Warwick District Council – Compliance Roadmap Action Plan:

Action Plan Leads	
Cabinet:	Cllr Paul Wightman, Cabinet Member for Housing
Executive Team:	Chris Elliott, CEO & Darren Knight, Deputy CEO
Strategy Lead:	Steve Partner, Head of Neighbourhood and Assets

External assurance:	Letrice Thomas, Pennington Choices

Priority*	
Critical:	Immediate
High:	Within three months
Medium:	Within six months

Status Key			
Off target	Initiated	Completed	Not commenced

Initials:	Name:	Job Title:
CE	Chris Elliot	Chief Executive
DK	Darren Knight	Deputy Chief Executive
SP	Steve Partner	Head of Neighbourhood and Assets
LB	Lisa Barker	Head of Housing Health and Communities
FJQ	Francis Quinn	Health and Safety and Premises Manager
SH	Simon Hodges	Compliance Manager
AR	Andrew Rollins	Head of Finance
GR	Graham Leach	Head of Governance and Monitoring Officer
RB	Richard Barr	Audit and Risk Manager
TD	Tracy Dolphin	Head of People and Communications
CR	Caroline Russell	Landlord Services Manager
PS	Paul Smith	Business Development and Change Manger
DL	Dominic Linton	Business Development and Change Officer
AM	Andy Moran	Principal Building Surveyor (Fire Safety and Climate Change)
AMo	Anna Monkton	Business Support Manager
NC	Nicki Curwood	Marketing and Communications Manager
RR	Rebecca Reading	Strategic Procurement and Creditors Manager

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Appendix 2

KW	Karen Weatherburn	Learning and Development Officer

Report ref no.	Recommendation	Progress	Resources	Lead Officer	Support Officers	Priority	Target comp date	Status
3.2	**Recommendation 1 – Governance and assurance structure:** Establish an appropriate governance and assurance structure to provide effective oversight of compliance and building safety and clarify responsibilities, accountabilities, and formal approval processes.	• Draft governance and assurance structure created and checked with Pennington. • Terms of reference drafted. • Governance structure and ToR approved. • Recruitment underway to appoint a scrutiny committee support officer. • Specialist Cllr scrutiny training planned for December 2023 to support their role in the Governance framework. • First meeting of the Compliance Board planned for December. • External compliance training being arranged for Audit & Scrutiny members before Christmas. • CEO of Association of Retained Council Housing agreed to join compliance board. • Tenant representative confirmed.	• Administrative support for diary management and meeting minutes and papers. • Additional scrutiny support officer to be funded. • External training for Cllr scrutiny members - £975.00 • Pennington Consultants	DK	GL LB	**Critical**	09.11.23	

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3.2	**Recommendation 2 – Compliance awareness session:** 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.	• External trainer has submitted training course proposal. • Senior Officer and Cabinet delegates identified. • Course outline approved. • Purchase order raised. • Course booked for SLT Cabinet on the **29.11.2023 - completed.** • Course planned before Christmas for the Asset Compliance Committee booked for the **21.12.2023**	• Pennington Consultants	**DK**	SP GL	**High**	**22.12.23**	■
3.2	**Recommendation 3 – Compliance and building safety strategy:** 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:	• Pennington Consultants quoted to assist and advise in policy development. • Fire Safety policy / strategy out for consultation.	• Pennington Consultants	**SP**	LB FQ SH CR	**High**	**30/06/24**	■

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	• Legal and regulatory obligations, now and in the future • Your overall objectives for property compliance, building safety and resident safety. • What actions need to be delivered to achieve these objectives. • How you will demonstrate that these actions are deliverable.								
3.2	**Recommendation 4 – Fire Safety Group:** • Broaden the scope of the existing Fire Safety Group to have full oversight of all legal fire and building safety requirements. • Develop a term 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.	• Terms of Reference Drafted. • Draft TOR circulated for comment. • Discussed and agreed TOR at Fire Safety Group 19/10/23.		LB	FJQ	**High**	09.11.23	
3.3				SH	PS	**Critical**	30.06.24	

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						DL			
	Recommendation 5 – Data Validation: Undertake a data validation exercise that is coordinated across all compliance areas to gain assurance around all property assets, compliance programmes and records: 1. Download the full asset list from your parent management system into a data validation workbook. 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. 3. Record evidence-based reasons for properties not required on each programme. 4. Validate a sample of compliance records to ensure they are valid and in date.	• 17/10 Meeting held with PS, DL and wider team to commence discussions on the specification of primary data search mechanism(s). • Full Asset List already available and v1.0 of a 'Validation workbook' has been created. • Order raised with Pennington Choices	• Pennington Consultants						

