

Strategic Plan

Data Control

March 26



L&Q

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Introduction

L&Q's second corporate strategy, adopted from 2026, refreshes our purpose: *'to provide social homes that everyone can be proud of'*. It also sets out three strategic commitments:

1. We'll provide social homes to meet housing need
2. We'll provide good landlord services
3. We'll be efficient and maximise our impact

To support and deliver these commitments, we have developed nine strategic plans, each aligned to one of our strategic risks. These plans are grouped around themes and set out:

- The activities we plan to deliver over the next five years
- The key milestones by when we will deliver this activity
- The measures we will use to track progress
- The strategic risk definitions and statements that govern delivery

Each strategic plan covers the five-year period (2026-31) outlined in our corporate strategy and will be reviewed and updated annually to ensure alignment with our five-year budget, Long-Term Financial Plan, risk appetite and any legislative or regulatory changes, as well as to the other eight Strategic Plans. Each Strategic Plan links with one or more annual Run the Business (RTB) plans across the teams responsible for delivery, which translate the Strategic Plan into specific initiatives for each financial year. Figures used are correct at document cover date.

These Strategic Plans are the tools we will use to track progress against our new corporate strategy and to provide assurance to the Group Board through our governance framework. They set out consistent board-level planning and assurance across all directorates, giving the Group Board confidence that the delivery of our corporate strategy is aligned, realistic, affordable, compliant, and within agreed risk appetite.

This document is the Strategic Plan for Data Control.

How to use this document:

The strategic activities set out in this Strategic Plan may involve specific resource requirements (i.e., training) and may be influenced by cross-functional activities, including those associated with our Transformation and Change Portfolio. Therefore, this document should be reviewed in conjunction with People and Talent, Organisational Governance and Control, and Data Control Strategic Plans.

The Executive Portfolio Accountability Owner for this plan is the Executive Group Director - Governance and Transformation. They hold the authority to set the direction, standards and parameters for their teams and associated activity, and agreement will be sought with those responsible for delivery, working collaboratively towards alignment wherever possible.

Accountable owners and delivery leads should use this plan as the single planning baseline for prioritisation, budgeting and delivery through the annual RTB planning and budgeting cycle. They should also report progress quarterly against the agreed RTB plans and Key Performance Indicators (KPIs), Performance Indicators (PIs) and Key Risk Indicators (KRIs), and escalate significant variances and risks through the established performance reporting and governance cycle.

Link to the new corporate strategy

Commitment 3: We'll be efficient and maximise our impact

Strategic Outcome: We'll be **resilient** so we can deliver our core operations through any challenge.

Things that we'll do:

- We'll understand our current and potential organisational risks and how these could affect us at all times, and will always work towards a stated risk appetite. This will mean we can make informed decisions about risks, and ensure effective controls are in place to mitigate and manage them.
- We'll prioritise continuous improvement, sustainable organisational performance, and effective risk mitigation in order to achieve financial and consumer ratings.

Transformation & Change Portfolio

Much of the activity set out in the Data Control plan contributes to L&Q's Transformation and Change Portfolio. This is a collection of programmes and projects designed to support our strategic commitments by transforming how we repair and maintain homes, deliver services for residents and customers, and manage our supply chain.

The illustration below provides an overview of the agreed scope for Transformation and Change at L&Q, and the five programmes it is delivering. The Data Control Plan will deliver activity which forms part of the Data and Information programme within Transformation and Change.

Activity contributing to the wider portfolio can also be found in the strategic plans for Organisational Governance and Control and People and Talent.

