Season 3 episode 2 - July 2023: Spotlight on... Knowledge and Information Management

Speakers

Victoria King, Sector Development Lead, Housing Ombudsman

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Question 1
00:00:00 Victoria King

So why did the Housing Ombudsman service choose to focus on knowledge and information management for the latest spotlight on report?

00:00:07 Zoe Miller

We were finding that it was a recurrent and dominant theme in our case work, but also our paragraph 49 investigations and our somatic spotlight reports, so anyone who would have read our paragraph 49 investigation into Rochdale Boroughwide Housing, for example, would have seen that the link that we made in there between the poor knowledge and information management and the direct effect that it had on the landlord's resident.

00:00:34 Zoe Miller

So we felt that it was time to move away from looking at a distinct and defined aspect of service provision and on to what is more akin to a root or underlying cause. And we had seen that KIM does have that direct effect on both service delivery and complaint handling. There's also the advent of the access to information Scheme as well. So we thought that it would be timely in terms of providing some practical recommendations to help housing associations prepare for that.

Question 2
00:00:00 Victoria King

Why is good knowledge and information management so important in the housing sector?

00:00:06 Zoe Miller

I would say that from the analysis and research that we did as part of this investigation, when you distil it, it's about people first and foremost. So where landlords don't hold knowledge and information about their homes, or importantly about their residents, it really limits their ability to provide that responsive, safe and high-quality service.

00:00:28 Zoe Miller

So we saw a lot of that around the areas of vulnerability. So where landlords aren't recording the vulnerabilities appropriately, capturing that important information and sharing it appropriately, it then has a direct effect on the residents. So one of the examples that we that we use in the report is a resident with two autistic children who asked the landlord specifically for to her for them to give her advance notice of any contract to visits, which they then failed to do.

00:01:00 Zoe Miller

So not only did she have the consequence of her two children being caused distressed by this unfamiliar person at the front door, it also meant that the appointment couldn't go ahead because she wouldn't allow access due to the fact that it was an inappropriate home visit. We also saw that a lot of it is to do with risk management. It is where there is poor KIM, it has the effect of exposing residents to harm or risk of harm.

00:01:31 Zoe Miller

And landlords also have their legal and regulatory responsibilities that they have to adhere to as well, and particularly with the advent of the tenant satisfaction measures, there's increasing obligations on landlords to hold accurate information. But one of the main things that we really try and convey in the report that good KIM benefits all. And by that we mean landlords and their residents. So there's better working relationships but increased trust.

00:01:59 Zoe Miller
Landlords are then able to target their resources, give greater clarity and certainty to both their residents and their teams and also there's reduced risk of reputational risk for the landlord. And also financial savings because not having to award residents compensation, either through their own complaints handling through the Ombudsman.

00:02:24 Zoe Miller

And also just reduce costs in terms of being more efficient. So we were finding examples where landlords were ended up having to pay sort of hundreds of pounds in compensation for what was a really minor issue that would have cost them next to nothing. But because they were unable to manage that appropriately due to their poor KIM. The costs then escalated.

Question 3
00:00:00 Victoria King

What key data from the Housing Ombudsman service casework did you look at?

00:00:08 Zoe Miller

We looked at casework data from the 1st of April 2021 and 31st of March 2022, and we were looking at cases where residents had either directly complained to us about the landlords KIM, or whether we found that it was a key issue that was sitting underneath the service provisions that haven't necessarily been complained about that we had identified and also where we'd found it was an issue, from our perspective, in terms of progressing the matter through the landlords complaint process.

00:00:40 Zoe Miller

And we made determinations on 191 cases which fell into those first two categories. So about being directly complained about or a key issue that we had identified. And we made 242 orders and 147 recommendations on those cases.

00:00:59 Zoe Miller

And we also looked at 38 cases where a specific complaint about landlords' information and data management was made.

00:01:08 Zoe Miller

Then it was a further 153 cases where KIM wasn't specifically complained about, but that we did find that the record keeping in data management was a key issue. We also looked at our complaint handling failure order data as well because I'm sure you can imagine there is a direct link again between KIM and the issuing of complaint handling failure orders. So we looked at how often we had to chase evidence of compliance on orders that we've made.

00:01:37 Zoe Miller

So we found that was in 51% of the determinations that we've made, we found that on average it took landlord 74 working days, over three months beyond the deadline for compliance to provide us with the necessary information. And we also listed the 10 complaint handling failure orders that we'd have to make due to the fact that landlords were unable to provide us with the necessary information.

