



# Warwick District Council

## Compliance and Building Safety Roadmap - Close Out Report

### May 2025

Our ref: WEA2425

## Preface

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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.

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## Version Control

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Date	Version	Description
04/06/2025	V0.1	First draft
05/06/2025	V0.2	Internal review
06/06/2025	V0.3	Issued draft
13/06/2025	V0.4	Client review
18/06/2025	V1.0	Final version

# 1. Executive summary

## 1.1. Summary of findings

- 1.1.1. We have been commissioned by Warwick District Council (WDC) to provide external assurance around delivery of the Compliance Roadmap (the Roadmap) that resulted from a Compliance and Building Safety Health Check undertaken by Pennington Choices in October 2023. This report provides a final status update in respect of all 32 actions within the Roadmap, which were provided to help improve and strengthen WDC’s approach to property compliance management.
- 1.1.2. Delivery of the 32 Roadmap actions began in October 2023 and you had intended to complete all actions by 31 October 2024. Although your original target has not been met, you have been monitoring progress of actions through the monthly *Highlight Report* which has governance oversight from the Consumer Standards and Compliance Board (Board).
- 1.1.3. As you are nearing completion of all Roadmap actions, this report provides external assurance and validation as to whether completed actions have been appropriately undertaken and can be evidenced with supporting documents or demonstrated through a system. Based on our assessment of these items, we can summarise your position, as of May 2025, in the table below.

Total actions	Completed	In progress	Not started
32	21	11	0

Table 1 – Roadmap actions summary, as of May 2025.

- 1.1.4. Positively, you have made significant progress since October 2023. Many of the actions have been completed at pace, and seven actions have been completed since our mid-point review in August 2024 (see Section 2.1.3). However, there is work to do to ensure all remaining actions are completed within an appropriate timeframe.
- 1.1.5. You can review all 32 actions with a corresponding status update and commentary in Appendix 1.

## 1.2. Next steps

- 1.2.1. Momentum appears to have slowed down in completing the remaining actions for a number of different reasons (see Section 3.1.3), and ideally to provide full assurance around compliance management, all actions should have been completed by now. Therefore, we recommend that you reestablish full visibility of individual, outstanding actions at Board to encourage urgency, scrutiny and monitoring until completion.
- 1.2.2. We recommend that the findings from this report are shared with your Leadership Team and Board so that members can understand the current position and provide support to deliver the outstanding actions where required.

## 2. Background

### 2.1. Overview

- 2.1.1. Pennington Choices undertook a Compliance and Building Safety Health Check in October 2023 for WDC, which resulted in a Compliance and Building Safety Roadmap (the Roadmap). The Roadmap is a prioritised action plan that provides a structured and methodical way for organisations to improve their *three lines of defence* (an effective assurance framework) in respect of property compliance and building safety.
- 2.1.2. The Roadmap includes actions to help improve day-to-day operational delivery, reporting and governance oversight, and objective, independent assurance.
- 2.1.3. WDC’s Roadmap is split into two sections with a total of 32 actions. The first covers cross cutting themes that are applicable to all compliance areas, such as data, policies, and contract management. The second section covers subject specific recommendations for each of the individual compliance areas (gas, electric, fire, asbestos, water, lifts and building safety). Roadmap actions are each given a priority rating and recommended timescales for completion.
- 2.1.4. Pennington Choices has been appointed to support with the more substantial actions, such as data validation, and strategy and policy development. To provide external validation of your progress against the actions, we also carried out a mid-point review in August 2024, the results of which are summarised in the table below.

Total no. actions	Completed	In progress	Not started
32	14	18	0

Table 2 – Roadmap actions summary, as of August 2024.

- 2.1.5. This report has not reconsidered the 14 actions previously verified as complete in August 2024. Instead, the report focuses on the 18 in progress actions that were outstanding at the mid-point review. Section 3 provides a summary of our findings in relation to these 18 actions, and we provide detailed commentary against each of these actions within Appendix 1.
- 2.1.6. To review the status of each of the 18 actions, we held a meeting with WDC’s Project Coordinator, Compliance Manager and Building Safety Lead on 19 May 2025 and reviewed supporting documents and data.

