

Building Safety Programme

Monthly Data Release
15 August 2019

Introduction

Building Safety Programme: Monthly Data Release

Data as at 31 July 2019 Coverage: England

Summary of latest figures (as at 31 July 2019)

There are 107 high-rise residential and publicly owned buildings in England that have completed remediation works to remove and replace Aluminium Composite Material (ACM) cladding systems – an increase of one since the end of June.

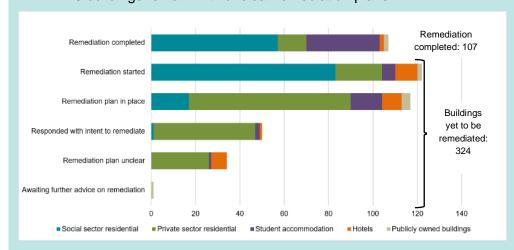
This leaves a total of 324 high-rise residential and publicly owned buildings with ACM cladding systems unlikely to meet Building Regulations yet to be remediated in England, as at 31 July 2019.

Of the **101 social sector residential buildings** with ACM cladding systems unlikely to meet Building Regulations yet to be remediated:

- 83 have started remediation;
- 17 have a remediation plan in place but works have not started; and
- One building has reported an intent to remediate and is developing plans.

Of the **166 private sector residential buildings** with ACM cladding systems unlikely to meet Building Regulations yet to be remediated:

- 21 have started remediation;
- 73 have a remediation plan in place but works have not started;
- 46 have responded with an intent to remediate and are developing plans; and
- 26 buildings remain with unclear remediation plans.



There remain **five private sector residential buildings** where the cladding status is still to be confirmed – this has fallen from approximately 170 buildings in June 2018.

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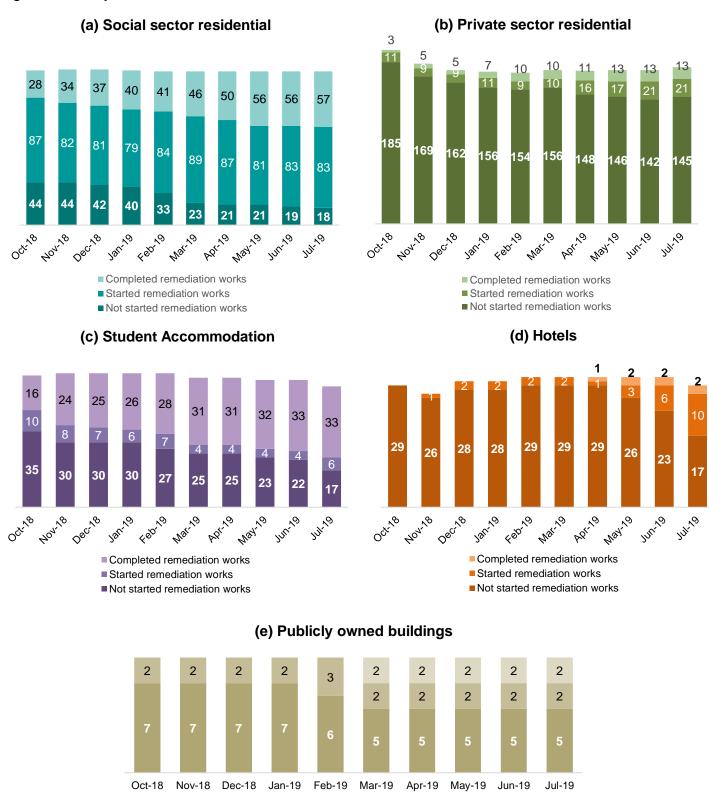
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Date of next publication:

9:30am on 12 September

Figure 1: Remediation progress for buildings with ACM cladding systems showing change since October 2018, based on previous Building Safety Programme monthly data releases

England, 31 July 2019



Completed remediation worksStarted remediation worksNot started remediation works

Figure 2: Location of high-rise residential and publicly owned buildings with ACM cladding systems unlikely to meet Building Regulations yet to be remediated

England, 31 July 2019

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Introduction

Following the Grenfell Tower tragedy, the government established a Building Safety Programme to ensure that residents of high-rise residential buildings are safe, and feel safe from the risk of fire, now and in the future. An independent Expert Panel was appointed to advise the Secretary of State for Housing, Communities and Local Government on building safety measures.

