

**Spotlight on:
Knowledge and Information
Management
(KIM)**

On the record

May 2023

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Ombudsman's Introduction

The missing Mars Climate Orbiter has unexpected parallels for social housing. NASA lost it in 1998 because no one realised two systems measured propulsion force differently. This oversight was compounded by a lack of quality assurance and data verification. The lessons around data errors, information sharing, interrogating information and internal communication are prescient for social landlords.



This failure cost NASA around \$500m. For social landlords, the cost is financial but also human. At Grenfell, crucial fire safety data was lost because the landlord believed it was held on its server rather than an individual device. At Rochdale Boroughwide Housing, key information was stored on individual computers and emails lost when new software was introduced.

While the consequences of these events were extreme, our latest Spotlight report demonstrates that poor knowledge and information management is routine. It is causing daily detriment to residents. This damages the sector's reputation and erodes trust with residents.

This report is purposely called *knowledge* and information management. The latter is familiar and while 'record keeping' is helpful shorthand, it is essentially about the maintenance of information. This does not do justice to the scale of the challenge – nor the extent of the opportunity if landlords get it right.

So, this report is also about how information can empower staff and equip landlords with the knowledge they need to develop services and rise to the acute challenges they, and their residents, can face.

Any casual observer of our work decisions or previous Spotlight reports would see a reoccurring theme of poor information management. Whether service charges, anti-social behaviour, cladding or repairs – poor data and record keeping is ubiquitous.

What can seem like a minor administrative error can have profound human and organisational impact. Our investigations have found information mismanagement contributing to financial detriment, loss of heating and hot water, or residents being exposed to fire and other safety risks. Too frequently residents do not receive a service appropriately tailored to their needs because disabilities have not been recorded.

The deeper dives we have done into individual landlords reveal how these individual cases are not isolated. At Catalyst, now merged with Peabody, amongst the record failings were missing repairs logs and jobs closed in error. This resulted in delays, confusion and uncertainty for residents. Investigations into Birmingham City Council

found there was no framework in place for the record keeping, nor expectations for data entry placed on staff and contractors.

This shows how complaints can be an exceptionally strong indicator of data gaps and information mismanagement. They can be one of the earliest warning signs of problems or identify missed opportunities. They can also indicate whether information management failings are about the system, the way people use it, the approach, or a combination of these factors.

Yet it is sometimes only with the Ombudsman's intervention that data failings are being acknowledged and addressed, months or years after the landlord was made aware. This is alarming. Our report also details how poor records can impede and delay the Ombudsman's work, leaving a resident without the redress they require for longer.

The complexities of this housing crisis require modern and agile services. But our report reveals how landlord's services can be held back by weaknesses in data and information, that can turn an ordinary service request into an extraordinarily protracted complaint.

Overall, last year two in three of our maladministration findings had information failings at their heart. This suggests the sector could have a significant challenge to get this right. So, the first lesson from this report is for landlords to squeeze every ounce of insight on information management from their complaints and to do so in a structured and appropriate way.

There are two core issues underpinning the findings of our investigation: the culture of the landlord and the effectiveness of its governance. This is present in both our casebook and our call for evidence. If the senior managers of an organisation do not value knowledge management or recognise how it benefits everyone, this is reflected by a bad data culture, compounded by an absence of performance management measures. Knowledge and information management is a barometer of how an organisation is functioning.

Therefore, successful knowledge and information management starts with an understanding and appreciation of its benefits to both the landlord and its residents. This needs senior leaders to be clear about the importance of knowledge and information management, and their standards and expectations. This in turn helps to foster a working environment where staff have direction, structure and guidance. These standards need to be routinely monitored through quality assurance processes, both internally and with third parties. Discussions with chief executives, suggest this is something they are focused on.

We recommend landlords implement a knowledge and information management strategy, if one does not exist. In doing so, landlords should ensure it is shaped not only by fundamental requirements such as data protection and regulatory returns, but by their own vision and purpose too.

For merging housing associations or councils closing ALMOs, this strategy is essential. Too often we see complaints handling deteriorate during organisational

change and landlords struggling for a prolonged period to recover from inadequate records for years. Cyberattacks can also expose and exacerbate these inherent weaknesses.

Having the information is one thing, but our report raises significant questions over how landlord's use it. How does the sector triangulate information to make the best, most informed strategic decisions. The boardroom may have discussed conflicting information on customer satisfaction and repairs performance and it may be that complaints can help to reconcile the contradictions. The sector's more recent use of the complaints procedure to grip damp and mould is a positive example of some landlord's analysing and giving weight to this intelligence, and not treating cases in isolation. This approach could be applied more widely and help inform some hard choices from investing in homes or building new homes to net zero.

For landlords, this can feel like another thing on an already impossible to-do list, but poor information management is such a strong and reoccurring theme across service areas that it is actually the closest thing the sector could get to a silver bullet.

Our recommendations range from practical 'quick wins' through to those that require more introspection. A combination of both the pragmatic and the ideological are required, with senior leaders being asked to reflect on the tone they both set and accept. Nor are the interventions necessarily prohibitively expensive and considerable time and money could be saved.

Landlords will be at different stages on these recommendations: given our report details how we found one landlord did not have something as basic as a system to record correspondence with residents, there will be much to do for some.

But of particular importance to all landlords are two areas. The first is the scale of the issues on disrepair, with 88% of landlord complaints handlers telling us how poor information undermines their response. When we investigate, I repeatedly see cases where the landlord's repair logs are missing or incomplete, and if they do exist are not informative because it records an operative's visit but not what they did, or indeed decided not to do. While concerns about material inflation, skill shortages or contractors are valid, this should not obscure fundamental intelligence failures in repairs services. How sometimes a repair issue that could impact other residents, like a leak or heating loss, can be treated in isolation without that information driving wider action. Listening to residents who live in the building and can have valuable knowledge about their home is vital too. It is positive landlords are investing more into repairs, but without good data management they cannot meet obligations under the Landlord and Tenant Act, nor potentially any new obligations under Awaab's Law.

Related are the issues with appointments, which are systemic for the sector. Consider how TransPennine Express was reported to cancel the same proportion of trains as social landlords are estimated to miss appointments each year – about 20%. British Gas engaged with its regulator to compensate for missing appointments that would equate to about 1% in social housing. Our report recounts the experience of a man who lost 14 days of annual leave because of missed appointments. Our

report shows how the expectations of residents in this space are comparatively basic in the 21st century and the advent of artificial intelligence.

Of course, some landlords will be thinking about resident's who refuse access. There can be issues, especially with some disrepair claims, but I would caution landlords to read about the experience of the mother with two autistic children. Her landlord ignored the need to plan appointments to manage welfare and then recorded "access denied" after turning up unannounced. We recommend landlords set out clear requirements before an appointment can be recorded as missed or refused as well as a wastage analysis of missed appointments. Whether the operative who turns up has the right parts or skills, is another matter.

The other area of emerging concern is the recognition of vulnerabilities. The concept of 'general needs' housing is being stretched with this housing crisis and landlords need to urgently modernise their approach. Repeatedly I am investigating cases where the resident's circumstances are not recognised, even though it could have a material impact. Read about a disabled resident's struggles for a year to get a properly adapted toilet.

These issues are not the preserve of the specialist providers and all landlord's need to act with more agility and sensitivity. We recommend landlords review information on safeguarding to ensure they can meet their duties, alongside obligations under the Equality Act, and to schedule appropriate sensitive information reviews.

That missing NASA orbiter demonstrates how even the highly resourced or skilled organisations can experience problems. So, as landlords traverse the knowledge and information management landscape, we would urge them to reflect on what positive change has been facilitated, and we will share experiences through our own Centre for Learning. We expect landlords to use these recommendations as a tool to guide their approach. We will also continue to assess and highlight information management issues in our casework, with any necessary remedies. For housing associations, the introduction of the Access to Information Scheme will also increase expectations around records and transparency.

These efforts will help not only today's residents but future generations of landlord staff: they need a legacy of information that's better than the one inherited by this one. Crucially, success requires a collective effort: the data analysed is only as good as the data entered and the decision in the boardroom relates directly to the log made in the resident's home. Knowing your residents and their homes has never mattered more. I have seen the potential for social landlords to use data to great effect: one landlord told me they contact any resident who has not reported a repair for more than a year. This single action helps address both the potential for disrepair and for wellbeing checks. It demonstrates how social housing can use the power of data to be proactive and do good.

Richard Blakeway

Housing Ombudsman

Background

Unlike previous Spotlight reports, which have concentrated on particular areas of service provision, such as heating and hot water, damp and mould reports or noise reports, this report focuses in on an underlying reason that service provision ends up failing – that the data and information needed to provide an effective and efficient service is missing, incorrect or misused/not used. It is such a significant underlying theme behind our Spotlight reports that we have previously dedicated entire sections of our reports to it, with associated recommendations. We regularly see it as a repeating theme within our Paragraph 49 investigations – where we take a deeper look at a landlord because our casework indicates that there may be systemic issues at place. Consistently, we find that poor knowledge and information management is a key contributing factor to why the landlord fails to provide an adequate service, particularly in the repairs service and in complaints handling.

