ICW Consumer Code for Homebuilders

On-Site Audit

19th February 2026

Background information

International Construction Warranties Limited (ICW) was incorporated in 2015. The business provides structural defect warranties for the construction industry. ICW is an appointed representative of ES Risks Ltd which is authorised and regulated by the Financial Conduct Authority. ICW have recently expanded their business to cover the Republic of Ireland.

ICW achieved Stage 2 approval for their Consumer Code in October 2016. Every builder or developer who takes out an ICW structural warranty policy must sign up to the Code. The Code is applicable to all homes where the ICW structural warranty policy was issued on or after 1st October 2015. There are currently 23,438 dwellings covered by the Code.

Audit Process

The focus of the audit was on

- Member Application Process
- New members
- Existing member Inspections/Audits
- Membership Withdrawal and Sanctions for Non-Compliant Member Businesses
- Marketing and Advertising by Member Businesses
- Terms and Conditions and Other Pre-Contractual Information

Member Application Process

A request for cover is received usually via the ICW website. All applications for ICW Warranty cover are entered onto the system and are reviewed by the underwriting team. ICW undertake their ‘know your customer checks’ to establish the risk to the business.

An interim quote is offered, subject to acceptance of Code obligations. There are standard acceptance measures to satisfy the underwriter’s criteria. This includes accounts history, build experience etc to establish the applicants ‘bona fides’.

The underwriting team seek to establish the applicant’s integrity and competence as a builder by validating them via the Federation of Master Builders website.

Financial creditworthiness is also an important part of the application process, anyone who has been bankrupt is unlikely to be accepted. For each new application, the financial due diligence is repeated.

ICW previously used the Smart Search system during the underwriting process, but since the last audit have started to use Credit Safe as they feel this provides a better overview of the applicants.

Credit Safe provide ICW with regular updates highlighting any issues, changes in directors or changes in risk status throughout the relationship with the member. The Credit Safe system also provides updates from the Health and Safety Executive website in relation to it’s enforcement activity.

There have been 11921 applications since the last audit. A sample member application was reviewed during the audit, which showed evidence that the above checks were made.

Best Practice:

ICW continue to invest considerable time and resources to ensure the integrity and competence of their applicants, consequently enhancing consumer protection.

New Members

Builders and/or developers subscribe to the scheme rather than becoming members. It is a condition of getting warranty cover that builders/developers sign up to the Code and ICW requires re-subscription each time the builder/developer requests additional insurance cover. Many developers are repeat business or have been subscribers to other building warranty codes e.g. NHBC.

ICW directly employ a team of 54 surveyors and a number of approved panel surveyors. The surveyors visit each new build site at least seven times and ensures the quality of the build at each stage. These inspections start with an initial overview visit for the surveyor to familiarise themselves with the plans for the build and develop a relationship with the developer. The first visit also confirms the developers understanding of the Code its' benefits and obligations.

Any key issues are identified including any need for training on the Code which would be addressed before any new homes are marketed. The surveyors have a prompt in their reporting systems to ask developers about where they intend to display the ICW & CTSI logos. Developers are reminded again at the last stage of the inspection process of the requirements of the Code.

Existing Member Inspections/Audit

Each build is subject to a rigorous inspection regime by an ICW surveyor (who all have relevant construction qualifications) who visits each site seven times during the project, four times for conversions e.g. office blocks converted to flats, barn conversions. Every unit within each build is inspected. The same surveyor carries out all of the visits throughout the project. The first visit is used to get to know the site manager and understand the development. The Code is mentioned at this first meeting. The surveyor can supply a document 'ICW Consumer Code for New Homes – Overview for Builders and Developers' that gives an overview of the requirements of the Code.

There is a final visit to sign-off the build and enable the new home insurance certificate to be issued. Each surveyor uses an electronic pad to photograph and record key stages of the build. The surveyors have quarterly meetings and an annual conference. When ICW surveyors and staff visit each site they ensure that the mandatory Code literature is available for buyers of properties.

The surveyor's reports cover insulation, drainage, sealing on doors, windows and other openings, health and safety, condition of glazing, testing of smoke alarms, gas appliances etc and list any outstanding actions to be completed before full sign-off. The reports also cover certification from Building Control, Electrical Safety, Gas

Safety, Energy Performance and Engineers Report. Any issues that remain unresolved may be excluded from warranty cover. Any such exclusions are highlighted in the deeds of the property and will be raised by the buyers solicitor in the course of the property purchase.

