

Building Safety Programme Monthly Data Release England: March 2021

Technical Notes



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Data collection

MHCLG uses data from several sources in the Data Release:

- Building Research Establishment tests;
- Local authority confirmation following local authorities providing updates on their own building stock in the social sector and working with building owners and agents to identify any cladding issues;
- Housing association confirmation following housing associations providing updates on their own building stock in the social sector and where they act as head lessors in the private sector;
- **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; and
- **Greater London Authority and Homes England** (the delivery partners for the Social Sector Remediation Fund and the Private Sector Remediation Fund) for information relating to the Social and Private Sector remediation funds.

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** until **December 2020**.

The data <u>table</u> on samples received by BRE for testing – which was a count of materials submitted to BRE for testing and was previously published each month – was discontinued in October 2019. The data <u>table</u> of descriptions of large-scale system tests undertaken by the BRE and the number of buildings with similar cladding systems was discontinued in November 2020.

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 process¹ 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 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.

Since **summer 2019** MHCLG has been collecting data on all external wall systems on residential buildings 18 metres and above in height and will publish appropriate information from the data collection in this Data Release when ready.

Since the **October 2019** Data Release MHCLG has reported on buildings known to be vacant. Buildings are vacated for a variety of reasons. This can be because they are being prepared for demolition or that a Fire and Rescue Service or local authority has issued a prohibition order, preventing residents from using the building. A vacated building that has had its cladding removed and with no further works to take place prior to demolition is considered to have been remediated.

It is known that some buildings have had their ACM cladding removed even though remediation is not yet complete. From **March 2020**, we have incorporated further information regarding those buildings that have started remediation – where works have finished but are awaiting sign-off, and where cladding has been removed but where works have not finished.

From **April 2020** until August 2020 we provided information on the impact of COVID-19 on remediation progress for those remediation projects which have already started remediation.

¹ 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.

From **May 2020** we have provided more analysis with a focus on remediation in local areas, for both local authorities and other aggregated areas.

From **June 2020** we have provided more analysis of the characteristics of all high-rise residential multi-occupied buildings. The methodology of which is described in a section below.

From **September 2020** we have robust data on vacant buildings yet to start remediation and these buildings are shown in the charts.

From **October 2020** we have published data on remediation progress by tenure for Greater Manchester, London and the Rest of England as a Web Table.

From **February 2021** we have published data for vacant buildings in all remediation categories and these buildings are shown in the charts.

Methodology: high-rise residential multi-occupied buildings

The central estimate as of April 2020 of 12,500 buildings (private residential, social, and student buildings) is a combination of the following:

- Projected estimate of buildings covered in a dataset held by MHCLG of private residential, social, and student buildings over 18m or over six storeys covering most high-rise buildings. We used a projection method to produce an estimate of the height and tenure composition of the dataset based on information already held.
- The impact of extending the scope to above six storeys and under 18 metres.

The impact of extending the scope is a combination of:

- Buildings in the data provided by the Ordnance Survey ® (OS ®) and the Domestic Energy Performance Certificate (EPC) data which were identified as above six storeys and under 18 metres; and
- A central estimate of buildings in the data provided by the Ordnance Survey
 [®] (OS [®]) and the Domestic EPC data were identified based on height ranges and an illustrative sampling method. Through which, MHCLG captured an estimated representation of buildings considered above six storey and under 18 metres by examining 10% out of a sample size of approximately 5,000 buildings.

All data collections which have contributed to the high-rise building dataset held by MHCLG are designed to collect information on buildings over 18 metres, data collected on buildings under 18 metres is a 'side effect'. There are likely to exist a significant number of six and seven storey buildings under 18 metres which are not present in the high-rise building

dataset for this reason and is why an alternative methodology has been designed to estimate these.