Our scope is to transform end-to-end how we: Repair and maintain our homes • Deliver services to residents and customers • Manage our supply chain			
We have five programmes	With objectives delivered by multiple projects	That will transform end-to-end journeys	Which will deliver business benefits
Service Design	We will implement new service designs that include processes and procedures, and workforce structures and capabilities. These will align with our group target operating model to deliver improved end-to-end journeys, ensuring clear roles and expectations. Our service designs will inform wider technology, data and information requirements	1. Find a home 2. Move to my new home 3. Manage my rent and payments	Measures <ul style="list-style-type: none"> • Reduction in number of role types involved in delivering a process • Reduction in process steps • Improvement in delivery of Service Level Agreements (SLAs) Outcomes <ul style="list-style-type: none"> • We're agile, and can invest/divest quickly • We're efficient and effective • We're performing well and adaptable
Organisational Culture and Leadership	We will evolve the culture, leadership and behaviours required to deliver our new target operating model, so these enable us to realise reliable, repeatable and consistent services	4. Get something fixed or sorted 5. My situation has changed 6. Want to move home	
Technology	We will deliver technology that is cheaper and simpler to maintain and sustain, enabling greater online transaction capability for residents and supporting the delivery of reliable, repeatable and consistent services	7. Want / need to move out 8. Raise an issue or complaint 9. Planned repairs / improvement work	
Data and Information	We will transform our data quality, operations, and governance to improve the accuracy and control of our information, enabling us to be a data and insights driven organisation that proactively serves residents	10. Ready empty homes 11. Compliance in all properties	
Process and Continuous improvement	We will implement and embed new processes and procedures to drive service improvement and support Transformation and Change deliverables	12. Supply chain	

Strategic Plan – Data Control

The table below outlines the activity that will take place over the next five years relating to the following themes:

Theme 1 - Establishing our data architecture *(Delivered as part of the Transformation and Change Portfolio)*

We will create a robust and integrated data foundation that provides trusted insights and enables efficient service delivery

1. By the end of 2026/27, we will design & begin to implement the Data Target Operating Model by assessing existing roles which manage data across L&Q, clarifying responsibilities, and establishing an efficient structure to eliminate duplication and improve delivery. We will also explore options through the use of our framework of consultants whilst building our Data Migration Capability. By the end of 2027/28, we will have completed the implementation of the new Data Target Operating Model and embedded it.
 - By the end of 2029/30, we will have rolled out a Target State Data Architecture¹. This will ensure we have a scalable data platform with clear integration standards to simplify and future-proof data management.
2. From 2026/27, we will build data migration capability by establishing repeatable tools and processes to reliably move and cleanse data into new systems with speed and accuracy. From 2027/28, we will embed this capability into major transformation projects.
3. By the end of 2026/27, we will define the approach and review tools to develop the Master and Reference Data Management². By the end of 2027/28, we will pilot a centralised Master Data Framework³. By the end of 2028/29, we will embed and optimize this capability across all major processes and reporting frameworks.
4. By the end of 2027/28, we will evaluate and select tools for an Enterprise Data Catalogue which will categorise all the data we own. By the end of 2028/29, we will launch the catalogue as a searchable, organisation-wide inventory of data assets, and embed its usage into process and procedures. By the end of 2029/30, we will deliver analytics training programmes to support better evidence-based decision-making using this data.
5. From 2030/31, we will build on the foundations in this strategic plan so that L&Q is in a stronger position to make good use of AI where it can add value to our strategic commitments. In the meantime, we will explore practical ways AI could help us improve how we manage data and support continuous improvement, including small-scale pilots and learning about where it can be used effectively.
6. From 2026/27, we will identify and address data gaps by systematically reviewing core data domains and processes, ensuring completeness and reliability of data for decision-making. This initiative will inform ongoing improvements to our data architecture.

¹ A blueprint for how we will store, manage and use data across our systems.

² Foundational data processes that help create a single source of truth, with trusted and consistent core data across the organisation.

³ A consistent way of managing and controlling key core data across the organisation, so that important information is more accurate and trusted across systems and teams.

Theme 2 - Embedding data governance and culture *(Delivered as part of the Transformation and Change Portfolio)*

We will embed a strong data governance & culture by establishing clear accountability, robust security, data literacy, and ethical data management

1. By the end of 2026/27, we will define the ownership model for all critical data to instil clear accountability for data assets. By the end of 2027/28, we will embed this through training, ensuring Data Owners and Stewards champion robust handling, protection, and trust in information.
2. By the end of 2026/27 we will establish clear security and privacy principles so that data is always managed lawfully and securely. By the end of 2027/28, we will embed these principles into our processes.
3. By the end of 2026/27, we will embed initial security controls across core information-management systems to strengthen data and information security, ensuring transparency and auditability by logging, monitoring, and regularly reviewing data access and usage. By the end of 2027/28, we will implement role-based access controls and visibility. By the end of 2028/29, we will introduce additional monitoring tools to provide transparency and assurance over data access and usage.
4. From 2026/27, we will work to foster organisation-wide data literacy and accountability by implementing a comprehensive annual programme to upskill ensure colleagues understand data and quality standards. By the end of 2026/27, we will introduce mandatory data quality standards. By the end of 2027/28, we will embed mandatory training and continue annual awareness and response activity.
5. By the end of 2026/27, we will establish a cross-functional Community of Practice to support the implementation of the Data Target Operating Model. This forum will enable effective working across teams by sharing best practice, reducing duplication and ensuring that governance and security principles are applied consistently. From 2027/28, we will hold monthly sessions to embed standards, share technical skills, and ensure consistent application of roles and responsibilities.

