



Building Safety Framework

Approval date	8 September 2025
Approval Level	Asset Investment Committee (AIC)
Review Period	2 years
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Responsible Director	Executive Director – Property and Development

Version Control

Version Ref	Author	Date
V0.1	Christine Turner for BSSG consultation	19 February 2025
V0.2	Christine Turner – following Building Safety Act audit by Pennington Choices	30 June 2025
V1	Christine Turner – following BSSG further consultation for Exec Approval	August 2025
V1.1	Christine Turner – following Exec consultation for recommendation to AIC	September 2025

Framework Checklist

Is Customer engagement required?	Not specifically for this Framework – but all underpinning policies with direct impacts have customer engagement considerations – in relation to specific Building Safety Act requirements, direct resident engagement activities are undertaken
Does this Framework require input or validation from external or legal experts?	Included by Pennington Choices as part of the Building Safety Gap Analysis Audit April 2025 with advice given on providing assurance in key areas for Building Safety Act areas
Is an Equality Impact Assessment (EIA) required?	Not for this Framework but individual policies underpinning this will need this consideration because of the impacts of the operational activities
Is a Data Protection Impact Assessment (DPIA) Required?	No
Is the Framework compliant with relevant legislation and regulatory requirements?	Yes
Has the Policy Development Guide been followed?	Yes – follows format with reference to the underpinning policies

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1.0 Introduction and Scope

1.1 Introduction

This Building Safety Framework (referred to as the/this “Framework”) outlines Wandle’s overarching approach for managing building safety activities across Wandle owned or leased properties. It supports the drive to move away from just “compliance” in individual building safety areas to a more holistic, joined up “building safety” approach.

This Framework has been developed in line with our values:

- Think customer – resident safety in their homes
- Build relationships – with all stakeholders in the delivery of building safety outcomes
- Work together – cross-team working to achieve joined up building safety outcomes
- Aim high – achieve building safety - not just minimum building compliance
- Own it – outcome driven, not just focussed on activity outputs

It ensures that actions we undertake will be underpinned by our vision of:

“Homes to be proud of and services you can trust”

This Framework has also been developed in line with our:

- Our Corporate Strategy aim providing the right homes that are safe, secure, and sustainable.
- Asset Management Strategy – with an *“Operational Foundation”* to provide safe, secure, and compliant homes

Underpinning this Framework are the performance management and reporting arrangements to ensure the Corporate Strategy enabling objective, *“Strong governance and financial resilience,”* is met regarding building safety.

1.2 Framework Statement

The Building Safety Framework’s overarching strategic aim is to ensure all areas of building safety are identified and management arrangements are in place in line with regulatory requirements for compliance and Wandle’s objectives for customer safety, including safe, secure and decent homes for residents.

The Framework establishes a Building Safety Management System (BSMS) that provides a systematic approach to managing building safety compliance. These are applied through the individual building safety policies for those areas shown in Section 1.4 (Scope of Framework).

The Framework also identifies those building safety areas that do not have specific duty holder regulatory requirements and outlines operational arrangements provided to help ensure the holistic approach to building safety.

