



Warwick District Council

Property Compliance & Building Safety Strategy

2024 - 2027

Owner	Steve Partner – Head of Neighbourhood & Assets
Directorate	Neighbourhood & Assets
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Equality impact assessment	An EIA has been undertaken and no issues have been found
Approved by	Asset Compliance Committee
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Strategic Lead Steve Partner – Head of Neighbourhood & Assets

Sign _____

Date _____

Governance Lead Paul Wightman - Portfolio Holder for Housing

Sign _____

Date _____

Document Version Control

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1.0	19.04.2024	WDC and Pennington Choices	Final version provided by Pennington for approval	Pennington Choices
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1. Introduction

Warwick District Council (Warwick DC) provides a wide range of local services, including the provision of social housing, maintaining approximately 5,644 domestic properties and 272 communal blocks and schemes. These properties are subject to landlord property compliance arrangements to ensure they are safe places to live (and work).

Property compliance and building safety is ultimately about risk management and keeping people safe. We do this by meeting our legal and regulatory obligations, through delivery of well managed programmes of testing, servicing, and inspections within the homes we own and manage, and carrying out remedial actions when required. Success relies on robust data management, performance management and assurance reporting, and employing competent individuals and suppliers.

The Grenfell Tower Fire in 2017 was a catalyst for change within the housing sector and a tragic event that we continue to learn from, to ensure that as far possible, no similar event occurs within our social housing portfolio. Since 2017, we have been on an improvement journey to develop a greater understanding of our buildings, seeking guidance from competent third parties, and listening to our residents.

Following an external assurance review of property compliance and building safety in October 2023, which provided a comprehensive improvement action plan, we have been strengthening our arrangements to ensure we continue to meet our overall strategic

priorities and legislative obligations. This strategy demonstrates how we continue to incorporate this learning as set out within our four key strategy objectives (see Section 3 for details).

An effective Property Compliance & Building Safety Strategy is important to support our organisational vision as set out within our Corporate Strategy 2030, which is *'to make Warwick District a great place to live, work and visit by improving lives and our environment.'* It supports, and aligns with, our Asset Management Strategy and forms part of our wider organisational commitment to driving a health and safety culture among our employees and contractors (as detailed within our Health and Safety Policy).

Our vision is to make Warwick District a great place to live, work and visit by improving lives and our environment.

The scope of this strategy includes Warwick DC assets which are assigned to the housing revenue account (primarily domestic properties, communal blocks and schemes). The strategy does not cover commercial or public buildings. The strategy primarily includes for the big seven areas of compliance: gas, electric, fire, asbestos, water, lifts and building safety.

Any properties that are owned by Warwick DC but managed by other organisations are included in our compliance programmes and treated in the same manner. We adopt a zero-tolerance approach to risk in these arrangements.