Methodology: Residential buildings between 11 metres and 18 metres in height

The central estimate as of September 2020 was determined by the number of unique TOIDs (Topographic Identifier) from the data provided by Ordnance Survey ® (OS ®) and the Domestic EPC data. A building has been included if it satisfies these criteria:

- 1. A building must have a height between 11 metres and 18 metres.
- 2. A residential building i.e. residential dwellings/flats, residential education and sheltered accommodation

The data provided by Ordnance Survey ® (OS ®) identifies a residential building by the AddressBase ® classification code. The codes were restricted to the following:

- 1. a building containing a residential dwellings/flats
- 2. a building containing a residential education
- 3. a building containing a sheltered accommodation
- 3. A purpose-built building i.e. a building with more than one unique property reference number (UPRN)

The UPRN is an identifier available for each address recorded within the AddressBase ® Data. A building between 11 metres to 18 metres specifically designed and built with multiple addresses i.e. more than one UPRN.

Applying the above criteria, results in an estimate of the total number of purpose-built residential buildings between 11 metres and 18 metres of 77,500 buildings, as of September 2020.

Methodology: dwellings in high-rise residential buildings

To be eligible for inclusion in dwellings estimates as of December 2020, buildings must:

- 1. Fulfil the height criteria for high-rise buildings above.
- 2. Have a recorded number of dwellings greater than 0.
- 3. Be a private or social sector residential building.

Although residential buildings also include hotels and student accommodation, the dwellings counts for these buildings are much less reliable than for private and social sector residential buildings. This is because it is harder to estimate the number of self-contained dwellings in a student accommodation building – for example, individual rooms may be counted as

opposed to flats within a building. For this reason, hotels and student accommodation have been excluded from this analysis.

Dwellings estimates for high-rise residential buildings were calculated using 66% of private and social sector residential buildings in our dataset (i.e. those with accurate dwellings data). As data coverage increases over time, our estimates are subject to change. Dwellings data comes mainly from child UPRN counts (66%) but also Local Authority engagement and Valuation Office Agency (VOA) data. Using UPRNs is currently the best way to increase dwellings data coverage, although it is not a perfect fit. The UPRN hierarchy of a building represents the hierarchy of the address, e.g. a parent UPRN for a residential building and child UPRNs for all flats within, but this may not always correspond to the precise structure of the flats contained in the building. Therefore, dwellings estimates could be subject to under or over estimation.

Methodology: dwellings in buildings between 11 metres and 18 metres in height

The dwellings estimates for 11-18m residential buildings, as of December 2020, have been calculated using topographic identifiers (TOIDs) to represent buildings and the child UPRN count recorded against each TOID in the OS ® database to be the number of dwellings. As noted for the building heights analysis, quality issues with these data mean that our estimates contain an element of uncertainty. This methodology uses TOIDs to identify buildings, which differs to that for buildings over 18 metres where we use buildings identified by Local Authorities, because there is a much smaller proportion of buildings between 11 and 18 metres with accurate dwellings data in our existing dataset.

There are a few key assumptions to this analysis:

- 1. A TOID represents a single building.
- 2. All child UPRNs recorded against a TOID refer to dwellings.
- 3. All records with a count of child UPRNs less than the number of storeys a building has are excluded (where a storey is calculated using height in meters, and every storey is assumed to be 3 meters).

As the dwellings data only comes from UPRNs in this case, the uncertainties of using UPRNs as a proxy for dwellings will likely be greater than for buildings over 18 metres. Also, there are many more buildings at the lower end of the height range which may skew the estimated number of dwellings per building and provide a lower figure than expected. In addition, there are some extremely low values for dwellings such as three or fewer per building. We have taken a central estimate between the average dwellings calculated using all buildings and between a height weighted estimate in order to compensate for this. However, dwellings estimates may still be subject to under or over estimation.

Methodology: leasehold dwellings in buildings over 11 metres

A leasehold dwelling is defined as a dwelling that is owned by a leaseholder but the building and land upon which is it built remains the property of a freeholder. For buildings over 18m or more than six storeys in height, we have used figures reported in the English Housing Survey (EHS) for purpose-built flats, high rise, to estimate the proportion of buildings in the private sector and private (leasehold) dwellings in social sector buildings. For 11-18m buildings, we have used the figures reported in the EHS for purpose-built flats, low rise, to a similar end. The categories do not map perfectly but we expect them to be a reasonable proxy (see more information on the EHS).