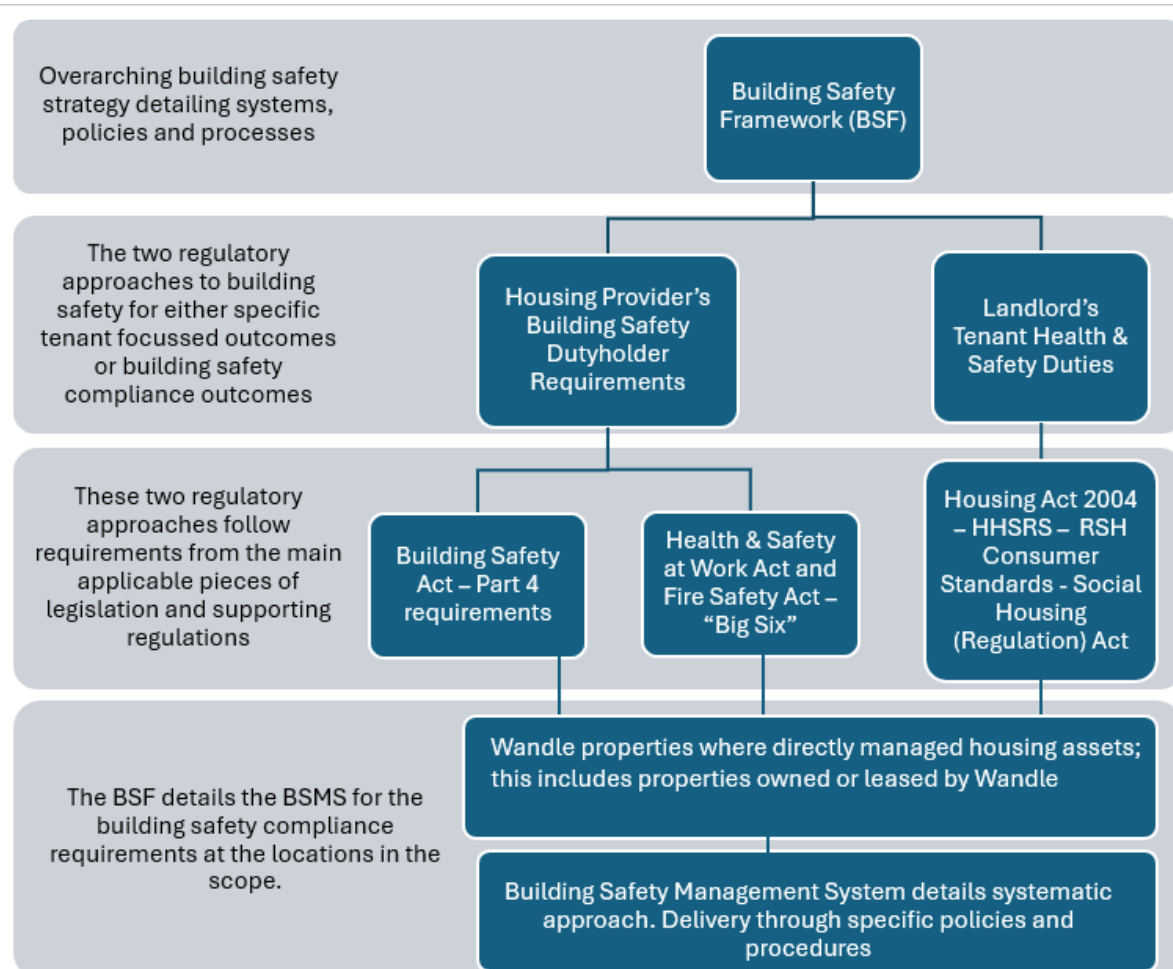
1.3 Framework Objectives

- Introduces a Building Safety Management System that provides the holistic approach for building safety with clarity on operational arrangements.

- Outlines a performance monitoring system that enables effective governance in all areas of building safety, including a property compliance dashboard that supports regulatory reporting
- Sets out the individual building safety policies required to meet the regulatory standards, including any additional requirements that will achieve to safety in residents' homes and operational activities required to enable effective performance.

1.4 Scope of Framework

The diagram below shows how the framework based on statutory and regulatory requirements for building safety activities is applied to Wandle properties.



1.4.1 Regulatory scope for housing provider dutyholder requirements

Where Wandle is designated as a housing provider dutyholder, the following statutory Acts applies.

