Data Management Policy

Summary

This policy explains how Portsmouth Homes manages, uses, shares, protects and securely disposes of information when delivering housing services.

Data management means the rules, responsibilities and processes we use to make sure information is accurate, secure, used appropriately and managed throughout its lifecycle.

The policy explains how we use information, feedback and complaints to improve services and make better decisions for residents.

This policy supports Portsmouth Homes in meeting the Regulator of Social Housing's consumer standards by ensuring that information about homes, services, safety, complaints, resident needs and performance is accurate, accessible, secure and used to support fair, evidence-based decisions.

Good data management helps us understand the condition of homes, identify and respond to risk, tailor services to residents' needs, learn from complaints and demonstrate that we are delivering safe, effective and well-managed landlord services.

This policy supports Portsmouth City Council's Data Strategy. More detailed information about how we collect, use, share and protect personal information is available in our Privacy Notices.

Effective date

1 November 2026

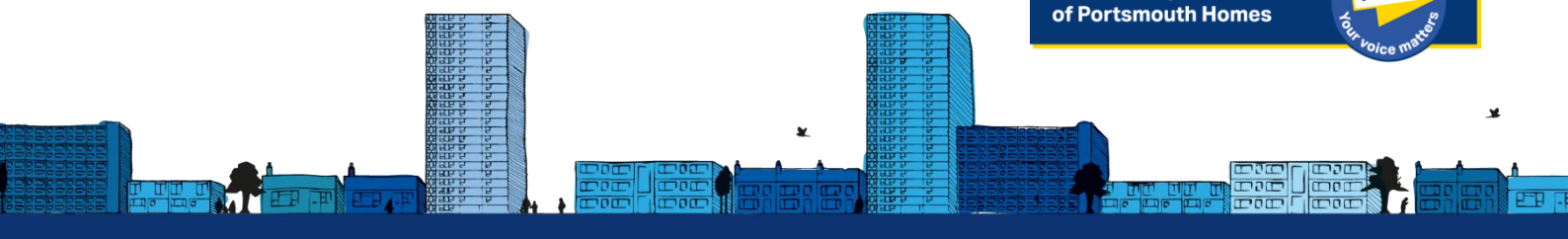
Review

We will review this Policy every 3 years or when there has been an update to legislative, regulatory, best practice or operational changes.

Version

Version 1.0

This policy was written with the help of residents of Portsmouth Homes



Data Management Policy contents

Summary 1
Effective date 1
Review 1
Version 1
Who this policy applies to 3
Why we have this policy 3
How We Use Information Responsibly 4
What you can expect from us 4
What information this policy covers 4
How we use your information 5
Meeting our legal and regulatory responsibilities 5
Keeping your information safe 6
Keeping Information accurate 6
If something goes wrong 6
When we share information 7
How we use information to improve services 8
Keeping information for the right amount of time 8
How we use technology and information systems 9
How staff handle information 9
Your rights over your information 9
How we check and improve 10
Your voice 10
What have we done to make sure this Policy is fair? 11
Regulation and legislation 11
Related documents 11
How to feedback 11
Compliments 11
Complaints 12
Housing Ombudsman Service 12

Who this policy applies to

This policy applies to how Portsmouth Homes manages and uses information.

It covers:

- All employees, contractors, agency staff and partner organisations who handle information on our behalf, where this is relevant to their role and agreed responsibilities have been clearly communicated and agreed.
- All systems and tools used to deliver our services
- All types of information, including digital and paper records, photographs and recordings

We will make sure that everyone covered by this policy understands their responsibilities for managing information safely and responsibly.

Any reference in this policy to ‘we’, ‘our’ or ‘us’ refers to Portsmouth Homes.

Any reference in this policy to 'tenant', 'customer' or 'resident' refers to a Portsmouth Homes tenant, leaseholder or shared owner.