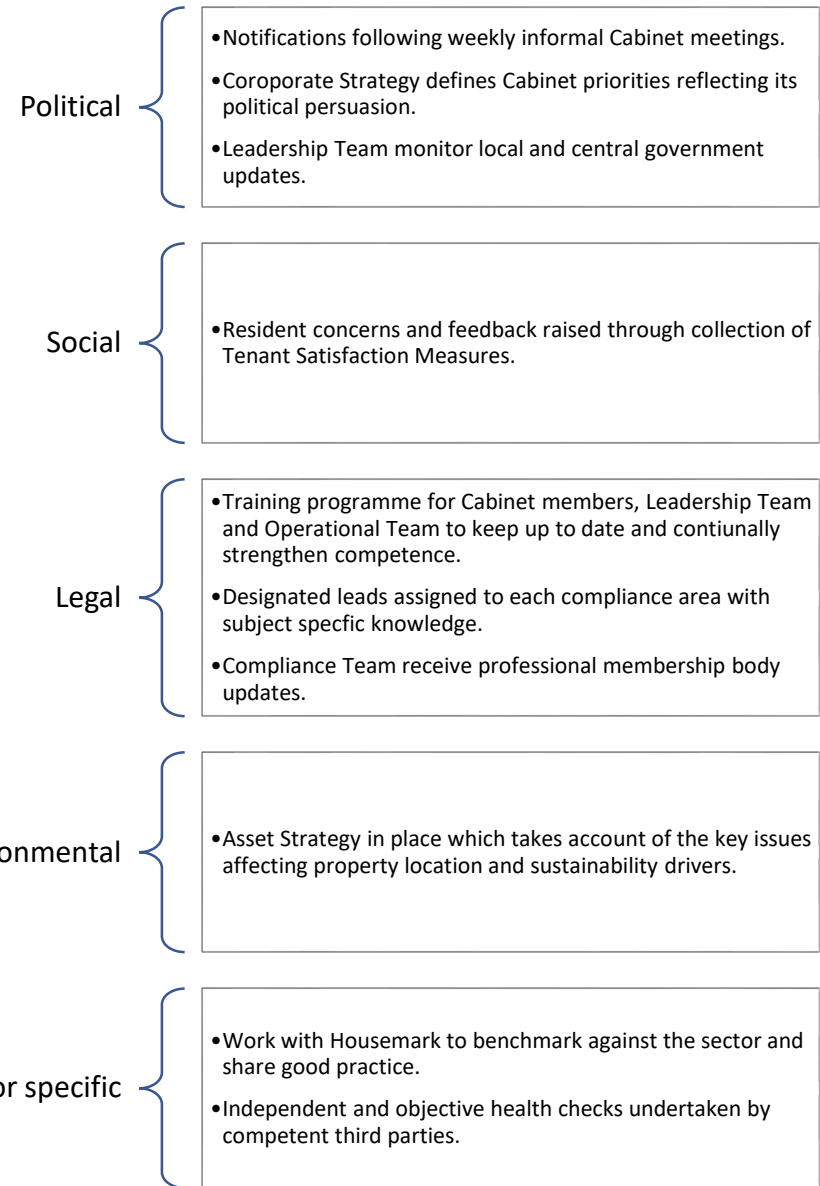
2. Operating landscape

Warwick DC must meet a range of legal and regulatory duties in respect of the safety and quality of our homes. The legal landscape surrounding property compliance and building safety has changed considerably over the past five years, with the introduction of significant pieces of legislation, including the Fire Safety (England) Regulations 2022, Building Safety Act 2022 and Social Housing (Regulation) Act 2023.

We must ensure we stay up to date with the latest obligations to ensure we can meet our duties. Failure to comply could mean we may be subject to legal action by the Health and Safety Executive, by our tenants or enforcement by the Building Safety Regulator. The Regulator of Social Housing can also act against us for failing to comply with regulatory duties. In addition, we must provide services to residents in a manner which meets the expectation of the Housing Ombudsman Service.

The diagram to the right demonstrates how we stay up to date with the latest changes in the operating environment that have an impact on property compliance and building safety.

Warwick District Council has an organisational risk register that can be found by following this link, [SBRR - December 2023.pdf](#). This is reviewed quarterly by Senior Leadership Team (SLT) and the Overview and Scrutiny Committee. Once the quarterly review has taken place, it is then approved by Cabinet. Council owned property, both buildings and equipment, are taken into consideration in the organisational risk register (specifically found at Risk 14).



3. Objectives

On 19 March 2024, the below employees attended a facilitated workshop session with external consultant Pennington Choices.

- Steve Partner – Head of Neighbourhood & Assets
- Jen Morrison – Project Manager
- Richard Barratt – Building Safety Lead
- Andy Moran – Principal Building Surveyor – Fire Safety & Climate Change
- Caroline Russell – Landlord Services & Community Manager
- Simon Hodges – Compliance Manager
- Peter Colley – Fire Safety Lead

During the session, we agreed on four key objectives for this strategy outlined below. The action plan at Appendix 1 describes the key activities required to deliver our objectives over the next three years. The strategy and objectives will be reviewed periodically to ensure it remains an accurate reflection of what we would like to achieve. They will also be reviewed if there is a change to relevant health and safety legislation.

<p>OBJECTIVE 1</p> <p>DEVELOP PROPERTY COMPLIANCE FRAMEWORK</p>	<p>Key results</p> <p>We will develop our property compliance and building safety operational delivery framework by completing the Compliance and Building Safety Action Plan by October 2024.</p> <p>This will ensure we meet all legal compliance obligations for the big seven areas.</p>	<p>OBJECTIVE 2</p> <p>STRENGTHEN OUR RESIDENT ENGAGEMENT APPROACH</p>	<p>Key results</p> <p>We will document a formal communications plan to outline how and when we will share resident safety information for all residential properties by December 2026. This will be in addition to the information we legally need to provide under fire and building safety legislation.</p> <p>This will ensure residents know and understand risks within their homes and can notify us of any concerns.</p>
<p>OBJECTIVE 3</p> <p>MEET ALL REQUIREMENTS OF THE NEW BUILDING SAFETY REGIME</p>	<p>Key results</p> <p>We will create the required documents, introduce operational procedures, and deliver cladding remediation (and other relevant building safety work) to meet all our Principal Accountable Person duties, for our six higher-risk buildings, by December 2026.</p> <p>This will ensure we meet our legal duties as set out in the Building Safety Act 2022.</p>	<p>OBJECTIVE 4</p> <p>EMBED NEW PROPERTY COMPLIANCE FRAMEWORK POST ACTION PLAN COMPLETION</p>	<p>Key results</p> <p>After completing the Compliance and Building Safety Action Plan, we will establish a regular scrutiny meeting/panel to monitor our property compliance approach, for the full period of this strategy.</p> <p>This will provide assurance that the actions we have taken, and principles of the action plan, are embedded within the organisation and will demonstrate continuous improvement.</p>