Statutory Regulations	Duties & relevance to BSF
Building Safety Act (BSA) 2022	Covers the BSA Part 4 Requirements - duty to manage building safety risks in High Risk Buildings (HRBs) that meets specific requirements of a dutyholder called an Accountable

Statutory Regulations	Duties & relevance to BSF
	Person or if more than one accountable person, then a Principal Accountable Person
Fire Safety Act 2021, including the Fire Safety (England) Regulations 2022 and the Regulatory Reform (Fire Safety) Order	Covers Wandle's role as the Responsible Person for fire safety for those residential properties directly managed for internal areas, or as one of the responsible persons if there are shared responsibilities for internal areas
Health and Safety at Work etc. Act 1974	Covers Section 3(2) of the Health and Safety at Work Act 1974 (HSWA) where Wandle has a duty of care to tenants because, as a housing provider, Wandle is regarded (under Section 53 of HSWA) as being self-employed and tenants fall into the class of " <i>other persons (not being his employees)</i> ."

For the Health & Safety at Work Act, the underpinning regulations that have specific dutyholder requirements are detailed in the table below:

Statutory Regulations	Duties & relevance to BSF
Control of Asbestos Regs 2012 (CAR)	Primary statutory requires for control and management of asbestos
Gas Safety (Installation and Use) Regulations 1998 as amended 2018	Sets out legal obligations to maintain gas installation & equipment.
Electricity at Work Regulations 1989	Duty to manage electrical installations and systems
The Control of Substances Hazardous to Health Regulations 2002 (COSHH)	Duty to undertake suitable and sufficient assessment of risks for hazardous substances and apply appropriate control measures to protect people from harm
Lifting Operations and Lifting Equipment Regulations 1998 (LOLER)	Statutory requirements requires all equipment used for lifting is fit for purpose, appropriate for the task and suitably marked, with suitable maintenance recorded and defects reported.

1.4.2 Landlord tenant health & safety duties

Where, Wandle has landlord tenant health & safety duties, the requirements of the following statutory Acts relating to health and safety hazards applies:

Statutory Regulations	Powers & relevance to BSF
Housing Act 1985 (as amended by the Homes (Fitness for Habitation Act) 2018	Requires all rented properties to be fit for human habitation at the beginning of tenancy and requires the landlord maintains to basic standard.
Housing Act 2004	Landlord to ensure their properties are safe and fit for habitation ensuring compliance with building regulations & Housing Health & Safety Rating System (HHSRS). The HHSRS assesses all hazards that may be present in a residential property and 'provide a safe and healthy environment for any potential occupiers or visitors'.
Social Housing (Regulation) Act 2023	Landlord duty to take all reasonable steps to ensure the health and safety of tenants in their homes and associated communal areas, including meeting the Regulator of Social Housing (RSH) Consumer Standards and compliance with "Awaab's Law".

1.4.3 Properties Affected

The Framework applies to building safety for all Wandle directly managed housing assets, including those owned or leased by Wandle. It also applies to properties where Wandle has delegated management to third parties e.g. supported living providers, who will have their own processes, but must also adhere to at least the regulatory standards set out in this Framework.

Although the Framework's building safety management system does not apply to properties where Wandle is the leaseholder and duties are carried out by the superior landlord (or their agents), we will monitor these providers against the regulatory standards set out in this Framework to help ensure Wandle residents are kept safe in all Wandle homes.

This Framework does not apply to Wandle workplaces leased with a landlord that are managed internally by Wandle's Facilities Team. The statutory and regulatory standards are subject to a different monitoring regime and governance assurance i.e. Health, Safety & Wellbeing Committee.

1.5 Performance Monitoring of this Framework

This Framework has a Delivery Plan to ensure compliance with the objectives. A staff led Building Safety Steering Group oversees the initiatives within the Building Safety Framework Action Plan. It also monitors and considers the implications of any new building safety requirements.

The regulatory compliance standards require performance monitoring by means of compliance reporting through Wandle's Governance structure comprising of;

- Senior Management Team
- Executive Team
- Asset Investment Committee (AIC)
- The Board

1.6 Feedback and Improvement

This Framework will be reviewed every two years by the Building Safety & Property Compliance Team or earlier if there are significant changes to building safety that require a revised approach. Feedback on this Framework will also be sought from operational teams as part of the collaborative discussion forum at the Building Safety Steering Group.