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	5. Quantify compliance gaps to develop a plan to resolve them.								
	6. Validation should include categorising buildings (11+ and 18m+) and the smoke and carbon monoxide alarm programmes.								
	7. Follow the above exercise with regular, documented validation to ensure asset and compliance data remains up to date.								
3.3	**Recommendation 6 – Active H configuration:** Configure Active H to record the correct compliance programme data and provide appropriate reporting outputs.	• 17/10 Meeting held with PS, DL and wider team to commence discussions on the specification of primary data search mechanism(s).		**SH**	PS DL	**High**	**30.06.24**		
3.3	**Recommendation 7 – Managing follow-up actions:** Implement a process for tracking all actions deriving from each of your compliance programmes. You should consider and	• Existing FRA actions now all in centralised spreadsheet. Ability to prioritise in relation to property, severity, department etc. Completed actions to be updated in spreadsheet, with completion date added.		**SH**	AM	**High**	**31.10.24**		

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	agree: the platform for recording actions, where the process can be automated, allocation, quality checks, evidence of completion and reporting.	Comments to be added to outstanding actions. • Work already undertaken with ICT on development of the Contractor Web Portal over the last 12 months which supports this Recommendation. The work done to-date is currently in TEST pending Acceptance Testing.						
3.3	**Recommendation 8 – Changes to asset and programme lists:** 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			SH	AM PS	**Medium**	**31.03.24**	

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	correct compliance programme.							
3.4	**Recommendation 9 – Operational lead for fire safety:** 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).	• Meeting with S151 regarding funding for additional resources • Market testing for suitable candidates • JD / Person specification being developed. • Initial screening interviews held.	Will require additional budgetary provision and highlighted with S151 officer	**SP**	TD FQ	**Critical**	**31/12/23**	
3.4	**Recommendation 10 – Operational lead for building safety:** Appoint an operational lead for building safety to support the strategic lead (Head of Neighbourhood and Assets) and take overall operational responsibility for day-to-day management of building safety risks in higher-risk buildings, and	• Meeting with S151 regarding funding for additional resources • JD / Person specification being developed. • Market testing for suitable candidates • Initial screening interviews held	Will require additional budgetary provision and highlighted with S151 officer	**SP**	TD FQ	**Critical**	**30/11/23**	

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	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								
3.5	**Recommendation 11 – Compliance reporting:** 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. 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. Data should be driven from Active H and performance	• PS has been tasked with leading on establishing a live reporting environment e.g., get to a using Power BI • Gas safety daily reporting completed. Work commenced on reporting for Lift safety and fire safety. • SH 08/11 - Variations of this exist already and co-dependant work has already started as part of Recommendation 3.3.x		**SH**	AM PS DL	**High**	**31.10.24** Major work will be done in three months – the live/instant reporting will take longer.	

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	presented in an easy to read format. Use our compliance scorecard examples as a benchmark for current best practice.							
3.6	**Recommendation 12 – Policies:** The Leadership Team and technical team members should attend a facilitated session to agree policy principles (obligations, inspection programmes, follow-up works, 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).			SP	LB CR SH PS	**High**	**31/01/24**	
3.6	**Recommendation 13 – Process maps & procedures:**		• Pennington Consultants quoted for assistance	SP	SH AM CR	**Medium**	**30/09/24**	

	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.								
3.7	**Recommendation 14 – Competence & Training matrix:** 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.				SP	KW FJQ TD	High	31/03/24	

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	Any gaps should be addressed by undertaking appropriate qualifications within appropriate timeframes.								
3.7	**Recommendation 15 – Compliance and building safety refresher training:** 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.			**SH**	KW	**Medium**	30.06.24	
3.8	**Recommendation 16 – Contract management:** 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	• Meeting booked with AM and Compliance Team Leader (wk. commencing 13/11) to examine existing meeting format/agendas, etc and establish standard templates for Contract Management recommendations going forward.			**SH**	AM	**Medium**	31.03.24	

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	changes to staff, and ensure evidence is provided. 2. Undertake regular, documented contractor competency checks (at least annually). 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.							
3.9	**Recommendation 17 – Internal audit:** 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. 2. Ensure that your internal auditor has the required levels of competence and knowledge of legal,			**AR**	RB	**Medium**	**30.01.24**	

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		regulatory and best practice compliance obligations to provide a meaningful assurance report with appropriate assurance ratings.							
3.9	**Recommendation 18 – External audit:** • 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. • 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.			**SP**	RB RR SH	**High**	**31/05/24**	

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3.10	**Recommendation 19 – resident communications:** 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, were English is not their first language, or those with disabilities and impairments.	• Initial activities to date: o New webpage for further information and FAQs o Tenant Building Safety Survey for end of November 2023 o Tenant newsletter December 2023 • Campaign scoping underway.		**NC**	LB SH AM CR	**Medium**	**30.06.24**	■
4.1	**Recommendation 20 – Gas and heating safety:**	• SH 08/11 - Meeting on 10/10 to review existing HPM		**SH**	CR PS/DL	**High**	**30.06.24**	■

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	1. Implement checks to ensure tenants are receiving LGSRs within 28 days of the service. 2. Display LGSRs in communal areas of buildings served by a communal boiler. 3. Ensure you can demonstrate compliance with the Smoke and Carbon Monoxide (Amendment) Regulations 2022 4. Ensure the following items are addressed as part of policy, procedure and process map development: • End-to-end access process. • Managing remedial actions. • New tenant checks to ensure they arrange turn on and test visits. • Checks on properties that are not currently connected to the gas mains networks.	process, existing policy and procedure. • 2009 policy and procedure identified, walk through of existing HPM (ActiveH Case Processing) for Gas Safety No Access. • Further meeting scheduled for 14/11 to identify required updates to Process Mapping						