In addition, housing associations will soon, as local authority landlords already do under the FOI Act, have to answer questions from their residents about the data they hold pertaining to their housing services under the new Access to Information Scheme¹ (ATIS). The right of appeal for ATIS requests will be to the Housing Ombudsman and it was therefore vital that we explored the key datasets that housing associations would reasonably be expected to hold in good order, ready to answer those requests, in accordance with good knowledge and information management.

But what is knowledge and information management?

Knowledge and information management (KIM) encompasses how data is:

- created
- stored
- used, and
- shared.

The housing sector often refers to ‘record-keeping’. Although record-keeping can be a useful shorthand, it refers to storing data only and does not reflect the other three aspects of knowledge and information management.

Without good information management, a landlord cannot adequately:

- Horizon-scan and identify risks
- Contingency plan
- Proactively address hazards (such as fire safety, asbestos and damp and mould)
- Fully comply with legal and regulatory requirements
- Ensure evidence-based practice, and
- Provide a high-quality service to residents.

¹ See [Annex 3](#) for details.

Good knowledge and information management (KIM) is crucial to any organisation's ability to perform and achieve its mission. Without good KIM, a landlord could be severely hamstrung in delivering its core social purpose efficiently and effectively, providing value for money as a modern, forward-looking organisation. Dame Judith Hackitt's [report](#) following the Grenfell tragedy specifically recommended the introduction of a 'golden thread' – both the information that allows a landlord to understand a building and the steps needed to keep both the building and people safe, now and in the future – as a tool to manage buildings.

There are a set of expectations placed on landlords from different sources for information management. The Decent Homes Standard requires landlords to report in their annual statistical return to the Regulator of Social Housing the number of homes they have that fail to meet the Decent Homes Standard.

The National Housing Federation (NHF) Code of Governance says housing associations should be able to identify and record evidence that they comply with four core principles and with more specific obligations flowing from them. It gives the example that boards should be able to show they have insight into the views and needs of the residents, including insight into their concerns and complaints, and uses this insight to inform decisions. The Code also states a housing association must also ensure it operates effectively, efficiently, and economically, and must also satisfy itself as to the integrity of financial information.

The Chartered Institute of Housing's [Professional Standards](#) require housing professionals to provide information and advice based on evidence and accurately presenting the options and facts. It states that meeting this standard in practice will rely on good record creation and management.

The HACT UK Housing Data Standards, which are recognised by the Industry Safety Steering Group, offer 10 [data standards](#), including voids, customer data, repairs, and resident feedback/complaints. The [Better Social Housing Review](#) specifically recommends adopting them to fulfil its recommendation for landlords to undertake a national audit of social housing.

The NHF also publishes [guidance on document retention and disposal](#) lists the documentation housing associations should keep, and gives recommended retention periods for documents relating to (for example) ASB case files, and property maintenance records. For local authority landlords, there is the Code of Practice on the [management of records](#) published by the Department of Digital, Culture, Media and Sport. The Information Commissioner's Office has also published a [Code of Practice](#) which includes good practice recommendations on records management.

The Local Government and Social Care Ombudsman recently published a [guide](#) for care providers on good record keeping, available on its public website. While the focus is on records in the provision of health and social care services, the principles are easily applicable to housing and property management.

There is, however, no one standard, policy or procedure that social landlords are compelled to adhere to when it comes to KIM and any requirements of policies and procedures that landlords do have to adhere to are, when articulated at all, included

as a part of the policy or procedure – they are not captured together in one document. For example, a landlord’s reasonable adjustments policy may contain detail about what details need to be captured on a database when a request is made but that is reliant on the individual landlord having a good data culture and specifically including that detail – policies and procedures surrounding social housing service obligations will often focus on achieving the obligation and contain no detail of how data and information about the service has been provided must be managed. It is sometimes only when an issue goes into the statutory, reportable, requirements of a landlord that datasets are maintained.

Methodology

In addition to reviewing the cases we determined between 1 April 2021 and 31 March 2022, we also reviewed the impact that landlord information issues had had on our ability to progress cases (for example, through the provision of evidence) and where we had to issue a complaint handling failure order because of an information-driven failure to progress a complaint.

We conducted a call for evidence that ran between 3 November and 23 December 2022. This was targeted specifically at complaints handlers within social landlords. We asked complaints handlers to articulate what KIM barriers they faced and how they impacted on their ability to do their job.

We worked with the London School of Economics on a project to explore the likely impact and required datasets of ATIS on housing associations, using FOI requests we made to local authority landlords.

Our residents’ panel session in November 2022 gave us valuable insight into residents’ lived experiences of issues with their landlord’s KIM practices.

We also considered recent RSH [judgements](#) and notices relating to data quality and asked the ICO for information about social housing provider complaints it had considered.

Key data from our casework

Issues with effective information and knowledge management are apparent across our casework. Even where we do not uphold the complaint, problem with information management are often present. Approximately two thirds of the cases we uphold have some issue or other with the data and information available to assess.

Our casework highlights issues with data and information management by landlords in the following ways:

- A. Directly complained about
- B. A key issue in the service provision complained about
- C. A key issue in progressing the complaint through the landlord's complaint process
- D. A key issue in progressing the complaint through the Ombudsman.

Between 1 April 2021 and 31 March 2022, there were 191 cases which fell into groups A or B. We made 242 orders and 147 recommendations on the 191 cases where KIM was either directly complained about, or was a key issue within the service provision complained of.

We investigated 38 cases where a specific complaint about a landlord's information and data management was made (group A). We made 39 findings² about information and data management across those cases and found maladministration in 51% of those findings.

Table A – Landlords, with two or more Ombudsman findings, where the complaint was about information and data management.

Landlords are listed in order of findings of maladministration³ per 10,000 homes.

Landlord	Total Findings	Mal Findings	Homes	Mal Rate	Per 10k
Lambeth Council	5	4	24051	80.00%	1.66
Nottingham City Council	2	1	26396	50.00%	0.38
Midland Heart	2	1	29814	50.00%	0.34
Clarion	4	3	109545	75.00%	0.27
Hyde Housing	2	1	39481	50.00%	0.25
Sanctuary Housing Association	2	1	80790	50.00%	0.12

We considered a further 153 cases in that year where their KIM was not specifically complained about, but their record keeping was considered to be a key issue in the

² This includes findings of no maladministration, reasonable redress, resolved with intervention, service failure, maladministration and severe maladministration. It excludes complaints that were withdrawn or considered to be outside jurisdiction to find on.

³ The term 'maladministration' covers service failure, maladministration and severe maladministration.

complaints that were made (group B). We made 186 findings across those cases where record keeping contributed to the service provision complained of and found 66% maladministration.

Table B - Landlords, with two or more maladministration findings on other types of complaints where **record keeping was identified as a key issue** within the handling of the complaint.

Landlords are listed in order of findings of maladministration per 10,000 homes.

Landlord	Total Findings	Mal Findings	Homes	Mal Rate	Per 10k
Haringey Council	6	5	15106	83.33%	3.31
Leicester City Council	4	4	20422	100.00%	1.96
Westminster City Council	6	2	11755	33.33%	1.70
Onward Homes	4	3	17644	75.00%	1.70
Hammersmith and Fulham Council	4	2	12022	50.00%	1.66
Notting Hill Genesis	9	7	50466	77.78%	1.39
Orbit Group	5	4	44379	80.00%	0.90
Lambeth Council	3	2	24051	66.67%	0.83
Sheffield City Council	3	3	38989	100.00%	0.77
Birmingham City Council	7	5	65600	71.43%	0.76
London and Quadrant	11	6	79811	54.55%	0.75
Catalyst	2	2	28384	100.00%	0.70
The Guinness Partnership	4	4	61414	100.00%	0.65
Metropolitan Thames Valley Housing	6	4	63962	66.67%	0.63
Sovereign Housing Association	3	3	55381	100.00%	0.54
Hyde Housing	3	2	39481	66.67%	0.51
Peabody	3	2	58646	66.67%	0.38
Southwark Council	2	2	53800	100.00%	0.37
Places for People	4	2	64988	50.00%	0.31
One Housing Group (The Riverside Group)	6	2	65347	33.33%	0.31

Even if poor information is not specifically complained of, or a key issue contributing to the complaint about a service provision, KIM issues cause problems in progressing complaints through the landlord's process (group C), or through our processes once the complaint has come to the Housing Ombudsman (group D).

When a complaint comes to the Housing Ombudsman, we will make an information request to the landlord for the evidence to allow us to make our assessment of the case, giving 10 or 20 working days to provide the information, depending on the complexity of the case. In 2022-23, we had to issue further chasers on 42% of the requests for complaint evidence that we made. When we had to chase for

paperwork, it took an average of another further 19 working days (4 weeks) to return the paperwork necessary, with one landlord taking 234 working days (eleven months) to provide the relevant paperwork.

Once we have determined the case, landlords are then required to provide evidence of compliance with the orders we have made. Between 1 April 2022 and 31 March 2023, we had to chase evidence of this compliance in 51% of the determinations we made. On average, it took landlords a further 74 working days (over three months) beyond the deadline for compliance to provide the necessary information.