This data release provides the latest data on high-rise (over 18 metres) residential buildings and publicly owned buildings, including:

- 1) those identified with Aluminium Composite Material (ACM) cladding systems unlikely to meet Building Regulations; and
- 2) progress with remediation of these buildings and the number of buildings yet to be remediated in each sector.

The data release uses data from several sources (see Appendix 1):

- Building Research Establishment (BRE) tests;
- Local authority confirmation following local authorities working with building owners and agents to identify any cladding issues; and,
- **Discussions with responsible stakeholders** including building owners, developers and agents.
- Valuation Office Agency property attribute data to validate the number of dwellings in high-rise residential buildings.

<u>The government's independent Expert Panel advised</u> that the clearest way of ensuring an external wall system adequately resists external fire spread is for all the relevant elements of the wall to be of limited combustibility, or to use an external wall system which can be shown to have passed a large-scale system test as specified in British Standard BS8414.

In the summer of 2017, the government commissioned a series of large-scale system tests to assess how different ACM panels with different insulation types behave in a fire. Seven tests were undertaken so urgent advice could be provided to building owners (see Tables 4 & 5 in the data tables published alongside this release).

The remediation of buildings with ACM cladding systems unlikely to meet Building Regulations is a complex process. Remediation work involves addressing any issues with the exterior cladding system and broader fire safety systems for each building. All of this work takes time and varies considerably depending on the building structure, extent of cladding, and existing fire safety systems. For many buildings this is a complex job involving major construction work which needs to be planned, consulted on and carried out carefully.

The government has worked with the Industry Response Group and Expert Panel to develop an information note to assist building owners in carrying out remediation work. Advice for buildings with partially clad ACM cladding systems was released to advise building owners, their professional advisers and fire and rescue services when considering whether it is safe to leave small or partial amounts of ACM cladding on a building.

On 17 October 2018, MHCLG <u>announced</u> funding to remediate high-rise social sector residential buildings with ACM cladding unlikely to meet Building Regulations. On 9 May 2019, the government <u>announced</u> its commitment to fund the remediation of high-rise private sector residential buildings with ACM cladding systems unlikely to meet Building Regulations. The private residential fund application guidance including eligibility and evidence criteria was published in July 2019.

<u>The government placed a ban on combustible materials on new high-rise homes</u>, implemented through the <u>Building (Amendment) Regulations 2018</u> (laid on 29 November 2018). The regulations came into force on 21 December with a two-month transitional period. The government has also published the <u>full consultation response document</u> and <u>Impact Assessment</u>.

The ban does not apply to existing buildings where no building work is being carried out. In these instances, we consider that a case-by-case risk-based approach to fire safety in existing buildings is most appropriate in line with the advice already issued by the Ministry and the Expert Panel.

The figures in this publication are correct as at the specified dates, but work is ongoing to remove and replace ACM cladding systems unlikely to meet Building Regulations. This means that the figures may include some buildings that have since removed and replaced ACM cladding systems.

The Ministry of Housing, Communities and Local Government will publish further data releases on:

- 12 September 2019,
- 10 October 2019, and
- 14 November 2019.

These will refer to the situation at the end of the previous calendar month.

Overview and updates

Number of high-rise residential and publicly owned buildings identified with ACM cladding systems unlikely to meet Building Regulations

MHCLG uses data from several sources to confirm whether a high-rise building has an Aluminium Composite Material (ACM) cladding system unlikely to meet Building Regulations (Appendix 1), including:

- Building Research Establishment (BRE) tests;
- **Local authority confirmation** following local authorities working with building owners and agents to identify any cladding issues;
- **Discussions with responsible stakeholders** including building owners, developers and agents.

There were 431 high-rise residential buildings and publicly owned buildings identified as having ACM cladding systems unlikely to meet Building Regulations, a decrease of two since the end of June. One additional building has been identified, and three buildings have become out of scope¹. The addition is one newly identified private sector residential building. Two private sector residential buildings were removed, which were identified as not having ACM cladding systems, as well as one student accommodation building which was found to be lower than 18 metres. Furthermore, two hotels and two student accommodation buildings have been reclassified as private sector residential buildings.