### 3. Findings

#### 3.1. Highlights from the review

- 3.1.1. Positively, since October 2023, you have completed a total of 21 out of 32 actions within the Roadmap. For each of the 21 actions, we were able to see documentary or system evidence to clearly demonstrate that the action had been completed.
- 3.1.2. There are 11 actions that are in progress that we could not verify as fully complete, these are summarised in Table 3 below. Of these 11 actions, two are critical, seven are high and two are medium priority rating. This highlights that some of these in progress actions are not being addressed or completed as quickly as we expect.

No.	Report ref./ recommendation	Priority	Area
1.	3.2 (5)	Critical	Data validation
2.	3.3 (7)	High	Follow-up actions
3.	3.8 (16)	Medium	Contract management
4.	3.9 (18)	High	External audit
5.	4.1 (20)	High	Smoke and carbon monoxide alarms
6.	4.2 (21)	High	Electrical safety catch up programme
7.	4.3 (22)	Critical	Fire safety
8.	4.5 (24)	Medium	Written schemes of control (water hygiene)
9.	4.6 (25)	High	Thorough examination follow-up actions (lift safety)
10.	5.2 (3)	High	Golden thread (building safety)
11.	5.2 (5)	High	Residents' engagement strategies (building safety)

Table 3 – Summary of the 11 in progress actions, as of May 2025.

- 3.1.3. We found several reasons why some actions have not progressed:
  - Individual actions from the Roadmap are no longer visible within the monthly *Highlight Report* as they have been consolidated into one summary action.
  - Actions have been transferred inaccurately and interpreted incorrectly on the Monday system (the system used for monitoring your action plans).
  - Actions are showing as complete within the Monday system with no supporting evidence to demonstrate completion, and upon investigation are actually incomplete.
- 3.1.4. The two critical actions are in relation to data validation and fire safety. The data validation exercise requires completing because there are at least 221 individual properties and three communal blocks that are not receiving compliance checks, as you have not determined whether any are required or not. In respect of fire safety, there is still work to do around fire risk assessment action management, developing a fit for purpose fire safety policy and demonstrating full compliance with the Fire Safety (England) Regulations 2022.

## 4. Conclusion

- 4.1.1. Overall, you have come a long way since we undertook the original Compliance Health Check in October 2023 and many of the Roadmap actions have been completed at pace. There is a level of governance and strategic oversight of progress, through the monthly Consumer Standards and Compliance Board (the Board), which is chaired by the Deputy Chief Executive. You have also made efforts to assign appropriate and dedicated resource to the project. As a result, it is evident that property compliance, building safety and resident safety is a core strategic priority for WDC.
- 4.1.2. However, you must continue your improvement journey and not lose momentum in completing the remaining Roadmap actions. Ideally, all actions should have been completed by now. Our review of your approach highlights that by consolidating outstanding actions into one summary action, for the purpose of reporting to the Board, has diluted its importance and reduced visibility. As a result, challenge and scrutiny around progress of outstanding actions has been limited.
- 4.1.3. As two of the actions in progress were assigned a 'critical' priority rating (data validation and fire safety) you should refocus your efforts on these recommendations to ensure they are completed with some urgency. While we have previously encouraged you to be realistic and practical about achieving self-imposed deadlines, we must also now encourage you to re-evaluate why some of the in-progress actions are taking so long to complete.
- 4.1.4. To support this, we recommend that each individual, outstanding action becomes visible again to the Board to encourage proactive, monthly monitoring. This will also support members to challenge and scrutinise delays and ensure they are monitored through to completion.
- 4.1.5. We recommend this report is shared with the Leadership Team and Board, so members understand the current position and provide support for any further action required.