2 Building Safety Management System (BSMS)

The BSMS identified for this Framework is the Plan-Do-Check-Act continuous improvement cyclical approach. The individual elements of this BSMS are shown in the diagram below:



The BSMS identifies the compliance areas and describes how this is applied to each area, i.e. building safety performance standards, the operational activities required to meet these standards and the assurance reporting mechanisms for reviewing performance for continuous improvement. The delivery is managed through individual policies and supporting processes detailing the operational activities required.

Health & Safety regulatory requirements for building related equipment, which are not subject to specific duty holder requirements, are outlined in Appendix B, capturing the operational activities required. These activities with no specific duty holder requirements are not subject to the same level of scrutiny (as those with duty holder requirements detailed in Section 1.2) but they are captured for transparency of all building safety elements and to ensure compliance with the overall building safety management.

2.1 BSMS 'Plan' – Standards & Performance Setting



The **plan** stage of the Building Safety Management System (BSMS) covers the following Standards & Performance Setting areas, including:

Regulatory and Wandle Policy Requirements – standards for each building safety area within the scope of Framework have applicable regulations and also consider Wandle's own requirements to meet obligations as a landlord for safe and secure homes for our customers.

Policies for each of the areas to meet these standards are set and agreed by Executive Team. Where the standards no longer reflect the parameters within the Building Safety Framework, it is referred to Asset Investment Committee for approval.

A schedule of operational policies that support the framework objectives is provided in Appendix A. Each policy, developed in line with our corporate objectives to provide safe, secure and sustainable homes, outlines the key operational controls to ensure compliance with the required standards. It also includes the following:

Responsibilities for delivering the operational activities for each building safety areas are outlined and a schedule of key duty holders, where applicable, is provided in Appendix A. The requirements of the new Social Housing Act 2023 for hazards are currently generally covered in specific Wandle policies e.g. Damp & Mould Policy, Repairs & Maintenance Policy, Anti-Social Behaviour Policy and Disrepair procedures. A housing hazard project commissioned as part of the Repair Transformation project will consider and recommend a holistic approach to ensure we meet the requirements of the legislation.

Stakeholder engagement – engagement with our customers and other stakeholders to consider and understand the impact of the building safety activities is undertaken as part of underpinning policy development and as a regulatory requirement for the high risk blocks under the Building Safety Act. The impacts on customers are also checked through the Equality Impact Assessments carried out for each underpinning policy.

Performance Metrics – each policy details the measurable values that track operational activities and processes to ensure the agreed standards and regulatory outcomes are achieved.

