

## APPENDIX B

### Equality Impact Assessment

<b>Report title</b>	<b>Knowledge and Information Management Strategy</b>
<b>Completed by</b>	<b>Adel Gardner, Housing Transformation Officer</b>
<b>Approved by</b>	<b>Vikki Cherry, Housing Transformation Manager</b>
<b>Date</b>	<b>13/8/24</b>

<b>The following statements will help you decide whether an EIA is necessary:</b>	<b>Tick all that apply</b>
Does it affect customers, colleagues or the wider community, and therefore potentially have an effect in terms of equality (for example, removing a service, workforce restructure, employment practices)	<input checked="" type="checkbox"/>
Could it result in a decision being made that would significantly affect how functions and services are delivered (for example, reducing a service or introducing a charge for a service)	<input type="checkbox"/>
Does it relate to a service that previous engagement has identified as being important to people	<input type="checkbox"/>
Does it, or could it in the future, affect different groups of people differently	<input checked="" type="checkbox"/>
Does it relate to a policy or service where there is significant potential for reducing inequalities or improving outcomes	<input checked="" type="checkbox"/>
Have there been, or are there likely to be, any public concerns about the policy or proposal	<input type="checkbox"/>
Does it have an effect on how other organisations operate in terms of equality (i.e. commissioned services)	<input type="checkbox"/>

### Section 3 Equality impacts

<p>Briefly explain what the policy/service/project aims to achieve</p>	<p>Knowledge and information management (KIM) is crucial for landlords to collect, store, share, and use data and knowledge. This includes information on tenants, properties, finances, policies, and maintenance schedules. Good management of knowledge and information helps us to make informed decisions, improve service delivery, and maintain legal and regulatory compliance.</p> <p>Successful knowledge and information management starts with an understanding and appreciation of its benefits to both the landlord and its tenants. Without good information management, a landlord cannot adequately:</p> <ul style="list-style-type: none"> <li>• horizon-scan and identify risk</li> <li>• contingency plan</li> <li>• proactively address hazards (such as fire safety, asbestos and damp and mould)</li> <li>• fully comply with legal and regulatory requirements</li> <li>• ensure evidence-based practice</li> <li>• provide a high-quality service to tenants.</li> </ul> <p>As part of their Knowledge and Information Spotlight Report, the Housing Ombudsman recommended that all Registered Providers deliver a Knowledge and Information Strategy.</p> <p><i>We recognise unconscious bias can exist, with the tendency of humans to act in ways that are prompted by a range of assumptions and biases that we are not aware of. This can include decisions or actions that we are not consciously aware of, as well as hidden influences on decisions and actions that we believe are rational and based on objective un-biased evidence and experience. Unconscious bias can be present in organisations and groups as well as influencing the behaviours and decisions made by individuals.</i></p> <p><i>Steps are in place to mitigate unconscious bias influencing data, actions, behaviours and decisions. These include data led decision making, panels and boards, benchmarking and overlaying data and information with external records to support decision making. There can be unconscious bias in data itself (how it's sourced and how it's modelled) and so steps will be taken to ensure data is not chosen to fit pre-conceived ideas. Policies being reviewed by a variety of individuals and committees, as well as established appeals systems. As our tenant engagement offering increases, all policies and strategies will involve consulting focus groups/similar.</i></p>
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<p>Have you undertaken consultation or involved people who are most likely to be affected or interested?</p> <p>Please include: data or community feedback, gaps in data, and how you intend to fill these gaps (where possible)</p>	<p>This policy is written predominantly around the requirements of the Housing Ombudsman’s Knowledge and Information Spotlight Report, married with data management principles and legislation.</p> <p>The Deputy Data Protection Officer has been consulted along with the Assistant Director – Governance (of whom is also the Data Protection Officer and Monitoring Officer for the Council).</p> <p>As our tenant engagement offering increases, all policies and strategies will involve consulting focus groups/similar.</p>
<p>Is there any evidence or research that demonstrates why some individuals or groups are, or are not, affected</p>	<p>No.</p>
<p><b>What impacts are there for each of the following characteristics</b></p>	
<p><b>Characteristics</b></p>	<p><b>Positive and negative impact</b></p>
<p>Gender</p>	<p>This strategy will have no significant impact.</p>
<p>Age</p>	<p><b>Positive:</b></p> <ul style="list-style-type: none"> <li>• Reducing the need for tenants to have to repeat their personal details and their “story”. By improving the way we join-up and manage the quality of data including vulnerabilities and reasonable adjustments in place we can avoid tenants having to give their details and repeat their experiences on multiple occasions.</li> <li>• Enhanced data set on homes allows us to ensure our programme is correct, reducing responsive repairs and inconvenience.</li> <li>• Retention policies ensuring data is not held longer than necessary and that it is held safely.</li> </ul> <p><b>Negative:</b></p> <ul style="list-style-type: none"> <li>• Potential that tenants are anxious about the amount of data we hold about them and the security of that data. This potential negative impact exists without the programme changing anything and a range of communications tools and processes are already in place. However, as the strategy seeks to</li> </ul>