# Appendix 1 – Compliance Roadmap With Comments

## Compliance roadmap

Compliance Roadmap – Cross Cutting Recommendations			
Report ref.	Recommendation	Priority	Status (May 2025)
3.2	<p><b>Recommendation 1 – Governance and assurance structure</b></p> <p>Establish an appropriate governance and assurance structure to provide effective oversight of compliance and building safety and clarify responsibilities, accountabilities, and formal approval processes (see example in Diagram 1 within the report).</p>	Critical	Verified as complete, August 2024.
3.2	<p><b>Recommendation 2 – Compliance awareness session</b></p> <p>The Leadership Team and appropriate scrutiny panel / committee should undertake a compliance awareness session to fully understand the latest legal and regulatory obligations placed upon them, the common pitfalls to pay attention to and how to provide more effective oversight, scrutiny, and challenge of compliance performance.</p>	High	Verified as complete, August 2024.
3.2	<p><b>Recommendation 3 – Compliance and building safety strategy</b></p> <p>Develop a standalone compliance and building safety strategy that: sets out your objectives, addresses the recommendations within this report and outlines how they will be achieved. Ensure that you are clear on:</p> <ul style="list-style-type: none"> <li>• Legal and regulatory obligations, now and in the future.</li> <li>• Your overall objectives for property compliance, building safety and resident safety.</li> <li>• What actions need to be delivered to achieve these objectives.</li> <li>• How you will demonstrate that these actions are deliverable.</li> </ul>	High	Verified as complete, August 2024.

## Compliance Roadmap – Cross Cutting Recommendations

Report ref.	Recommendation	Priority	Status (May 2025)
3.2	<p><b>Recommendation 4 – Fire Safety Group</b></p> <ol style="list-style-type: none"> <li>1. Broaden the scope of the existing Fire Safety Group to have full oversight of all legal fire and building safety requirements.</li> <li>2. Develop a terms of reference for the group that ensures achieving the requirements of fire and building safety legislation and guidance is included as a standard agenda item.</li> </ol>	High	<p><b>Verified as complete, August 2024.</b></p>
3.3	<p><b>Recommendation 5 – Data Validation</b></p> <p>Undertake a data validation exercise that is coordinated across all compliance areas to gain assurance around all property assets, compliance programmes and records:</p> <ol style="list-style-type: none"> <li>1. Download the full asset list from your parent management system into a data validation workbook.</li> <li>2. Confirm which properties will or will not be subject to each compliance programme. All properties should be defaulted to require an inspection until it can be evidenced otherwise.</li> <li>3. Record evidence-based reasons for properties not required on each programme.</li> <li>4. Validate a sample of compliance records to ensure they are valid and in date.</li> <li>5. Quantify compliance gaps to develop a plan to resolve them.</li> <li>6. Validation should include categorising buildings (11+ and 18m+) and the smoke and carbon monoxide alarm programmes.</li> <li>7. Follow the above exercise with regular, documented validation to ensure asset and compliance data remains up to date.</li> </ol>	Critical	<p><b>In progress.</b></p> <p>We note that you are currently working with Cadent and National Grid as part of your validation processes, however, this action remains outstanding as there are at least 221 individual properties and three communal blocks that have not been fully validated to check which compliance inspections are required (up to 30 April 2025).</p> <p>This is a critical action, and ideally it should have been completed by now. You must address this as a priority to provide full assurance.</p>

## Compliance Roadmap – Cross Cutting Recommendations

Report ref.	Recommendation	Priority	Status (May 2025)
3.3	<p><b>Recommendation 6 – Active H configuration</b></p> <p>Configure Active H to record the correct compliance programme data and provide appropriate reporting outputs.</p>	High	<b>Verified as complete, August 2024.</b>
3.3	<p><b>Recommendation 7 – Managing follow-up actions</b></p> <p>Implement a process for tracking all actions deriving from each of your compliance programmes. You should consider and agree: the platform for recording actions, where the process can be automated, allocation, quality checks, evidence of completion and reporting.</p>	High	<p><b>In progress.</b></p> <p>We have seen evidence to show that fire risk assessment actions are now being managed through the Active H system and not on a spreadsheet, which is positive. There were a total of 606 actions outstanding at the time of this review.</p> <p>For gas and electrical safety, the service job remains open on the Active H system until all follow-up works have been completed to enable a compliant landlord’s gas safety record or satisfactory electrical installation condition to be produced, which is good practice.</p> <p>However, we were not provided with follow-up work trackers for asbestos or water hygiene but were advised that they are currently being managed by spreadsheet and will be transferred to Active H soon.</p> <p>There is also no central visibility of follow-up actions for lift safety. We reviewed an outstanding action on the thorough examination report for Eden Court (inspection date, 29 April 2025) and WDC were unable to evidence that this action was being addressed.</p>