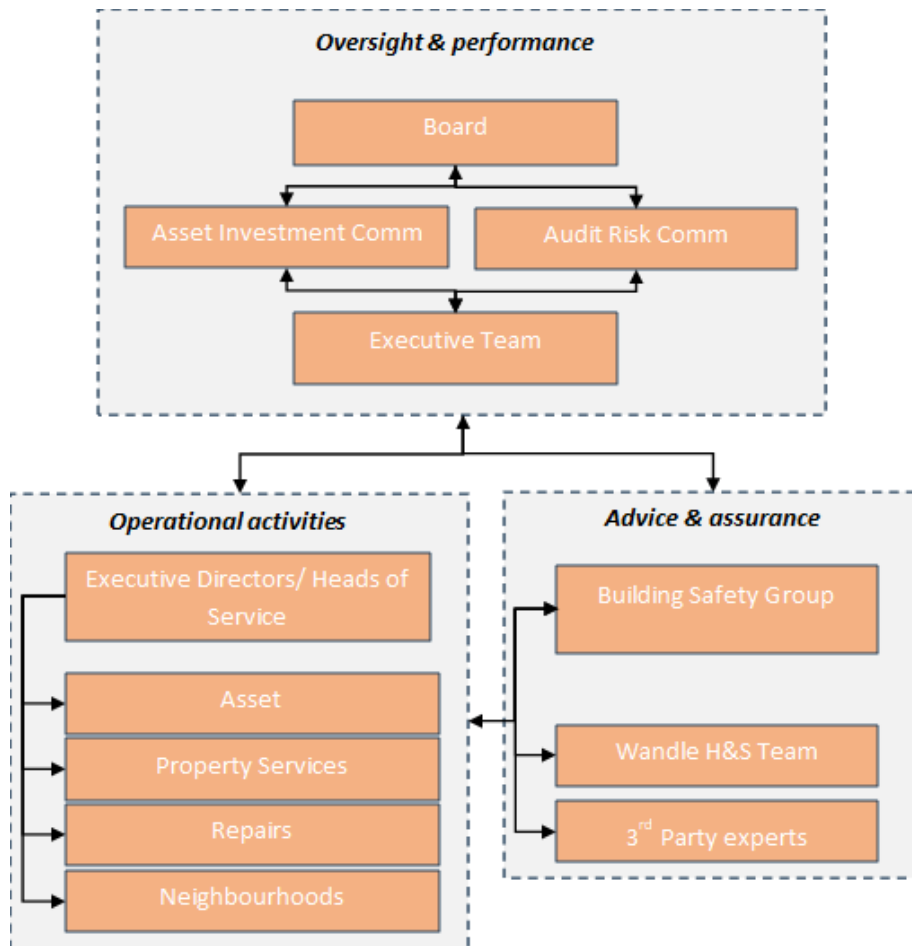
Competencies – defined competencies for each area are outlined in the policy to ensure effective resources are in place to deliver the operational activities required for the agreed standards. All competencies are defined and captured on the Wandle Training Matrix to ensure all staff have the appropriate training and qualifications to achieve these competencies.

2.2 BSMS 'Do' - Operational Activities



The '**doing**' stage of the Building Safety Management System (BSMS) covers the Operational Activities required to deliver the building safety standards and performance requirements.

Organisational Arrangements for managing compliance in this BSMS is demonstrated through the structure and responsibilities for delivering the operational activities. The diagram below shows the overall organisational structure that provides management and oversight functions:



Contractual Arrangements are discharged through competent contractors, to support activities where specialised or accredited competence is required for compliance and building safety regulatory requirements. The procurement and management of these contracts follow Wandle's "Procurement Procedures and Standing Orders".

Compliance Delivery for the operational delivery activities are outlined within the applicable policy procedures or processes. All procedures and processes in place to deliver the policies are kept in the Policy Library on Wandle's intranet.

Data Management arrangements are in line with each building safety policy regulatory requirements and Wandle's data reporting requirements for property compliance key performance indicators. Data produced as part of compliance operational activities are the data sources e.g. records, and this data is reconciled by the Asset Management Team against asset information held on the Asset Management System. Each building safety policy detailed in Appendix A, with underpinning processes or procedures, includes the type of records generated and the data captured for reporting purposes, including for the key performance indicators.

2.3 BSMS 'Check' - Measuring Performance



The **check** stage of the Building Safety Management System covers measuring performance against the agreed key measures in the relevant policies and operational activity outcomes.

A **Property Compliance Dashboard** provides assurance on performance against the key performance indicators. The Property Compliance Dashboard compiled by Asset Management uses data provided by the operational activities for the compliance areas. This compliance dashboard is reported through Wandle's governance structure (Senior Management Team, Executive Team, Asset & Investment Committee and Board).

Contract Monitoring uses performance information against contract KPIs to ensure compliance delivery from the Operational Activities. These contract monitoring activities are governed by the contract management arrangements within the "Procurement Procedures Rules and Strategy".

Internal Inspections form part of the monitoring arrangements at Wandle to help proactively identify hazards that require remediation or removal. These inspections help ensure safety issues are identified and addressed in a more timely manner than regulatory programmed servicing or inspections with contractors. Internal inspections also provide assurance as spot checks on works carried out and as evidence of remediation actions carried out.