Table 1: Number of buildings identified with ACM cladding systems unlikely to meet Building Regulations, by tenure England, 31 July 2019								
	31 July 2019	30 June 2019	Monthly change					
Social sector residential	158	158	0					
Private sector residential	179	176	+3					
Student accommodation	56	59	-3					
Hotels	29	31	-2					
Publicly owned buildings	9	9	0					
Total	431	433	-2					

Building Safety Programme Monthly Data Release, data as at 31 July 2019

¹ Work with local authorities and building owners over the last few months to verify data quality has resulted in some buildings now falling out of scope as they have been confirmed as being lower than 18 metres tall or the ACM cladding systems comply with Building Regulations.

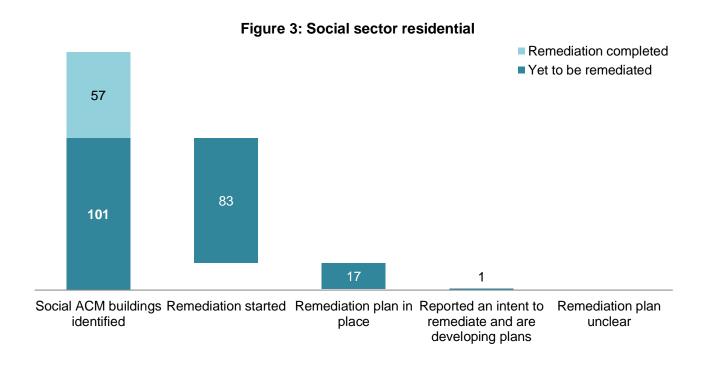
We have collected data on over 6,000 private sector residential high-rise buildings. There remain five private sector residential buildings for which the cladding status is awaiting confirmation – compared with approximately 170 in June 2018. Enforcement notices have been issued on a minority of these remaining buildings to get information on building construction from owners, and on the other unknown buildings owners are pursuing testing action.

Once buildings with ACM cladding systems are identified, local authorities work with fire and rescue services to ensure that interim safety measures are in place and to ensure that the buildings are remediated to comply with Building Regulations.

2) Progress in remediating buildings

2.1) Social sector residential remediation

As at 31 July 2019, 158 high-rise social sector residential buildings have been identified with ACM cladding systems unlikely to meet Building Regulations. Of these, 57 buildings (36% of all identified social sector residential buildings) have completed remediation – including receiving sign-off from building control where necessary – an increase of one since the end of June. The remediated social sector residential buildings account for approximately 3,800 dwellings.

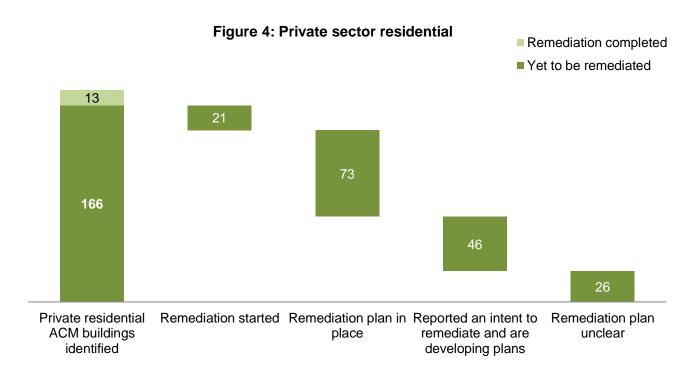


This leaves 101 social sector residential buildings yet to be remediated. Once building has started since the end of June – no net change in the total number of starts in social sector residential buildings. Since the end of June, one building has started remediation. Yet to be remediated social sector residential buildings account for approximately 7,800 dwellings.

Funding for the remediation of 144 of these 158 buildings is provided from the government's social sector ACM cladding removal fund (launched on 17 May 2018 to help remediate social sector residential buildings). Remedial works for the remaining 14 buildings are being funded through a combination of existing funds and litigation action.

2.2) Private sector residential remediation

There were 179 high-rise private sector residential buildings identified with ACM cladding systems unlikely to meet Building Regulations, of which 13 buildings have completed remediation – unchanged from the end of June. Remediated private sector residential buildings account for approximately 1,400 dwellings.

