

Self-Assessment against Housing Ombudsman Spotlight report on Knowledge and Information Management – September 2025

Governance and Culture	
R1 Define the oversight role of governance for knowledge and information management	Governance should seek assurance that the landlord knows its products, services and residents well, and that it uses this data to inform business and financial planning.
<p>Overall responsibility for Mid Devon Housing (MDH) sits with the Cabinet Member for Housing, Assets and Property. The Homes Policy Development Group (PDG) meets four times a year and consists of eight Councillors and three tenant representatives. The purpose of the Homes PDG is to:</p> <ul style="list-style-type: none"> • Assist the Council and the Cabinet in the development of its budget and policy framework by in-depth analysis of current provision, performance and policy issues. • Undertake all preparatory work in the development of policy including involvement of members of the Cabinet, members of other bodies. • Review and scrutinise the performance of other public bodies in the area. <p>The remit of the Homes PDG is delivering new affordable and social homes annually, improving and maintain the existing stock to world class standards and scrutiny of:</p> <ul style="list-style-type: none"> • HRA Housing • Neighbourhood and Tenancy Management • HRA Income Collection • Tenant Involvement • Housing Needs and Allocation • Repairs and Maintenance • Complaints • Voids including stock occupancy • Repairs and Maintenance • Stock condition • Delivery of new homes • Quality and safety of MDH properties 	

The Homes PDG role specifically in reference to Knowledge and Information Management (KIM), is relevant to all of the above functions of the Housing Service and includes:

- Provide informed advice to portfolio holders and senior leadership on the future planning and strategic direction of Landlord Services, ensuring decisions are underpinned by robust knowledge and information management relating to vision, values, objectives, and priorities.
- Develop and implement and maintain strategies, policies, and procedures—such as the HRA Business Plan, Asset Management Strategy, and Resident Engagement and Involvement Strategy—based on comprehensive data analysis and effective information governance.
- Lead oversight of the HRA budget, including the annual review and assessment of the draft Business Plan and associated Capital and Revenue Budgets, ensuring decisions are evidence-based and informed by accurate financial data.
- Maintain an up-to-date risk management register supported by current intelligence and reporting systems, and make recommendations on significant risks to HRA landlord services based on information analysis.
- Monitor the performance and outcomes of landlord housing functions and associated service delivery by internal departments and external contractors, using reliable performance data and structured information flows.
- Review and act upon scrutiny reports and findings from audits or service reviews, ensuring knowledge gained is captured, shared, and used to drive improvement planning and service learning.
- Provide assurance to portfolio holders on compliance with relevant legislation and regulatory requirements by maintaining and referencing comprehensive compliance records and documentation.
- Sign off all regulatory submissions, ensuring accuracy, completeness, and alignment with documented data and reporting standards.
- Ensure business continuity arrangements for HRA services are current, risk-informed, and supported by accessible knowledge resources and information systems to maintain service delivery during disruption.
- Facilitate meaningful tenant and leaseholder engagement by sharing accessible and relevant service information, enabling residents to shape policy, scrutinise performance, and contribute to service development.
- Promote equality, diversity, and inclusion by ensuring that knowledge of residents' needs, preferences, and lived experiences informs service delivery and strategic planning.
- Regularly review and analyse complaints data to identify themes and trends, using this information to inform service changes, improve tenant experience, and reduce service failure.
- Ensure that tenants, leaseholders, and resident groups have access to timely, accurate, and clear information on service performance, improvement plans, and strategic developments.
- Oversee the content, quality, and accessibility of strategic tenant-facing communications, including the Annual Report to Tenants, ensuring consistency, clarity, and alignment with best practice in information and knowledge management.

A Cross Departmental group will be established by the Head of Housing and Health to consider KIM for MDH and a KIM Strategy will be developed by January 2026. There is currently a wealth of data available and there are regular data reports to the Management Team which inform strategy development, service planning and delivery.

MDH has adopted the MDDC Information Asset Register (IAR) as a foundational tool for managing and governing data across departments. The IAR serves as a comprehensive inventory of all data assets—including letters, communications, spreadsheets, and other formats—used in the course of council business.

Scope and Functionality: The IAR captures detailed information about each asset, including its lifecycle, associated processes, data types, volume, and deletion protocols. This ensures visibility and control over the data held by each service area.