We issue Complaint Handling Failure Orders (CHFOS) where a landlord is not complying with the obligations of our Scheme. In the last two years, we have issued 10 CHFOS where the complaint has come to the Ombudsman for investigation and we have either been unable to get the appropriate evidence from the landlord to investigate, or the landlord has failed to provide evidence of compliance with our orders, because of failings in the landlord's information management.

Landlord	2021-22	2022-23
Lambeth Council	3	
Abri Group Limited	1	
Arhag Housing Association Limited		1
Haringey London Borough Council		2
Notting Hill Genesis		1
Orbit Group Limited		1
Trafford Housing Trust Limited		1

If a landlord, or resident, disagrees with the decisions made on our cases, they can ask for a review. Between 1 April 2022 and 31 March 2023, we received 27 review requests from landlords where the only reason a review was being requested was because they had found new evidence that they considered changed the decision. This represents 11% of review requests during the year. Only seven of those review requests actually resulted in the finding being changed.

Key data from our call for evidence

Our call for evidence survey was open for six weeks from early November 2022 and asked landlord complaint handlers for their experience of knowledge and information management. We received 315 responses:

- 205 from housing associations
- 83 from local authorities or Arm's Length Management Organisations (ALMOs)
- 15 from almshouses
- 10 from cooperatives
- two from retirement villages

It's time consuming to always have to record every single piece of communication with a resident, and not always necessary unless the issue becomes a complaint – CEO (London)

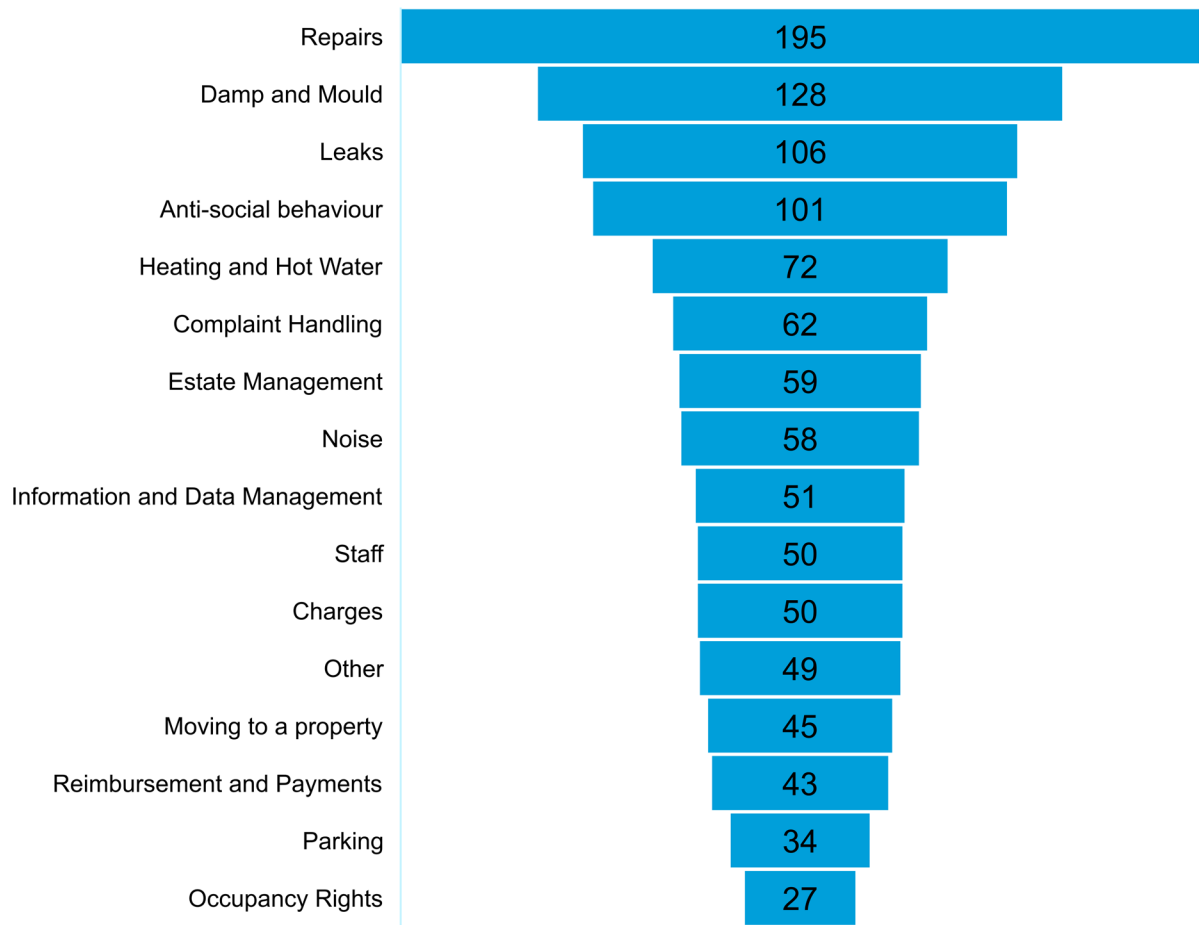
We asked whether issues with accessing or being provided with records (data) to respond to complaints was present in the organisation. Follow-up questions focused on how this impacted their complaint handling.

- 56% of respondents told us they were having issues accessing or being provided with records in order to respond to complaints
- 82% of those having issues said that it impacts their ability to fully address complaints
- 77% of respondents told us it impacted their ability to meet their complaint handling timeframes.

However, of the respondents who initially said that they had no issues accessing data to answer complaints, 18% subsequently acknowledged that data issues impacted their ability to fully address complaints or to adhere to complaint handling timescales. This is concerning as it suggests these landlords failed to fully recognise that a lack of access to data was affecting their complaint handling.

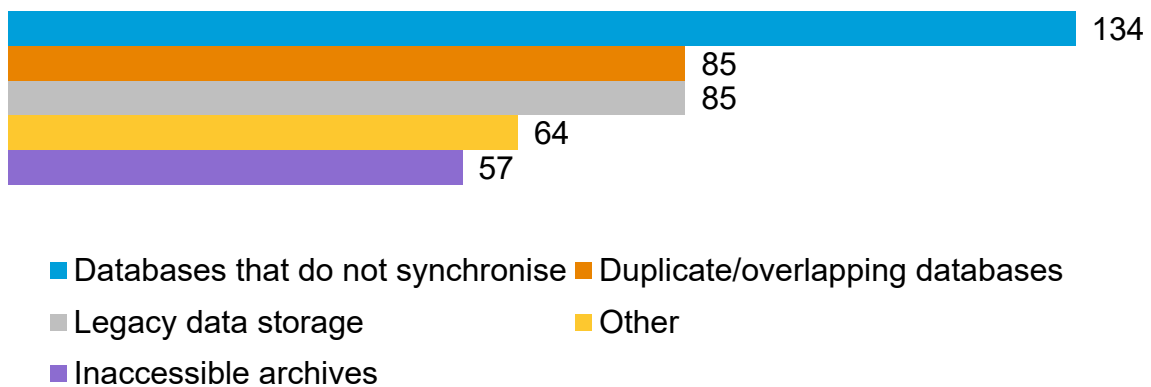
As evidenced in our casework, complaints about the repairs service were the most affected by data access issues with 195 respondents citing repairs as affected, 88% of whom stated it was this service area that was the most problematic.

Service areas where data access has been problematic



When we explored why complaint handlers had issues accessing the data they needed, 57% of respondents told us it was because the databases did not synchronise. Data synchronisation is where data entered into one database, moves across and is recorded appropriately in another database – e.g. the detail given in a call with the rehoming team may where appropriate be copied across to the relevant records on the repairs database.

Issues with databases



Databases failing to synchronise affected all types of landlords, but it was noticeable that a higher proportion of respondents from medium and large landlords reported issues – 45% and 47% respectively, compared to smaller landlords where only 22% of respondents said it was an issue. This may be because smaller landlords do not have automated synchronisation processes and instead rely on double manual data entry – staff put the same information in multiple spreadsheets and databases.

We also asked respondents for any other issues that were common to data access. These included:

- The system used is outdated/not fit for purpose
- Staff are not trained on the importance of accurate record keeping
- Multiple systems are being used for the same purpose, often because of mergers
- Delays or failures with third party updates

Staff are not trained on data quality – Information Manager (London)

Overall, 93% of responses to our call for evidence indicated problems with accessing and using data to some degree.

Key findings from the LSE Capstone Project

This research project's purpose was to explore and scope the likely impact of the Access to Information Scheme (ATIS) for housing associations and provide the Housing Ombudsman with findings and recommendations for what these landlords may need to rectify before the launch of the Scheme.

Under the Scheme, it is proposed that the Housing Ombudsman will handle appeals and complaints about the information requests made to housing associations. Local authority landlords are required to release information under the Freedom of Information Act.