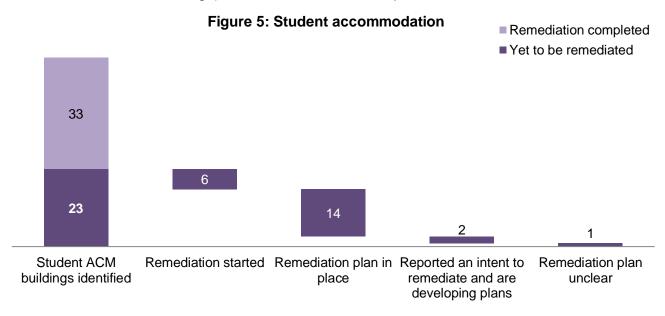


Of all identified private sector residential buildings, 166 are yet to be remediated. Of these 166 buildings, 21 (12% of all identified private sector residential buildings) have started remediation – unchanged from the end of June. There are 26 buildings (15%) with an unclear remediation plan, falling by nine compared to the end of June. Yet to be remediated private sector residential buildings account for approximately 13,200 to 17,000 dwellings.

On 9 May 2019, the government <u>announced</u> its commitment to fund the remediation of high-rise private sector residential buildings with ACM cladding systems unlikely to meet Building Regulations. The private residential fund application guidance including eligibility and evidence criteria was published in July 2019.

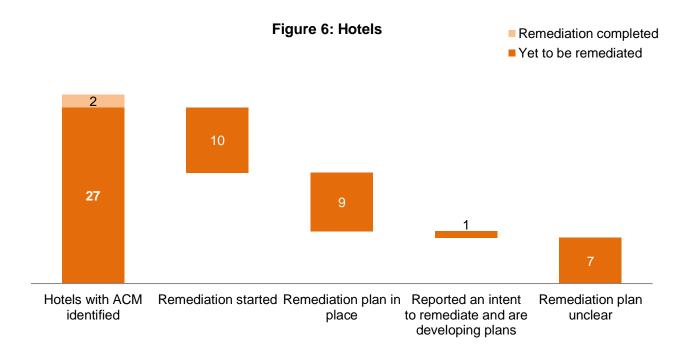
2.3) Student accommodation remediation

Of the 56 high-rise student accommodation buildings identified with ACM cladding systems unlikely to meet Building Regulations, 33 have completed remediation - unchanged since the end of June. Remediation has started in six student accommodation buildings (11% of all identified student accommodation buildings), an increase of two compared to the end of June.



2.4) Hotel remediation

For the 29 high-rise hotels identified with ACM cladding systems unlikely to meet Building Regulations, two hotels have completed remediation, unchanged since the end of June.



Ten hotels (34% of all identified hotels) have started remediation, an increase of four since the end of June. Remediation plans are unclear for seven hotels (24%), an increase of one since the end of June.

2.5) Publicly owned buildings remediation

Two of the nine publicly owned buildings (publicly owned schools and health buildings) with ACM cladding systems unlikely to meet Building Regulations have completed remediation works, unchanged from last month. This comprises one school and one health building.



The Department for Health and Social Care and Department for Education are working with building owners on appropriate remedial work whilst considering building users' needs.

Appendix 1: Technical Notes

This appendix comprises of:

- Glossary of terms used;
- Information on the data collection process; and
- Information on the data quality process.

Glossary

Building control: A statutory process of assessing plans for building work and building work on site to decide whether the plans and work comply with the requirements in the building regulations.

BS8414: BS8414 is a British standard test method that measures the fire performance of external cladding systems.

Dwelling: A self-contained unit of accommodation which may comprise one or more household spaces (a household space is the accommodation used or available for use by an individual household). This definition of a dwelling is consistent with the Census 2011.

EPC (Energy Performance Certificates) data: The <u>EPC database</u> is open data that records the energy performance of dwellings as well as other dwelling-level variables such as the floor level, tenure, and street address/postcode.

Litigation action: Legal proceedings to recover costs from those responsible for installing the unsafe cladding.

Private sector residential building: A building is classified as a private sector residential building if the freeholder is a private company and contains at least one dwelling occupied as a private residential accommodation. Private sector residential buildings exclude hotels and student accommodation.