	<p>raise the profile of the benefits of data and the benefits of sharing data this increased profile has the potential to increase awareness and, in some cases, increase anxiety.</p> <ul style="list-style-type: none"> <li>• A national survey (Public attitudes to data and AI: Tracker survey) shows the main perceived risks that the public associate with data use are related to data security and selling data for a profit. Both concerns are especially high amongst those who are aged over 55. Those who feel they have less knowledge about data and technology are more likely to have concerns surrounding data security.</li> <li>• Increased number of home visits to ensure our property data remains up to date may cause anxiety.</li> </ul> <p><b>Any mitigation required:</b></p> <ul style="list-style-type: none"> <li>• Improved communications with tenants, to include how their data is kept securely, how it is used, and how and why their data is shared.</li> </ul>
Disability	<p><b>Positive:</b></p> <ul style="list-style-type: none"> <li>• By improving our data and the way we use that data, we can increase our understanding of tenants so that we can make effective decisions about future resource allocations and the provision of services to best reflect and meet need. It is expected that over time data improvements, combined with new approaches to insight, will foster deeper analysis of equalities issues by developing a more comprehensive view of our communities and better understanding ways we can tailor services to the needs of different groups.</li> <li>• By improving the data we hold on tenants with protected characteristics and vulnerable groups we will be able to better monitor the position, including supporting data for EIAs.</li> <li>• Reducing the need for tenants to have to repeat their personal details and their “story”. By improving the way we join-up and manage the quality of data including vulnerabilities and reasonable adjustments in place we can avoid tenants having to give their details and repeat their experiences on multiple occasions. This will also result in an improved service tenants and reduced wasted ‘no access’ appointments.</li> <li>• Enhanced data set on homes allows us to ensure our programme is correct, reducing responsive repairs and inconvenience.</li> </ul> <p><b>Negative:</b></p> <ul style="list-style-type: none"> <li>• Potential that tenants are anxious about the amount of data we hold about them and the security of that data. This potential negative impact exists without the programme changing anything and a range of communications tools and processes are already in place. However, as the strategy seeks to raise the profile of the benefits of data and the benefits of sharing data this increased profile has the</li> </ul>

	<p>potential to increase awareness and, in some cases, increase anxiety.</p> <ul style="list-style-type: none"> <li>• Annual reviews of items such as third party authority and communication preferences may become a barrier.</li> <li>• Increased number of home visits to ensure our property data remains up to date may cause anxiety.</li> </ul> <p><b>Any mitigation required:</b></p> <ul style="list-style-type: none"> <li>• Work on data quality with services to support them to improve the quality of the data and reduce the gaps in tenant data around vulnerabilities and disabilities.</li> <li>• Third party authority procedure will need to take into account items such as long term health issues and review best practice outside of the sector, such as banking.</li> <li>• Recording preferences for home visits as part of tenancy notes to reduce anxiety when home visits are carried out. Communications explaining why these visits are necessary.</li> </ul>
Race	No impact identified
Religion or belief	This information is not collected for tenants.
Sexual orientation	This information is not collected for tenants.
Gender reassignment	This information is not collected for tenants.
Pregnancy, maternity and paternity	<p><b>Positive:</b> By improving the data we hold on tenants and their households, will allow us to monitor occupancy and underoccupancy rates, as well as forecast issues such as damp condensation and mould based on occupancy rates.</p> <p><b>Negative:</b> None.</p>
Marriage and civil partnership	No impact identified
Rural isolation	No impact identified.

Socio-economic factors	No impact identified
Other <i>(for example, those with dependents/caring responsibilities, asylum seeker and refugee communities, children in the care system, etc)</i>	No impact identified
Overall, if there is a potential adverse impact after the mitigation, please state why and whether this is justifiable.	
How will you monitor this to ensure there is no adverse effect in the future?	Monitored as part of each review of the Strategy.
Outcome of EIA:	<p>The continuation of the Knowledge and Information Strategy is recommended. A range of mitigating actions are already in place and further learning as the strategy develops will inform additional mitigating actions.</p> <p>This Knowledge and Information Strategy will improve the data position for the landlord service and enable wider improvements in service delivery through the provision of improved data and the use of that data</p> <p>Action plan:</p> <ul style="list-style-type: none"> <li>• Easy to read leaflet to be produced and shared with third party authority arrangements</li> <li>• Staff communication and engagement plan</li> <li>• Staff data skill and training plan</li> <li>• Procedures to support data housekeeping.</li> </ul>