## Compliance Roadmap – Cross Cutting Recommendations

Report ref.	Recommendation	Priority	Status (May 2025)
3.3	<p><b>Recommendation 8 – Changes to asset and programme lists</b></p> <p>Formalise and document the process for adding, removing, or making changes to properties on Active H, including who has authority to do so. Ensure there is a clear audit trail of uploading and setting attributes against each property and quality assurance checks to ensure each property is on the correct compliance programme.</p>	Medium	<p><b>Complete.</b></p> <p>We were provided with the procedure <i>Protocols for Adding, Updating, Deleting Assets and Asset Attribute Occurrences</i> which meets the requirements of this recommendation.</p>
3.4	<p><b>Recommendation 9 – Operational lead for fire safety</b></p> <p>Appoint an operational lead for fire safety to have oversight of all fire safety related programmes and performance (fire risk assessment programme and actions, Fire Safety (England) Regulations obligations, fire equipment servicing, and so on).</p>	Critical	<b>Verified as complete, August 2024.</b>
3.4	<p><b>Recommendation 10 – Operational lead for building safety</b></p> <p>Appoint an operational lead for building safety to support the strategic lead (Head of Neighbourhoods and Assets) and take overall operational responsibility for day-to-day management of building safety risks in higher-risk buildings, and communications with residents of those buildings. Operational duties can be delegated, however, the operational lead should have full oversight of all activities through a clear assurance and 'lines of defence' framework.</p>	Critical	<b>Verified as complete, August 2024.</b>
3.5	<p><b>Recommendation 11 – Compliance reporting</b></p> <p>Develop a standalone weekly compliance report that covers the big six compliance areas and addresses the items raised in the report (Section 3.5). This new report should also be used to provide monthly and quarterly summaries to the management and Leadership Team.</p> <p>Reporting should include follow-up actions: total number of actions, actions by risk/priority, actions completed in time and overdue and supporting narrative to provide a status summary.</p>	High	<b>Verified as complete, August 2024.</b>

## Compliance Roadmap – Cross Cutting Recommendations

Report ref.	Recommendation	Priority	Status (May 2025)
	Data should be driven from Active H and performance presented in an easy-to-read format. Use our compliance scorecard examples as a benchmark for current best practice (see Appendix 3).		
3.6	<p><b>Recommendation 12 – Policies</b></p> <p>The Leadership Team and technical team members should attend a facilitated session to agree policy principles (obligations, inspection programmes, follow-up work, contractor competencies, KPIs, and so on). The output of this session will be used to draft seven separate policy documents which should be approved through your updated governance framework, subject to version control and reviewed every two years (or sooner, if there is a change in legislation, regulation, or other approved guidance).</p>	High	Verified as complete, August 2024.
3.6	<p><b>Recommendation 13 – Process maps and procedures</b></p> <p>Once the policies have been approved, develop standalone procedure documents and process maps to support each of your policies. Your procedure documents should clearly outline how each of your service areas are delivered operationally. The process maps should visibly demonstrate the end-to-end process and areas of responsibility for all parties involved.</p>	Medium	<p>Complete.</p> <p>Process maps and procedures for the big six compliance areas were drafted with support from Pennington Choices in June 2024.</p>
3.7	<p><b>Recommendation 14 – Training matrix</b></p> <p>Develop a training matrix to specify the training, competence, and qualification requirements for all employees responsible for oversight and delivery of compliance and building safety programmes. This will identify gaps and ensure training and competence is kept up to date. Any gaps should be addressed by undertaking appropriate qualifications within appropriate timeframes.</p>	High	Verified as complete, August 2024.
3.7	<b>Recommendation 15 – Compliance and building safety refresher training</b>	Medium	Verified as complete, August 2024.