Why we have this policy

We hold information about you, your home and the services you receive. This policy explains how we make sure that information is:

- Accurate and reliable
- Kept safe and secure
- Used only for a clear and appropriate purpose
- Available to authorised staff who need it to provide a service or carry out their role
- Shared only where there is a lawful reason and only with the people or organisations that need it

For example, a customer repairs officer may need information about a repair and any relevant access or support needs.

We use information to provide safe and well managed homes, make informed and fair decisions, improve services, and meet our legal and regulatory responsibilities.

This includes meeting the expectations of:

- The Regulator of Social Housing, which sets standards for safe and well-managed homes
- The Housing Ombudsman, which promotes fairness, transparency and learning from complaints

How We Use Information Responsibly

We will ensure information is:

- Accurate and up to date
- Kept secure and protected from unauthorised access
- Accessible to those who need it to carry out their role
- Used lawfully, fairly and transparently
- Kept only for as long as needed to provide services, meet legal requirements or resolve issues
- Used to help us improve services and make informed decisions

What you can expect from us

We will:

- Use your information to provide services and support your tenancy or lease
- Keep your information safe, secure and up to date
- Be open about how we use your information
- Only collect and keep the information we need
- Only share your information where there is a clear and lawful reason, and only share the information needed for that purpose
- Use feedback, complaints and service information to improve what we do
- Make fair and informed decisions based on accurate information
- Meet our legal and regulatory responsibilities

Where appropriate, we may share relevant information with organisations such as the Housing Ombudsman to help resolve complaints, support fairness and improve services.

We will ask for your consent where consent is the appropriate lawful basis. However, data protection law also allows or requires us to use and share information in some circumstances without consent. More information is provided in the “When we share information” section.

What information this policy covers

This policy covers the information Portsmouth Homes collects, creates and uses when providing services. This includes:

- **Personal information:** information that identifies or could identify someone, such as their name, address, contact details, tenancy or lease information.

- **Special category information:** personal information that needs additional protection, such as information about someone's health, disability, ethnicity, religion or sexual orientation.
- **Other sensitive information:** information that may need careful handling, such as safeguarding concerns, support needs, financial information or allegations about someone.
- **Non-personal information:** information about homes, buildings, repairs, assets, neighbourhoods or service performance that does not identify an individual.

Information may be provided by residents, created by our staff, or received from contractors and partner organisations. We will manage it according to what it contains, why it is needed and the level of protection required.

How we use your information

We will only use your information for a clear and lawful purpose. Our Privacy Notices provide more information about why we use personal information and the legal reasons that allow us to do so.

This includes using information to:

- Manage repairs and maintenance
- Carry out safety checks, such as gas, electrical and fire safety inspections
- Keep accurate records about your home
- Manage your tenancy or lease
- Respond to enquiries, requests and complaints
- Understand any support needs you may have
- Communicate with you in the way you prefer
- Manage rent accounts and service charges
- Help prevent fraud and misuse of our services

We only use your information for appropriate purposes and in line with our legal and regulatory responsibilities.

Meeting our legal and regulatory responsibilities

We use information to meet relevant legal and regulatory responsibilities. For example, we may use it to:

- Carry out building and resident safety checks
- Keep accurate tenancy, lease, repair and property records
- Respond to requests from regulators, auditors or the Housing Ombudsman



- Investigate and respond to complaints
- Protect residents and meet safeguarding responsibilities
- Prevent and investigate fraud
- Monitor and report on the quality and performance of our services

This helps us demonstrate that our homes and services are safe, effective, fair and well managed, and that we can provide reliable evidence to residents, councillors, auditors, the Housing Ombudsman and the Regulator of Social Housing when required.

