

# Knowledge and Information Management – Self-Assessment Form



This form details our response as a landlord to the Housing Ombudsman's Knowledge and Information Management (KIM) self-assessment. This provides Royal Borough of Greenwich's (RBG) required response for how as an organisation we comply with the Housing Ombudsman's recommendations as noted in the [Spotlight Report on Knowledge and Information Management \(KIM\) May 2023](#).

## Governance and culture

No	Recommendation	Comply	Evidence, commentary and any explanations
1	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.	Yes	<p>We have an Information Governance Working Group (IGWG) and Information Governance Steering Group (IGSG) in operation. The IGWG meet once a month and is formed of GDPR reps from all council directorates, including Housing and Safer Communities. They support GDPR related issued such as Information Governance Policy, Subject Access Requests, data breaches etc.</p> <p>The IGSG has been revamped lately and will now oversee Digital Policy, KIM, Data Protection Policy and work and will oversee the council's direction on the exploration of how we might leverage AI tech.</p>
2	Implement a knowledge and information management strategy. This should include: <ul style="list-style-type: none"><li>• defining knowledge and information management</li></ul>	Partial	There is a corporate Records Management Policy which dates from 2018. Corporately we are undertaking a comprehensive review of all data and digital policies and the aim is to create a new 'Data and Digital Policy Framework'.

	<ul style="list-style-type: none"> <li>• clear definitions of which data repository is to be used for which datasets</li> <li>• the implementation of an Information Asset Register so you know what data you already have, what you don't have, and what you need</li> <li>• outcomes-focused data mining: what you are trying to achieve and what do you need the data for?</li> <li>• how it aligns with the overall business strategy and the need for continuous service improvement</li> <li>• what the expected standards are, how they will be monitored, and the consequences of failing to adhere to them</li> </ul>		<p>This framework will cover all aspects of policy relating to data, information management, technology policy and all guidance. Work started on the framework in autumn 2024. In the meantime, we are replacing aspects of the records management policy but in stages, taking an agile approach so that we have policies and guidance that the council needs. The data deletion and retention policy was approved on 30 October 2024 by our General Purposes Committee. We also had the acceptable use, cyber security, Bring Your Own Device (BYOD), Mobile devices and Data Sharing policies approved at the same time.</p> <p>We have a Record of Processing Activities document in place for Housing and Safer Communities which was updated last year.</p>
<b>3</b>	Benchmark against other organisations' good practice in knowledge and information management. This should underpin a continuous improvement approach to service delivery.	Yes	<p>We were part of a benchmarking group with several London boroughs between September 2023 and March 2024, the purpose being to discuss the KIM spotlight report and share any areas of good practice. This will be shared with colleagues who are leading on the 'Data and Digital Policy Framework' as mentioned in recommendation 2. We are also part of the Housing Directors Network.</p> <p>We have developed further benchmarking questions and intend to use the same peer group to follow up on their progress and gain any further good practice as a result.</p>

4	<p>Review safeguarding policies and procedures. To ensure data analysis forms part of a landlord's proactive activities to satisfy their duties.</p>	Partial	<p>As a Local Authority we all follow government rules and regulations relating to safeguarding as well as the council's written policy however Children's and Health and Adult Services are the lead departments.</p> <p>Housing staff must complete safeguarding training and know how to recognise concerns and report them to our colleagues in the specialist services and to Tenancy staff to add alerts. Alerts are added to our Housing management system of specific concerns.</p> <p>We also run a specific compulsory training course for all our Repairs staff, and they have a specific process for raising concerns and reporting them to the relevant Social Services Teams. This is owing to this team going into resident's homes more than other teams.</p> <p>Before enforcement action is taken Vulnerable Case Conferences are held in conjunction with Adult Social Care and an EIA form completed.</p> <p>In 2024, we have started project on vulnerability, to improve the ways that we respond to the needs of our vulnerable residents in social housing and temporary accommodation.</p> <p>Data analysis is conducted by children's and adult services based on the reports and wider intelligence that we share with them.</p>
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<b>5</b>	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.	Partial	Equality training is part of our mandatory training for staff with compliance monitored. Consideration will be given as to whether this needs bolstering to focus on the relevance of knowledge and information management, potentially utilising the Housing Ombudsman KIM training to meet this.
<b>6</b>	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.	Partial	<p>There is internal alert guidance with includes vulnerability alerts. A list is regularly sent out to teams with alerts against their names, to allow officers to review them and remove from records if no longer appropriate.</p> <p>We know that we need to build on this system to ensure that we always maintain accurate records. Our Regulation Ready Board have considered our current approach to vulnerabilities and have agreed for a specific project to improve the ways that we respond to the needs of our vulnerable residents in social housing and temporary accommodation. Scoping of this work commenced in autumn 2024 and forms part of this project.</p>