A digital training package for developers is available alongside the ICW Learning and Development programme which centralises the training process and provide real time and accurate audit data for ICW. This ensures that an open, timely, auditable and effective communication channel is open between ICW and the builders/developers and their staff.

Auditing of developers is carried out by the Consumer Standards Director. In 2025 50 email/letters have been sent to developers to request that they take part in an audit. 30 developers responded and 28 telephone audits were carried out and two on-site audits have taken place. No particular issues were identified.

This is an ongoing process, with approximately 10 emails a month being sent to developers who have had final warranty certificates issued.

Membership Withdrawal & Sanctions for Non-Compliant Member Businesses

ICW Code members do not leave, they remain members of the ICW Structural Warranty Register for the life of the warranty. The warranty lasts 10 years in total and is transferable if the buyer sells the property.

The Code provides for a Disciplinary and Sanctions Panel to be convened if necessary. The panel consists of two insurance professionals, a Trading Standards professional, a Construction Industry Professional, and a Surveyor or Engineer (e.g. RICS). The Disciplinary and Sanctions Panel is empowered to consider any allegations of a breach of the ICW Code.

Any non-compliant business faces a range of sanctions including a requirement to re-train, a formal warning or a refusal by ICW to issue the final insurance certificate. Ultimately suspension, termination or legal action against the builder is considered.

Marketing and Advertising by Member Businesses

ICW members are provided with copies of the 'ICW Consumer Code for New Homes' and a practical guide called 'Getting to Know Your New Home' to distribute to home buyers. These documents are clearly marked with the ICW & CTSI Approved Code logo. The use of logos in marketing material is now part of the surveyors first on site visit.

The use of the ICW logo in sales offices is checked in the audits by the Consumer Standards Director.

Terms and Conditions and other Pre-Contractual Information

The Code requires that terms and conditions and any pre-contractual information be supplied for assessment. These are reviewed by ICW and any issues addressed with the builder/developer.

To date no examples of non-compliance have been identified.

Customer Service Provisions

ICW have developed and rolled out a training programme in relation to the content and requirements of the Consumer Code for all ICW staff and ICW developers. A pool of online training materials is available for developers.

Consumer Complaints Process

ICW use a complaint flowchart. To in 2025, 200 complaints were received. The main areas for complaints are snagging and deposits. A ‘snag’ is a small defect or issue that remains outstanding in a new property after building work has been completed. ICW have recently implemented a new snagging list. The builder/developer is responsible for snagging for the first two years after practical completion.

A Claims Team has been established under the control of the Claims Manager. The team take all complaints & enquiries and steer homeowners in the right direction for how to best resolve their issue. Complaints and warranty claims can be logged on the ICW Website and will be responded to within 48 hours. The team follow a policy of ensuring that every complaint is touched at least every 30 days to ensure they are efficiently resolved.

ICW use CEDR (Centre for Effective Dispute Resolution) for ADR services. There were 37 cases referred to CEDR in 2025. Of which 31 were found in favour of the home-owner, 3 were resolved with remedial work carried out and the remaining 2 cases the builder/developer had gone into liquidation.

The remaining 26 cases resulted in awards totalling £269,961.56 and 16 were paid out. The outstanding 10 were subject to sanctions within the ICW code, no members are currently in the disciplinary process.

Complaints received in 2025 - **200**

Type of Complaint	Total No	Stage 1	Stage 2
Snagging	197	187	10
Pre-Sale/Reservation Agreement	3	3	0

Stage 1 - Resolved prior to ADR
Stage 2 - ICW refer case for ADR

Customer Satisfaction and Feedback

ICW surveyors visit each site to ensure that the mandatory literature is available for buyers of properties. On site surveys are conducted for compliance with membership rules and promotion of the Code. All members were found to be in possession of the ICW literature required by the Code.

A process was launched in 2023 where a link/QR code is shown on the Change of Details form. This is supplied to the home buyer with the ICW warranty certificate and is completed by the home-owner upon purchase of the property. This will take them to a SurveyMonkey survey. The Survey results are evaluated on an ongoing basis with follow up and action taken on any feedback received.

Conclusion

The code is well written, comprehensive and fully complies with the requirements of the CCAS Consumer Codes Approval Scheme.

ICW are considering more closely aligning their Code to the CCNH & CCHB Codes.