Keeping your information safe

We use proportionate security measures to protect information from loss, misuse, unauthorised access, alteration or disclosure. These measures may include:

- Limiting access to authorised staff who need the information for their role
- Using passwords, access controls and secure systems and PCC approved security measures
- Securely storing and disposing of paper records
- Providing information handling and data protection training
- Applying appropriate security requirements to contractors and partner organisations
- Monitoring, reviewing and improving our information security arrangements

Keeping Information accurate

We aim to keep the information we hold about you accurate, up to date and complete. We do this by recording information clearly, updating records when we become aware of changes, correcting errors where appropriate and using reliable information to support decisions about your home, tenancy, lease or services.

If something goes wrong

If information is lost, disclosed to the wrong person, accessed without permission or otherwise put at risk, we will report it to the Portsmouth City Council, Data Protection Team, who will:

- Record and investigate the incident
- Take proportionate action to contain it and reduce any risk
- Consider what can be done to put matters right
- Assess whether we need to report it to Portsmouth City Council's Data Protection Officer, the Information Commissioner's Office or another relevant organisation

- Inform affected individuals where required, including where the incident is likely to result in a high risk to their rights and freedoms
- Provide appropriate updates to a person who has raised a concern, while respecting the privacy and confidentiality of others
- Identify and implement learning to reduce the risk of a similar incident happening again

Not every incident must be reported externally, but all suspected information incidents must be reported internally and assessed in line with our procedures.

When we share information

We may share relevant information with other organisations where this is needed to provide housing services, protect someone's safety or wellbeing, prevent or investigate fraud, or meet a legal or regulatory responsibility.

Depending on the circumstances, this may include contractors, local authorities, emergency services, health or support services, regulators and the Housing Ombudsman.

We will ask for your consent where consent is the appropriate legal basis. However, consent is not always required. We may use another lawful basis, or share information without consent, where:

- The law requires or allows us to do so
- It is necessary to deliver or administer a housing service
- We need to protect someone from serious harm
- We need to meet a safeguarding responsibility
- We need to prevent or investigate crime or fraud
- A regulator, court or other authorised body lawfully requires the information

Before sharing information, we will:

- Identify the purpose and lawful basis for sharing
- Consider whether sharing is necessary and proportionate
- Share only the minimum information needed
- Share it only with people or organisations that need it
- Use an appropriate and secure method
- Keep a record where required

Our Privacy Notices give more information about who we may share personal information with and why.

How we use information to improve services

We use information to understand what is working well and where improvements are needed. This includes reviewing:

- Performance information and service trends
- Repairs and asset data
- Feedback, engagement activity and resident views
- Complaints, compliments and “you said, we did” actions
- Investment needs across homes and services

By using information in this way, we can make informed decisions, improve service delivery and provide better outcomes for residents.

Keeping information for the right amount of time

We do not keep information indefinitely. How long we keep it depends on:

- What the information is
- Why it was collected or created
- How long it is needed to provide a service or manage a tenancy or lease
- Whether it may be needed to respond to a complaint, claim, audit or investigation
- Any legal, regulatory or financial requirements

Different types of records are therefore kept for different periods. For example, some records may only be needed while we deal with an enquiry, while records relating to a tenancy, property safety, financial transaction or legal decision may need to be kept for longer.

We follow Portsmouth City Council’s records retention arrangements. These set out how long different categories of information should be kept and the reason for the retention period.

When information reaches the end of its retention period, we will review it and securely delete, destroy or anonymise it unless there is a lawful reason to keep it for longer.

How we use technology and information systems

We assess information and security risks when introducing or significantly changing systems that use personal information. Appropriate access, security and supplier controls will be applied.

We use secure systems and technology to help us deliver services and manage information effectively.

This helps us to:

- Provide services more efficiently
- Avoid asking you for the same information more than once
- Share information safely between services when needed
- Understand how services are performing and where improvements can be made

By using technology in this way, we can provide a better service and make it easier for residents to access the support they need.

How staff handle information

All staff are responsible for handling information safely and appropriately.

Staff must follow relevant policies, procedures and access controls. They must report suspected information incidents promptly and must not access, use or share information unless there is a clear work-related reason for doing so.