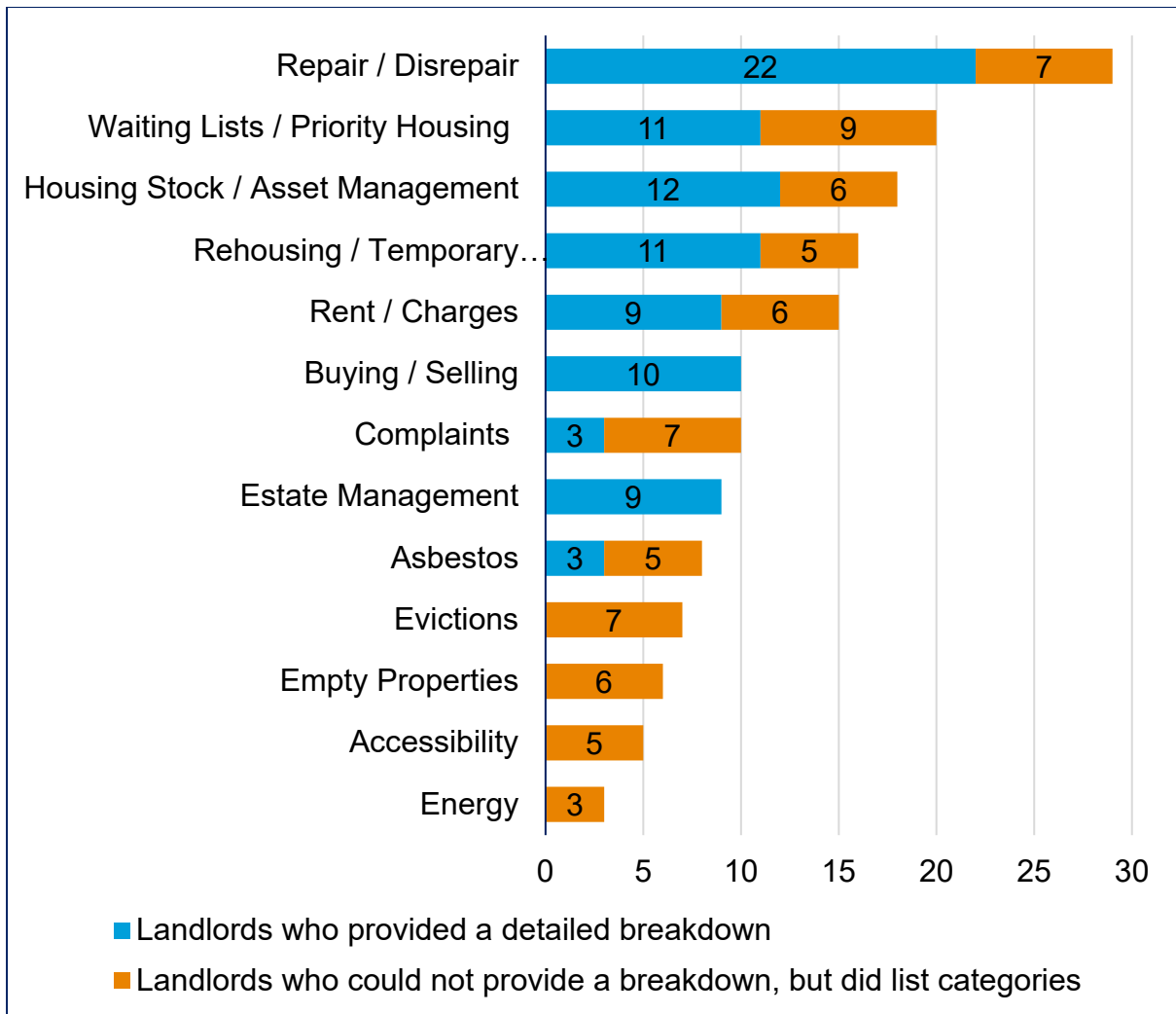
To inform the project, the Housing Ombudsman Service made FOI requests to 50 randomly selected local authority landlords:

- 1) How many requests for information under the Freedom of Information Act has the council received each month over the previous 12 months period, on the subject of their housing service provision?
- 2) Which specific area of housing service provision the requests were about?

Of the 50 councils that responded:

- 26 councils provided a detailed breakdown of their FOI requests
- 11 could not provide a breakdown but did list overall categories
- 11 could only provide the total amount of FOI requests received, and
- 2 councils were unable to respond at all.

The 26 councils who were able to provide detailed breakdown of their FOI requests, informed us that they had 1952 requests in that time period, relating to their housing provision – an average of 75 data requests a year.



When analysing the detailed breakdown, combined with the landlords who were able to tell us what categories of requests they got, if not the number of requests, it was clear that repairs was the most asked about area of service provision.

Insight from our casework

Both the difficulties we experience getting the information we need to handle cases, and the cases themselves, highlight the significant issues the sector has with all aspects of knowledge and information management, not just the record keeping aspect of it. We regularly have to widen our complaint definitions to include the issues we see and make specific findings, particularly in reference to complaints handling.

Creating data – listening and recording

If information is not created correctly, it has less integrity and cannot be relied on. This can be either a complete absence of information, or inaccurate and partial information. We regularly find instances where, despite being told by a resident about multiple issues, and the resident producing evidence to support this, the landlord only recorded information about one aspect. In those instances, landlords are often unable to explain why they did not record the other information.

The failings to create and record information accurately results in landlords not taking appropriate and timely action, missing opportunities to identify that actions were wrong or inadequate, and contributing to inadequate communication and redress.

Incorrect information can also cause real detriment. Landlords' poor KIM caused residents – and landlords – financial loss, both directly and indirectly. In one case we investigated, a resident's home had been transferred from the council to a housing association, with the right to buy being preserved in the tenancy agreement. Within that agreement, it did say that the right to buy would not be preserved further, were they to transfer to another home with a different landlord. However, the landlord's system had incorrectly recorded their tenancy agreement as secure. Therefore, when approached by the resident about whether the right to buy would be preserved, it wrongly confirmed that they would keep the right to buy and the resident went ahead and transferred. Subsequently, when they approached their new landlord to start the process, their application was refused as the right to buy had not been preserved.

Incorrect information can also contribute to an increased risk to a resident's health and safety, particularly when gaining the access required for repairs and mandatory safety checks. Often, the underlying issue was a simple recording error that would have been relatively straightforward to resolve had it been identified.

Vulnerabilities

The term 'vulnerabilities' has no standard definition. Broadly, they are characteristics that a resident possesses, either permanently or temporarily, that may mean they need care or support to complete landlord-tenant transactions, e.g. paying their rent,

opening the door to allow a gas safety check. These characteristics may also mean that reasonable adjustments are appropriate to actively prevent harm or distress. These can include recognised physical disabilities or mental health issues, but will also include transitory situations, such as financial difficulty or a broken leg.

We repeatedly found that a resident's vulnerabilities had not been appropriately recorded, even when the landlord had been advised multiple times and the procedures explicitly stated that vulnerabilities would form part of the decision-making process. In the absence of that information, wrong decisions were made, those most in need were not prioritised and residents were treated insensitively. We saw examples of residents being left without usable bathroom facilities for over a year, communication requirements ignored and residents facing unfair court action because of their landlord's inadequate recording of their vulnerabilities.

We did find some instances in our casework where knowledge of a resident's vulnerabilities was managed well, to the benefit of all involved. The resident disclosed that the way he reacted to certain situations meant he posed a risk of violence to repairs contractors attending his property. The landlord engaged with his mental health advocate and the resident to devise a plan for handling repairs appointments to ensure that contractors never attended unannounced, appointments were always made well in advance and the resident was able to make arrangements to remove himself from the situation. Because the landlord had maintained accurate and detailed records on what they had done and the reasonable adjustments they had made, we were able to conclude it had acted reasonably and found no maladministration.

Access

We saw instances where residents had told the landlord they needed advance notice of any appointments so they could make arrangements to be at home, yet landlords failed to record and act on this request, meaning an operative arrived at a home that they could not get access to – a waste of that resource and time and causing unnecessary delay. We also saw numerous examples of the initial service request not being logged on the system, the resident having to chase for progress updates, and the landlord either not replying or replying but being unable to give an update.

Landlords were, in some cases, recording multiple entries of refused or denied access without exploring whether that was really the case, even when the resident challenged it.

Those landlords did not examine these cases to establish why a resident would refuse access when it was them who had repeatedly requested for the repair to be carried out.

We also saw instances where the landlord asserted during the complaints process that the resident had refused access, despite there being no evidence recorded at all about what had happened.

Case study – poor records undermine oversight of contractor

Miss Y complained to her landlord twice in a three-month period about unsafe kitchen works and several missed appointments. She asked for a full investigation of the completed works and a response to her complaints.

The landlord said the work had initially failed a post-work inspection but had since passed. Miss Y said some of the inspection work was not carried out. She wrote to the landlord again and asked for compensation for the time she had been without a kitchen and the inconvenience of the missed appointments.

We had also issued a Complaint Handling Failure Order because the landlord had not responded to Miss Y's complaint. The landlord apologised for the delays and inconvenience but did not offer any compensation.