Publicly owned buildings: A publicly owned building is one that is owned by a public authority, a government department or an arms-length body.

Social sector residential building: A building is classified as a social sector residential building if the freeholder is a registered social landlord and there is at least one social tenant living in the building.

Student accommodation: Buildings are classified as student accommodation if the tenancy specifically states that it must be let exclusively to students.

Valuation Office Agency (VOA) data: The <u>Valuation Office Agency</u> (VOA) is responsible for banding properties for Council Tax and it is a statutory requirement of the VOA to maintain accurate valuation lists for Council Tax. The <u>VOA's Property Details dataset</u> contains information on the main features and attributes of a property including the address/postcode and number of dwellings.

Warranty claim: A warranty claim is one made under a ten year warranty that may be provided by the National House Building Council or a structural insurance policy. These tend to provide cover against actual or imminent damage caused by structural defects or breach of building regulations.

Data Collection

MHCLG uses data from several sources in the data release:

- Building Research Establishment tests;
- Local authority confirmation following local authorities working with building owners and agents to identify any cladding issues; and
- **Discussions with responsible stakeholders** including building owners, developers and agents.
- Valuation Office Agency property attribute data to validate the number of dwellings in high-rise residential buildings.

Since **summer 2017** MHCLG have been funding the testing of cladding from high-rise residential buildings at the BRE. This establishes the category of ACM cladding, which, along with insulation type, determine compliance with Building Regulations. MHCLG are reasonably confident that all social sector high-rise residential and publicly owned buildings with ACM cladding systems unlikely to meet Building Regulations have been identified. The BRE test data for private sector, social sector residential and publicly owned buildings have been published in data releases since **December 2017**.

Since **autumn 2017**, local authorities have been working with private sector building owners to ascertain combinations of ACM cladding and insulation on high-rise private sector buildings which have not been tested by BRE. Local authorities have used information from sources such as local fire and rescue services, building plans, ACM tests undertaken elsewhere, knowledge of similar buildings where BRE tests have confirmed ACM cladding, and/or building inspections.

MHCLG and local authorities have adopted many approaches over the last two years to identify the cladding and insulation status of the remaining private sector buildings. This has included the payment of an allowance to local authorities for identifying buildings or starting an enforcement process² against building owners, with a cut-off date at **end May 2018**. The data release of **28 June 2018** was the first that included data confirmed by local authorities. MHCLG are confident that the vast majority of buildings with cladding systems unlikely to meet Building Regulations have been identified, and publishing the data ensures transparency on high-rise building safety.

Since **spring 2018** MHCLG have been talking with building owners, developers and agents to ascertain updates on remediation. As of **11 February 2019**, the questionnaire used to collect information on high-rise residential buildings in England with ACM cladding systems was updated to provide increased precision in response options concerning the status of remediation. This might result in marginal changes in the data as further updates are collected. Additional questions were added which do not impact the data in this release.

Since early 2019 MHCLG have collected data on dwellings from the VOA Property Details data

² Local authority enforcement powers under the 2004 Housing Act include Section 235 powers to demand documents from building owners, and Section 239 powers to take a sample of a building for testing.

website. We have used this data to provide greater coverage of the number of dwellings in buildings with ACM cladding systems, as well as validating responses from responsible stakeholders.

Data Quality

Assessment of Data Quality

In 2015 the UK Statistics Authority published a <u>regulatory standard for the quality assurance of administrative data</u>. To assess the quality of the data provided for this release the department has followed that standard. The standard is supported with an <u>Administrative Data Quality Assurance Toolkit</u> which provides useful guidance on the practices that can be adopted to assure the quality of the data they utilise.

The data used in this release is classified as Medium risk in terms of data collection process, with a High public profile. The publication of the Building Safety Programme data release can be considered high profile, as there is significant mainstream media interest following the Grenfell Tower fire. These statistics form the headline figures for the remediation of unsafe buildings in England and as such are critical to policy making. They are also frequently quoted in national and local media.

The data quality is considered a medium concern given that a large number of local authorities and housing associations are involved in the data collection process, with some local authorities acting as intermediaries in the data collection process.

