



Housing* Knowledge and Information Management (KIM) Strategy

for Canterbury City Council's Social Housing Management Service

Author: John Nottage (Tenancy Policy and Programme Officer)

November 2024

Preface.....	1
1. Introduction to KIM	2
2. Purpose	2
3. Governance.....	3
4. Accountability and risk management.....	4
5. Record keeping	5
6. Implementation and review.....	5
7. Conclusion and future direction.....	7
8. Relevant and related documents	8
Expectations set for social housing landlords	8
References	9

Preface

This strategy champions the Housing Ombudsman's recommendations for enhancing Canterbury City Council's (CCC) record-keeping within its social housing landlord service.

It emphasises the importance of robust Knowledge and Information Management (KIM) for effective tenant services and compliance.

The purpose of this strategy is to underscore record keeping and to keep it continually under review so that information management is maintained and improved.

Getting KIM right is a main building block of social housing.

It is, according to the Housing Ombudsman (2023), "the closest thing the sector could get to a silver bullet".

Following the tragic death of [Awaab Ishak](#), investigations identified a culture of 'othering of residents' and a pattern of marginalisation and exclusion of residents was at the heart of the issue.

Data consultant Paterson (2023) highlights "this pattern was exacerbated by an extremely poor data culture causing daily detriment to residents".

The Regulator of Social Housing (RSH) mandates that social housing providers must actively engage with tenants to gather information that can enhance housing services.

This KIM strategy outlines data handling protocols, specifying where data will be stored, why it's collected and who will access it.

It serves as the standard document for CCC's landlord KIM practices, complementing CCC's broader Digital and Technology policies.

Annual reviews will ensure alignment with any relevant new policies.

Section 8 will be updated with documents that are related at yearly reviews of this strategy or sooner, for example, particular service areas may require their own niche strategy.

1. Introduction to KIM

*This strategy (version 1) relates only to any Knowledge or Information passed to or held by CCC about a person or persons who hold a lease, tenancy, licence to occupy, service agreement or other arrangement to occupy premises owned or managed by CCC in its capacity as a social housing landlord and member of the Housing Ombudsman scheme.

In other words, this strategy relates to Canterbury City Council's Social Housing Management Function.

The remainder of this document will refer to this function of CCC as the landlord service.

This strategy will relate to the Northgate (NEC) system which is the database for housing management but will relate also to any KIM in other systems such as HUUME (which holds information about Transfer applications that are outside of the Housing Act 1996 Part 6) and also Integra (which holds information about some shared owners).

However, this strategy will incorporate KIM on any system, software, application or document that relates to the landlord service.

2. Purpose

"Purpose" is essential for effective Knowledge and Information Management (KIM). Paterson (2023) asserts, data protection is about more than security—it's also about data quality, risk management, transparency and defending human rights.

The seven principles of GDPR provide guidance for handling both existing and new data.

We follow rules on using information set by The Data Protection Act 2018 and the General Data Protection Regulation (GDPR).

Under these rules, as detailed on CCC's website, all personal information must be:

- processed lawfully, fairly and in a transparent manner
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes

- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed
- accurate and where necessary kept up to date
- kept for no longer than necessary for the purposes for which the personal data is processed and
- processed in a manner that ensures appropriate security of the personal data
- Accountability. CCC shall be responsible for and be able to demonstrate compliance with each of the 6 previous bullet points (see section 4).

Every officer is responsible for KIM, with line managers ensuring parameters are set, reviewed and documented to create a traceable record of practices across work areas.

For example, KIM may differ for one type of customer; leaseholders, versus tenants who rent, due to service needs or past practices.

Changes in KIM practices will be logged in the 'social housing KIM Log' for future reference and compliance.

A record of changes will be integral for future RSH, HO, SAR or Freedom of Information (FOI) requests.

3. Governance

If risks are identified, they are escalated to the Head of Service and, if needed, recorded on the Corporate Risk Register.

Line managers and staff play key roles in identifying and escalating risks within the landlord service.

The risk register is regularly reviewed by corporate management team which demonstrates senior level oversight.

The Housing Ombudsman and Regulator of Social Housing expect senior leaders to maintain high KIM standards.

At CCC, strategic management will establish KIM direction, while operational line managers will be responsible for ongoing quality assurance and maintaining an environment of clear guidance.

4. Accountability and risk management

Accountability and Risk Management Accountability is one of the key principles enshrined in Article 5 (2) of the UK General Data Protection Act (UK GDPR).