We found there was maladministration in the landlord's handling of the kitchen works, complaint response and record keeping. The landlord had failed to carry out the work in the agreed timeframe and to an acceptable standard. It failed to act when Miss Y reported concerns about the quality and safety of the completed work. Throughout its communication with Miss Y, the landlord did not acknowledge the inconvenience and impact of the delays on her family life. The landlord failed to monitor its contractors and coordinate the works schedule. This led to multiple missed appointments, unscheduled attendance, late notice cancellations and contributed to the delays.

We ordered the landlord to pay Miss Y £925 compensation in recognition of the time, trouble, frustration and inconvenience. We also ordered it to arrange a survey, complete any recommended work, and improve its repair and maintenance services and complaint handling.

KIM failing: The landlord failed to keep adequate records to show that it had monitored major works, or how it had managed its contractor throughout the process. Its failure to maintain accurate records affected its ability to provide Miss Y with comprehensive or robust complaint responses.

Case study – failure to use intelligence prolongs noise issues

Miss R complained about the landlord's handling of noise caused by her neighbour, who had an adapted bathroom because of a disability. The bathroom was above Miss R's bedroom and it needed to be used more at night. The landlord wrote to the neighbour and visited Miss R to explain that the noise may be from plumbing. Miss R continued to report noise and provided recordings.

The landlord did some work to reduce the water pump noise. For the next few weeks, Miss R made clear her view that it was not only the pump causing the noise but also other, deliberate, actions by her neighbour, including door slamming and taps being left to run. She was very clear that the night noise was causing serious sleep deprivation.

The landlord's Noise Officer visited and noted noise from the cold tap and the light cord pull mechanism. The landlord told Miss R it would install noise measuring equipment and if necessary, would do further work to reduce the pump noise. Nothing was mentioned about the other, acknowledged, noise issues.

Miss R continued to send in diary entries and recordings, describing the very severe impact of the noise. When the landlord's operatives attended and declared the pump to be fine, Miss R repeated the detail of the other noise. The Noise Officer's assessment had not been passed to the operatives, so they had no context or actions beyond checking the pump.

The light cord was finally replaced with a switch and soft door-closers were installed a few days later. However, Miss R continued to report that she was still being disturbed.

The landlord sent its stage two complaint response to Miss R. It said that it did not follow up on the light cord or pipe noise as its officers had failed to identify a statutory noise nuisance. The landlord had also failed to link her complaints together. The landlord offered Miss R £300 compensation.

We found service failure in the landlord's response to Miss R's report of noise. While the landlord had taken some action, it had no action plan to respond to the suggestion that some of the noise was being created deliberately. We also found service failure for the handling of Miss R's complaint. We ordered the landlord to pay Miss R a total of £850 compensation.

KIM failing: The landlord failed to appropriately use or manage the information and evidence available, ignoring Miss R's allegations and descriptions of the adverse effect, as well as disregarding its own Noise Officer's opinions.

Storing – systems and databases

Once information has been created, it is vital that it is then stored and maintained appropriately, in accordance with data protection requirements. Landlords will find it almost impossible to have sound knowledge and information management without some form of system or process in place. We saw an example of a resident having to endure water ingress for eight years because the landlord did not have a system to record customer communication. Each of the 15 times he contacted them about the problem, he had to repeat the entire situation and there was no continuity of handling. While this may be a more extreme case of poor knowledge and information management – not having any system at all is unusual – the poor information management governance and culture evident in this case was a theme throughout our casebook.

Third parties

Issues can be evident when it comes to the involvement of other parties and previous Spotlight reports on cladding and managing agents have made specific recommendations on knowledge and information management in relation to managing agents and freeholders.

In one case, when a maintenance contract ended, it left the landlord unable to answer basic questions about what had happened on a repair, because all of the relevant information was stored on the contractor's databases, not the landlord's. Throughout the repair, the landlord had no system in place to monitor what information the contractor had been giving them, so they were unable to explore the delay the resident was reporting. It was implausible that it genuinely took several months to obtain a tree-felling quote, but the landlord was oblivious to this until the resident got in touch.

Digital infrastructure

System upgrades and changes can lead to data loss. Having different systems and databases across an organisation can also cause issues with multiple systems storing the same datasets, potentially with differences in the data itself, with different degrees of functionality and no synchronisation. These underlying issues can be exposed in the event of a cyber-attack.

Legacy databases from mergers or significant structural changes, such as changing managing agent or bringing services back in house from an arms-length body or contractor, also have the potential to become inaccessible if licences are allowed to lapse. We saw examples of multiple complaints being raised for the same issue because the systems were not capable of linking the complaints correspondence. Some landlords have even had to ask the Ombudsman for details of complaints already made to them because they have no record of them. Every year, when we go through the verification process for the annual complaints statistics, we have a number of landlords who are unable to match their data to ours and require a case list to allow them to manually cross-reference.

Case study – missed opportunities to resolve issues earlier

Miss B's complained about the landlord's decanting and rehousing process, its handling of damp and mould reports, staff behaviour and the level of communication received.

The Ombudsman Service felt that mediation could be attempted to resolve the matter and a proposal was set out to the landlord with an expected date for a response.

The landlord responded confirming that they would engage in mediation, but requested an extension to replying to the proposal fully because the appropriate person was on leave.

No further response was received from the landlord. Upon issuing a second proposal notice, the landlord responded that it was looking into the matter and a counter proposal would be issued shortly. This did not occur and eventually the landlord confirmed that it would be best if the complaint was fully investigated by the Ombudsman.

We therefore requested information from the landlord to progress that investigation, but nothing was received. We issued a Complaint Handling Failure Order and the case was progressed on what evidence was available.

KIM failing: The landlord missed an opportunity to rebuild a relationship with Miss B because they could not engage with the proposal as the information was stored on an individual's computer, not a central database. It was then unable to provide any information for our investigation.

Case study – estate works impeded because access issues wrongly assumed

Mr K contacted his landlord about mechanical ventilation systems across the estate. Internal emails show that contractors needed simultaneous access to all six flats in the block and an appointment had been arranged but two residents had not so far agreed to provide access – there was, however, no evidence to support this assertion.

The landlord's stage 1 response said it had attended and done testing in various properties, but further investigations were required and there were "issues" with the fans.

When Mr K chased for a further update, he was told the contractor had aborted its recent appointment because of a lack of access and that a new appointment had been arranged, contradicting the assertion they'd attended and done tests. Internally, the landlord then recorded that Mr K would be refusing access. There is no evidence of how the landlord came to that conclusion.

The landlord provided no information explaining what it was doing to arrange further assessments or inspections, nor could it provide any records for what had already been done or what the outstanding issues were.

The landlord stated it had problems accessing a discontinued database, which may have included further correspondence between it and Mr K.

We made a finding of service failure. We determined the landlord's record-keeping failures contributed to the overall detriment experienced by Mr K. We ordered the landlord to pay Mr K £500 compensation and write to Mr K within four weeks with an action plan. We also recommended the landlord review its processes for record-keeping on estate wide repairs, and ensure it maintains easily accessible records of its inspections and outcomes, including those carried out by contractors.

KIM failing: The landlord not only recorded an unsubstantiated opinion about behaviour Mr K *might* display, its databases were unable to produce any evidence of its inspections, findings or action taken as a result.

Case study – complaint about roof leak reveals absence of customer records

Mr A's roof was resealed by his landlord following a report of a leak, but water ingress continued and Mr A reported the leak again. The landlord surveyed the building and identified the need for exploratory work.

Despite the repairs to the roof, the leak was reported again later that month. The leak persisted despite further repairs and the landlord inspected the property again. Over the following three months, Mr A chased the landlord for updates but did not receive anything.

After six years of this, the landlord carried out a further inspection and suggested removing tiles from the roof for investigation. There was then a further four month delay before that happened.

Despite the work on the roof, there were more leaks, more inspections and more additional work was needed. In total, the landlord took over eight years to resolve the water ingress, and two years to exhaust its internal complaints procedure. Mr A asked the landlord to address the issue over 15 times during this period.

When the complaint came to the Ombudsman, we asked the landlord for records, which it was unable to provide. The landlord told us it did not have a system to record customer communication, but it had since introduced a customer database, which was now used by its front facing officers and repairs team to document interactions with residents.

We found severe maladministration regarding the landlord's response to the water ingress and complaints handling. We ordered the landlord to pay Mr A £1,983 in compensation, and to confirm what remedial works were needed to restore Mr A's home and possessions.

KIM failing: The lack of adequate systems to record contact with residents inevitably led to the landlord being unable to respond to the leak, Mr A's repeated contact over *eight years*, or the formal complaint within a reasonable timescale.

Case study – complaint handling undermined because system for recording correspondence not integrated

Mr C reported a fencing repair to his landlord. The landlord took details but did not log it as a repair. When there was no progress, Mr C chased the landlord, which said it had no record of this repair. Mr C asked again for his repair to be logged.

After three months Mr C chased again, only to find that the repair had still not been logged. He was promised a call-back, but it did not happen. The same happened the following week.