Reactive inspections are carried out, following reported health and safety incidents by the responsible team i.e. fire safety incidents by the Compliance Team, health and safety incidents by the Neighbourhood Teams and damp and mould by the Repairs Team/Damp & Mould team. Planned internal inspections include the following:

Type of inspections	What is included	How often	Responsible Team
Estate Inspections – purpose-built blocks (above 11m)	H&S hazards Cleanliness	Monthly (above 11m blocks)	Estate Services
Estate Inspections – purpose-built blocks (below 11m)	Fire doors - labelled - kept shut good condition, intumescent strips in place	Bi-monthly (below 11m blocks)	Estate Services
Estate Inspections – street converted	Fire notices Fire signage Combustible materials Fire exits clear AOV/smoke vents Fire alarm panel	Six monthly	Estate Services
High Risk Buildings (above 18 metres)	Fire doors in working order Wayfinding signs on each floor Dry risers undamaged Fire Alarm operational with no faults AOV doors closed on each floor & operational No smoking signs on each floor Lifts Operational Are there combustible items in the intake cupboards? PIB box onsite checks No visual fire stopping works required in the communal areas	Monthly	Building Safety & Property Compliance Team
Post-works inspections	Remedial or project works that are not subject to third party quality assurance inspections	As required as per project or % of overall completed works	All teams

Quality Assurance is delivered by:

- Appointing partners and contractors that conduct internal quality control that is evidenced through performance reporting and contract meetings.
- Additional level of assurance through appointed competent third-party specialists to support policy development and/or oversee activities delivered by our contractors i.e. technical checks by suitably qualified quality assurance specialists. These are identified in Appendix A.
- Employing internal quality control roles – Surveyors and Officers who ensure that the activities being delivered in our customers' homes continue to achieve the required level of quality and customer service.
- Carrying out customer satisfaction surveys at the end of transactional activities, which provide added level of assurance.

2.4 BSMS 'Act' - Reviewing Performance



The **act** stage in the Building Safety Management System covers reviewing performance to enable learning and continuous improvement. The three key parts to reviewing performance (Governance, Internal Audit and Continuous Improvement) ensures the outcomes of the building safety management system are evaluated and actioned appropriately.

Governance - Assurance on performance from the operational activities is carried out by performance reporting to stakeholders. Performance reports, including the Property Compliance Dashboard, are sent to the following stakeholders for management and oversight:

- Senior Management Team – receives compliance report information.
- Executive Team – receives overall compliance performance, damp & mould and disrepair reports.
- Asset Investment Committee (AIC) & Board – receive quarterly reports for building safety compliance performance, damp & mould and disrepair.

Internal Audit – internal audit arrangements for the Building Safety Compliance areas include specialist ad hoc audits or internal audits (as part of annual internal audit plan) carried out by external organisations reporting mainly to Audit & Risk Committee.

Continuous Improvement – performance reporting includes the identification of areas requiring improvement and action plans to progress improvement.

The staff led, Building Safety Steering Group (BSSG), will monitor developments within the industry, review accidents and incidents, consider feedback from third party specialist reviews to determine additional operation activities or measures required. BSSG will review new policies and recommend for approval to Executive Team. The group will commission and monitor initiatives required to ensure outcomes of the Building Safety Framework is met.

3 Roles and Responsibilities

Asset Investment Committee has oversight over the safety of buildings within Wandle's portfolio and are responsible for approval of the Framework. This Framework has the following roles and responsibilities:

3.1 Framework Owner

The Framework Owner is the Executive Director Property & Development, who is responsible for ensuring the requirements for the whole Building Safety Management System are in place so compliance standards at Wandle can be appropriately monitored and reported for effective governance.

3.2 Policy Owners

A schedule of ownership of the operational policies for the Building Safety Compliance areas that sets out Wandle's internal policy standards is included in Appendix A.

Approval of building safety policies, where in line with the standards outlined in the Building Safety Framework, is delegated to Executive Team. Where new arrangements outside the policy framework is proposed, the policies (or revised Building Safety Framework) will be referred to Asset Investment Committee for approval.

