

Data Management Policy

Consultation Feedback, Consideration and Action Log

Item	Detail
Original Policy Name	How We Use and Protect Your Information (Data Governance) Policy
Final Policy Name	Data Management Policy
Feedback source	Resident workshops, resident consultation responses, staff consultation responses, written comments and survey feedback received during the consultation period.
Survey feedback	Survey findings from online/paper form
Purpose	To record feedback, themes, response/action and status for this policy.
Consultation period	22 July 2026 - 17 August 2026
Number of responses received	16
Resident responses	16
Staff responses	0
Main themes raised	Information sharing and consent, Plain English, Retention of information, Accountability and trust, Data breach communication, Definitions, Legal and regulatory responsibilities, Security, Headings and structure
Changes made following consultation	15
Feedback noted but no policy change required	1

1. Key themes from current feedback

Theme	No. of comments
Information sharing	3
Plain English	4
Retention	2
Accountability / trust	4
Data breach communication	1
Definition	1
Legal / regulatory	1
Headings / structure	1
Security	1

2. Resident Focus Group - Feedback log

Ref	Feedback source	Theme	Feedback	Response	Status
1	Resident meeting / Word document	Retention / clarity	Under information principles – bullet point “kept as long as necessary” – how long?	Explain how long information is kept, why different records are kept for different periods and what happens when information is no longer needed.	Policy updated

Ref	Feedback source	Theme	Feedback	Response	Status
2	Resident meeting / Word document	Information sharing / consent	Under sharing information – in some situations, we may need to share information without your consent – what does this mean and why?	Add clearer information about when we may ask for consent, when information may be shared without consent and the safeguards we use to protect information	Policy updated
3	Resident meeting / Word document	Plain English / examples	Under why we have a data governance policy – used responsibly, only shared when necessary, accessible to those who need it – what does this mean?	We added clearer explanations and practical examples to show how information is used responsibly, who can access it when needed for their role and how information is protected.	Policy updated
4	Resident meeting / Word document	Information sharing / consent	Under what you can expect from us – only share your information when necessary and appropriate – what does this mean?	Explain that information is shared only when there is a valid reason and only with people or organisations that need it	Clarification added
5	Resident meeting / Word document	Information sharing / consent	Under what you can expect from us – only share your information when necessary and appropriate – with consent?	Explain the different reasons information may be shared and when we may or may not need your permission.	Clarification added
6	Resident meeting / Word document	Trust / accountability	Concern that resident information may not always be handled appropriately.	We strengthened the policy to provide clearer reassurance about how we protect, manage and use residents' information.	Policy updated

Ref	Feedback source	Theme	Feedback	Response	Status
7	Resident meeting / Word document	Reporting / accountability	Report it where required – this should be every time.	We updated the section to explain that all information incidents are reported internally, investigated and assessed. We also explained when incidents may need to be reported to organisations such as the Information Commissioner's Office.	Policy updated
8	Resident meeting / Word document	Data breach communication	Take action to put things right – Concern that individuals may not always receive updates following a reported data incident.	Explain how we will communicate with affected individuals where appropriate following an information incident.	Policy updated
9	Resident meeting / Word document	Definition	Why we have a data governance policy – what is data governance?	We renamed the policy to "Data Management Policy" to make it easier to understand and added a clear explanation of what data management means and why it is important.	Policy updated
10	Resident meeting / Word document	Plain English	Section What we mean by information and data – sentence below “data means information” – it is too confusing.	We simplified the language used throughout the policy and explained different types of information in a clearer and more straightforward way.	Policy Updated
11	Resident meeting / Word document	Legal/regulatory wording	We use information to meet our legal and regulatory requirements – what does this mean?	We added practical examples showing how information helps us provide services, keep residents safe and meet our legal and regulatory responsibilities.	Policy updated

Ref	Feedback source	Theme	Feedback	Response	Status
12	Resident meeting / Word document	Security / assurance	Keeping your information safe and secure – how do you keep it safe?	We expanded the policy to explain the security measures we use, including staff training, access controls, secure systems and how we protect information from unauthorised access.	Policy Updated
13	Resident meeting / Word document	Plain English / explanation	Investment needs across homes and services – explain?	We added examples showing how information helps us plan repairs, identify service improvements and make decisions about future investment in homes and services.	Policy updated
14	Resident meeting / Word document	Retention / signposting	In line with Portsmouth City Council's records retention arrangements – explain?	We expanded the policy to explain why different types of records are kept for different lengths of time and what happens when information is no longer needed.	Policy updated
15	Resident meeting / Word document	Headings / structure	Change heading – make clearer	We reviewed and updated section headings to make the policy easier to read and find information.	Heading amended

3. All Survey feedback

Ref	Feedback source	Theme	Survey feedback	Response	Status
S1	Survey	General feedback	You confirmed that the policy was clear and easy to understand, clearly stated its purpose and that they understood both resident and landlord responsibilities. You also felt the policy treated residents fairly and equally.	No action required.	Noted - no changes required

