



Warwick District Council
Compliance and Building Safety
Roadmap
Project Status Report
August 2024

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Preface

Pennington Choices provides property surveying and consultancy services to organisations nationwide. We have a wealth of experience working with more than 150 public and private sector organisations across social housing, NHS, education, retail, rail, police, and local authorities over the past 20 years. Our breadth of services makes us unique and provides a cost and time-effective solution to our clients.

Our advisory, professional and out-sourced services are:

- Housing and finance consultancy
- Occupational health and safety
- Recruitment services
- Asbestos – surveying, analysis, and management
- Chartered building and quantity surveying
- Stock condition and asset management
- Fire safety and compliance
- Energy - EPCs and sustainability services
- Gas and electrical – auditing, inspection, and management
- Professional training and qualifications

We develop lasting professional relationships and partnerships with all our clients. We do this by helping them to meet their strategic objectives by adding real value to organisations and projects. Many of our long-term clients are contractors, social housing organisations, local authorities, health and social care organisations, private landlords, homeowners, and education providers.

Contents

1. Findings	4
1.1. Overview	4
1.2. Summary of findings	4
2. Conclusion	7

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Version Control

Date	Version	Description
14/08/2024	V0.1	First draft
15/08/2024	V0.2	Issued draft
	V0.3	Client review
	V1.0	Final version

1. Findings

1.1. Overview

- 1.1.1. Pennington Choices undertook a Compliance and Building Safety Health Check in October 2022 for Warwick District Council (WDC), which resulted in a Compliance and Building Safety Roadmap (the Roadmap) to help improve and strengthen WDC’s overall approach. Pennington Choices have been appointed to support with the delivery of some of those actions while the remaining actions are being wholly managed by WDC.
- 1.1.2. Delivery of all actions within the Roadmap commenced in October 2022 (on a priority basis), and you intend for all actions to be completed by 31 October 2024. Positively, you are monitoring the completion of actions through the monthly *Highlight Report* which has governance oversight from the Compliance Programme Board.
- 1.1.3. This project status report provides a high-level update on the status of all actions within the Roadmap. The information is correct as of 1 August 2024 when we met with WDC’s Project Coordinator, Compliance Manager, Building Safety Lead and Fire Safety Lead to discuss progress. There were a total of 32 recommended actions within the Roadmap. Our view of the status of these actions is summarised in the table below.

Total no. actions	No. actions completed	No. actions ongoing	No. actions not started
32	14	18	0

Table 1 – Roadmap actions summary, as of 1 August 2024.

1.2. Summary of findings

- 1.2.1. We are satisfied that 14¹ actions have been fully completed and where appropriate we have requested supporting documentary evidence to substantiate this finding. We found that for three of these 14 actions, recommendation 11 compliance reporting, recommendation 12 compliance policies and recommendation 7 measuring performance, they are considered ‘in progress’ within the most recent *Highlight Report* (dated 10 July 2024), however, for the purposes of meeting the requirements of the recommendation, we deem them to be fully complete.

¹ Completed compliance actions (12): R1, R2, R3, R4, R6, R9, R10, R11, R12, R14, R15, R19. Completed building safety actions (2): R1, R7.

1.2.2. With regards to the 18 ongoing actions², there were three actions that you have marked as 'complete' within the most recent *Highlight Report*, that we believe should still be in progress as we were not fully assured that the actions were completed fully to satisfy the recommendation. The three actions are:

- 1) **Recommendation 5 data validation:** This action has been marked as complete, however, there were **7,640 properties** that required further investigation to ensure all required properties are included on compliance programmes at the time of issuing the final data validation report in March 2024. While we recognise that you have since undertaken some validation and this figure has reduced, it is not clear how much validation is remaining or your target times for completion. This should be addressed as a priority to provide full assurance.
- 2) **Recommendation 5 (building safety) residents' engagement strategies:** This action has been marked as complete, however, upon reviewing the strategies provided, while there are a number of positive elements, they do not fully satisfy the requirements of the legislation and guidance. We noted the following which is not an exhaustive list:
 - The strategies do not state that WDC is the Principal Accountable Person, and what that means under the Building Safety Act 2022, which it should.
 - The strategies do not confirm whether there are any other Accountable Persons for the building.
 - There does not appear to be a date of issue or version number to show when a review is required (which should be at least every two years).
 - The strategies do not clearly state what information you will provide the resident with, for example, inspection schedules, building information, legal or regulatory information, although they do state *how* information will be provided, which is positive.