Where required, the appropriate Lead for each Policy area will have underpinning processes/procedures to support the operational activities required for compliance.

Cross-cutting strategies such as the No Access Framework, as well as processes such as Fire Safety Inspections are developed collaboratively to support the *working together* principles underpinning this building safety framework and to provide outcomes that continually improve standards.

4 Related Documents

Policies	Asbestos Policy and Management Plan, Water Hygiene Policy, Fire Safety in Housing Policy, Gas Safety Policy, Electrical Safety Policy, LOLER Policy, Damp & Mould Policy, No Access Framework, Procurement Procedures Rules and Strategy
Procedures	Fire Risk Assessment incl. Fire Door Inspection Process, Fire Door Repair and Replacement Process, Fire Safety Inspection Process, Asbestos Management Process, Water Hygiene Management Process, Gas Process, Electrical Process, Lifting Equipment Process
Other internal documents	Monthly Property Compliance Dashboard, Monthly Corporate Performance Report, Quarterly AIC Report, Annual Board Report

5 Delivery Plan

This Framework will be approved with a delivery plan of workstreams to develop or to confirm areas detailed above, overseen by the Building Safety Steering Group. Key internal stakeholders to be included in the workstreams are Building Safety & Property Compliance, Health & Safety, Customer Services, Governance, M&E, Asset Management and IT:

Approval route	Date
Building Safety Steering Group	5 August 2025
Executive Team	26 August 2025
Asset Investment Committee	8 September 2025

Regular updates on progress against the delivery plan below will be considered approved by Asset Investment Committee.

Action	Responsibility	Target Date
Update Building Safety Framework Action Plan with this Delivery Plan	Head of Asset Management	September 2026

Development of High Risk Buildings Policy	Building Safety & Compliance Lead	January 2026
Development of policy and procedures for new regulatory requirements for “Awaab’s Law” i.e. Social Housing (Regulation) Act	Head of Property Services	August 2026
“Golden Thread” Process – on Building Safety Framework Action Plan	Head of Development	March 2026
Building Safety Act and Fire Safety Act Compliance Dashboard – on Building Safety Framework Action Plan	Head of Asset Management	March 2026
Appendix B– ensure all areas and locations have been identified in excel monitoring sheet + details are provided for electrical charging points and where reported is recorded	Head of Asset Management & Head of Property Services	January 2026

6 Appendices

Appendix A: Schedule of Wandle Operational policies required for Building Safety activities (as September 2025)

Appendix B: BSF Monitoring Schedule for Plant & Equipment (extract of excel spreadsheet as September 2025)

Appendix A - Schedule of Wandle Operational policies required for Building Safety activities (as of September 2025)

Building Safety Policy	Date	Responsibility for Policy	Key Dutyholder Responsibility	Third party assurance
Asbestos Management Policy	2025	Building Safety & Property Compliance	Building Safety & Property Compliance	
High Risk Buildings Policy	To be developed	Building Safety & Property Compliance	Building Safety & Property Compliance	
Damp & Mould Policy	2023	Head of Property Services		
Electrical Safety Policy	2024	Building Safety & Property Compliance	M&E team	Morgan Lambert
Fire Safety Policy	2023	Building Safety & Property Compliance	Building Safety & Property Compliance	Morgan Lambert
Gas Safety Policy	2024	Building Safety & Property Compliance	M&E team	Morgan Lambert
Hazards “Awaab’s Law” Policy	To be developed	Head of Property Services		
LOLER (Lifting Equipment) Policy	2024	Building Safety & Property Compliance	M&E team	Calford Seaden
Water Hygiene Policy	2024	Building Safety & Property Compliance	Building Safety & Property Compliance	Morgan Lambert