Compliance and Best Practice: Completion of the IAR is mandatory for all departments and is recognised as a best practice requirement by the Information Commission. It also supports compliance with audit standards and the Cyber Assessment Framework.

Integration with GDPR Requirements: The IAR is essential for updating Mid Devon District Council's Record of Processing Activity (ROPA), a legal requirement under Article 30 of the UK GDPR. It enables MDH to demonstrate accountability and transparency in how personal data is processed.

Strategic Role: Going forward, the IAR will form the backbone of MDH's Information Management Strategy. It will help ensure that only necessary data is retained, that retention periods are adhered to, and that appropriate security classifications are applied. This will support improved data governance, risk management, and operational efficiency.

R2 Implement a knowledge and information management strategy

This should include:

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

The MDH KIM Working Group will develop a Kim Strategy which will cover how data is:

- Created
- Stored
- Used
- Shared

The Strategy will address all areas outlined in this recommendation. While robust record keeping remains a core requirement, the Strategy aims to go further—ensuring the service is equipped to develop evidence-based practices. It will support informed decision-making through effective insights that strengthen risk analysis, strategic planning, and service development.

The Strategy will encompass both Information Management (IM)—focused on IT systems, data collection, storage, and access—and Knowledge Management (KM)—centered on people, processes, and the creation, sharing, and use of knowledge. We acknowledge the importance of embedding this approach into the organisation’s culture.

This is not just about collecting data, but about how we actively use it. The Strategy will outline both quick wins and longer-term initiatives. Key data areas of focus will include information on housing stock and its condition, as well as data about our tenants and leaseholders. This includes data on Protected Characteristics under equalities legislation and any temporary or ongoing vulnerabilities relevant to tenancy sustainment.

MDH is actively progressing in several areas related to data management and system development, though challenges remain in ensuring consistency, integration, and oversight. The Project Group will define an Action Plan which will set out the requirements for MDH to achieve good KIM and this Action Plan will be regularly monitored and updated.

Stock Condition Data: Work is underway to implement electronic forms that will feed directly into the Integrator system. This will enable more comprehensive recording of key property data, including Housing Health and Safety Rating System (HHSRS) assessments, Decent Homes standards, asbestos surveys, and septic tank information.

Orchard System Enhancements: Recent developments include the introduction of an annual review process for User Defined Characteristics (UDCs), supporting better tracking and updating of tenant-related data.

Anti-Social Behaviour (ASB) Case Management: A new ASB CAS process is being introduced to streamline case handling. This includes structured action plans for each stage of the ASB response, aiming to improve consistency and accountability.

Use of Artificial Intelligence: AI use within the Housing Service is currently limited. In Finance and Performance, Copilot (via Microsoft Teams) is used informally to assist with Excel formula guidance. However, there are no formal controls or governance mechanisms in place for AI usage across the service.

Data Integrity and Quality Control: There are no formalised procedures for ensuring data integrity. Quality control is largely reactive, relying on regular reporting and managerial scrutiny to identify and resolve anomalies. This approach lacks consistency and strategic oversight.

Data Accessibility and Integration: MDH does not currently operate a centralised data repository. As a result, no single officer has access to a complete and integrated view of tenancy and property data. To address this, consideration is being given to equipping frontline staff—such as Neighbourhood Housing Officers and Repairs operatives—with tablets that provide remote access to both Orchard and Integrator systems. This would support real-time data updates and improve service delivery.

As part of our ongoing efforts to address damp and mould issues in housing, we have introduced Aico Environmental Sensors for deployment in affected properties. These sensors are strategically placed throughout homes to continuously monitor key environmental indicators such as temperature, humidity, and carbon dioxide levels. The data collected provides actionable insights that support targeted interventions and effective case management, ultimately contributing to the creation of healthier and safer living environments.

In parallel, we are exploring the implementation of a digital improvement operating system designed to enhance the efficiency of frontline operations. This platform, if adopted, would offer automated workflows, integrated AI capabilities, and customizable templates. These features aim to support continuous improvement among operatives, enabling them to respond more effectively to challenges and deliver better outcomes for residents.

Current limitations in tenancy inspections mean that we lack visibility into the condition of properties prior to pre-vacate assessments. This gap in information reduces our ability to proactively plan and schedule necessary works when properties become vacant, potentially impacting turnaround times and resource allocation.