Other observations are:

- The link to the Compliance Health Check report should really be a link to other regular maintenance checks (as stated within the document). In our view, it is not clear what benefit is gained from providing a link to the report completed in October 2022, which is not a true reflection of your current position as you have made significant progress since then.
- There are stock images of people included, but it would be more helpful to include images of the Housing Officer and Estates Officer for each building.

² Ongoing compliance actions (13): R5, R7, R8, R13, R16, R17, R18, R20, R21, R22, R23, R24, R25. Ongoing building safety actions (5): R2, R3, R4, R5, R6.

You should address this by reviewing the official guidance³ and updating the strategies in line with this.

3) **Recommendation 6 (building safety) complaints procedure:** This action has been marked as complete, however upon reviewing the documents provided, while they are good documents they do not fully satisfy the requirements of the legislation and guidance. We noted the following which is not an exhaustive list:

- None of the documents (policy, procedure or process map) outline the definition of a relevant building safety complaint so that residents know exactly what they are to report them.
- None of the documents define which buildings these complaints are applicable to (that is, higher risk buildings which are at least seven storeys or 18 metres in height with at least two residential units).
- None of the documents include that building safety complaints must be kept on record for seven years or what specific information must be captured.

You should address this by reviewing the official guidance⁴ and updating the documents in line with this.

1.2.3. Based on the above observations, you should return these three recommendations back to 'in progress' until the recommendation has been completed satisfactorily.

1.2.4. With regards to recommendation 14 competence and training matrix, while we can verify that the action is complete, we recommend that you strengthen the matrix by:

- Including whether each role has achieved the required training.
- If a role has not achieved the required training, including by what date it should be achieved by (with supporting commentary).
- Including who is responsible for monitoring and updating the matrix and how often it is reviewed.

1.2.5. With regards to recommendation 19 resident communications, while we can verify that the action is complete, because you have taken appropriate action and developed a residents' communications plan, we strongly recommend that the scope of the plan is broadened to include all residents, that is, those in houses, flats and other accommodation, regardless of building height. We also strongly recommend that you broaden the scope to include all areas of property compliance not just fire and building safety.

³ <https://www.gov.uk/guidance/preparing-a-resident-engagement-strategy>

⁴ <https://www.gov.uk/guidance/operating-a-complaints-system-for-building-safety-in-a-high-rise-residential-building>

- 1.2.6. With regards to recommendation 7 managing follow-up actions, which is an ongoing action, while we recognise that you are making progress by developing systems to provide more visibility of these actions, we recommend that you also consider the following:
- Management of fire risk assessment (FRA) actions is still not providing full assurance due to how the data is being recorded and displayed. Compliance performance should be easy to see and digest and should not require a detailed explanation to convey the position. To provide full assurance, you should consider these principles to streamline and simplify your approach to displaying the status of FRA actions.
 - Apart from FRA actions, it is unclear from the dashboard report whether any other programmes have outstanding follow-up actions. All this requires in the narrative is a sentence to confirm that there are no outstanding actions, or if there are, provide a narrative summary to outline the corrective action being taken.
- 1.2.7. We are satisfied that for all the remaining ongoing actions, there is an appropriate plan in place to complete them within a reasonable timeframe.

2. Conclusion

- 2.1.1. Overall WDC has made an impressive amount of progress with completing the actions within the Roadmap. This is largely due to the new and effective governance and assurance framework in place to ensure actions are completed and to provide oversight and scrutiny of progress. This is also due to assigning appropriate and dedicated resources to the project. As a result, it is now evident that property compliance, building safety and resident safety is a core strategic priority for WDC.
- 2.1.2. The above report does highlight some areas to address, however, with appropriate focus it should not take long to resolve these issues. One of the main challenges you will face is completing all the remaining actions by the self-imposed October 2024 deadline. We encourage you to allow some flexibility with this, and schedule actions based on priority, practical timeframes for completion and quality outcomes. To support this, the Compliance Programme Board should remain as a permanent fixture within your governance and assurance framework past 30 October 2024.
- 2.1.3. We recommend this report is shared with Executive Leadership Team and Board, so members understand the current position and provide support for any further action required.

Mission, vision, and values

Our company brand is an integral part of how and why we do what we do. It is important to us that any 'new recruits' share our values and are onboard with these and our sense of purpose for the organisation which are captured in our:



Our Mission

To have a positive impact on the people who work with us



Our Vision

Your exceptional trusted expert



Our Values

We deliver | Fun | Integrity | Resilient | Collaborative | Brave

We live our values every day at Pennington Choices Ltd; they serve as a compass for our actions and describe our behaviours.