#### Devise key recording standards

No	Recommendation	Comply:	Evidence, commentary and any explanations
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<b>7</b>	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.	Partial	This is a priority as data quality is a key concern and we do intend to look at this issue in the medium term. As noted in recommendation 3, a council wide 'Data and Digital Policy Framework' is being developed and Housing & Safer Communities will be worked with on this. Locally the Housing Digital Roadmap is a piece of work that will consider our data architecture across all systems.
<b>8</b>	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.	Yes	All agreements/contracts with third parties have clear clauses on data processing and data sharing which act as minimum standards. Consideration is given each time depending on the level of data processing that's due to happen, where this includes personal data there is an additional data processing agreement appended to the agreement which further details the type of information being processed by the third party.
<b>9</b>	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.	Partial	We have started to create an internal searchable register of FOIs to aid with quick identification of previously answered FOIs.
<b>10</b>	Publish FAQs on websites and keep them updated. This allows for information self-service and reduces resourcing requirements.	Partial	<p>We provide self-serve information on our website examples include <a href="#">reporting repairs</a>, <a href="#">applying for social housing</a>, <a href="#">reporting ASB</a>, <a href="#">a housing options tool</a> and <a href="#">complaining about us as a landlord</a>.</p> <p>We also publish information on our website via our <a href="#">Publication Scheme</a>. Each directorate is responsible for choosing what additional information to publish on the website and we include information on our TSM</p>

			performance. We are considering which data we can publish on our website to answer common FOI requests and have identified housing allocations as the first priority for this work.
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### Ensure appropriate systems are in place

No	Recommendation	Comply:	Evidence, commentary and any explanations
11	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.	Partial	<p>This is a priority as data quality is a key concern and we do intend to look at this issue in the medium term. As noted in recommendation 3, a council wide 'Data and Digital Policy Framework' is being developed and Housing &amp; Safer Communities will be worked with on this. Locally the Housing Digital Roadmap is a piece of work that will consider our data architecture across all systems.</p> <p>We started a project in autumn 2024 to improve the ways that we respond to the needs of our vulnerable residents in social housing and temporary accommodation. Recording of vulnerabilities forms part of this.</p>
12	Train staff on using systems. Including minimum data standards, performance measures and quality assurance processes.	Partial	Staff are trained on using systems as part of their induction and on the job training where needs are identified. The level of quality assurance and standards varies depending on the systems being used, consistency in this area is aiming to be addressed as part of the Data and Digital Policy Framework and Housing Digital Roadmap.

<b>I3</b>	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.	Partial	<p>We have a number of databases across our services, some of which are shared. The ease of interrogation and data extraction for evidence based decision making varies. For repairs a potential PowerBI tool is to be rolled out as Phase 3 of the repairs transformation programme to further improve this.</p> <p>This is a priority as data quality is a key concern and we do intend to look at this issue in the medium term. As noted in recommendation 3, a council wide 'Data and Digital Policy Framework' is being developed and Housing &amp; Safer Communities will be worked with on this. Locally the Housing Digital Roadmap is a piece of work that will consider our data architecture across all systems.</p>
<b>I4</b>	Schedule appropriate sensitive information reviews. 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.	Partial	<p>A list is regularly sent out to teams with vulnerability alerts against their team to allow officers to review them and remove from records if no longer appropriate.</p> <p>In terms of vulnerability this is a priority as data quality is a key concern and we do intend to look at this issue in the medium term. The intention is to develop a council wide data quality approach.</p>

### Mergers and other structural changes

No	Recommendation	Comply:	Evidence, commentary and any explanations
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<b>15</b>	Stress test systems prior to change. 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	N/A	Not applicable
<b>16</b>	Undertake a risk assessment regarding knowledge and information shortfalls before the change. 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.	N/A	Not applicable
<b>17</b>	Proactively investigate incoming datasets during mergers as part of due diligence. Identify gaps in the knowledge of incoming stock and residents, and work to fill those gaps.	N/A	Not applicable
<b>18</b>	Establish clear data exception reporting processes. This allows the new organisation to identify issues post-change quickly	N/A	Not applicable

## Repairs

<b>No</b>	<b>Recommendation</b>	<b>Comply:</b>	<b>Evidence, commentary and any explanations</b>
<b>19</b>	Set out clear requirements of operatives before they are allowed to record an appointment as missed. 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.	Partial	A missed appointment/no access workstream has been co-developed with planners, supervisors and tradespeople. In June 2024 training with Operatives started, with 4 trades, and a refresher session took place with planners and tradespeople. Once the process is embedded in these teams, we intend to roll it out to all trades to ensure a consistent approach to No Access visits. When fully



			embedded this will ensure that every reasonable step is undertaken to gain access in resident's home before recording as a no access on the system. To ensure a joined-up approach, back-office staff will receive guidance on which jobs to cancel and which jobs are to stay open. Supervisors has ensured us that they will ensure compliance with the process.
<b>20</b>	Conduct wastage analysis on missed appointments. 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.	Yes	We report, monitor and review missed appointments including refusal and no access cases regularly. We also review the costs of missed appointments. This is an active piece of work and links into recommendation 19.
<b>21</b>	Implement an automated appointment reminder system. This could take the form of text messages the day before.	Yes	There is an automated system in place at present that sends a notification at the time of a repair being booked and the day before we are due to attend. Following learning from complaints this system will be enhanced with the ability for messaging to be more personal and detail exactly what repair is (in the event that multiple repairs were reported at the same time or that a service is due). This aims to both improve communication with residents and reduce 'lost jobs' that can happen when residents aren't clear on exactly what repair is due to take place ahead of time.