Within the voids process, before-and-after photographs of properties are routinely captured and stored on a shared drive. However, to ensure this visual evidence is accessible to Neighbourhood Officers and supports wider operational decision-making, a formal process is required to upload and store this data within the Orchard system.

Additionally, there is a need to implement a centralised database to record information on all trees located on our properties. This should include details of inspection dates and responsible personnel. Establishing a structured process for regular tree inspections is essential to maintaining tenant safety and ensuring compliance with health and safety standards.

R3 Benchmark against other organisations' good practice in knowledge and information management.	This should underpin a continuous improvement approach to service delivery.
<p>MDH engages in benchmarking activities to support performance monitoring and service improvement, though there are areas requiring further development and resourcing.</p> <p>HouseMark Submissions: MDH currently submits data to HouseMark's monthly Pulse survey, contributing to sector-wide benchmarking and insight generation.</p> <p>Annual CORE Submission: The service aims to complete the Annual CORE submission, which includes Tenant Satisfaction Measures (TSMs), Extract Insight, Headline Financials, Employee Costs, and Non-Pay Costs. However, this exercise was not fully completed in 2023/24 and remains outstanding for 2024/25, primarily due to resource constraints within both MDH and Finance Services.</p> <p>Data Sharing and Use: Benchmarking data is currently shared internally but is not routinely analysed or used to inform wider service improvements or strategic planning.</p> <p>Tenant Satisfaction Measures (TSMs): MDH publishes TSMs on its website prior to submission to the Regulator. Once signed off, comparative data is available from the Regulator's annual publications. MDH also includes TSM results in its Annual Report to Tenants, supporting transparency and accountability.</p> <p>To support continuous improvement of our repairs service, we utilise Voicescape to conduct post-repair surveys with residents. The data collected through these surveys is analysed to measure customer satisfaction and identify areas for enhancement. This feedback mechanism ensures that service performance is monitored effectively and that actionable insights are used to drive improvements across our repairs operations.</p>	
R4 Review safeguarding policies and procedures	To ensure data analysis forms part of a landlord's proactive activities to satisfy their duties.
<p>The MDH Safeguarding Adults at Risk, Children and Young People Policy and Procedures was adopted by Council in April 2025. The Policy aims to compliment and work in tandem with the Mid Devon District Council Corporate Safeguarding policy and guidance and is specifically aimed at Housing Officers and contractors.</p> <p>The Policy highlights that we aim to action each report of safeguarding as appropriate. This is monitored by the Safeguarding Champions and a quarterly report is produced and discussed to identify trends and put in place supportive actions.</p>	

<p>MDH is taking steps to strengthen safeguarding practices across its housing services, particularly in relation to third-party contractors and internal data management.</p> <p>Repairs operatives currently complete annual safeguarding e-learning as part of their mandatory training. However, there is a gap in specific guidance regarding the procedures for identifying and reporting safeguarding concerns. This lack of process-focused training may limit the effectiveness of safeguarding interventions and highlights the need for clearer operational protocols and targeted training to ensure staff are confident and equipped to respond appropriately.</p> <p>Contractor Safeguarding Requirements: Third-party contracts are being reviewed to ensure they include minimum standards for safeguarding. This will include a mandatory requirement for contractor staff to receive safeguarding training and a formal obligation to report any concerns directly to MDH.</p> <p>Incident Reporting and Monitoring: Collaborative work is underway with the Community Safety Officer to incorporate safeguarding incidents into the broader service delivery reporting framework. However, there is currently no consistent internal procedure for recording safeguarding incidents. Establishing a standardised process will be essential to enable effective monitoring, trend analysis, and responsive action planning.</p>	
R5 Train staff on the requirements of the Equality Act 2010	Particularly with relevance to the importance of knowledge and information management as a tool for compliance
<p>MDH currently provides Diversity and Equality training through its internal learning hub. However, this training does not explicitly reference the Equality Act 2010, which limits its effectiveness in supporting legal compliance and informed service delivery.</p> <p>A formal request will be made to Mid Devon District Council's HR team to incorporate specific Equality Act 2010 training into the mandatory learning programme. This would ensure that all staff have a clear understanding of their responsibilities under the Act, particularly in relation to knowledge and information management.</p> <p>Additionally, there is recognition of the need to extend equality training requirements to third-party contractors. Future contracts will include a mandatory provision for annual equality training, ensuring that all personnel working in MDH homes are equipped to deliver inclusive and compliant services.</p>	
R6 Review internal guidance around recording vulnerabilities	Particularly to ensure temporary, as well as permanent vulnerabilities are recognised, recorded and then removed from records once no longer appropriate
MDH has a Vulnerability Policy which was launched in 2020 which specifically details how Officers will:	