Theme 3 - Modernising reporting and analytics *(Delivered as part of the Transformation and Change Portfolio)*

We will standardise data reporting tools, enabling secure self-service reporting, and building advanced predictive analytics

1. By the end of 2026/27, we will implement a standardised reporting framework and catalogue, rationalising and simplifying the Business Information (BI) landscape and defining a clear standard solution (e.g. Power BI) to ensure consistent data presentation across all centrally-managed service dashboards to achieve "One Version of the Truth". By the end of 2027/28, we will embed a 'COUNT' approach (Collect Once Use Numerous Times) to drive efficiency and consistency.
2. From 2027/28, we will roll out self-service reporting tools. These will enable operational teams to securely access and interpret data independently, with governance oversight by the Data and Information team to ensure "One Version of the Truth". From 2028/29, we will embed Self-Service Reporting into continuous improvement and training, reducing formal report creation requests to the Data & Information team.
3. By the end of 2028/29, we will build the technology and data foundations for advanced analytics to drive Predictive Foresight and Advanced Analytics Build. By the end of 2029/30, we will pilot predictive modelling (e.g. forecasting rent arrears and anticipating maintenance needs). By the end of 2030/31, we will optimise data automation and AI-driven insight to improve the way we manage and deliver homes and core services.

Theme 4 – Information and cyber security

We will strengthen organisational information and resistance to cyber threats by improving security capabilities, training, monitoring, supplier assurance, network protection, backup integrity and AI-driven security automation

1. From 2026/27, we will evolve our approach to organisational information and cyber security by enhancing existing mandatory training to address the modern threat landscape, while introducing wider learning opportunities that focus on the behaviours that support effective data security beyond technical controls.
2. By the end of 2026/27, we will conduct a comprehensive security review and enhancement of the existing Security Operations Centre (SOC) tooling to better detect and prevent AI-enhanced cyber risks. This will include (but is not limited to) advanced phishing and the increased volume of risky incoming data.
3. By the end of 2026/27, we will introduce a third-party risk management process to assess the cyber security of all key suppliers, ensuring that shared data is protected throughout our supply chain.
4. By the end of 2027/28, we will strengthen information security at remote sites security by activating advanced security features on existing network equipment to specifically isolate smart devices (IoT) from our main network.
5. By the end of 2027/28, we will implement role-based segmentation across our technology network. This will enable us to automate the containment of malicious activity and limit the movement of threats within the network.
6. From 2028/29, we will deploy fixed backup solutions for all critical data domains to ensure that L&Q can rapidly recover essential functions and resume operations even in the event of a sophisticated ransomware attack.
7. From 2028/29, we will use AI-driven Security Automation to validate security controls in real-time and reduce manual response requirements, ensuring our defences keep pace with emerging external threats.

- All activities and reporting are to include Northwest (NW) data unless and until it is explicitly out of scope.

Strategic Risk: Data Quality and Governance

2026/27 Strategic risk description

- **Risk that:** we may base operational service delivery and improvement and asset-related, investment, decisions on data, reports, and intelligence that is unreliable or insufficient
- **Caused by:** a fragmented approach to data governance and an insufficient organisation-wide understanding of asset and service-related data, alongside systems and architecture that are not designed to reliably turn this data into information for operational delivery, compliance, and decision-making.
- **Resulting in:** poorly informed business decisions that contribute to financial loss, inefficient distribution of resource, and/or failure to maintain compliance with regulatory and statutory obligations.

Key Risk Indicators

Data Quality Score - Complete and Accurate Data to Support our Social Tenants

Data Quality Score - Complete and Accurate Data to provide assurance that Social Housing is safe

Risk Appetite level

The Data Control Strategic Plan targets a **low appetite** for Data Quality and Governance risk, prioritising robust data for decision making and compliance. While current measures require improvements, the Transformation and Change portfolio is specifically designed to address these gaps and deliver necessary change. Any emerging risks identified during the plan's lifetime will be proactively managed and highlighted through the Risk and Assurance (ICAF) reporting.