We will maintain clear governance arrangements for the information we hold. This means identifying who is responsible for key data sets, making sure staff understand their role in creating and maintaining accurate records, and escalating data quality, security or system issues where they may affect residents, service delivery or regulatory compliance. Senior managers will use assurance activity, performance reporting and learning from complaints to identify where data management needs to improve.

We make sure that staff:

- Receive training relevant to their role
- Understand how to protect and use information responsibly
- Have the skills needed to use information to support services and decision-making

Your rights over your information

You have rights over the information we hold about you. This includes the right to:

- Know what information we hold about you

- Request a copy of your information
- Ask us to correct information that is inaccurate
- Raise concerns about how your information is used

If you have any questions or would like to exercise your rights, you can speak to a member of Portsmouth Homes staff or find more information on the Portsmouth City Council website: **Freedom of Information - Portsmouth City Council**

How we check and improve

We are continuing to strengthen how we manage, review and use information to improve our services. This includes developing clearer ways to check whether key housing records are accurate, complete, secure, accessible to authorised staff and used to support learning, assurance and service improvement.

We will take reasonable steps to improve the quality and reliability of key housing records. This includes recording decisions and actions clearly, updating records promptly when circumstances change, using agreed systems rather than informal records where possible, and checking important information before it is used to make decisions or report on service performance.

We will also consider:

- Feedback from residents
- Complaints and Housing Ombudsman decisions
- Checks and reviews of our processes
- How records are created, stored, updated, retained and securely disposed of
- Legal and regulatory requirements

We use what we learn to improve services, strengthen how we manage information, and make sure we continue to meet residents' needs.

Your voice

We provide residents a wide range of meaningful opportunities to engage, influence and scrutinise the Landlord Strategies, policies and services, to include participation in regular resident meetings and give feedback on services and policies.

If you would like to be included in future resident engagement focus groups and would like to know how to get involved, please contact us for more information:

You can contact our team by:

- Email: **housing.engagement@portsmouthcc.gov.uk**
- Phone: 02392 834835
- Website**:** visit the **Resident engagement and community resources on our website**

What have we done to make sure this Policy is fair?

We completed an Integrated Impact Assessment (IIA) to consider the positive and negative impacts this Policy may have on people with protected characteristics under the **Equality Act 2010**. This Policy should have direct and positive equality and diversity impacts.

Regulation and legislation

We recognise the variety of legislation, and we will continue to monitor relevant legal guidance. The list below reflects some of the existing legal framework and relevant publications:

- **Social Housing (Regulation) Act 2023**
- **Freedom of Information Act 2000**
- **The Environmental Information Regulations 2004**
- **UK General Data Protection Regulation (UK GDPR)**
- Data Protection Act 2018

Related documents

This policy should be read in conjunction with:

- **Portsmouth Homes policies, strategies and reports**
- Tenancy Agreement / Leasehold Agreement
- **Portsmouth City Council Data Strategy**
- Privacy notices

How to feedback

If you have any questions around the policy or would like to know more about its application, please contact the relevant service in the first instance.

You can get this policy in large print, braille, audio or in another language by contacting your Housing Office. More information is available **translation, interpreting and audio information**.

Compliments



To help us provide the best service we can. We would like to hear customer views on the services that they use. If the customer is pleased with a member of staff or service, please let us know.

- Telephone: 02392 606383
- Email address: **HNBLandlordComplaints@portsmouthcc.gov.uk**

Complaints

If a customer is unhappy, they can refer to our Landlord Complaints Policy.

- Online complaint form at **Make a housing complaint**
- Telephone: 02392 606383
- Email address: **HNBLandlordComplaints@portsmouthcc.gov.uk**

Housing Ombudsman Service

If a customer is unhappy, they can contact the Housing Ombudsman Service for advice and guidance at any time.

- Online complaint form on **the Housing Ombudsman Service website**
- Telephone: 0300 111 3000
- For more information, visit **Housing Ombudsman's Complaint Handling Code**