Mr C raised a formal complaint. The landlord's initial response failed to address the points Mr C had raised, so he requested an escalation to stage 2. This request was wrongly treated as a new complaint. When Mr C queried this, this query was also logged as a new complaint. At this point, Mr C wrote to the landlord's CEO as he felt there was no progress with either the repair or his formal complaint.

The fence was repaired 11 months after the initial request. The landlord apologised and stated its systems do not allow for emails and correspondence in a matter to be linked, which made communication with other departments difficult. The landlord also accepted it had failed to "fully interrogate" its system in this matter.

We found maladministration regarding the handling of the repair and complaints. We ordered the landlord to apologise to Mr C and pay him £150 compensation.

KIM failing: The landlord's failure to adequately record reports of repairs and its inability to easily correlate information caused unreasonable delays in this case, not to mention causing Mr C avoidable distress, inconvenience, time, and trouble.

Case study – staff turnover lead to complaint information being inaccessible

Miss T's repairs took a total of four years to resolve. She reported repair issues with the external doors to her property causing a severe draught, water ingress, and problems with vermin. Miss T had to keep her heating on constantly and her finances and physical and mental health were affected.

The landlord arranged an inspection and agreed the doors needed to be replaced. The resident was told she would have to wait until the new financial year, which the resident was not happy with. The landlord recorded this as an 'expression of dissatisfaction' that had been resolved. The landlord then incorrectly closed the repair job as "no works required."

Six months later, Miss T chased her replacement doors. The landlord told her the works may need to be pushed back. It stated it had tried to carry out the works the previous year, but Miss T had failed to grant access; Miss T disputed this.

Miss T submitted a formal complaint. In its stage 1 response, the landlord asserted the doors were scheduled for replacement and appointments to install the doors had been made three times, but each time no access was granted.

Miss T challenged this and highlighted that there was no evidence of any attempts to access, such as 'no access' cards. The landlord then admitted to Miss T that it was having difficulty obtaining the history of the case, because staff had left and the details were not on a central database.

The landlord told Miss T it would arrange for an operative to attend her property regarding the draughts. Miss T informed the landlord she would be available all day, but not after 5pm. When the operative arrived after 5pm, the landlord recorded a 'no access' appointment.

In its final complaint response, the landlord acknowledged it had no evidence to support its statement that Miss T had refused access. Despite this, the landlord had repeatedly blamed Miss T for this aspect of the delay in the repairs.

We found service failure in both the handling of the repair request and of Miss T's complaint. We ordered the landlord to pay Miss T £550 compensation.

KIM failing: The landlord incorrectly recorded a matter as closed without resolving it, made unsubstantiated statements that Miss T had refused access, and had no systems in place to keep adequate records of its contact with Miss T or of its ex-employees' actions.

Case study – landlord struggles to retrieve information undermines complaint handling

Miss J referred their complaint about a moth infestation. We requested specific evidence from the landlord to investigate.

The landlord failed to meet our deadline and we chased for a response. The landlord's response was late and incomplete. It failed to provide details of repairs reported, copies of survey or inspection reports or evidence of any action taken as a result. It also failed to provide any information about the resident's vulnerability. We sent a final request.

The landlord's response was late again. It confirmed it had no evidence relating to repairs and could only provide information about Miss J it gathered at the start of her tenancy six years previously. In the meantime, Miss J had developed a debilitating physical condition which affected her mobility and mental health.

We found service failure, ordered the landlord to inspect the property and determine whether any remedial work was required to resolve the problem and to what extent it was responsible, and take Miss J's vulnerabilities into account in doing so.

KIM failing: The landlord failed to keep adequate and up-to-date information, and was therefore unable to evidence how it had used its discretion in applying relevant procedures.

Using – knowledge and action

Creating data in systems that hold it appropriately are the first steps needed for good data management, but to turn that data into knowledge and action plans, it must be used. Conversely, if the creation of the data has been done poorly, or the systems do not exist to hold it adequately, any usage of that data will be inherently flawed.

Repairs

We saw repeated failures within repairs complaints to either use or analyse the information that was already recorded on the systems. In one case, the resident had two autistic children.

She had explained this to the landlord, telling it she would need advance notice of any contractor visit as the presence of an unexpected stranger would overwhelm her children and cause them severe anxiety. Regardless, the landlord sent a contractor to the property without notice and consequently was not let in.

This was then recorded by the landlord as "refused access", despite it being the landlord's fault that access was not permitted. We frequently saw cases where "refused access" had been repeatedly recorded against a repair report with no analysis of why access was being refused or indeed if it was really being refused, even when the resident expressly challenged the assertions that they had refused access.

In one case, a communal boiler repeatedly failed whenever there was a power outage. The contractor made a written recommendation for a part to be repaired, but the landlord did not act on this recommendation and continued to rely on a technician attending and restarting the boiler whenever the power went out.

It did use the recommendation and it did not use the data recorded to explore the other issue this identified – that the building was regularly suffering power outages. Its lack of action on what it knew meant all the residents in the block repeatedly lost heating and hot water during winter months.

We also saw examples of the wrong professional being sent in response to reports despite what was required being clearly recorded on the system. In one case, the resident expressly flagged that her front door was a fire door and the repair needed was specific to the legal requirements of a fire door.

The landlord sent a general contractor who confirmed back what was already known – it needed a specialist fire door contractor. This lack of due diligence calls into question the landlord's approach to managing fire risk. An apparent lack of knowledge in relation to fire safety measures, and the lack of urgency given to the repair, is concerning in the context of the Grenfell tragedy – the flat was on the 14th floor.

Case Study – failure to record vulnerabilities leads to poor response to water ingress

Mrs E reported a leak from the roof into her leasehold property. The landlord's roofer carried out repairs, but Mrs E reported a recurrence of the problem several months later. The landlord inspected several times but delayed in carrying out repairs, which were again unsuccessful in fixing the leak.

Mrs E complained about the landlord's response to her reports. She said that the leak had worsened, causing damp and mould in several rooms. She was worried about the effects on her family's health and potential structural damage.

The landlord delayed three months before responding to the complaint. It said the problem was with pipework in the bathroom. Mrs E's plumber disagreed. The landlord then found problems with the roof and exterior allowing water in. It also noted that five or more other residents on the estate had reported similar leaks. Despite this, there were significant and unreasonable delays before any work was carried out.

The resident continued reporting concerns about the health of her family, by now including a three-year old child with serious allergies. Despite this, the landlord did not carry out the necessary work until almost four years since the first report of the problem.

We found severe maladministration. We ordered the landlord to apologise and pay £4,500 in compensation. We also ordered it to review its procedures for responding to reports of leaks, damp, and mould. We recommended it check the condition of other properties at the block which may be subject to the same problems.

KIM failing: The landlord failed to record or react appropriately to Mrs E's concerns about the risks to her family's health caused by the damp at the property. It also failed to use all the information available in a timely way to notice that the problem was more widespread.

Case Study – failure to use information results in resident not having adaptations

Mrs P had multiple health problems and disabilities. She required a toilet with a disabled pan height, and accessible taps. She reported problems with her kitchen and bathroom taps and a broken toilet flush handle. Two weeks later, the landlord's operative repaired the flush handle (but not the taps), leaving the toilet cistern leaking. A week later he fixed the taps but flooded the kitchen, damaging the floor.

Weeks later, Mrs P's toilet was still leaking. She complained about the operative and asked the landlord for compensation. The landlord said it was investigating and monitoring the operative's performance. It ordered a new toilet and non-slip bathroom flooring. Ten weeks after her initial report, Mrs P asked for an update and was told the bathroom work was cancelled due to the pandemic; it was only doing emergency repairs. She contacted the landlord three further times for an update on her compensation claim and asked for a survey of the damage.

The landlord eventually installed a new toilet and, a few days later, flooring. However, the new toilet did not have a disabled pan height. When Mrs P's MP intervened, the landlord said that an inspection was booked but there is no evidence that it took place.

Mrs P's advocate got in touch to progress the toilet and also flagged that the cord on her new extractor fan was not long enough and lever taps had only been fitted to the bath (not the kitchen or bathroom sinks). The landlord booked an inspection.

The landlord's inspector confirmed the toilet needed replacing, that an electrician should see if the fan could be modified, and that lever taps could be installed 'once the reason for the resident's request could be established'.

Despite the number of issues (there were other ancillary repairs), and the pandemic complications, there was no comprehensive action plan, formed from all the information the landlord held, in place for when or how to carry out the repairs. Mrs P's essential repairs took nearly 14 months. The landlord offered £395 in recognition of its poor service.

We found service failure in the landlord's handling of the repairs, the conduct of its staff, and the lack of consideration of her vulnerability. We also found that the compensation offered to Mrs P was not proportionate and ordered the landlord to pay £545 in compensation.

KIM failing: The landlord held information about Mrs P's needs but failed to use any of it, leading to avoidable distress and inconvenience.

Case study – strong records enables landlord to respond effectively on service charges

Mr M complained about the landlord's handling of his service charge account. He said that the landlord had charged him for the same major works twice in error.