The medium rating does not reflect the suitability of the data and quality of this data for BSP's purposes, but rather that the quality assurance processes undertaken are more stringent compared to low-risk data. It should be taken into account that the data is collected from multiple sources, the data is not suitable to be used for other purposes.

The data collection involves more than 50 organisations (including 19 local authorities and 37 housing associations). The department does not have full oversight of their systems and quality procedures; we provide clear guidance and documentation to them via DELTA data collection system.

Risk Profile Matrix

Statistical Series	Administrative Source	Data Quality Concern	Public Interest	Matrix Classification
Building Safety Programme data release	Local authorities and housing association's individual data systems	Medium	High	Medium Risk [A2]

Operational context and admin data collection

Figure 8 shows the statistical production process, quality assurance (QA) checks and engagement between housing associations, local authorities, responsible stakeholders and MHCLG during the process.

Building-level data is reported to MHCLG by housing associations and local authorities via the DELTA data collection platform. The data is continually updated via DELTA submissions and engagement with housing associations and local authorities to reflect progress on the ground.

The DELTA collection platform pre-populates forms so that housing associations and local authorities can update records without having to submit complete entries each time.

Communication with data supply partners

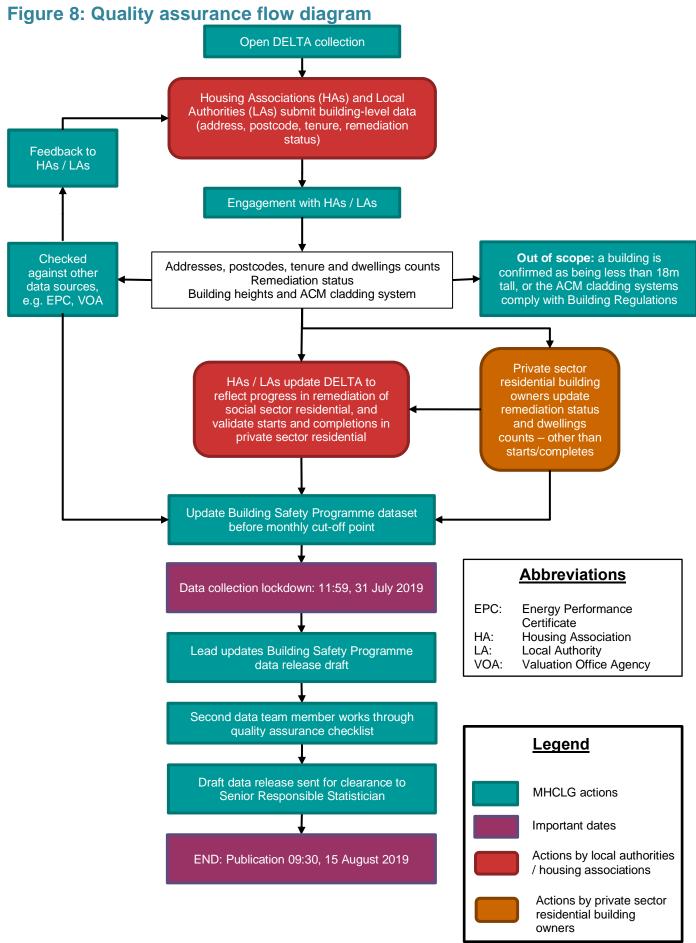
MHCLG asks for updates to building-level data, especially remediation status, throughout each month and requests that housing associations and local authorities submit important updates before the data cut-off point (the last day of each month). Building owners, managers and agents report the remediation status of a building periodically.

There is a risk that some housing associations and local authorities have provided postcodes that are no longer in use. If there are any differences between the data supplier's responses and other data sources, MHCLG reconciles any differences and improves the data quality.

QA principles, standards and checks by data suppliers

Housing associations and local authorities update DELTA to reflect progress in remediation and these updates are included in the dataset. Starts and completions for private sector residential buildings are confirmed by local authorities before it is updated in the dataset, and subsequently, the data release.

Completions are confirmed with a sign-off certificate from the relevant Building Control body, where necessary. Local authorities also confirm if a building is under 18 metres or the ACM cladding systems comply with Building Regulations.