- Identify a tenant who may have a vulnerability and/or support need
- Record any vulnerabilities on housing management system
- Use all available information to identify if a tenant is vulnerable
- Take account of known vulnerability factors in the provision of services and in decisions around tenancy management and enforcement
- Assist vulnerable tenants in accessing additional services that they may need.
- Record any known representatives who act as a 'delegated authority' or with power of attorney or other care givers who may act on the tenants behalf
- Consider any additional needs due to the vulnerability and where appropriate vary our service delivery to ensure vulnerable residents still receive the same level of service
- Make appropriate referrals to tenancy sustainment services, such as CHAT (Churches Housing Action Team) or support agencies, based on our local knowledge of resources and the needs of the tenant, where appropriate to do so
- Make reasonable adjustments when a request is made and justified

In addition to the Published policy an internal Flagging Accounts procedure was launched in 2023 which details the requirement to add a 'flag' to the Housing Management System (HMS) for vulnerable tenants or households or those who disclose any of the protected characteristics. Once a flag has been added there is a 12 month review period at which time if the flag is no longer relevant (such as pregnancy) it is removed.

MDH has systems in place to support the recording of tenant vulnerabilities, but current practices highlight several areas for improvement in consistency, data accuracy, and contractor engagement.

Frontline Data Entry: Repairs operatives have access to Orchard via the Agile platform and are technically able to record User Defined Characteristics (UDCs) when vulnerabilities are identified. However, there is limited evidence that this functionality is being consistently used. This suggests a need for targeted training to ensure operatives understand the importance of capturing and updating vulnerability data in real time.

Review of Historical Data: A significant volume of outdated UDCs remains in the system, including entries such as "has COVID," which are no longer relevant. A review and cleansing of historical data is required to ensure that only current and applicable vulnerability flags are retained. Orchard has the capability to extract these records, enabling a structured project to assess and remove obsolete entries.

Contractor Reporting Requirements: MDH is reviewing third-party contracts to ensure they include clear expectations around the reporting of vulnerability concerns. This will include mandatory safeguarding and vulnerability awareness training for contractor staff, along with formal processes to ensure that any concerns raised are accurately recorded in MDH systems and appropriately acted upon.

<p>MDH has introduced a procedure to improve the governance and accuracy of vulnerability data recorded through User Defined Characteristics (UDCs). When a UDC is added to the system, it now requires managerial approval to validate the associated actions. This ensures that entries are appropriate and aligned with service standards.</p> <p>To maintain data relevance, an automated annual review process has been implemented. This review is triggered for each UDC entry and sent to the original staff member who recorded it. If the originator is no longer active, the review is redirected to a designated group of managers. This process supports ongoing data quality and ensures that outdated or no longer applicable vulnerability flags are identified and addressed in a timely manner.</p>	
<p>R7 Develop organisational key data recording standard requirements that will ensure good records that support the business and demonstrate compliance with national standards</p>	<p>This should set out the minimum standard to which data must be entered in the various databases owned by the landlord.</p>
<p>MDH currently faces significant challenges in maintaining data hygiene and ensuring compliance with GDPR regulations across its systems and processes.</p> <p>Orchard System: There is no routine data cleansing conducted by Housing Officers within Orchard, nor is there an automated process in place. This represents a direct breach of GDPR requirements, particularly in relation to data minimisation and retention.</p> <p>Document Management System (DMS): When a tenancy ends, records should be manually transferred to an archive where they are scheduled for automatic deletion after 12 years. In practice, this process is not consistently followed, and a formal procedure is needed to ensure tenancy records are properly monitored and archived.</p> <p>Third-Party Contractors: There is currently no assurance that data held by third-party contractors complies with GDPR, nor is there evidence of any data cleansing activity. This presents a risk to data governance and regulatory compliance.</p> <p>As part of the KIM Strategy development MDH will need to review and adopt existing industry standards such as HACT UK Housing Data Standards and the CIH Professional Standards.</p>	
<p>R8 Make adherence to the minimum standard for knowledge and information management part of the service level agreement with third parties</p>	<p>The quality of information sharing should form part of the assessment at procurement stage.</p>
<p>MDH recognises the need to strengthen data governance in its relationships with third-party service providers. Currently, there are no industry standards applied to the quality of data exchanged between MDH and external contractors, which presents a risk to consistency and compliance.</p>	

As part of the emerging Knowledge and Information Management (KIM) Strategy, MDH will develop a minimum standard for data handling and reporting. Once established, this standard will be embedded into all third-party Service Level Agreements (SLAs), ensuring that contractors adhere to clear expectations around data quality, integrity, and compliance.