## Compliance Roadmap – Cross Cutting Recommendations

Report ref.	Recommendation	Priority	Status (May 2025)
	The Compliance Team should undertake refresher training that covers all compliance areas to refresh their knowledge and ensure they remain up to date with the latest legislation and obligations.		
3.8	<p><b>Recommendation 16 – Contract management</b></p> <ol style="list-style-type: none"> <li>1. Ensure your regular contractor performance meetings include standard agendas, record minutes and monitor key performance indicators. Also incorporate checks of accreditations, insurances, competency, and any changes to staff, and ensure evidence is provided.</li> <li>2. Undertake regular, documented contractor competency checks (at least annually).</li> <li>3. Migrate data and records from contractors’ systems to Active H to re-establish full control, ownership, and accountability of all compliance programme data to ensure programmes are driven by WDC.</li> </ol>	Medium	<p><b>In progress.</b></p> <ol style="list-style-type: none"> <li>1. We have seen satisfactory evidence to demonstrate this element of the recommendation is complete (contractor meeting directory showing regular client meetings and standard meeting agenda template).</li> <li>2. While we discussed that the Building Safety Lead undertakes annual contractor competency checks, the results of which are stored within the Document Management System (DMS), there was no central log to evidence that the checks were being undertaken, or to show when the next checks were due. Therefore, this element is outstanding.</li> <li>3. We are satisfied that this element of the recommendation is complete. The team described how records are received from each compliance contractor and where each record is stored.</li> </ol>
3.9	<p><b>Recommendation 17 – Internal audit</b></p> <ol style="list-style-type: none"> <li>1. Ensure that your internal audit regime reviews all seven compliance areas at least once every two years, and as a minimum, establishes whether WDC is compliant with its legal and regulatory obligations.</li> </ol>	Medium	<p><b>Complete.</b></p> <p>Consultant Morgan Lambert has been appointed to undertake the internal audit programme and will cover each compliance area once every two years.</p>

## Compliance Roadmap – Cross Cutting Recommendations

Report ref.	Recommendation	Priority	Status (May 2025)
	<ol style="list-style-type: none"> <li>Ensure that your internal auditor has the required levels of competence and knowledge of legal, regulatory, and best practice compliance obligations to provide a meaningful assurance report with appropriate assurance ratings.</li> </ol>		<p>Although we are satisfied that this action is complete, we have not reviewed the output of any internal audit reports, which you should ensure satisfies the requirements of the original recommendation.</p>
3.9	<p><b>Recommendation 18 – External audit</b></p> <ol style="list-style-type: none"> <li>Implement 100 per cent desktop checks of compliance records to provide assurance that certification has been completed correctly (for example, nine-point check of gas safety records) and follow-up works are actioned within an appropriate timeframe.</li> <li>Implement a third-party technical auditing regime across all compliance areas to undertake sample checks of contractors’ field work and desktop reviews of compliance records. The auditor(s) should be competent and appropriately accredited.</li> </ol>	High	<p><b>In progress.</b></p> <p>There is a new contract in place with TCW to review 100 per cent of compliance certification across all six areas, which requires further support from the IT Team to mobilise and implement.</p> <p>There is a contract in place with Corgi commencing in June 2025 to undertake five per cent on-site checks for gas and electrical programmes. On-site checks for the other compliance areas are currently in review, with the Building Safety Lead responsible for implementation.</p>
3.10	<p><b>Recommendation 19 – resident communications</b></p> <p>Develop and implement a formal resident communications campaign to share key messages around resident health and safety across all areas of property compliance and building safety. This should include consideration of the legal fire and building safety requirements under the Fire Safety (England) Regulations 2022 and Building Safety Act 2022. Also consider how you intend to inform harder to reach groups, such as those without internet access, where English is not their first language, or those with disabilities and impairments.</p>	Medium	<p><b>Verified as complete, August 2024.</b></p>