00:02:02 Zoe Miller

It's important to note that in addition to our own casework, we also looked at the regulator's judgments, and we also consulted with the Information Commissioner's Office as well to look at the themes and data arising from their own investigations.

Question 4
00:00:00 Victoria King

You worked with the London School of Economics on this report. Why did you do this and what were the findings?

00:00:08 Zoe Miller

So we were very fortunate in that we were approached directly by them. So there was some third year politics, philosophy and economics students who wanted to do some research, study for us. We asked them to do piece of work around the access to information scheme, specifically around helping us with the guidance we want to provide to housing associations to help them prepare for the event of ATIS and we provided them with 50 FOI requests that we had put into local authorities.

00:00:46 Zoe Miller

So we randomly selected 50 local authorities and we asked them how many requests for information under the Freedom of Information Act they'd received each month over the last 12 months on the subject of their housing provision and also we asked them if possible, which specific area of housing service provision the requests were about.

00:01:06 Zoe Miller

We did that initial piece of work for the students and sent them all the responses that we've received for them to complete their analysis.

00:01:13 Zoe Miller

And broadly what they found was that categorisation was key. The local authorities who had clear categorisation systems and were able to capture and record the information and were clear about what they were being asked.

00:01:29 Zoe Miller

Invariably, their data was then clearer, so they were able to tell us exactly how many they've received, what the subjects were about and which specific area of service provision and provide a detailed breakdown.

00:01:42 Zoe Miller

So we found that 26 of the local authorities were able to do that. Two of the local authorities weren't able to provide us any information at all, and the other local authorities were able to provide some information, but not a detailed breakdown. And what they found in terms of themes was overwhelmingly the main area of service provision that local authorities were asked about was about repairs, and that was well over half of all requests received were about repairs.

00:02:15 Zoe Miller

And they also found that the local authorities who performed better and were more efficient at answering their FOI requests, had frequently asked questions sections on the website that they routinely kept updated. And that meant that they had to spend less time dealing with individual new requests because they could simply signpost to the information already on their website.

Question 5

00:00:00 Victoria King

You asked landlord's complaint handlers to submit evidence as part of the report. What did they tell you?

00:00:10 Zoe Miller

So we received 315 responses from across housing associations, local authorities, arms length management organisations, arms houses, cooperatives and retirement villages. So a really good cross section.

00:00:26 Zoe Miller

And we found that 56% of the respondents told us that they were having issues accessing or being provided with records in relation to complaints.

00:00:37 Zoe Miller

82% of those having issues said that it impacts their ability to fully address complaints, with 77% telling us it impacted their ability to meet their complaint handling timeframes.

00:00:51 Zoe Miller

And in terms of the areas of service provision that were most affected by the data access issues, again repairs were a main area. So 88% of all responses said that this was the service area that was most problematic. And I think it's important to note as well that 93% of all the respondents said that they recognise that they do have problems with KIM overall, which was reassuring in one sense. But some of the comments that we received were less reassuring.

00:01:46 Zoe Miller

Straight away from some of the feedback that we were receiving, although it was clear that landlords were quick to accept the issues that they had, we weren't satisfied that they were seeing it as being something within their control. The overall sense that we got was that for some landlords, they feel that it's a bit of a lottery and something that staff are either good at or not. And that was another quote that we received, telling us that it is hit and miss, was the expression used, saying some staff are very good at it, some were not. We also have a quote from an information manager saying staff are not trained on data quality.

00:02:24 Zoe Miller

Which again plays into this idea that this is something that landlords don't have any control over, rather than actually looking at themselves and what training do those staff need? What other support do staff need? Why is it so variable in terms of the staff who are good at it and those that aren't.

00:02:44 Zoe Miller

And this has really helped to shape the section that we started to write about the culture and the governance of an organisation and how important that is. Because if your most senior person in the organisation is saying that it's not always necessary to have good KIM. Then of course that is going to filter down to all staff throughout the service provision.

Question 6
00:00:00 Victoria King

Looking more now at the insight from the Housing Ombudsman service casework. You talk about information not being captured or recorded by landlords, or when it is captured the information only being part of the story or completely inaccurate.

Can you tell us more about this impact?

00:00:18 Zoe Miller

Yes, certainly. So one of the overriding things that came from out from our casework was around access and particularly in relation to residents refusing access.

00:00:29 Zoe Miller

We saw repeated cases and examples where the resident had informed the landlord that they needed advance notice of any appointments so they could make arrangements to be at home. And we found that this information either just wasn't recorded at all or it was recorded and disregarded.