4. Draft You Said / We Did summary

You said	We did
You wanted a clearer explanation of what data governance means and why we collect, use and manage information.	We renamed the policy to make it easier to understand and added a simple explanation of how information helps us provide services, support residents, make decisions and meet our responsibilities.
You wanted clearer information about when and why information may be shared, including situations where consent may not be required.	We expanded the policy to explain when information may be shared, when we may ask for your consent and when the law allows us to share information without consent.
You wanted clearer explanations of terms such as "necessary and appropriate", "legal and regulatory requirements" and "used responsibly".	We replaced technical wording with clearer explanations and examples to help residents understand what these terms mean in practice.
You wanted to understand how their information is protected and what happens if something goes wrong.	We added more information about the security measures we use to protect information and explained how we investigate issues, take action and learn from them if something goes wrong.
You wanted more information about how long information is kept and what happens when it is no longer needed.	We explained that different types of information are kept for different periods and that information is securely deleted or disposed of when it is no longer required.
You wanted reassurance that Portsmouth Homes is accountable and transparent when handling personal information.	We strengthened our commitments around openness, accountability and residents' rights so it is clearer what residents can expect from us when handling their information.
You wanted the policy to use clearer, less technical language and easier-to-understand headings.	We reviewed the policy, simplified the language and made the document easier to read and understand.
You wanted to better understand how information is used to improve services.	We added examples showing how information, feedback and complaints help us identify improvements, plan future work and make decisions about services.

You said	We did
You felt some headings and section titles were unclear and difficult to understand.	We updated section headings and improved the layout of the policy to make it easier to navigate and find information.
"You said, We did" - Summary for Communications Team	
You said: Some parts of the policy were difficult to understand, particularly around how we use information, when information may be shared, how long we keep information and how we keep it safe.	We did: We renamed the policy to make it easier to understand, simplified the language, added clearer explanations and examples, expanded information sharing and retention sections, strengthened information security and incident management information, and updated headings to make the policy easier to read and navigate

4. Cabinet Report

How consultation was undertaken
Portsmouth Homes has a duty to consult residents and take account of resident views when developing housing policies. The draft Data Management Policy was made available for consultation between 22 July 2026 and 14 August 2026. Residents were invited to provide feedback through consultation workshops, written comments and consultation survey responses. The consultation sought views on the clarity of the policy, its purpose, and whether residents understood how Portsmouth Homes collects, uses, shares, protects and manages information.
Who responded
Feedback was received from residents through consultation meetings, written comments and survey responses. Residents provided detailed feedback on the language used within the policy and asked for clearer explanations of how information is managed, shared and protected. Consultation responses focused on improving understanding, transparency and confidence in how Portsmouth Homes handles information.
What the key themes were
The main themes raised during consultation were: • Information sharing and consent. • Plain English and reducing technical language. • How long information is kept and records retention. • Accountability and trust in how information is managed. • Data breach reporting and communication.

- Information security and protection.
- Understanding legal and regulatory responsibilities.
- Improving policy structure, headings and navigation.
- Explaining what data management means and why it is important.

Residents were supportive of the overall purpose of the policy but wanted clearer explanations and practical examples to help them better understand how their information is used and protected. Survey feedback also confirmed that residents found the policy clear, easy to understand and fair.

How feedback influenced the final policy

Resident feedback directly informed the final version of the policy.

Following consultation, the policy was amended to:

- Rename the policy from "How We Use and Protect Your Information (Data Governance) Policy" to "Data Management Policy" to make its purpose clearer.
- Add a clear explanation of what data management means and why it is important.
- Expand information about when and why information may be shared, including circumstances where consent may not be required.
- Add clearer explanations and examples to improve understanding of key terms and concepts.
- Strengthen information security, incident management and accountability sections.
- Explain how information helps Portsmouth Homes provide services, keep residents safe and meet legal and regulatory responsibilities.
- Improve information about records retention, including why different records are kept for different periods and what happens when information is no longer needed.
- Add examples showing how information is used to improve services and make investment decisions.
- Simplify language throughout the policy and improve headings and navigation.

The final policy attached at Appendix A reflects the amendments made following resident consultation.

Where feedback was considered but did not lead to policy changes and why

All feedback received during consultation was reviewed and considered. Consultation feedback resulted in amendments to the policy, additional explanations, updated headings and clearer language throughout the document. No significant feedback themes were identified that required no policy change. Where comments requested further explanation rather than a change in approach, the policy was updated to provide greater clarity and additional examples to assist understanding.

Portsmouth Homes is committed to meaningful resident engagement. Consultation feedback has been considered in line with the Transparency, Influence and Accountability Standard, and residents have been informed how their views have influenced the final policy and decision-making process.