It is a vital pre-condition for customers' trust in their housing provider, because it requires controllers to demonstrate how they comply with the data protection framework (The GDPR) and uphold information rights under the law.

The Information Commissioner's Office (ICO, n.d.) states, "Accountability is not about ticking boxes."

The ICO suggests that an ability to identify, assess and manage privacy risks is a crucial element of delivering a risk-based approach to accountability:

"Understanding the risks of the way you use personal data specifically is central to creating an appropriate and proportionate privacy management framework."

CCC has a diverse and complex landlord service.

We will take a risk-based approach to demonstrating compliance.

The ICO also highlights that accountability enables the implementation of "appropriate and effective policies, procedures and measures [which are] proportionate to the risks, which can vary depending on the amount of data being handled or transferred, its sensitivity and the technology you use."

Strategic and operational managers will work together with operational staff to evidence a risk-based approach to information management and evidence this on the 'Social Housing KIM Log' each quarter.

Operational service managers will be responsible for ensuring that the KIM Log is updated each quarter and recorded in a way to chart progress.

Housing Ombudsman complaints are centrally managed and reported annually to the Audit committee.

This demonstrates independent and political oversight.

5. Record keeping

The Housing Ombudsman's spotlight report on KIM states:

"Failing 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."

To strengthen record-keeping, we will:

- develop minimum data recording standards to ensure compliance and support organisational needs
- include knowledge and information management standards in future third-party service agreements and procurement assessments, as well as reviews of them
- keep website frequently-asked questions updated to reduce resource demand through self-service
- regularly review sensitive tenant information to ensure records reflect current circumstances like disability, financial challenges or family changes
- use the information from accurate records of missed appointments to identify patterns, improve efficiency and develop effective action plans.

6. Implementation and review

The Director, relevant Heads of Service and Service Managers will identify all applicable line managers within the landlord service.

Line managers will document and review KIM practices quarterly, focusing on both established and evolving best practices and recording this on the 'social housing KIM Log'.

There may be a benefit to standardising the recording and logging of best practice.

However, the Locality, Case, Corporate Case and Facilities Management Service Managers (Service Managers) and Heads of Service will determine the level of autonomy allowed by line managers and 'KIM Log administrators' to demonstrate good KIM.

Where KIM is working well and can be demonstrated well, it is not envisaged that any changes will need to be made so long as demonstrable good KIM can be accessed by senior management for their own review, checking and evidencing to the Regulator of Social Housing (RSH).

Principles to embed into practice and consider when reviewing KIM

- 1) Identifying the key activities taken to deliver a service.
- 2) Establishing the lifecycle of the data required.
- 3) Assigning who has responsibility for each stage of data management.
- 4) Establishing what essential data is required by the users of that information.
- 5) Identifying the gaps in knowledge and holes in the process, e.g., poor documentation.
- 6) Identifying where data quality reporting is required.

The 'Social Housing KIM Log' will be the central repository for KIM recording, accessible for internal reviews and any future inspections by the RSH.

Recording on the 'Log' is not to be confused with landlord service data where repositories will range from the Northgate (NEC) database, Enterprise/Anite/'Information@Work' document store and workflow, and spreadsheets etc.

7. Conclusion and future direction

This strategy identifies the opportunities to strengthen and continuously improve CCC's record-keeping practices, with a focus on improving data management by enhancing a culture of accountability and implementing a quarterly KIM review cycle.

It will be for line managing staff (in the landlord service) to demonstrate that all the locations of Knowledge and Information, relating to whichever work area, are accounted for and managed well.

This will also include for contractors, who are data processors and hold key knowledge and information for CCC.

Therefore, key to data management is managing the journey and handover of information.

Being too cautious and not sharing information can be just as damaging as a data breach.

This strategy along with quarterly review and monitoring will improve KIM, bringing structure to handling data related to CCC's landlord service in three key ways:

- To define the relationships between different data roles and ensure that each work area or role profile has clearer responsibilities over their data elements. Defining relationships between different data roles in the landlord service means establishing clear connections and responsibilities among various types of data, like tenant information, property details, maintenance records, and financial data. It involves determining how these data sets interact, who has access to them, and how they are used to improve services, ensure compliance, and make informed decisions in the management of the landlord service.
- To sketch out pathways for streamlining data management approaches to create sharper insights that deliver more efficient decision making. This means that the many work areas of CCC's landlord services will develop the ways that data is created, stored, analysed, used and deleted to reduce errors and improve the core social purpose of effectively providing a modern, forward thinking landlord service.