Compliance Roadmap – Subject Specific Recommendations			
Report ref.	Recommendation	Priority	Status
4.1	<b>Recommendation 20 – Gas and heating safety</b> <b>1.</b> Implement checks to ensure tenants are receiving landlord’s gas safety records (LGSRs) within 28 days of the service.	High	<b>Complete.</b> We have seen evidence to show that the heating contractor must confirm whether they have issued an LGSR to the resident after completing the service (for residents with an email address). For residents who require a copy via post, an Active H report shows which properties require it; a process overseen by the Compliance Team Leader.
	<b>2.</b> Display LGSRs in communal areas of buildings served by a communal boiler.		<b>Complete.</b> This is now undertaken by the Estates Team, overseen by the Compliance Team Leader.
	<b>3.</b> Ensure you can demonstrate compliance with the Smoke and Carbon Monoxide (Amendment) Regulations 2022.		<b>In progress.</b> There is visibility of your overall compliance position in respect of smoke and carbon monoxide alarms, which is positive. However, there are still over 200 properties that have not been validated to check whether they should have an alarm installed and a level of non-compliance (70 properties without a smoke alarm installation).
	<b>4.</b> Ensure the following items are addressed as part of policy, procedure, and process map development: <ul style="list-style-type: none"> <li>● End-to-end access process.</li> <li>● Managing remedial actions.</li> <li>● New tenant checks to ensure they arrange turn on and test visits.</li> <li>● Checks on properties that are not currently connected to the gas mains networks.</li> <li>● Compliance with Dangerous Substances and Explosive Atmosphere Regulations 2002 through risk assessments.</li> </ul>		<b>Complete.</b> Policies, process maps and procedures were drafted with support from Pennington Choices in June 2024.

Compliance Roadmap – Subject Specific Recommendations			
Report ref.	Recommendation	Priority	Status
4.2	<p><b>Recommendation 21 – Electrical safety</b></p> <p>1. Establish a catch-up programme to address the non-compliant properties that do not have a valid test certificate dated within the last five years.</p>	High	<p><b>In progress.</b></p> <p>Good progress has been made to gain access to long term no access properties since the original Compliance Health Check. The electrical installation condition report (EICR) report that was provided shows that 39 properties have an EICR dated older than five years, compared with 231 in October 2023.</p> <p>You have advised that the outstanding EICRs are long term, persistent no access issues that legally you do not have the same recourse as with gas. You also advised that the new no access policy is going through approval and will be enforced after Cabinet approval.</p> <p>However, ten of these properties are more than two years overdue and there is no visibility of the status of these within the reporting that goes to the monthly Consumer Standards and Compliance Board, so there is still some work to do to provide assurance of the action taken to try to gain access to these properties.</p>
	<p>2. Ensure the following items are addressed as part of policy, procedure, and process map development:</p> <ul style="list-style-type: none"> <li>• End-to-end access process.</li> <li>• Managing remedial actions.</li> <li>• Ensuring Active H captures reinspection dates less than five years (as recommended by the competent person).</li> </ul>		<p><b>Complete.</b></p> <p>Policies, process maps and procedures were drafted with support from Pennington Choices in June 2024.</p>

Compliance Roadmap – Subject Specific Recommendations			
Report ref.	Recommendation	Priority	Status
4.3	<b>Recommendation 22 – Fire safety</b>	Critical	<b>Complete.</b> You have implemented a cyclical FRA programme to ensure FRAs are regularly reviewed, and premises reassessed in line with the fire risk assessor’s recommended review frequency. At the time of our review, all but one property was compliant.
	1. Complete all outstanding fire risk assessments (FRAs) in line with the fire risk assessor’s recommended reassessment frequency.		<b>In progress.</b> Positively, management of FRA actions is monitored through the Active H system and the previous tracker spreadsheet has been retired. This is significant, as you have found it challenging to provide assurance around management of FRA actions due to the complexity of the tracker spreadsheet. Now that there is full visibility of all 606 outstanding actions in Active H, this is your opportunity to ensure the related reporting is clear and concise to provide assurance. There is still work to do to demonstrate that each action has been assigned and prioritised appropriately for completion.
	2. Extract all FRA actions into an appropriate monitoring platform to accurately track the completion of each action. Record who the actions have been allocated to, action priorities and timeframes, completion dates and supporting evidence (post-inspections, certification, before/after photographs, and so on.).		<b>In progress.</b> You were unable to provide evidence (for example, management level reporting on fire door checks or providing prescribed information to residents) to demonstrate full compliance with the Fire Safety (England) Regulations 2022.
	3. Ensure you can demonstrate compliance with the Fire Safety (England) Regulations 2022, including undertaking fire door checks.		<b>Complete.</b> You have chosen to undertake Type 1 FRAs (non-destructive assessment of the common areas only) to communal blocks as this satisfies your obligations under the Regulatory Reform (Fire Safety) Order 2005. You have also advised that you undertake other types of surveys, dependent on requirements, and use specialist contractors when needed.
	4. Consider undertaking Type 3 FRAs to all properties as this provides a more detailed understanding by assessing a sample of homes within each block.		