00:00:50 Zoe Miller

Either because there was a poor data culture, or it wasn't accessible and sometimes the reasons were unknown.

00:01:00 Zoe Miller

But the direct consequence of that was residents firstly not being able to have their underlying issue resolved or repair issue, but then also in effect being blamed for that situation. So we saw examples of where this happened over a repeated period of time.

00:01:20 Zoe Miller

One gentlemen had taken 14 days annual leave in total, on separate occasions, and it was unpaid leave. And he said to the landlord, "I need advance notice" and I take these days off his annual leave and the contractor didn't arrive and he was informing the landlord: "I waited in again all day." And nobody turned up. And rather than the landlord

then scrutinising the information held on that particular record and information that they had about that resident and that repair job; it was just simply recorded as refused access. Which then has connotations in itself that it's saying that the resident was then to blame for that.

00:02:03 Zoe Miller

And we were really struck that there was no scrutiny or analysis or professional curiosity as to why would the resident be refusing access. It's in their interests to allow this. They're repeatedly saying that they want the appointment. They're telling you the contractor didn't turn up. And you're just simply closing it as a refused access and then booking another appointment.

00:02:28 Zoe Miller

And we saw this repeatedly. It was either refused access and also missed appointments and so examples where residents would say I'm only available up until this time. So a lady who had a medical appointment, she said: "I can wait all day, but I won't be available after 5." And of course, the contractor turning up after that time frame and her not being in and again it being recorded as a missed appointment or refused access.

00:03:00 Zoe Miller

So that was one of the most common themes that we saw in terms of information not being captured so not being captured in the 1st place and then also they're not being scrutinised, analysed, or used as insight to look at themes. So what is it? What is this theme around our repairs? Why? Why is it taking so many appointments and and why is there an issue with the contractor?

00:03:20 Zoe Miller

Is it something to do with the resident? Do they have additional support needs? And all that was just missing. It was just being reduced to a data entry as refused access and touched on before around vulnerabilities. But this was a key area that we saw around the specific information that residents have provided around their particular support needs.

00:03:48 Zoe Miller

And that's not being recorded, shared, and acted on. And we have a case study within the report around a resident with her adapted bathroom needs. She didn't get the modifications that she needed for her bathroom for nearly 14 months and this was fundamentally because of poor knowledge and information management.

00:04:19 Zoe Miller

She was flagging the concern, she said exactly what she needed, and operatives were coming out but doing partial repairs. She was informing the landlord that there were still issues and that it just wasn't joined up. So the landlord wasn't taking all these reports

from her and looking at what the contractor had done. And seeing, OK, what's outstanding here?

00:04:44 Zoe Miller

And so I think that this example is one of the clearest ones in terms of that human impact. Because whilst it's easy to think, well, it's about record keeping and dismiss it in those terms. When you read some of the case studies, in particular this one regarding Mrs P and the essential repairs that she needed. It really does show you the effect that this does have both on the resident and on the organisation as well.

Question 7
00:00:00 Victoria King

So we talked about recording and capturing information wholly and accurately, but without having a system or a database to store that information on and keep it maintained appropriately, it would be impossible for the landlord to have an understanding of circumstances. Did you find examples of this in your research for the report? What were the reasons for landlords not having access to a system or a database where all this information should be contained? What was the impact of this?

00:00:29 Zoe Miller

Yes. So we do have one case study in the report where we found severe maladministration and the reason for that for the poor knowledge and information management, was a complete lack of system. I would say that was rare. That was the only case that we found that actually had a complete absence of any system whatsoever.

00:00:49 Zoe Miller

But what we did find was that there were systems that, for whatever reason, weren't fit for that particular purpose. So reflecting again, what we were told in the call for evidence where lots of systems are not able to communicate with one another and not being able to interrogate systems either because of the system itself or staff not actually knowing how to do that and the issue of systems itself was particularly interesting one in this investigation because we found that some landlords were very much saying it's all down to the system and it's system failure.

00:01:26 Zoe Miller

The flip side we had landlords telling us that they saw a new system as a panacea for all their ills and we see that quite a lot, particularly with mergers where landlords will tell us we again have a centralised system. And we're not saying that is inherently good or bad. Of course there are times when that makes a lot of sense. But where landlords are just wholly reliant upon a system they're then overlooking the human element of that.

00:01:56 Zoe Miller

And that's something that we really want to convey because systems, of course, are part of it. But systems are used by people. It all comes back to what direction are you giving your staff, what training are you providing them with and what are your service standards first and foremost because you need to be able to give that clarity and direction in terms of this the benchmark for how we record things. These are the requirements. This is the process map for how we record this and if that's missing, you could have the most expensive system in the world, but it's not going to solve the issues for you.