4. Regulator of Social Housing (RSH)

The Social Housing (Regulation) Act 2023 was approved by Parliament and received Royal Assent on 20 July 2023. It aims to improve social housing quality by delivering ‘transformational change’ for social housing tenants. This enables the Regulator of Social Housing (RSH) to implement a new, proactive consumer regulation regime that will enhance sector standards and ensure tenants’ needs are prioritised.

There are a new set of strengthened consumer standards that Warwick DC must comply with. The new Safety and Quality Standard, which will be in effect from April 2024, requires landlords to provide safe and good-quality homes for their tenants, along with good-quality landlord services.

As part of this new, proactive regime, the RSH will undertake a programme of inspections to review how landlords are performing against the standards. They will conclude the level of assurance they have about the landlord’s delivery of the outcomes of their standards. Where landlords do not provide the evidence that gives them assurance, this will be reflected and published in regulatory judgements and grades.

If the RSH believes that improvements are required, they can use a range of tools for intervention, such as requiring landlords to submit a performance improvement plan or using other enforcement powers. Such action would result in ongoing engagement and scrutiny from the RSH until they are satisfied the

issues have been addressed and measures and controls in place to prevent a recurrence.

The RSH will also gather information in between planned inspections, through the tenant satisfaction measures, quarterly survey or other engagement.

Based on this, we must always ensure compliance with the standards. For the elements relating to property compliance and building safety, we can achieve this by implementing all four key objectives (set out in Section 3).