Compliance Roadmap – Subject Specific Recommendations			
Report ref.	Recommendation	Priority	Status
	<p>5. Ensure the following items are addressed as part of policy, procedure, and process map development:</p> <ul style="list-style-type: none"> <li>• Management and reporting of periodic checks on fire safety equipment.</li> <li>• Housing management issues that impact on fire safety, such as hoarding and allocations.</li> <li>• Person centred fire risk assessments.</li> <li>• Incident management, internal investigation and responding to property fires and near misses.</li> <li>• Liaison with the local fire and rescue service.</li> </ul>		<p><b>Complete.</b></p> <p>There is a fire policy in place from 2024 onwards, and a fire safety procedure and processes are also in place (developed in June 2024) which satisfy the requirements of this recommendation.</p> <p>You are in the process of drafting a new fire safety policy that aligns with your other compliance policies which is due to be completed in July 2025.</p>
4.4	<p><b>Recommendation 23 – Asbestos Management</b></p> <p>1. Undertake all outstanding reinspection surveys on your communal blocks to ensure asbestos containing materials are being monitored and managed appropriately. Ensure this is followed by a regular, risk-based reinspection programme, with the frequency determined in agreement with the competent person.</p>	Medium	<p><b>Complete.</b></p> <p>You have implemented a cyclical asbestos re-inspection programme and at the time of the review all properties were compliant.</p>
	<p>2. Ensure the following items are addressed as part of policy, procedure, and process map development:</p> <ul style="list-style-type: none"> <li>• Establish Appointed Person and Deputy Appointed Person roles (ensuring they are appropriately qualified).</li> <li>• Develop a fit for purpose asbestos management plan.</li> <li>• Use of priority assessment scores and material assessment scores to determine the risk of an asbestos item.</li> </ul>		<p><b>Complete.</b></p> <p>Policies, process maps and procedures were drafted with support from Pennington Choices in June 2024.</p>

Compliance Roadmap – Subject Specific Recommendations			
Report ref.	Recommendation	Priority	Status
4.5	<b>Recommendation 24 – Water Hygiene</b>	Medium	<b>Complete.</b> You have implemented a cyclical legionella risk assessment programme and at the time of the review all properties were compliant.
	1. Undertake all outstanding legionella risk assessments.		<b>In progress.</b> You were unable to provide evidence of written schemes for the properties requiring a legionella risk assessment, although you did provide evidence that this has been commissioned with your water hygiene contractor.  You also advised that the written schemes are being produced by the contractor and are taking longer to complete. You are in regular contact with the contractor regarding this.
	2. Ensure written schemes of control are documented to provide guidance on how to manage and monitor the risks identified within the legionella risk assessments.		<b>Complete.</b> Policies, process maps and procedures were drafted with support from Pennington Choices in June 2024.
	3. Ensure the following items are addressed as part of policy, procedure, and process map development: <ul style="list-style-type: none"> <li>Establish Responsible Person and Deputy Responsible Person roles (ensuring they are appropriately qualified).</li> <li>Managing water hygiene in domestic properties – adopting a practical and proportionate approach.</li> <li>Managing water hygiene void properties (considering the void standard, removing high risk installations, system flushing, replacing shower heads, etc.).</li> </ul>		
4.6	<b>Recommendation 25 – Lift Safety</b>	High	<b>In progress.</b> There is no central visibility of follow-up actions for lift safety. We reviewed an outstanding action on the thorough examination report for