2026/27 Risk appetite statement



We will accept

- Continuous improvement and development of technology and data may not fully enable service and product delivery in a cost-effective way.
- Reliable and consistent data management and data flows will not be fully and accurately aligned to the processes, teams, and structures as set out in a "Data Target Operating Model".
- We accept that manual process and data validation may be required in the interim whilst strategic solutions within the Transformation and Change portfolio are being delivered.
- There remain limitations in how automated data/information systems provide Governance assurance and accept that manual data validation will incur additional cost/resource.

We won't tolerate

- Investing finance and resource into technology where it is unproven, does not demonstrate value for money, and where there is no evidence of tangible benefit to sustain or improve services or operational efficiency.
- Ignoring inaccurate data when it is found, poor processing techniques that allow inaccuracies or gaps to enter data flow.
- Assuming data requirements remain static and be unresponsive where change is requested or required.
- Implementing short term technical solutions that are not aligned to the wider plans of the organisation

- While change is taking place and systems develop, not all colleagues will fully understand their role in processing data to a suitable minimum standard. During this time, there could be delays in the deployment and implementation of suitable software solutions to support them.
- Until dialogue is undertaken with leadership to fully understand their information needs, reporting tools may be in place but not yet deliver desired monitoring data until metrics have been fully developed and checked for accuracy.
- The increased cost and complexity associated with rectifying historic data quality issues, rebuilding foundational data architecture, and addressing long-standing gaps in asset and service-related data.

Expected risk status and proposed risk appetite level for 2026/27					
	Key		Expected Risk Status	Risk Appetite	
	Very low	Low	Medium	High	Very High
Data Quality and Governance Strategic Risk					

Strategic Risk: Data and Information Security

2026/27 Strategic risk description

- **Risk that:** L&Q data and information integrity, confidentiality and availability may be compromised, obtained or accessed by an untrusted or unauthorised party
- **Caused by:** data and information security controls that are unable to prevent, detect and/or respond adequately to a malicious cyber-attack or unauthorised information disclosure. Organisational data/information security governance is not consistently adhered to by colleagues
- **Resulting in:** any L&Q information and data compromise that negatively impacts organisation vision, mission, goals, colleagues, residents (customers), investors and other affiliated parties

Key Risk Indicators

- Average Response time to High-Risk Incidents in Seconds (Responsive Information Security)
- % Phishing Campaign Success Rate (Security Culture & Awareness)
- % Mission Critical Service Availability

Risk Appetite level

Given the significant operational, financial and compliance impacts that a data & information security incident could cause, we will continue to work towards reducing our exposure and strengthening our security maturity. The inherent nature of such a threat environment means we must maintain a **low appetite** for accepting penetration of L&Q systems and data loss, continuing to minimise risk wherever practicable and ensure controls keep pace with emerging threats and maintaining system integrity.

2026/27 Risk appetite statement

We will accept

- There will be continued Cyber-security challenges and other organisational mechanisms by malicious actors to access L&Q systems to seek confidential and restricted data whilst ensuring L&Q will immediately respond and restrict access from core data systems.
- There may be colleagues that actively or accidentally access data and intelligence inappropriately, creating a data breach, and will be responded to via HR policies, technical controls and/or governance.

We won't tolerate

- Cyber-security attacks that access core L&Q systems and medium/long term access to data and information in those systems.
- Insufficient or mis-aligned investment in people, processes or technology where this leaves core information security capabilities below the minimum standards required to protect sensitive data, meet regulatory obligations (including L&Q data retention and data minimisation policies), and ensure effective detection and response to cyber threats.
- Knowingly placing our residents, customers, colleagues, or stakeholders' private or sensitive information, or business-sensitive / confidential information, at risk.
- Ignoring indications of insecure data or information processing that may expose the organisation to security risk.

- Addition, deletion or modification of data or information without considering the sensitivity of its content.

Expected risk status and proposed risk appetite level for 2026/27					
	Key		Expected Risk Status	Risk Appetite	
Data and Information Security Strategic Risk	Very low	Low	Medium	High	Very High
		