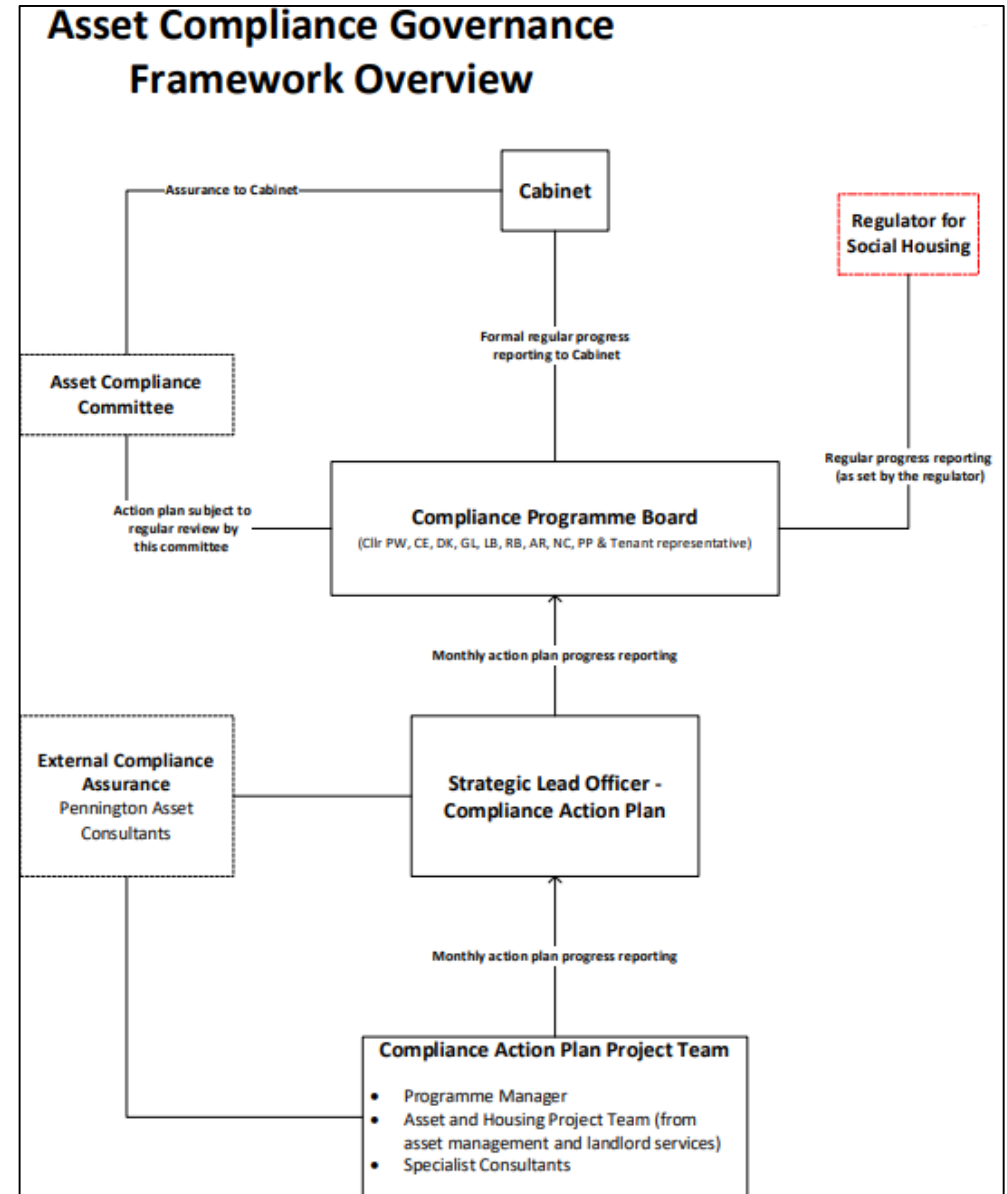


5. Governance & strategic approach

Our governance structure, set out in the image to the right, supports scrutiny and oversight of property compliance. The Asset Compliance Committee and Cabinet receive regular performance reporting that sets out our levels of legal compliance.

Our Cabinet has overall governance accountability to ensure full compliance with legislation and regulatory standards, and the Head of Neighbourhood & Assets has overall strategic accountability for property compliance and building safety.

We provide regular awareness training on property health and safety compliance to our Cabinet members and leadership team to inform strategic decision making, including how to provide effective challenge, scrutiny, and oversight.



6. Three lines of defence

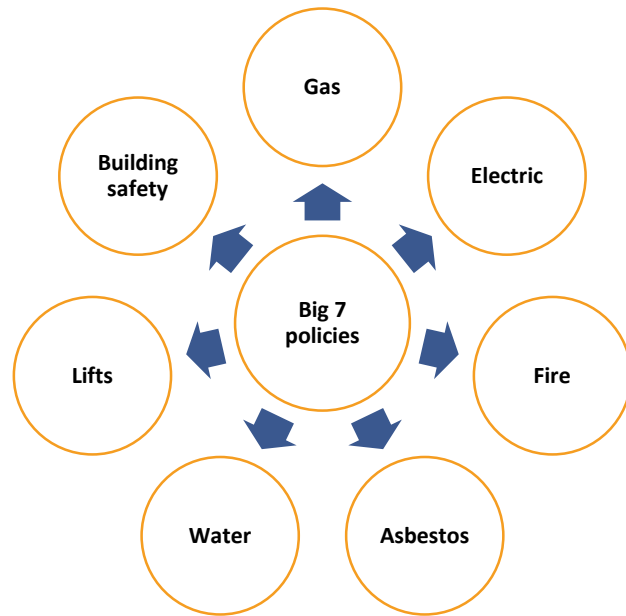
This strategy is modelled around the 'three lines of defence' model which provides an effective framework to provide assurance. The following sections of the strategy show how we put this into effect.



7. First line of defence: policies, processes, procedures

We have detailed policy documents for the following 'big seven' risk areas of compliance that set out **what** Warwick DC will do to meet our compliance obligations. The policies also set out the key strategic decisions we have made that have significant risk and cost implications associated with them.

The policies are approved by the Asset Compliance Committee to ensure they have been considered appropriately and will be reviewed at least every two years, or sooner if legislative requirements change.