This strategic shift will support improved oversight, enhance accountability, and ensure that data shared with MDH meets regulatory and operational requirements.

R9 Have a clear categorisation system for ATIS/FOI requests

This allows quick identification of whether the question has previously been answered and analysis of which systems require refinement to answer questions in future.

The current approach to managing Freedom of Information (FOI) and Subject Access Requests (SARs) within MDH lacks formal structure and consistency, which limits the ability to track, analyse, and improve responses.

Request Handling: FOI and SAR requests are typically managed by a small number of senior managers. Requests are forwarded to relevant departments based on the nature of the information required, and the systems used to retrieve data vary accordingly.

Lack of Categorisation: There is no categorisation system in place for FOI or SAR requests, either at the corporate or service level. This limits the ability to identify recurring themes, assess system performance, or refine data collection processes. Consideration is being given to implementing a local categorisation system, particularly in light of the volume of requests received.

SAR Process Gaps: There is currently no defined or standardised process for handling SARs, which presents a risk to compliance and service consistency. A formal procedure will be required to ensure timely, accurate, and GDPR-compliant responses.

R10 Publish FAQs on websites and keep them updated

This allows for information self-service and reduces resourcing requirements

We have a range of FAQ's available on our website including:

[Request it - MIDDEVON.GOV.UK](https://www.middevon.gov.uk/request-it)

[Leaving your home - MIDDEVON.GOV.UK](https://www.middevon.gov.uk/leaving-your-home)

[Evictions - MIDDEVON.GOV.UK](https://www.middevon.gov.uk/evictions)

[Report it - MIDDEVON.GOV.UK](https://www.middevon.gov.uk/report-it)

[Right to buy - MIDDEVON.GOV.UK](https://www.middevon.gov.uk/right-to-buy)

[Mutual Exchange leaflet](#)

[FAQs - MIDDEVON.GOV.UK](https://www.middevon.gov.uk/faqs)

[Reporting nuisance/anti-social behaviour and how we deal with it - MIDDEVON.GOV.UK](https://www.middevon.gov.uk/reporting-nuisance)

[ASB Flyer](#)

[Anti-social Behaviour Toolkit - MIDDEVON.GOV.UK](https://www.middevon.gov.uk/anti-social-behaviour-toolkit)

[Fire Safety in Communal Areas - MIDDEVON.GOV.UK](https://www.middevon.gov.uk/fire-safety-in-communal-areas)

[FAQ How to use valves and stop cocks](#)

["How to" YouTube guides - MIDDEVON.GOV.UK](#)

[Damp and Mould - MIDDEVON.GOV.UK](https://www.middevon.gov.uk/damp-and-mould)

[Heating - MIDDEVON.GOV.UK](https://www.middevon.gov.uk/heating)

[Renewable Energy - MIDDEVON.GOV.UK](https://www.middevon.gov.uk/renewable-energy)

[Aids and adaptations - MIDDEVON.GOV.UK](https://www.middevon.gov.uk/aids-and-adaptations)

[Complaints and feedback - MIDDEVON.GOV.UK](https://www.middevon.gov.uk/complaints-and-feedback)

[Right to Buy Q&A Solar Panels](#)

MDH maintains a wide range of tenant-facing information on its website, including FAQs, service guides, and policy documents. However, there is currently no central repository or register of the content published, nor is there a system in place to track when pages were last reviewed or updated.

Content Ownership and Review: There is no clear ownership assigned to individual service area pages, which limits accountability for ensuring content remains accurate and relevant. As a result, some published information may be outdated or no longer necessary.

Need for Structured Oversight: To improve governance, MDH will establish a formal register of all website content. Each article or page will be assigned to a responsible officer who will be required to conduct an annual review. This will ensure that published information is proactively maintained and aligned with current service standards and strategic priorities.

