a corporate team. Requests for information are distributed to relevant officers to complete.</p> <p>HIAG is aware that there are some FOI requests that ask for the same or similar data and there is ongoing work to consider what information we could pro-actively publish in order to satisfy some of these requests and reduce the administrative burden.</p>	
R10 Publish FAQs on websites and keep them updated	This allows for information self-service and reduces resourcing requirements
The KIM Strategy will seek to identify Housing Information that we can publish in this way and pick up as 'frequently asked questions (FAQs)' and the potential to enhance any existing system to answer questions in the future.	
Ensure appropriate systems are in place	
R11 Review existing databases for capability and capacity to record those key data requirements	To ensure databases are capable of adequately capturing information about residents – e.g. vulnerabilities

	To ensure databases are capable of adequately capturing information about homes – e.g. repairs and stock condition
<p>An ICT led review is underway with our existing provider NEC to understand the full potential capability of the system, and its component modules, with the aim of using our existing system across council services as far as this is possible. This would help to improve data sharing and bring data together to provide a single view of the tenant. It would provide better outcomes for tenants and would enable, for instance, easier integration of stock data and personal data, including vulnerability so that access issues for statutory servicing, for example, can be readily matched to personal data which may suggest a need for individual sensitive responses to specific residents. The review seeks to provide richer, more integrated data, better outcomes for residents and potential efficiencies for the service.</p>	
R12 Train staff on using systems	Including minimum data standards, performance measures and quality assurance processes
<p>The KIM strategy will cover staff training requirements at recruitment and on an ongoing basis. The training requirements will be considered on a tailored basis related to the access level that the staff member needs to better perform their duties.</p> <p>IT system training is currently included for staff at induction depending on their specific roles and responsibilities. The KIM strategy will bring greater structure to the training provision.</p> <p>The council has already invested in AI including the use of BOTS to automate data transfer and data entry for high volume, repetitive work flow. These aim to improve efficiency, maximise data quality and reduce the potential for human error. The council has also started to use Copilot, which amongst other things can aid in understanding, interpretation and analysis of data. The KIM strategy will seek to identify additional tasks that can be automated and further potential for AI in service development and delivery.</p> <p>Power BI will be used to help understand or levels of data integrity and therefore influence a more targeted approach to quality assurance and performance management.</p>	
R13 Ensure databases are easy to interrogate and that the data can be extracted and used	Staff should be able to easily access the information they require. This is essential for evidence-based practice and informed decision-making. Where systems can be interrogated effectively, this produces crucial insight regarding patterns, themes and potential shortfalls.

<p>The Landlord Service operates and maintain a number of databases to deliver services. We recognise a key need for good quality and timely data, and the ability to extract, analyse and present data in a number of formats to meet our business needs. The KIM strategy will reflect this.</p>	
<p>R14 Schedule appropriate sensitive information reviews</p>	<p>Resident information and personal characteristics change on a regular basis. Records should be appropriately reviewed to ensure a landlord continues to know its residents – disability or illness, financial difficulties and family composition.</p>
<p>We have in place a retention and destruction policy related to the landlord service which ensures that sensitive data is not kept longer than necessary. Tenancy checks operate on an ongoing basis to ensure that data is refreshed, kept up to date and captures the changing needs of tenants. As part of our digital strategy we are looking to provide a self-serve facility so tenants can inform us about any material change in their circumstances including medical issues, mobility issues, vulnerabilities etc.</p> <p>As a landlord service we have a general awareness of the value of personal contact with our tenants. Staff are trained to recognise issues such as safeguarding and signs of financial stress, self-neglect or abuse.</p>	
<p>Mergers and other structural changes</p>	
<p>R15 Stress test systems prior to change</p>	<p>To identify whether they can ‘talk’ to each other; data can be securely transferred, and staff from each landlord can access the data they need</p>
<p>Recommendation aimed primarily at Housing Associations. There are no plans for shared services</p>	
<p>R16 Undertake a risk assessment regarding knowledge and information shortfalls before the change</p>	<p>This should be a living document with clear risks and mitigations documented, incorporating a review cycle and emerging risk identification. This document should continue beyond the date of change.</p>
<p>Recommendation aimed primarily at Housing Associations. There are no plans for shared services</p>	
<p>R17 Proactively investigate incoming datasets during mergers</p>	<p>Identify gaps in the knowledge of incoming stock and residents, and work to fill those gaps.</p>
<p>Recommendation aimed primarily at Housing Associations. There are no plans for shared services</p>	

R18 Establish clear data exception reporting processes	This allows the new organisation to identify issues post-change quickly
<p>Recommendation aimed primarily at Housing Associations. There are no plans for shared services</p>	
Repairs	
R19 Set out clear requirements of operatives before they are allowed to record an appointment as missed	<p>This should include ensuring that the appointment was notified to the resident, it was made at a time they could attend, checking that any contact requests were adhered to, guidance on what level of contact (e.g., Two door knocks, calling the resident) etc</p>
<p>Missed appointments, especially if missed more than once, could be indicative of vulnerability. To avoid this we recognise the importance of connecting data across services. Failure to do this impacts the service provided to tenants and also exposes the council to increased disrepair claims and potential financial loss.</p> <p>Our automated notification system allows residents to track the operative's location in real-time on the day of the appointment. If a resident is absent or misses the appointment, the operative will attempt to contact them using the provided phone number. If unsuccessful, they will seek alternative contact information from the back office and wait on-site for up to 15 minutes before marking the job as an unsuccessful call. The operative must capture clear photographic evidence of the door and a photo confirming the posting of a notification to the resident.</p>	
R20 Conduct wastage analysis on missed appointments	<p>Use the insight generated by accurate records of missed appointments to identify efficiencies and action plans, including whether a broader time range of appointments would be of benefit.</p>
<p>The Service currently offers three time slots: AM (8:00 AM to 1:00 PM), PM (1:00 PM to 5:00 PM), and School Run (9:30 AM to 2:30 PM). We closely monitor and manage no-access issues using a dedicated system.</p> <p>If a no-access issue arises, our back-office team will attempt to contact the resident up to three times within the works target time frame, using their most recently provided contact information. If unsuccessful, the planning team will send a letter confirming the attempts and providing guidance on rescheduling. A copy of this letter is also sent to tenancy management for their awareness.</p>	

If the operative observes any concerning circumstances during the entry attempt, they will immediately contact their team leader to escalate the situation to tenancy management for urgent assistance.

R21 Implement an automated appointment reminder system

This could be the form of text messages the day before

Regardless of whether a resident reports a repair online or through our contact centre, we ensure their most current contact information is accurately recorded in our system. Our system automatically sends text messages to residents at key points, including:

- Confirmation of the operative's identity and the scope of the repair.
- Appointment scheduling.
- Reminders the day before and on the day of the appointment.
- Notifications when the operative is on route and nearing the resident's location.

Additionally, our automated notification system enables residents to track the operative's location in real-time on the day of the appointment, providing them with up-to-date information on their arrival.