



Warwick District Council

Compliance Action Plan Report

April 2026

Our ref: WEA3013

Preface

Pennington Choices provides property surveying and consultancy services to organisations nationwide. We have a wealth of experience working with more than 200 public and private sector organisations across social housing, NHS, education, retail, rail, police, and local authorities over the past 25 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

Date	Version	Description
01/05/2026	V0.1	First draft
05/05/2026	V0.2	Internal review
05/05/2026	V0.2	Issued draft
18/05/2026	V0.3	Client review
29/05/2026	V1.0	Final version

1. Executive summary

1.1. Summary of findings

- 1.1.1. Pennington Choices has been commissioned by Warwick District Council (WDC) to provide independent assurance over delivery of the Compliance Roadmap (the Roadmap) arising from the Compliance and Building Safety Health Check we delivered in October 2023. This report provides a final status update against all 32 Roadmap actions, which were intended strengthen and improve WDC's approach to property compliance management.
- 1.1.2. Delivery of the 32 Roadmap actions began in October 2023, with an original target to complete all actions by 31 October 2024. While this target was not achieved, progress has been monitored by the Consumer Standards and Compliance Board.
- 1.1.3. As delivery of the Roadmap nears completion, this report provides independent assurance and validation that completed actions have been implemented appropriately and can be evidenced through supporting documentation and/or system demonstration. Based on our review, we summarise WDC's position as at April 2026 in the table below.

Total actions	Completed	In progress	Not started
32	27	5	0

Table 1 – Roadmap actions summary, as at April 2026.

- 1.1.4. Positively, you have made steady progress since October 2023. Many of the actions have been completed at pace, and six actions have been completed since our last review in May 2025. However, there is work to do to ensure the five 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. While we appreciate the progress made so far, it is concerning that several actions remain outstanding two and a half years after the original Compliance Health Check recommendations. This continues to limit your ability to provide full assurance around compliance management. We encourage you to reflect on one of the core principles of property compliance: the importance of being able to **evidence** compliance to demonstrate resident safety. Strengthening this approach will support more robust assurance going forward.
- 1.2.2. We recommend that the findings from this report are shared with your Leadership Team and Boards 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 for Warwick District Council (WDC) in October 2023, which resulted in a Compliance and Building Safety Roadmap (the Roadmap). The Roadmap is a prioritised action plan that sets out a structured approach to strengthening WDC's *three lines of defence* (an effective assurance framework) in relation to property compliance and building safety.
- 2.1.2. The Roadmap includes actions designed to strengthen day-to-day operational delivery, management reporting, governance oversight, and the provision of objective, independent assurance.
- 2.1.3. WDC's Roadmap comprises two sections and a total of 32 actions. The first section addresses cross-cutting themes applicable across all compliance areas, including data quality, policies and procedures, and contract management. The second section sets out recommendations for each individual compliance area (gas, electric, fire, asbestos, water, lifts, and building safety). Each action is assigned a priority rating and recommended timescales for completion.
- 2.1.4. Pennington Choices has been appointed to support delivery of the more substantial actions, including data validation and strategy and policy development. To provide external validation of progress against the Roadmap actions, we also completed a mid-point review in August 2024, and a follow-up review in May 2025; the results are summarised in the tables below.

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

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

Total no. actions	Completed	In progress	Not started
32	21	11	0

Table 3 – Roadmap actions summary, as at May 2025.

- 2.1.5. This report has not re-verified the 21 actions that were confirmed complete in August 2024 and May 2025. It focuses on the 11 actions that remained in progress at the last review. Section 3 summarises our findings in relation to these 11 actions, with detailed commentary provided in Appendix 1.

2.1.6. We held a meeting on 20 April 2026 with the WDC colleagues listed below to confirm the status of each of the 11 actions.

- Head of Housing.
- Compliance Manager.
- Interim Asset Manager.
- Project Manager.
- Building Safety Lead.
- Business Development & Change Officer.

2.1.7. We also reviewed your supporting documentation and data to inform and evidence our assessment.

3. Findings

3.1. Highlights from the review

- 3.1.1. Positively, since October 2023, you have completed a total of 27 out of 32 actions within the Roadmap. For each of the 27 actions, we were able to see documentary or system evidence to clearly demonstrate that the action had been completed.
- 3.1.2. There is one action, relating to lift safety follow-up works (Recommendation 25) that we have consolidated with Recommendation 7 to remove duplication.

Total no. actions	Completed	In progress	Not started
32	27	5	0

Table 4 – Roadmap actions summary, as at April 2026.

- 4.1.1. There are five actions that remain in progress that we could not verify as fully complete. These are summarised in Table 4 below. Of these five actions, two are critical, two are high and one is medium priority rating. This highlights that some of these in progress actions are not being addressed or completed as quickly as we would 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.	4.2 (21)	High	Electrical safety catch up programme
5.	4.3 (22)	Critical	Fire safety

Table 5 – Summary of the in progress actions, as at April 2026.

- 4.1.2. The two critical actions relate to data validation and fire safety. The data validation exercise remains incomplete as you have not confirmed whether three properties require a gas safety check and/or the provision of smoke and carbon monoxide alarms. However we do note that this exercise is nearly complete, and the remaining three properties have been reviewed by the Compliance Team and the Housing Enforcement Team and are being escalated through the no access process.
- 4.1.3. In relation to fire safety, further work is required to evidence completion of fire risk assessment (FRA) actions, ensure effective oversight of the FRA actions programme, and demonstrate full compliance with the Fire Safety (England) Regulations 2022.
- 4.1.4. Please refer to Appendix 1, which sets out the full Compliance Roadmap with our detailed commentary against each action, explaining whether it has been verified as complete or remains in progress.

5. Conclusion

- 5.1.1. Overall, significant progress has been made since the original Compliance Health Check undertaken in October 2023. Many of the Roadmap actions have been completed within the expected timescales, supported by governance and strategic oversight through the monthly Consumer Standards and Compliance Board, which is chaired by the Deputy Chief Executive. This demonstrates that property compliance, building safety, and resident safety are recognised as core strategic priorities for WDC.
- 5.1.2. Notwithstanding this progress, it remains a concern that several actions are still outstanding two and a half years after the original Compliance Health Check recommendations were issued. This continues to limit your ability to provide full assurance over the effectiveness of your compliance management.
- 5.1.3. We therefore encourage continued focus on one of the fundamental principles of property compliance: the ability to clearly evidence compliance to demonstrate resident safety. Strengthening this evidential approach will help clarify what is required to conclude each outstanding action and support the provision of more robust assurance going forward.
- 5.1.4. Given that two of the remaining actions are assigned a 'critical' priority rating (data validation and fire safety), you should focus attentions on completing these recommendations as a matter of urgency (we note that there are just three properties outstanding to complete the validation exercise).
- 5.1.5. While we have previously encouraged a realistic and practical approach to setting delivery timescales, it is now appropriate to re-evaluate the reasons for the prolonged delivery of some in progress actions, and to review your plan and timescales for their completion.
- 5.1.6. We recommend this report is shared with the Leadership Team and Board, so members have a clear understanding of the current position and can provide appropriate oversight and support for the completion of the remaining actions.

Appendix 1 – Compliance Roadmap With Comments