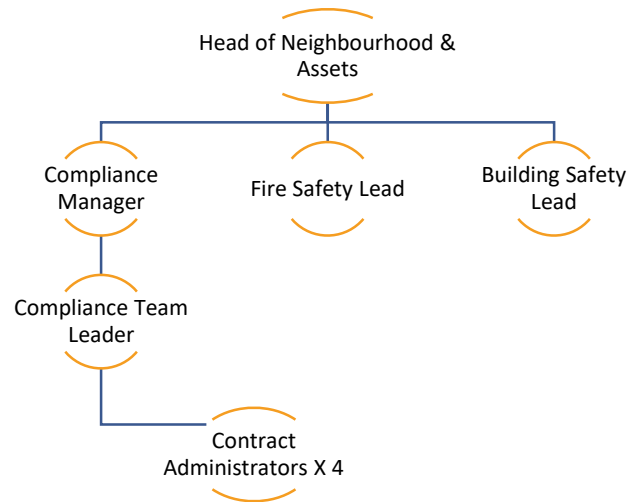
The policies are supported by operational process maps and procedure documents. These outline **how** Warwick DC delivers our end-to-end compliance processes including milestones, timescales, interdependencies, roles and responsibilities. Procedures also include contract delivery and confirm how operational performance and compliance will be monitored. The policies and procedures are important documents that support joined up and more efficient ways of working.

Policy templates include the following information:

- ✓ Objectives
- ✓ Roles and responsibilities
- ✓ Legislation, guidance, and regulatory standards
- ✓ Obligations
- ✓ Statement of intent
- ✓ Programmes
- ✓ Follow-up work
- ✓ Data and records
- ✓ Resident engagement
- ✓ Competent persons
- ✓ Training
- ✓ Performance reporting
- ✓ Quality assurance
- ✓ Significant non-compliance and escalation

8. First line of defence: operational structure, training & competence

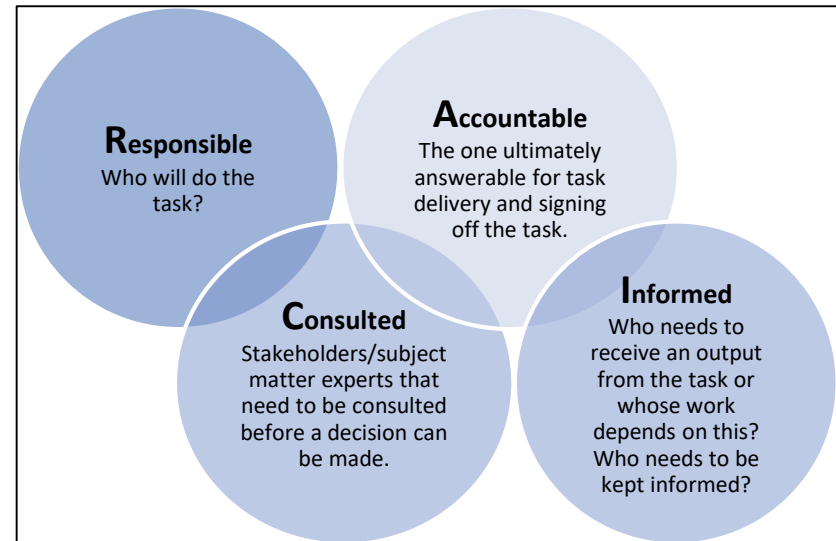
We have provided additional investment and resources to support property compliance management. Our operational structure for compliance delivery is below:



Our policies detail the qualifications, skills, and competencies we require individuals to hold for each area of compliance. We support Warwick DC staff to gain relevant compliance management qualifications as required. We will regularly review training requirements across all areas of compliance.

We are also supported by a panel of competent, qualified, technical experts and contractors who provide external assurance and technical advice, deliver compliance inspections, and remedial works.

We will adopt the RACI model to provide transparency and clarity around roles and responsibilities across all teams and individuals involved in property compliance:



Health and Safety Lead – As required under the Social Housing (Regulation) Act 2023 we have appointed the Head of Neighbourhood & Assets as our Health and Safety Lead to:

1. Monitor our compliance with health and safety requirements.
2. Assess risks of failure to comply with health and safety requirements.
3. Notify Warwick DC Councillors of the risks assessed and any material failures to comply with health and safety requirements.
4. Provide advice to Councillors as to how Warwick DC should address associated risks and failures.

9. Second line of defence: contract management

We proactively manage all contractors through a framework of structured formal contractor meetings and arrangements across all compliance programmes. We provide regular contract management training for individuals managing and dealing with compliance and building safety contracts.

All contracts are formally procured, with support from third-party technical experts where required, to ensure service specifications are robust. Plus, annual contractor checks take place to review insurance, qualifications, and accreditations.

10. Second line of defence: data, systems and reporting

Successful data management supports our assurance and delivery of property compliance. We must understand how many properties we own and manage, and of those, which compliance obligations must be met.