Appendix B - BSF Monitoring Schedule for Plant & Equipment

Area	Compliance Activity	Frequency	Operational Responsibility
Fire Systems	Fire Detection and Alarm testing and servicing	Weekly call point tests where application-every six months inspection & servicing	Building Safety & Property Compliance Team (through contractors)
	Standalone detection testing and servicing	Biannual for Grade F	Building Safety & Property Compliance Team (through contractors)
	Emergency Lighting testing	Monthly testing - annual 3-hour test	Building Safety & Property Compliance Team (through contractors)
	AOV inspection and testing	Every six months	Building Safety & Property Compliance Team (through contractors)
	Dry Risers	Every six months	Building Safety & Property Compliance Team (through contractors)
	Extinguishers - inspection	Annual	Building Safety & Property Compliance Team (through contractors)
	Fire Blankets Inspection	Annual	Building Safety & Property Compliance Team (through contractors)
	Air Mist system	Annual	Building Safety & Property Compliance Team (through contractors)
	Lightning Protection	Annual	Building Safety & Property Compliance Team (through contractors)
	Sprinkler system inspection	Annual	Building Safety & Property Compliance Team (through contractors)
Legionella	Calorifier Inspect & Clean	Annual	M&E Team (through contractors)
	Infrequently Used Outlet Flushing	Weekly	M&E Team (through contractors)
	Monthly Monitoring Visits	Monthly	M&E Team (through contractors)
	Shower Clean & Disinfect	As per policy	M&E Team (through contractors)
	Water Heater/Boiler	Annual	M&E Team (through contractors)
	Water-Tank Inspections	6 monthly	M&E Team (through contractors)
	Water-TMV	Annual	M&E Team (through contractors)
Fall Arrest System	Inspection	Annual	Building Safety & Property Compliance Team (through contractors)
Electrical	Communal EICR	5 yearly	M&E Team (through contractors)
Gas - LGSR	Commercial LGSR and BMS	Annual	M&E Team (through contractors)
M&E installations	Air Conditioning	Annual	M&E Team (through contractors)
	Domestic lifts e.g. Arjo	6 monthly (servicing & insurance inspections)	M&E Team (through contractors)
	Auto Doors	Annual	M&E Team (through contractors)
	Auto Gates	6 monthly minimum	M&E Team (through contractors)
	Closomat	Reactive	M&E Team (through contractors)
	Door Entry	Annual	M&E Team (through contractors)

Area	Compliance Activity	Frequency	Operational Responsibility
	Extraction & Ventilation	Annual	M&E Team (through contractors)
	Laundry	Annual	M&E Team (through contractors)
	LEV Insurance Inspection	Annual	M&E Team (through contractors)
	Pumps and Valves - Service	Quarterly	M&E Team (through contractors)
	Septic Tank - Consent to Discharge	Quarterly	M&E Team (through contractors)
	Septic Tank - Desludge	Quarterly	M&E Team (through contractors)
	Septic Tank - Electrical Check	Quarterly	M&E Team (through contractors)
	Septic Tank - Service	Quarterly	M&E Team (through contractors)
Other Forms of Heating	Domestic Other Forms of Heating	Annual	M&E Team (through contractors)
	Heat Interface Units - inspecting and servicing	Annual	M&E Team (through contractors)
	Electric Storage Heaters	EICRs - five yearly	M&E Team (through contractors)
Smoke Alarms	CO Detector	Annual	M&E Team (through contractors)
	CO Detector Renewal	Every ten years	M&E Team (through contractors)
	Domestic Smoke Alarm Renewal	Every ten years	Repairs Team for reactive replacement and M&E for planned replacement
	Domestic Smoke Alarm Testing	Annual	Customers
Solar/PV	Solar/PV	Currently re-active	Asset Management
Scooter sheds	Electrical check and hydraulic mechanism	Part of EICR for electrics so every five years and annual for those with hydraulic mechanisms	M&E Team (through contractors)
Warden call	Checking devices	Annual	Neighbourhood Team (through contractors)
Electric vehicle charging points	Checking charging points	Part of EICR for electrics so every five years. Reactive repairs	M&E Team (through contractors)
TV Aerials	No PPM required so reactive	Reactive	Repairs
Playground equipment	Inspections	Annual	Estate Services Team (through contractors)