- A more accountable organisation which is able to rely on well-managed data to make informed decisions is one that can provide highly effective services to its customers. This means that CCC's landlord service can serve its customers better as it prioritises accountability and uses well-managed data. In practice, this could improve how quickly we respond to customer needs, predict and prevent problems, allocate resources effectively and improve service quality. This all leads to higher customer satisfaction and trust in CCC as a responsive and efficient landlord service.

KIM must be embedded in all practice, similarly to the resource and financial considerations in delivering a modern landlord service.

Line managers will apply a risk-based approach with adherence to the principles in section 2 and section 5 with the purpose of bringing continuous improvement to the structure of how data is handled.

8. Relevant and related documents

[Housing Ombudsman Spotlight on Knowledge and Information Management \(KIM\)](#)

[Privacy notice | Canterbury City Council](#)

[Service privacy notices | Canterbury City Council](#)

[Code of Practice on the management of records issued under section 46 of the Freedom of Information Act 2000](#)

Expectations set for social housing landlords

The expectations for landlords when it comes to KIM can be taken from several sources including:

- 1) Decent Homes Standard. Landlords must report properties below standard.
- 2) National Housing Federation (NHF) guidance lists required documents and retention periods for case files, property maintenance, etc. [data retention schedule v1.7 toolkit.xlsx](#)

- 3) Chartered Institute of Housing (CIH). Professionals must base information and advice on evidence, necessitating accurate record creation. [CIH professional standards | Chartered Institute of Housing](#)
- 4) Information Commissioner's Office (ICO) have a code of practice outlining best practices in record management. [Section 46 Code of Practice – records management | ICO](#)
- 5) NHF code of governance. Boards should document how tenant feedback and financial integrity shape decisions. [National Housing Federation - Code of Governance 2020](#)
- 6) Local Government and Social Care Ombudsman (LGSO). Although the LGSO guide on good record-keeping applies to health and social care services, its principles are easily applicable to housing and property management. [Ombudsman issues guide for care providers on good record keeping - Local Government and Social Care Ombudsman](#)
- 7) HACT UK Housing Data Standards. Recognised by Industry Safety Steering Group and offer 10 data standards which includes voids, customer data, repairs, resident feedback and resident complaints. The Better 'social housing review' recommends adopting these standards for landlords to fulfil their recommendation that all landlords undertake a national audit of social housing. [UK Housing Data Standards | HACT](#)
- 8) Department of Digital, Culture, Media and Sport. For Local Authorities, there is a code of practice on the management of records. [Code of Practice on the management of records issued under section 46 of the Freedom of Information Act 2000](#)

References

Housing Ombudsman (May 2023). *Spotlight on: Knowledge and Information Management (KIM) On The Record*. Retrieved from <https://www.housing-ombudsman.org.uk/wp-content/uploads/2023/05/KIM-report-v2-100523.pdf>

Paterson, C. (2023) *The Social Housing Round Table: Knowledge and Information Management online seminar (20 June 2023)*. Retrieved from <https://www.youtube.com/watch?v=KFs3UwsSFKU>

Information Commissioner’s Officer (n.d.) *Accountability framework*. Retrieved from <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/accountability-and-governance/accountability-framework/>

*Housing Ombudsman (n.d.) *Our Jurisdiction*. Retrieved from <https://www.housing-ombudsman.org.uk/centre-for-learning/fact-sheets/our-jurisdiction/>

Canterbury City Council (n.d.) *Budgets and transparency*. Retrieved from <https://www.canterbury.gov.uk/budgets-and-transparency/data-protection>

Version history

Version Number	Release date	Reviewer	Summary of changes
1	11/11/2024	John Nottage	First Draft
1.1	2/12/2024	Marie Royle and Matthew Archer	Input from MR and MA on structure and reference in policy to current retention schedules and Data Protection information on CCC website.
		John Nottage	Added in section 5 on record keeping
1.2	17/12/2024	John Nottage	Feedback from the meeting on 2 December that the ‘social housing information asset register’ is too granular and creates a risk of over-complicating. Replaced with more autonomy for KIM Log Owners to demonstrate good KIM. Review after first ‘KIM quarter’ at the end of February 2025. Strategy wording updated accordingly.
1.3	18/2/2025	Marie Royle	Sign off from Marie Royle (Director People)