In response to the complaint, the landlord was able to provide financial records dating back more than six years, evidencing that Mr M had not paid twice and accompanying it with an explanation of the relevant charges. This information even included a period before the landlord took over responsibility for Mr M's lease.

KIM success: This is an example not only of good financial information but knowledge of the history of the properties taken on post-merger.

Sharing – reporting and disseminating

A crucial, and often overlooked, aspect of good knowledge and information management is the need to share it appropriately.

The ICO made recommendations over nine years ago when its [investigation](#) found that landlords tended not to have formal policies, procedures or agreements setting out requirements around data sharing.

When discussing the requirements of GDPR, the conversation is usually around keeping data safe and the large scale data breaches that regularly hit the headlines, like the reports of an email sent in 2020 by one landlord to residents giving Covid-19 advice that contained the contact details, dates of birth, ethnicity and sexual orientation of a significant proportion of their residents.

But the requirements of GDPR are also to share information when it is appropriate and for a legitimate business purpose.

Our 2022 Spotlight investigation on noise specifically highlighted that local authorities were often wrongly applying GDPR to the information about applicants that housing associations needed in order to make a good allocation decision and incorrectly withholding information that should have been shared.

Even when the information was not personal data governed by the requirements of GDPR, we found landlords regularly withheld or omitted to share important information, leading to significant consequences for the resident.

Appointments

We found that residents were not notified of appointments made by the landlord and then when not home, a missed appointment was logged against their repair issue through no fault of their own.

We also saw cases where the resident was not told what the appointment was for, or why the work was necessary, which in some cases made them reluctant to grant access to contractors. We also saw information being shared, but not in an accessible format – effectively meaning it had not been shared at all.

An absence of information sharing was often seen internally as well – with information not being passed between service departments.

Not all information sharing methods have significant cost implications. Our Resident Panel members spoke as enthusiastically about receiving text message reminders of appointments and the use of communal notice boards, as they did about more costly measures.

Service charges/rent

We repeatedly saw cases where the landlord was unable to provide the information requested that would allow the resident to understand the charges levied on their account.

Sometimes this was because the information had not been shared with the landlord by a third party accountant, sometimes this was because the landlord wrongly believed that the resident was not entitled to the information and sometimes it was because different departments had slightly different information on the various different systems that they operated.

Building relationships

We found good examples of proactive information sharing to a wider audience than just the person asking the question – a resident had complained about the smell from other residents dumping rubbish around the communal bins. In response, both the landlord and the local authority provided a joint leaflet for the resident and over 5,000 other households within the area.

The leaflet confirmed that both the local council and the landlord had received regular reports of fly tipping, overspill and litter, and that they were committed to working together to investigate instances of fly tipping.

When the complaint came to the Ombudsman to investigate, the landlord was able to demonstrate it had completed regular inspections of the communal bin area and, where 'overspill' was recorded, it dealt with this and ensured pest control inspections were undertaken to identify any remedial or preventative measures were required.

Case study – inability to share records undermine landlord’s knowledge of complaint

Mr Z complained about the landlord’s response to blocked drains at his property – the landlord had sent a plumber rather than a specialist drainage contractor. The problem recurred six months later and Mr Z complained again. The landlord said the drain survey found the blockage was the water company’s responsibility. Mr Z was unhappy with this explanation and the delay in explaining. Three months later, the landlord apologised for the delayed response and offered £50 compensation. It offered a further £50 in recognition of its poor communication about its decisions.

Mr Z escalated his complaint to the Ombudsman. The landlord gave an account of its actions and decisions but was unable to provide the supporting evidence, meaning our investigation was unable to determine whether the landlord’s response to the blocked drains report was reasonable or in line with its policies.

We found maladministration on the report of blocked drains and service failure for the landlord’s complaint handling and record-keeping. We ordered the landlord to pay Mr Z £400 compensation, provide a copy of the drain survey and details of the resulting actions it would take. We also made recommendations to improve its complaint handling and record keeping.

KIM failing: The landlord’s actions may have been reasonable but its inability to provide evidence of those actions undermined any statements it made.

Case study – poor information sharing between landlord and contractor prolongs bathroom repairs

Mr G reported bathroom repairs to his landlord and a contractor was booked to attend. Mr G took unpaid leave from work to ensure he was at home, but the contractor did not attend. Mr G contacted the landlord and expressed frustration that this was not the first time this had happened. The landlord apologised – a technical error meant its operative had not received the instruction to attend.

Mr G and the landlord agreed to reschedule the works. The landlord failed to book the works in as agreed and contacted Mr G to apologise, saying it would let him know the new dates. Mr G was understandably annoyed about this, as each appointment needed him to take time off work.

The works were rearranged, and Mr G again took time off work and waited in all day, but the contractor did not attend. By this point, over the last year, Mr G had used 14 days of annual leave to deal with the situation and ensure he was available for the contractors.

The landlord did not respond to further contact, so Mr G raised a formal complaint. When he still did not receive a response, he referred the matter to the Ombudsman.

The landlord's repairs record provided to us during our investigation evidenced when jobs were raised, their target dates and whether a job was closed or cancelled. They did not, however, record the dates of any appointments, note when operatives could not gain access, or whether a job was successfully completed.

We found maladministration in the landlord's handling of the repairs and its complaints handling. We ordered the landlord to pay Mr G £300 in compensation in recognition of the time and trouble and inconvenience caused. We also ordered the landlord to review its record keeping processes in relation to repairs.

KIM failing: The landlord's inadequate information sharing with its contractor and its incomplete repair records led to avoidable inconvenience.

Case study – internal communication failures drive by inadequate information hampers complaints team

Mr S complained about the landlord's response to several concerns he had about its management of the estate. We requested specific evidence from the landlord to investigate.

The landlord responded on the day the evidence was due and asked for more time as the housing department had not provided the necessary information. We allowed further time, however, the landlord missed two further deadlines. We issued a Complaint Handling Failure Order.

KIM failing: This demonstrates the landlord's failure to communicate and share information across different departments and suggests that complaint-handling staff at the landlord cannot easily access necessary information from other teams in order to investigate complaints or respond to our evidence requests.

Conclusions and recommendations

Governance and culture

As highlighted through this report, successful knowledge and information management starts with an understanding and appreciation of its benefits to both the landlord and its residents. This needs to be centrally-led, with senior leaders clear about the importance of knowledge and information management, and their standards and expectations. This in turn helps to foster a working environment where staff have direction, structure and guidance and adherence to the standards is routinely monitored through quality assurance processes, both internally and with third parties.

An organisation's culture and its governance significantly impacts how, when, and why, things go wrong. Where there is poor governance, there is often a lack of accountability, unclear roles and responsibilities, as well as a lack of understanding or appreciation of the importance of both information sharing and evidence-based practice. This then informs or exacerbates a culture where KIM is not valued.

This lack of understanding of the importance of good knowledge and information management and an associated cultural acceptance of poor practice adversely affects both service delivery and complaints handling – the correlation between poor knowledge and information management and delay, poor communication, financial uncertainty and poor complaints handling, and the human consequences of that, were evident throughout our casebook. Even where the landlord has fulfilled its obligations, it cannot evidence this, leaving the landlord professionally vulnerable.

“It is cultural; the issues are inherent”.

“The landlord seems to blame each other internally and disagree.”

Resident panel participants, October 2022

Once a poor data culture develops, and a landlord is struggling to use its resources to mitigate for that, it is easy to see why knowledge and information management might be seen as an optional ‘add on’: a drain on resources and less important than other competing demands. Consequently, this becomes a vicious circle.

Our call for evidence shows that landlords are aware of their shortfalls and challenges with knowledge and information management, which is reassuring. What is less reassuring, however, is the lack of actions planned or taken in light of this awareness – the responses were passive and indicated an underlying fatalism that good knowledge management is outside of their control. One senior leader told us it is “hit and miss” as some staff are skilled in it, but others are not, but without any recognition that this was their responsibility, as part of their leadership duties, to

address. Senior leaders set the tone for the organisation – they need to value knowledge and information management.

A culture which fosters clear expectations and standards, led from the top and held up for scrutiny by governance, is required. A culture where staff have clarity about their roles and responsibilities (both individual and collective) and, crucially, they know what the standards and expectations of the organisation are in relation to knowledge and information management and strive to uphold them. This provides direction and structure for staff and engenders a sense of professional pride in maintaining standards.

Recommendation 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.
Recommendation 2	Implement a knowledge and information management strategy	This should include: <ul style="list-style-type: none"> • 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 • 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
Recommendation 3	Benchmark against other organisations' good practice in knowledge and information management.	This should underpin a continuous improvement approach to service delivery.
Recommendation 4	Review safeguarding policies and procedures	To ensure data analysis forms part of a landlord's proactive activities to satisfy their duties.

Recommendation 5	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
Recommendation 6	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.

Devise key recording standards

The number of local authority landlords who were unable to answer our FOI request appropriately because they did not record any/adequate data about previous FOI requests is concerning, given that the FOI Act has been in force for 18 years. In 2021-2022, the Information Commissioners Office (ICO) upheld a third of the complaints it received about social housing providers' responses to information requests with another third considered to be potential infringements. Any fines imposed as a result of those breaches will impact the funding of front-line services.

