

How We Use and Protect Your Information (Data Governance) Policy

Summary

This policy explains how Portsmouth Homes manages, uses, protects and governs data and information in the delivery of our services.

It explains how we keep information accurate, secure and used responsibly. It also explains how we use information, feedback and complaints to improve services and make better decisions for residents.

This policy supports Portsmouth City Council's Data Strategy. More detailed information about how personal information is collected, used, shared and processed is available in our Privacy Notices.

Effective date

Example text

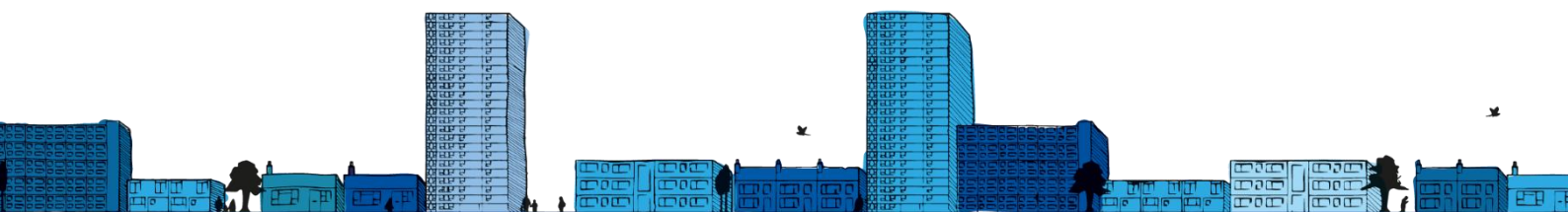
Review

Latest Review Date:

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



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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 a Data Governance 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 responsibly
- Only shared when necessary

We use information to provide safe and compliant homes, make 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

Our Information Principles

We will ensure information is:

- Accurate
- Secure



- Accessible to those who need it
- Used lawfully and fairly
- Kept only as long as necessary
- Used to support better services and decision making

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 when necessary and appropriate
- 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.

What we mean by information and data

Data means information. We use information to provide services, manage tenancies and leases, support residents and improve what we do.

This may include:

Personal information about individuals, such as names, contact details and tenancy or lease information.

Special category (sensitive) information, such as health information, disabilities, support needs, safeguarding concerns or ethnicity, where this is relevant to providing services and requires additional protection under data protection law.

Non-personal information about homes, buildings, repairs, assets, services or communities.

Different types of information may require different levels of protection and management, depending on the nature of the information and how it is used.

Information may come from you, our staff, contractors or partner organisations.

Some information is personal or sensitive and needs extra care. Other information may be about homes, services or communities rather than individual people. We use each type of information appropriately, depending on what it is needed for.



How we use your information

We use your information to help us provide safe, reliable services and support you in your home.

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 our legal and regulatory requirements
- Provide information to regulators when needed
- Monitor and report on our performance
- Support audits, inspections and service reviews

This helps us demonstrate that our services are safe, effective and meeting the standards residents can expect.

Keeping your information safe

We take your privacy seriously. We will:

- Keep your information safe and secure
- Only allow access to people who need it to do their job
- Use secure systems and technology to protect your information



- Make sure staff are trained to handle information responsibly

If something goes wrong, we will:

- Investigate what happened
- Take action to put things right
- Report it where required
- Learn from it to help prevent it happening again

This helps us protect your information and maintain your trust in the services we provide.

Keeping Information accurate

We aim to keep the information we hold about you accurate, up to date and complete.

This is important because we use this information to provide services and make decisions that may affect you, your home and your tenancy or lease.

You can help by letting us know if any of your details change.

Sharing information

Sometimes we may need to share your information with other organisations to help us provide services, keep people safe, meet our legal responsibilities, or respond to complaints and enquiries. This may include contractors, local authorities, emergency services, health or support services, regulators and the Housing Ombudsman.

We will ask for your consent to share your personal information where this is needed or appropriate.

In some situations, we may need to share information without your consent. This may be where we have a legal or regulatory duty, need to help protect someone's safety or wellbeing, or need to provide housing services.

When we share information, we will:

- Only share information where it is necessary and appropriate.
- Make sure there is a clear and lawful reason for sharing it.
- Only share the information needed for the specific purpose.
- Take steps to ensure information is handled safely, securely and responsibly.

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 will only keep information for as long as we need it. How long we keep information will depend on what the information is, why we need it and any legal, regulatory or business requirements that apply.

For example, some information may need to be kept while we provide a service, manage a tenancy or lease, deal with a complaint, meet a legal duty or keep an accurate record of decisions made.

When information is no longer needed, we will dispose of it securely in line with Portsmouth City Council's records retention arrangements.

Using systems and technology safely

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.

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

This helps us keep information safe, provide better services and make informed decisions for residents.

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 regularly review how we manage information and use it to improve our services.

This includes considering:

- Feedback from residents
- Complaints and Housing Ombudsman decisions
- Checks and reviews of our processes
- Managing records, for example. 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
- 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](#)