Compliance Roadmap – Subject Specific Recommendations			
Report ref.	Recommendation	Priority	Status
			Eden Court (inspection date, 29 April 2025) and you were unable to evidence that this action was being progressed.
	<p>2. Ensure the following items are addressed as part of policy, procedure, and process map development:</p> <ul style="list-style-type: none"> <li>Establish a formal process for notifying the compliance team of new domestic lifts installations.</li> <li>Managing remedial actions.</li> </ul>		<p><b>Complete.</b></p> <p>Policies, process maps and procedures were drafted with support from Pennington Choices in June 2024.</p>

## Building Safety Action Plan

Building Safety Action Plan			
Report ref.	Recommendation	Priority	Status
5.2	<p><b>Recommendation 1 – Building registration</b></p> <p>Any higher-risk buildings identified following completion of the wider data validation exercise should be registered with the Building Safety Regulator.</p>	Critical	<b>Verified as complete, August 2024.</b>
5.2	<p><b>Recommendation 2 – Building safety cases and reports</b></p> <p>Establish and implement an appropriate infrastructure around property and building safety compliance, which includes, an effective assurance framework, defining roles and responsibilities and implementing and documenting supporting policies and procedures.</p> <p>This will allow the safety case and safety case report development project to resume and will include documenting a safety management system and building risk assessment.</p>	High	<p><b>Complete.</b></p> <p>You have employed a Building Safety Lead to take responsibility for ensuring compliance with the building safety regime.</p> <p>As a result, the building safety case report project was able to resume, and all six building safety case reports were handed over as final in December 2024 by Pennington Choices.</p> <p>You must now ensure that the reports are reviewed in line with your chosen review cycle, kept up to date, and submitted to the Building Safety Regulator when requested to do so.</p>
5.2	<p><b>Recommendation 3 – Golden thread</b></p> <p>Document the approach and commitment to delivering golden thread principles for all higher-risk buildings. This should include what information will be held, what systems will be used, how one version of the truth will be maintained, and how digital information will be accessed, managed, and shared to support ongoing reviews of the safety case.</p>	High	<p><b>In progress.</b></p> <p>Positively, you have documented your approach to the golden thread principles at a high level within your safety case reports and safety management system. However, this does not provide the detail we expect (for example, how information will be accessed, managed, and shared) for you to demonstrate compliance with this aspect of the legislation.</p>
5.2	<p><b>Recommendation 4 – Mandatory occurrence reporting</b></p> <p>Develop a mandatory occurrence reporting procedure that captures the principles of reporting and recording safety occurrences as intended by the Act.</p>	High	<p><b>Complete.</b></p> <p>With support from Pennington Choices, you have developed a mandatory occurrence reporting procedure to ensure safety</p>

Building Safety Action Plan			
Report ref.	Recommendation	Priority	Status
			occurrences are managed appropriately and escalated to the Building Safety Regulator.
5.2	<p><b>Recommendation 5 – Residents’ engagement strategies</b></p> <p>Develop building specific residents’ engagement strategies for your higher-risk buildings that include, tenancy management arrangements, allocations, how residents will be involved in decision-making around building safety risks and how they can access safety information.</p>	High	<p><b>In progress.</b></p> <p>The example strategy provided for Eden Court does not appear to have been updated in line with the recommendations from the mid-point review, which was to ensure your residents’ engagement strategies meet the requirements specified in government guidance<sup>1</sup>.</p>
5.2	<p><b>Recommendation 6 – Complaints procedure</b></p> <p>Either develop a separate complaints procedure or ensure the existing generic procedure is updated to ensure that WDC can satisfy itself that building safety issues have been resolved (for example, taking action to minimise the possibility of recurrence, ensuring there is no impact on the risk profile of the building or updating the building risk assessment and safety case).</p>	High	<p><b>Complete.</b></p> <p>You have developed a fit for purpose <i>Complaints Policy</i> that satisfies the requirements of the Building Safety Act 2022 and supporting government guidance.</p>
5.2	<p><b>Recommendation 7 – Measuring performance</b></p> <p>Develop performance measures and assurance reporting, to enable effective oversight to ensure building safety obligations are being achieved.</p>	Medium	<b>Verified as complete, August 2024.</b>

<sup>1</sup> <https://www.gov.uk/guidance/preparing-a-resident-engagement-strategy>