Creating a record serves a number of purposes. Good records assist housing providers to offer efficient and effective services by ensuring that decisions and actions are taken based on good quality information. Clear information is readily available to any member of staff who becomes responsible for a particular matter, easing handovers between staff. Communication with residents is improved when staff are able to access all of the relevant up to date information and get a good understanding of the issue, and what action has been taken (or not taken) and why. If a housing provider is asked to explain what happened, and why, good records will enable it to do so. Poor quality or absent records result in the landlord being unable to answer questions, or being unable to provide evidence to support its explanation – this impacts negatively on its credibility and relationships with the requestor.

Records should tell the full story of what happened, when, and why. A record should:

- Make clear who created it, and when;
- Be created as close as possible to the time of any events it is documenting;
- Be clear, specific, and unambiguous, and not include jargon or abbreviations;
- Include all relevant information, but not irrelevant opinion or speculation;
- Clearly state any decision made, and the reasons for it. This includes any decision to take no further action;
- If an action was taken, be clear about who did what, and when; or
- For planned actions, state who will do what and by when.

Creating a detailed record may take time, but it will save a great deal more time and trouble later when it is easily located and referred to when resolving an issue. Our call for evidence, the LSE research and our casebook clearly identifies which areas

of sector provision landlords are most likely to have FOI/ATIS requests made about and which areas of sector provision generate the most complaints. Landlords also need to ensure that they create comprehensive datasets that allow them to demonstrate compliance with sector standards, such as Decent Homes.

Recommendation 7	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.
Recommendation 8	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.
Recommendation 9	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.
Recommendation 10	Publish FAQs on websites and keep them updated	This allows for information self-service and reduces resourcing requirements.

Ensure appropriate systems are in place

Interestingly, we have found that systems act as a lightning rod for landlords' concerns, and solutions, for knowledge and information management. Some have told us their system itself is the problem (for example, because it doesn't synchronise or share information with other systems) and believe a new system alone to be the solution. This shows how commonplace it is to overlook that it is those who use the systems – the organisation and its staff – which are often the weak link. No system will ever be good enough to compensate for incorrect data entry, user error and a lack of quality assurance measures aligned to performance management. Landlords also need to have contingency plans in place in the event of unforeseen critical data incidents, such as cyber-attacks. Any landlord could find itself a victim of one. Landlords should consider how systems and information can be safeguarded in such an event, with planned workarounds to minimise the disruption to service delivery.

Local authority landlords who have effective knowledge and information systems in place typically also have efficient processes for dealing with Freedom of Information (FOI) requests and recognise that being transparent by publishing their requests and frequently asked questions reduces the number of further FOI requests. Housing associations who already manage their knowledge and information management well will be better equipped to deal with the forthcoming Access to Information Scheme. The research conducted by London School of Economics overwhelmingly shows that organised and efficient systems are key to managing future ATIS requests. The upfront cost of these digital tools and systems reduces the overall cost of responding.

Recommendation 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.
Recommendation 12	Train staff on using systems.	Including minimum data standards, performance measures and quality assurance processes
Recommendation 13	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.
Recommendation 14	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.

Mergers and other structural changes

Landlords' governance should be effective in identifying shortfalls before they escalate. Our call for evidence highlighted data is being lost or made inaccessible when stock is transferred, contracts with managing agents are ended, service

provision is brought back in house or a merger happens. A merger or other structural change is an opportunity to carry out due diligence on the systems, their compatibility and conduct risk assessments. We have seen issues where landlords referred to systems not ‘speaking’ to each other and legacy data being inaccessible. One recently merged landlord has identified that while all staff could set tasks on the system, only certain staff could then see those tasks and action them – staff who did not have the appropriate permissions were unaware of work required. These issues should be identified with action plans to address them, long before a planned structural change happens, not subsequently.

We have found from our casebook and engagement with landlords that structural change/merging is not always given sufficient planning and testing time, meaning any irregularities or issues are not identified until the point the change has occurred, by which time, data may be irretrievably lost or corrupted.

We have also seen merging landlords relying on moving to a centralised database as the solution for information management issues. However, our casework has shown that the creation of a central database cannot be relied upon without addressing any cultural and training issues as the solution. Where merging landlords/organisations already have existing KIM shortfalls, there is a significant risk of those problems remaining unresolved or getting lost in a bigger organisation, or becoming even bigger.

Recommendation 15	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
Recommendation 16	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.
Recommendation 17	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.
Recommendation 18	Establish clear data exception reporting processes.	This allows the new organisation to identify issues post-change quickly

Repairs

In two-thirds of the cases we upheld about repairs, poor records or information management played a pivotal part in the maladministration. The majority of complaint handlers who responded to our call for evidence said that poor records and systems were undermining their ability to respond effectively to residents, with these problems most acute in repair complaints.

When residents are not responded to, are passed to multiple departments, their repair requests are not logged, their vulnerabilities not recorded and considered, and they are blamed for missed appointments, it is easy to see why they would become frustrated and conclude they are not treated as important. It is also why they then make complaints about the service.

Recommendation 19	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.
Recommendation 20	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.
Recommendation 21	Implement an automated appointment reminder system.	This could take the form of text messages the day before.

Annex 1 – Recommendations Summary

Governance and culture

Recommendation 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.
Recommendation 2	Implement a knowledge and information management strategy	This should include: <ul style="list-style-type: none"> • 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 • 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
Recommendation 3	Benchmark against other organisations' good practice in knowledge and information management.	This should underpin a continuous improvement approach to service delivery.
Recommendation 4	Review safeguarding policies and procedures	To ensure data analysis forms part of a landlord's proactive activities to satisfy their duties.
Recommendation 5	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
Recommendation 6	Review internal guidance around	Particularly to ensure temporary, as well as permanent,

	recording vulnerabilities	vulnerabilities are recognised, recorded and then removed from records once no longer appropriate.
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Devise key recording standards

Recommendation 7	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.
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Annex 2 – Regulatory judgements

Narrative regulatory judgements and notices published by the Regulator since January 2021 and June 2022, and any subsequent regrades, which included data quality as a key issue.

Provider	Date	Explanation
Croydon Churches Housing Association Limited	29/06/2022	Governance downgrade
Estuary Housing Association Limited	28/04/2021	Governance downgrade and changed basis for viability grade
Honeycomb Group Limited	28/04/2021	Governance downgrade
	11/01/2023	Viability regrade
Lincolnshire Housing Partnership Limited	28/04/2021	Governance upgrade
One Housing Group Limited	27/01/2021	Governance downgrade
Shepherds Bush Housing Association Limited	22/06/2022	Governance downgrade
Sovereign Housing Association Limited	29/06/2022	Governance downgrade
	15/11/2022	Viability regrade
Swan Housing Association Limited*	10/12/2021	Governance and viability downgrade
	15/11/2022	Viability regrade

*Swan Housing Association Limited became a subsidiary of Sanctuary Housing Association on 8 February 2023. As a result, this regulatory judgement was withdrawn.

Annex 3 – Access to Information Scheme (ATIS)

The aim of ATIS is to drive a culture change whereby housing associations are more open with their tenants, requiring the sharing of a much wider range of information in relation to tenants' homes and the services housing associations provide. Council landlords, as public bodies, are already subject to the Freedom of Information Act.

There are 3 key principles of ATIS:

- All social housing tenants can access information from their landlord
- Tenants have access to information about their landlord's management of social housing
- Tenants have the right to challenge any unreasonable withhold of the above information

For those landlords with effective knowledge and information management, ATIS should not prove burdensome. For those without, ATIS will cause additional pressure and strain on resources.

The Housing Ombudsman will be the appeals body for ATIS.

Our jurisdiction

We can consider complaints from the following people⁴

- A person who has a lease, tenancy, licence to occupy, service agreement or other arrangement to occupy premises owned or managed by a landlord who is a member of the Housing Ombudsman Scheme
- An ex-occupier if they had a legal relationship with the member at the time that the matter complained of arose
- A representative or person who has authority to make a complaint on behalf of any of the people listed above

This means that, as well as considering complaints from tenants, we can also accept complaints from leaseholders and shared owners. The only category of homeowners who are not eligible to bring a complaint to the Housing Ombudsman about a member landlord are those who own the freehold of their home.

However, we cannot consider complaints where:

- The landlord/managing agent is not a member of the scheme
- The complainant does not have a landlord/tenant relationship, leaseholders and shared owners, with a member landlord/managing agent
- The landlord complaints procedure has not been exhausted
- They concern matters that are, or have been, the subject of legal proceedings and where the complainant has or had the opportunity to raise the subject matter of the complaint as part of those proceedings
- That involve the level of service charges or costs associated with major works
- They fall within the jurisdiction of another Ombudsman, regulator or complaint handling body.

Housing

Ombudsman Service

PO Box 152, Liverpool L33 7WQ

0300 111 3000

www.housing-ombudsman.org.uk

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⁴ Para. 25 of the Housing Ombudsman Scheme lists the people who can make a complaint to the Ombudsman.