Building Safety Programme Monthly Data Release, data as at 31 July 2019

Producers' QA investigations and documentation

When reviewing the dataset using updates from engagement or the DELTA collection system, a conflict checker is used to ensure there are no inconsistencies with previous data releases. MHCLG quality assures the building-level data (i.e. addresses/postcodes, tenure, dwellings, and remediation status) using other data sources such as the EPC database and VOA data.

MHCLG have collected data on the number of dwellings from responsible stakeholders and where a response was not given, the Valuation Office Agency (VOA) data is used. The VOA data is also used to validate the responses from responsible stakeholders with respect to the number of dwellings, as well as addresses and postcodes.

The range in the number of dwellings for yet to be remediated private sector residential buildings is due to a mismatch between the responses MHCLG received and the VOA data. The two data sources exactly match for the number of dwellings for 52 yet to be remediated private sector residential buildings, out of a possible 126 which have data from both sources (41%). For the yet to be remediated social sector residential buildings, 61 (73%) of the 83 buildings with both data sources match exactly for the number of dwellings.

The VOA data was determined to be a suitable source to validate the number of dwellings based on quality assessment by the VOA and <u>ONS</u> as part of work on the 2021 Census. Every residential dwelling that is liable for Council tax has a record with the VOA, so the data has good coverage and accuracy. However, there is a slight degree of incompleteness. Property attribute data are only updated when it is brought to the attention of the VOA that a record may be inaccurate. Reliance is placed upon local authorities to flag any changes to the VOA (such as new builds, demolitions, or alterations). As a result, there are some records in the list that are not updated as regularly as others, and the time lag associated with these updates is unclear.

Once the data collection is locked down, two members of the Building Safety Programme data team begin working on updating the monthly data release. One takes the role as the lead producer and the other takes the role of quality assuring the data.

The lead statistician updates the data release, the second data team member then goes through the draft and quality assures the data. Simultaneously, a Building Safety Programme team member external to the data team reviews and quality assures the release.

A quality assurance checklist, which evolves over time, is used by the second data team member to work through the draft once it is complete. The quality assurance checklist includes;

- ensuring totals in the tables and figures align with the disaggregated data,
- ensuring published figures across the data release and live table are consistent,
- ensuring the data release map is accurate,

- performing checks related to disclosure so that any ACM clad buildings are not identified in areas with less than ten high-rise buildings,
- checking for inconsistencies compared to any previous data releases, and
- making sure all changes in the data are plausible.

Once the data team are content that the items on the checklist have been scrutinised and ticked off, the provisional data release is sent to senior staff for approval. Once approved by senior staff, the data release is prepared for publication.

Revisions Policy

This policy covers two types of revisions:

- Non-Scheduled Revisions: Where a substantial error has occurred as a result of the compilation, imputation or dissemination processes, the Data Release, data tables and any other accompanying documents will be updated with a correction notice as soon as is practical.
- Scheduled Revisions: Where new information becomes available post publication, this is incorporated in to the next scheduled Data Release, data tables and any other accompanying documents.

This policy has been developed in accordance with the UK Statistics Authority Code of Practice for Statistics and the Ministry of Housing, Communities and Local Government Revisions Policy.

Appendix 2: Buildings in local authority areas yet to be remediated with ACM cladding systems unlikely to meet Building Regulations

Table 2 sets out local authority areas with high-rise residential buildings and publicly owned buildings that are yet to be remediated – these areas are grouped into bands. The bands used are; one to five buildings, six to ten buildings, 11 to 20 buildings, and over 20 buildings. The buildings included all have ACM cladding systems unlikely to meet Building Regulations and are residential buildings over 18 metres tall or publicly owned buildings.

As at 31 July there are 74 local authorities in England where such buildings were identified (see Table 6 in the data tables published alongside this release), of which 62 local authorities have at least one such building yet to be remediated within their boundaries.

We exclude local authorities with fewer than ten high-rise residential buildings (regardless of whether they have cladding) from the table below, as their inclusion could lead to the identification of one or more buildings with ACM cladding systems unlikely to meet Building Regulations in these areas – hence we list 54 local authorities below.

Table 2: Number of buildings with ACM cladding systems unlikely to meet Building Regulations yet to be remediated³, by local authority England, 31 July 2019

This table/map has been removed. Please contact us if you require further information.