00:02:28 Zoe Miller

The London School of Economics Research that was carried out did make recommendations about two systems in particular, and we purposely didn't include that in the report as any kind of recommendation, firstly because it's not appropriate for us to be endorsing any kind of particular system, but also we thought the risk of doing that was that it would then be seen as all we need to do is get that system and that is going to take care of everything and it's not going to. It's not going to resolve issues around mindset. If you don't have the right mindset and the culture and the governance, the system isn't going to solve these issues or prevent them for you.

Question 8
00:00:01 Victoria King

The report talks about evidence-based practice. What did you find out about this?

00:00:08 Victoria King

One of the key things that we'd like to get across to landlords is that we did find examples where they had actually handled the substantive issue itself well. Whether that was a complaint or another aspect of service delivery, but time and time again, they were then falling down at the final hurdle. Not making an accurate and contemporaneous record as to what that decision was.

00:00:34 Zoe Miller

And crucially, when I'm talking about decisions, I mean the decision to sometimes take no action. So they had done the hard bit in terms of making sure that they were following correct processes and weighing up the risk and but then decided to take no further action. And because it's seen as a negative in terms of it's a negative decision. There seems to be a sense that you don't then need to record if you've decided that the decision is no further action. So I think in terms of evidence based practice, one of the things we really like to say to landlords to help them benefit them in terms of being able to prove that they're doing all that hard work around the decision making and their rationale for it is that if you do decide that the decision is that you don't need to do anything, that is a decision in itself and needs to be treated exactly the same way.

Question 9
00:00:00 Victoria King

The Spotlight report notes that successful knowledge and information management starts with an understanding and appreciation of benefits to both the landlord and its residents. This is something that can be embedded within organisations, governance, and culture. Why is this so important?

00:00:37 Zoe Miller

Touching on what I mentioned earlier about the importance of evidencing your decisions. We found that even where the landlord has fulfilled its obligations, it leaves itself professionally vulnerable if it cannot evidence the action that it has taken, including a decision to not take any further action. So that is the essence of why it's important.

00:00:59 Zoe Miller

But also sitting underneath that is if you have a culture that values and appreciates KIM, you're able to give your staff direction and structure and guidance. There's a clearer sense of collective and individual responsibilities and roles. You can then give those clear standards and impose them upon third parties such as contractors, so that they also have that same structure, and guidance, and certainty.

00:01:31 Zoe Miller

And we talked about in the report this viscous circle, where a poor data culture exists, then it becomes strained further because it is then struggling to respond to complaints or requests for information. And we could see that in so many cases where there was already that culture in place and then any other demand on the service for anything to do with the information requests is then seen as a burden. It then feeds back into that view of 'Ohh well this is so time-consuming and unimportant, and I've got so many other things to do.' That was a really clear pattern that we saw emerging from our casework.

00:02:14 Zoe Miller

Some of the feedback that we received from our resident panel and some of the quotes that we received from them are really quite telling. The residents can feel it. It's palpable to them when this culture does exist.

00:02:26 Zoe Miller

So some of the quotes that we put in the report, one resident said: "It's cultural". They used that word and they said the issues are inherent and another quote is that the landlord: "seems to blame each other internally and disagree."

00:02:41 Zoe Miller

And we had other quotes with one resident described it as "an institutional deafness." So you can see from these strong sense of feelings that the people on the receiving end, that should be first and foremost, they're acutely aware of when there are these cultural issues surrounding and poor knowledge and information.

00:03:07 Zoe Miller

And I think in terms of what landlords need to do in order to prevent this, or improve what they're already doing is, our recommendations. We do have recommendations specifically around this. So we talk about defining the oversight role of the governance and information management. That comes back to what we're saying about you have to really know your stock and essentially know your residents really well and that you're using that data to inform business and financial planning.

And a key part of that is having a knowledge and information strategy and we deliberately use the word strategy rather than policy because strategy is more all-encompassing and a strategy should be defining whether you need an information asset register for example, so that you have that log of what data you do hold.

00:03:59 Zoe Miller

What you don't have and what you might need and that clarity around data. What are you trying to do when you're doing data mining? So having that outcomes focused approach and that clarity and the strategy also needs to sit alongside the business strategy and a continuous service improvement agenda as well. And crucially it comes back to the point around expected standards.

00:04:20 Zoe Miller

So not only having those standards around, 'this is how we do it in our organisation' and 'this is the bare minimum', if you like of 'it cannot go beneath this line' and how you're then going to monitor those consequences of failing to adhere to them.