Ensure appropriate systems are in place

[R11 Review existing databases for capability and capacity to record those key data requirements](#)

[To ensure databases are capable of adequately capturing information about residents – e.g. vulnerabilities](#)

[To ensure databases are capable of adequately capturing information about homes – e.g. repairs and stock condition](#)

MDH currently operates two core systems—Orchard and Integrator—for managing tenancy and property data. However, these systems do not integrate, and manual transfers of tenant contact information are required to bridge the gap. This lack of interoperability presents challenges for efficiency, data accuracy, and service delivery.

System Limitations: Integrator has limited storage capacity in its current format. Discussions are ongoing with ICT to transition to a cloud-based solution that will better support long-term operational needs and scalability.

User Practices and Data Recording: There are inconsistencies in how staff use systems to record key actions. For example, Estate Neighbourhood Officers often send out Community Protection Notices (CPNs) and Community Protection Warnings (CPWs) without using the designated recording process. This results in delayed data entry, inaccurate reporting, and the need for manual adjustments—ultimately wasting time and undermining data reliability.

System Viability and Strategic Considerations: Orchard is currently outdated and unsupported, with MDH signing a waiver to continue its use. This raises concerns about long-term viability and may prompt broader discussions about system replacement, particularly in the context of any future local authority reorganisation or merger.

Cultural Shift Required: There is a need to reinforce the importance of timely and accurate data recording across the service. Data management should not be viewed as a low-priority administrative task but as a critical component of service quality, compliance, and strategic planning.

R12 Train staff on using systems

Including minimum data standards, performance measures and quality assurance processes

MDH currently lacks a structured approach to training staff on data quality standards and the importance of timely record-keeping. Officers are not trained on what constitutes “good data,” nor are they routinely instructed on the need to update records immediately following tenant interactions.

This gap in training extends to induction programmes, where data management is not currently emphasised as a core responsibility. As a result, data quality may be inconsistent, and opportunities to maintain accurate, real-time records are often missed.

To address this, MDH will need to develop and implement a comprehensive training programme that embeds data management principles into both onboarding and ongoing professional development. This will support improved service delivery, compliance, and strategic decision-making.

R13 Ensure databases are easy to interrogate and that the data can be extracted and used

Staff should be able to easily access the information they require. This is essential for evidence-based practice and informed decision-making. Where systems can be interrogated effectively, this produces crucial insight regarding patterns, themes and potential shortfalls.

MDH operates and maintain a number of databases to deliver services. We recognise a key need for good quality and timely data, and the ability to extract, analyse and present data in a number of formats to meet our business needs. The KIM strategy will reflect this.

MDH has made efforts to enable field-based staff to access and update housing data through mobile technology, but limitations in system design and device provision continue to hinder effective use.

System Access via Agile: Repairs operatives have access to Orchard records through the Agile platform but cannot update data directly.

Data Fragmentation: Property-specific data is stored in Integrator, which does not integrate with Orchard and is not accessible via Agile. This creates a fragmented data environment, limiting operatives' ability to view comprehensive property information while on site.

Finance System Integration: Orchard does not interface with MDH's finance systems, meaning rent accounts are not automatically updated. This disconnect adds administrative burden and increases the risk of data inconsistencies.

Device Limitations and Remote Updating: While repairs operatives are equipped with tablets, Neighbourhood Housing Officers only have mobile phones, which restricts their ability to access and update records in the field. As a result, remote data entry is minimal, and delays in updating systems can lead to service inefficiencies and gaps in tenant records. Voids operatives currently only used paper tickets but there are plans to upgrade to tablets.

To improve operational effectiveness, MDH will need to review system usability, expand device access for frontline staff, and explore opportunities for system integration to support real-time data management.

R14 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.

MDH faces significant challenges in managing legacy data across its housing systems and shared drives, with several areas requiring urgent attention to ensure compliance with data protection regulations and improve operational efficiency.

Housing Management System (Orchard): Implemented in 2008, Orchard holds data on all MDH tenants since its inception. However, no systematic data cleansing has been undertaken, meaning records for former tenants and households remain in the system unnecessarily. This poses a direct risk to GDPR compliance.

Integrator System: Similarly, Integrator has not undergone any data cleansing since its implementation. The accumulation of outdated property data may affect reporting accuracy and system performance.