Active H holds all asset and property compliance programme data and is used to manage actions raised from inspections. The document management system on our internal server holds surveys and assessment records.

Over the next six - 12 months we will be transitioning from a server-based application of Active H to a web system. We are also

in the process of reviewing Active H's functionality to determine how it can be best used for recording, managing and delivery of compliance programmes. We will review and realign our data hierarchy and block structures within Active H to align with compliance obligations.

We will undertake a monthly data reconciliation/ validation exercise across all assets and all compliance programmes to ensure that records are accurate and up to date, as well as confirming evidence for assets not on compliance programmes.

Reporting: As a minimum we report the following key performance indicators for each area of property compliance - monthly to the Asset Compliance Committee:

- Number of properties - domestic, communal blocks and others (number).
- Properties not on programme (number).
- Properties with valid and in date inspection records (number and percentage).
- Properties without valid and in date inspection records (number and percentage).
- Properties due for inspection (number).
- Follow-up works/ actions arising from programmes split by priority and whether they are overdue or not (number).
- Explanation of corrective action required and progress with completion of follow-up works (narrative).

11. Third line of defence: quality assurance

We are in the process of implementing programmes of external quality assurance technical audits (field and desktop) across all compliance areas on a sample basis. Our approach to each compliance area is set out within individual policies.

We are reviewing our internal audit function with the aim of developing a programme that includes all seven compliance areas over a two-year period. We will ensure that the internal auditors are competent to undertake this task.

We will commission an independent, external 'health check' of property compliance every two years. The purpose will be to test compliance with legal and regulatory requirements and to identify any non-compliance issues for correction collectively across all areas.

12. Resident communications

We will develop a resident safety communications plan, in line with key objective number two, to strengthen our approach to resident health and safety. We will proactively promote the work we do to keep our residents safe and develop a plan that raises general awareness about key safety issues as residents are often best placed to mitigate risks themselves.

13. Supporting documents

- Corporate Plan
- Asset Strategy
- Individual compliance policies x 7
- Health and Safety Policy
- Compliance Health Check Report (October 2023)
- Compliance Health Check Action Plan (October 2023)
- Asset Compliance Committee terms of reference
- Compliance Board terms of reference

Documents in development:

- Resident Safety Communications Plan

14. Appendix 1 - Action Plan

High	Within six months
Medium	Within 12 months
Low	Before the end of the strategy (by Dec 2026)

Objective	Action	Action	By when?	Accountable	Responsible	Priority
1 Develop property compliance framework	1.	Complete all the actions within the compliance and building safety action plan. The action plan includes establishing an effective governance and assurance framework, undertaking a full compliance data validation exercise, and developing compliance policies, procedures and processes. There are a total of 25 actions.	Oct 2024	Steve Partner	Neighbourhood and Assets	High
2 Strengthen our resident engagement approach	2.	Develop a formal communications plan to outline how and when we will share resident safety information for all residential properties. This should include consideration of hard to reach groups, digital applications, seasonal communications and the fire and rescue service. This will be in addition to the information we legally need to provide under fire and building safety legislation.	Dec 2026	Steve Partner	Marketing and Communications	Low
3 Meet all requirements of	3.	Develop six building safety case reports, one for each higher-risk building.	Dec 2024	Steve Partner	Neighbourhood and Assets & Pennington Choices	High

the new building safety regime	4.	Develop a building risk assessment for each higher-risk building.	Dec 2024	Steve Partner	Neighbourhood and Assets	Medium
	5.	Develop a mandatory occurrence reporting procedure.	Jul 2024	Steve Partner	Compliance	High
	6.	Develop six residents' engagement strategies, one for each higher-risk building.	Dec 2024	Steve Partner	Marketing and Communications	High
	7.	Develop a building safety management system document.	Jul 2024	Steve Partner	Building Safety Lead	High
	8.	Establish and document how the golden thread of information will be achieved with ongoing management.	Oct 2024	Steve Partner	Neighbourhood and Assets	High
	9.	Deliver cladding remediation work and other applicable building safety work.	Dec 2026	Steve Partner	Building Safety Lead / Fire Safety Lead	Low
4 Embed new property compliance framework post action plan completion	10.	Establish a regular scrutiny meeting/panel to continually monitor our property compliance and building safety approach after October 2024 when the Compliance and Building Safety Action plan will be completed.	Dec 2026	Steve Partner	Neighbourhood and Assets	Low
	11.	Develop a terms of reference for this group.	Dec 2026	Steve Partner	Neighbourhood and Assets	Low