00:04:42 Zoe Miller

So we saw so many cases where there seemed to be no repercussions, probably because there was no strategy or there was a poor data culture, but where there was continuous poor record keeping and data management and there didn't seem to be any oversight of that, it wasn't being picked up through any kind of routine quality assurance processes. And where there was some indications, perhaps it had been picked up, it was unclear what had then happened as a result. So that information wasn't then being used to say, well, how can we improve this and where are the gaps and what do we need to do to stop this from happening?

00:05:21 Zoe Miller

We also go on to say as well about some of the training that we think that staff would benefit from and I know this is something that our centre for learning will be is working on and be able to launch some e-learning to sit alongside and support of some of these recommendations.

We are recommending that landlords train staff on the requirements of the Equality Act and this ties in with what we're talking about, the vulnerable residents and the importance of recording any reasonable adjustments that residents may need. So making sure staff feel really confident around their roles and responsibilities to do that.

And we're also talking about a review of safeguarding policies and procedures and safeguarding training may or may not sit alongside that.

00:06:16 Zoe Miller

And then, of course, staff need training on the systems that they are using. And coming back to the point around systems, we're saying that staff need to know how to use them and also it's for the landlord to conduct their own analysis of the suitability for the system. So we we're not here to tell the landlord whether their system is or isn't fit for purpose. That is something that only they will know.

00:06:37 Zoe Miller

They need to be doing an analysis of that system, and do they think that it is a system that is fit for purpose? If not, what needs to happen so that there is a lot of talk about centralised system and what do you need to sit alongside that?

00:06:56 Zoe Miller

Because the system itself isn't ever going to be the solution. What we can say is that any system that you do use needs to be easy to interrogate and everyone needs to be able to extract the data that they need to be able to use.

00:07:11 Zoe Miller

And particularly when it comes to mergers. We're really urging landlords to carry out their due diligence of their systems prior to the mergers because we are finding that it is almost an afterthought or certainly appears to be an afterthought. And newly merged landlords are then finding themselves in a situation where systems aren't communicating with one another. Certain members staff may be able to set a task to other departments, but then that department isn't able to then say whether that task has been completed. And that's one of the examples that we give. It really should be something that in terms of a merger, you're making sure that you don't end up with any corporate memory loss of data when you're going through any kind of structural organisational change.

Question 10
00:00:01 Victoria King

Repairs have been a dominant theme you've talked about and it's covered in the KIM report. What recommendations do you have for landlords around repairs?

00:00:11 Zoe Miller

I think firstly, it comes back to that point that was being made around having your clear process and the clarity that you can give to staff and your third parties.

00:00:23 Zoe Miller

So I think it's about being really clear with the operatives. This is our process map, for when you attend a residence property and you're enabled to get access, or they appear

not to be answering and they appear not to be in. So there should be a really defined and clear process where everyone knows this is what you do if you're in that situation.

00:00:44 Zoe Miller

That could be about the system that you use from recording. That being clear about how many attempts you're supposed to make, who it is that you notify that you've made those attempts. How you evidence that you did indeed attend? So we're not prescriptive about what that looks like, but we are saying that does need to exist. And another recommendation that we had actually came directly from the resident panel.

00:01:17 Zoe Miller

So we were told by the residents on the panel that what they really appreciate is just a simple text reminder or any kind of reminder where they're informed 'you have this appointment tomorrow' or whenever it may be.

00:01:27 Zoe Miller

And that is something that we think is really quite easy or should be relatively quite straightforward to implement. And it doesn't have in resource-intensive implications. It should be something that is quite easy to do. That is overwhelmingly, one of the things that that we were told by them and wanted to reflect that in our recommendation.

00:01:48 Zoe Miller

And lastly, we've called it wastage analysis on missed appointments, but it comes back to that theme of user insight generated by your missed appointments or refused access. So coming back down to that scrutiny of well, there seems to be a pattern emerging here of missed appointments and then looking at what is causing that? What is the root cause? Is it because the time isn't appropriate? Has the contractor perhaps gone to the wrong address? Have we given the contractor the right address?

00:02:27 Zoe Miller

And that should be happening at a much earlier stage. It should never get to the point where a resident has waited in multiple times and the particular 14 as the example that I gave where they're continually being inconvenienced by having to wait in for a contractor. And so we really want to stress the point that where you think there is an issue around missed appointments, you need to be really recording that and then analysing the information that you have and looking at what's driving that and what can be done.