³ 'Yet to be remediated' represents all buildings where remediation has started, there are plans in place, building owners have reported an intent to remediate or where remediation plans are unclear; only buildings where remediation is complete are excluded.

Appendix 3: Voluntary compliance with the Code of Practice for Statistics

<u>The Code of Practice for Statistics</u> was published in February 2018 to set standards for organisations in producing and publishing official statistics and ensure that statistics serve the public good.

Whilst MHCLG's Building Safety Programme Data Release is not National Statistics, the principles of transparency of high-quality analytical outputs to inform decision making and the public underpin this data release.

Trustworthiness: trusted people, processes and analysis

Honesty and integrity (T1): The Building Safety Programme Data Release is managed by professional analysts in MHCLG – this involves design of data collection tools, checking of provided data, and analysis. All work is undertaken by professionally qualified and experienced data analysts - professional members of the Government Statistical Service, Government Operational Research Service or Government Social Research profession, where all staff have Personal Development Plans focussed on their long-term professional development (**Professional capability –** T5).

Independent decision making and leadership (T2): The work is governed by the Analysis and Data Directorate in MHCLG, accountable to MHCLG's Chief Analyst and the Head of Profession for Statistics.

Orderly release (T3): MHCLG pre-announces the publication date for this data release. As part of our continuous improvement, the data cut-off date for Data Releases now aligns to the end of the calendar month.

Transparent processes and management (T4): MHCLG has robust, transparent, data-management processes.

All data are provided by local authorities, housing associations, building owners / developers / managing agents, the DHSC, DfE and the BRE. Responsibility for the data lies with the data provider - as such only data either provided by BRE following testing or data verified by local authorities, housing associations, the DHSC or DfE are published.

Data Governance (T6): MHCLG uses robust data collection and release processes to ensure data confidentiality. A <u>published privacy notice</u> clearly sets out why data are collected, data sharing, and the legal basis for processing data. This is consistent with the General Data Protection Regulation.

High quality: robust data, methods and processes

Suitable data sources (Q1): Data originates from a number of sources outside the control of MHCLG: local authorities, local Fire and Rescue Services, housing associations, building owners / developers / managing agents, DHSC, DfE, BRE. Data are triangulated, where possible, and data are always verified by these bodies — who are ultimately responsible for the quality of their data. Where the quality of data is unclear, it is either not published or quality issues are highlighted.

Sound methods (Q2): Data collection tools and processes are robustly designed and tested prior to use, learning lessons from previous Building Safety Programme data collections and best practice from across the government analytical community.

Assured Quality (Q3): All data are quality-assured prior to publication.

As the quality of data improves, it is our intention to publish further data on the safety of high-rise and complex buildings.

For transparency, we also published the Building Safety data tables for the first time in the November 2018 data release.

A revisions policy is in place to ensure that any revisions are addressed quickly and systematically.

Public value:

supporting society's need for information and accessible to all **Relevance to users** (V1): The nature of building safety means this data release is of high value to the public, to residents of high-rise buildings and building owners/developers. However, the data release balances disclosure control (risks of disclosing individual buildings) with informing the public and keeping people safe.

Accessibility (V2): Given the immediate nature of building-safety issues, and the need to develop interim solutions and longer-term remediation, data from the BRE are shared with Fire and Rescue Services and Local Authorities once MHCLG are aware of issues.

Officials and Ministers also use the data prior to publication to monitor progress and develop timely interventions. This enables immediate action to be taken. Therefore, the data may be used for operational purposes before publication in this data release.

To assist with public accessibility the data tables underpinning this data release are now published as .csv files.

Clarity and Insight (V3): Complex data are clearly explained in the Data Release – see Appendix 1 and Appendix 2 for further details. Where insight and interpretation are offered, these have been verified with local authorities, BRE and other knowledgeable bodies.

Innovation and improvement (V4): This data release series started in December 2017. As the quality of data improves, it is our intention to publish further data on the safety of high-rise and complex buildings.

Efficiency and proportionality (V5): Burdens on data providers have been considered, and MHCLG has worked to minimise the burden. Given the nature of building safety, MHCLG feels the current burden on data providers is appropriate.

Given issues of public safety, only aggregate level data are published. Hence, further analysis of primary data is not possible.