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	• Compliance with Dangerous Substances and Explosive Atmosphere Regulations 2002 through risk assessments (where necessary).							
4.2	**Recommendation 21 – Electrical safety:** 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. 2. Ensure the following items are addressed as part of policy, procedure and process map development: • End-to-end access process. Managing remedial actions. • Ensuring Active H captures reinspection dates less than five years (as recommended by the competent person)			**SH**	**CR** PS/DL	**High**	**31.10.24**	

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| 4.3 | **Recommendation 22 – Fire safety:**

1. Complete all outstanding fire risk assessments (FRAs) in line with the fire risk assessor's recommended reassessment frequency.

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 (postinspections, certification, before/after photographs, etc.).

3. Ensure you can demonstrate compliance with the Fire Safety (England) Regulations 2022, including undertaking fire door checks. | • Person engaged to carry out fire door checks
• Fire Safety team undergoing review of FRA and appropriate actions
• Housing site staff carry out daily inspections
• Point 2 has been completed | | SP | SH
AM
CR
LB
PS
FJQ | **Critical** | **31/01/24** | |

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	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. 5. Ensure the following items are addressed as part of policy, procedure and process map development: • Management and reporting of periodic checks on fire safety equipment. • Housing management issues that impact on fire safety, such as hoarding and allocations. • Person centred fire risk assessments. Incident management, internal investigation and responding to property fires and near misses. Liaison with the local fire and rescue service								
4.4	**Recommendation 23 – Asbestos Management:**			**SH**	CR PS/DL FJQ	**Medium**	**31.10.24**	

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	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. 2. Ensure the following items are addressed as part of policy, procedure and process map development: • Establish Appointed Person and Deputy Appointed Person roles (ensuring they are appropriately qualified). • Develop a fit for purpose asbestos management plan. • Use of priority assessment scores and material assessment scores to determine the risk of an asbestos item.								
4.5	**Recommendation 24 – Water Hygiene:**			**SH**	CR PS/DL	**Medium**	**30.06.2024**		

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	1. Undertake all outstanding legionella risk assessments. 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. 3. Ensure the following items are addressed as part of policy, procedure and process map development: • Establish Responsible Person and Deputy Responsible Person roles (ensuring they are appropriately qualified). • Managing water hygiene in domestic properties – adopting a practical and proportionate approach. • Managing water hygiene void properties (considering the void standard, removing high risk installations, system							

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	flushing, replacing shower heads, etc.)							■
4.6	**Recommendation 25 – Lift Safety:** 1. Review all thorough examination remedial actions and ensure they are completed. 2. Ensure the following items are addressed as part of policy, procedure and process map development: • Establish a formal process for notifying the compliance team of new domestic lifts installations. • Managing remedial action	• 08.11 Ongoing dialogue with Contractor undertaking LOLER Inspections. • 08.11 Initial data extracted from Contractor web portal.		**SH**	None	**High**	**31.03.24**	■
5.2	**Recommendation 1 – Building registration:** Any higher-risk buildings identified following completion of the wider data validation exercise should be registered with the Building Safety Regulator	• Seven higher-risk buildings registered with the BSR. • An identified outcome of the data validation process.		**SP**	**PS SH**	**Critical**	**31.03.24**	■

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5.2	Recommendation 2 – Building safety cases and reports: 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. 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.	• Pennington commissioned to prepare draft building safety cases based on information being supplied. • Daily safety inspections undertaken by housing teams on site	• Pennington Consultants	SP	LB CR AM	High	31.03.24	
5.2	Recommendation 3 – Golden thread: Document the approach and commitment to delivering golden thread principles for all higher-risk buildings. This should include what information will be held,			SP	LB	High	31.03.24	

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	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.							
5.2	**Recommendation 4 – Mandatory occurrence reporting:** Develop a mandatory occurrence reporting procedure that captures the principles of reporting and recording safety occurrences as intended by the Act.	• Work with AssessNet to add pilot to existing system- initial idea completed 10.10.23. Meeting externally 2.11.23 • Follow up meeting booked for 17.11.23 • External focus group to commence 01.24	• Pennington Consultants quoted at £2,145.00	**FJQ**	N/A	**High**	**31.07.24**	
5.2	**Recommendation 5 – Residents' engagement strategies:** Develop building specific residents' engagement strategies for your higher-			**SP**	NC CR LB	**High**	**March 2024**	

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		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.							
5.2	**Recommendation 6 – Complaints procedure:** 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).	• Draft policy out for consultation with senior officer • Recruitment commenced for a corporate complaints manager			**GL**	LB AMo	**High**	**March 2024**	
5.2	**Recommendation 7 – Measuring performance:**				**SH**	AM PS	**Medium**	**30.04.24**	

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	Develop performance measures and assurance reporting, in line with the above, to enable effective oversight to ensure building safety obligations are being achieved.							

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