Shared Drives (S/R/Q): There are no formal review processes in place for data stored on the S and R drives, and no visibility or analysis of personal data held on individual Q drives. This lack of oversight increases the risk of retaining irrelevant or sensitive information without justification.

Document Management System (DMS): When a tenancy ends, records should be manually transferred from the live DMS to the Housing Tenancy Archive, where they are scheduled for automatic deletion after 12 years. In practice, this transfer process has not been consistently followed, and no deletions have occurred since 2011. An internal procedure is urgently needed to ensure tenancy records are archived and deleted in line with retention policies.

To address these issues, MDH will need to implement a comprehensive data cleansing programme, establish clear procedures for data lifecycle management, and ensure all systems and storage locations are regularly reviewed for compliance and relevance.

Mergers and other structural changes

R15 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 aimed primarily at Housing Associations.
There are no plans for shared services

R16 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 aimed primarily at Housing Associations.
There are no plans for shared services

R17 Proactively investigate incoming datasets during mergers

Identify gaps in the knowledge of incoming stock and residents, and work to fill those gaps.

Recommendation aimed primarily at Housing Associations.
There are no plans for shared services

R18 Establish clear data exception reporting processes

This allows the new organisation to identify issues post-change quickly

Recommendation aimed primarily at Housing Associations.
There are no plans for shared services

Repairs

R19 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
<p>MDH currently lacks formalised procedures for recording missed appointments, both for internal operatives and third-party contractors. This absence of clear guidance presents a risk to service consistency, accountability, and performance monitoring.</p> <p>Internal Operatives: There are no documented requirements outlining the conditions under which an appointment can be recorded as missed. As a result, practices may vary between teams or individuals, leading to inconsistent reporting and potential inaccuracies in performance data.</p> <p>Third-Party Contractors: Similarly, no formal standards are in place for external contractors regarding the recording of missed appointments. This gap in expectations and oversight may result in unreliable data and missed opportunities to identify service inefficiencies.</p> <p>To address this, MDH will need to develop a definitive process that clearly sets out the criteria and evidence required before an appointment can be marked as missed. This process should be embedded into both internal procedures and third-party service level agreements to ensure consistency and transparency across all service providers.</p>	
R20 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.
<p>MDH currently does not conduct formal wastage analysis on missed or refused appointments within the Repairs service. This represents a missed opportunity to identify inefficiencies, improve resource allocation, and enhance service delivery.</p> <p>Repairs Team: No structured analysis is undertaken to understand the causes or patterns of missed appointments. Without this insight, it is difficult to implement targeted improvements or assess the impact on operational performance.</p> <p>Planned Maintenance: Some limited analysis is conducted within the Planned Maintenance team. This includes efforts to reduce missed appointments by grouping service calls geographically. While this is a positive step, it remains isolated and does not extend to the wider Repairs function.</p> <p>To improve efficiency and accountability, MDH should implement a comprehensive wastage analysis process across all relevant teams. This would enable data-driven decision-making and support the development of action plans to reduce missed appointments and optimise service delivery.</p>	
R21 Implement an automated appointment reminder system	This could be the form of text messages the day before
<p>MDH has implemented basic functionality to support appointment confirmations and reminders for repairs, but the current system lacks flexibility, integration, and accessibility for all tenants.</p>	

Booking and Confirmation: Tenants can report repairs via online enquiry, telephone, or email. When an appointment is booked—either through direct contact or digital request—a confirmation text is sent to the lead tenant. However, if the lead tenant does not have a registered phone number, no message is sent to joint tenants or other household members.

Reminder Functionality: A reminder text is sent the day before the scheduled appointment. However, tenants cannot cancel or reschedule appointments via return text, limiting the system's responsiveness and convenience.

Operative Communication: Repairs operatives have the ability to send a text when they are en route to a property, but this is not consistently done. Additional training is needed to ensure this feature is used reliably to improve tenant experience and reduce missed appointments.

Third-Party Contracts: The use of automated appointment reminders is not currently a requirement within third-party contracts. This presents an opportunity to strengthen service standards by including automated communication protocols in future agreements.

To enhance service delivery, MDH should consider expanding its automated notification system to include multi-channel communication, real-time tracking, and tenant interaction capabilities. This would improve engagement, reduce missed appointments, and align with best practice in customer service.