Methodology: residents in buildings over 11m

The estimated number of residents living in buildings over 11 metres in height is calculated by multiplying the estimated number of dwellings (method above) by average household size. We have used data from the English Housing Survey (EHS) to assume an average household size of 1.8 in 11-18m buildings (low-rise) and 1.9 in buildings over 18 metres (high-rise). These figures were last measured in 2017-18 and as such may not be up to date. In addition, the EHS categories do not map perfectly to height in metres but we expect them to be a reasonable proxy (see more information <u>here</u>). The estimates are liable to change if there are subsequent updates to our methodology, but this remains our current best estimate as of February 2021.

Data quality

Assessment of data quality

In 2015, the UK Statistics Authority (UKSA) published a <u>regulatory standard for the quality</u> <u>assurance of administrative data</u>. To assess the quality of the data provided for this release, the department has followed that standard.

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, the Greater London Authority and Homes England 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 the Building Safety Programme'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 100 organisations, including local authorities and 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

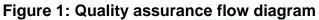
Statistical Series	Administrative Source	Data Quality Concern	Public Interest	Matrix Classification
Building Safety Programme data release	Local authorities' and housing associations' individual data systems	Medium	High	Medium Risk [A2]

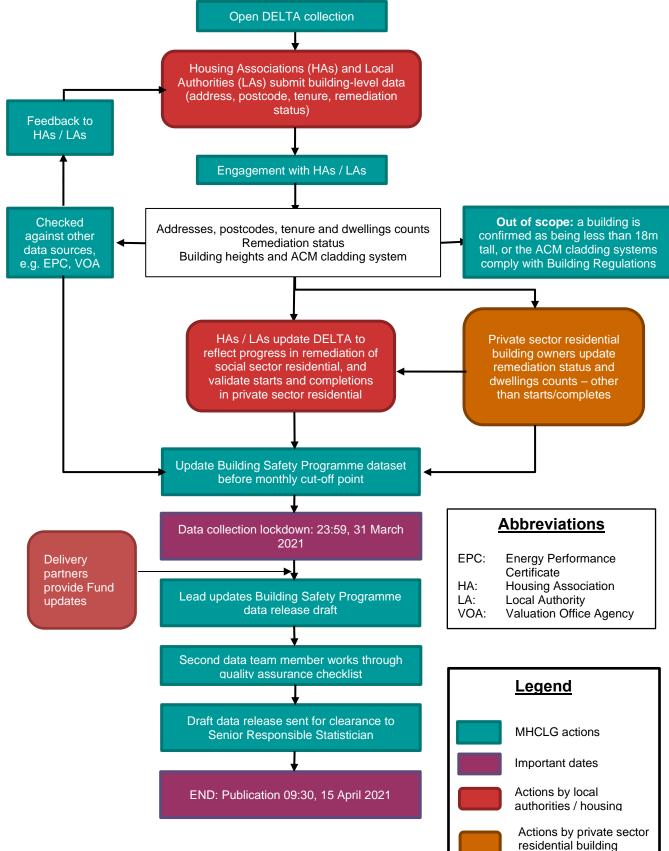
Operational context and admin data collection

Figure 1 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.





owners

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. Delivery partners for the Social Sector Remediation Fund and the Private Sector Remediation Fund also provide updates to MHCLG, with weekly updates on the latter.

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.

Quality Assurance 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, either of which would result in a building falling out of scope of this data collection and reporting.

Producers' QA investigation 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 Energy Performance Certificates (EPC) database and Valuation Office Agency (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 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. In this Data Release there are two yet to be remediated private sector buildings for which we do not have an estimate of dwellings.

For some buildings there is a mismatch between the responses MHCLG received and the VOA data. Where we have data from both sources, the degree of match for private sector buildings is 41% (with 70 exact matches among the 170 buildings with data from both sources) and it is 77% for social sector buildings (111 of the 144 buildings). This results in

a range of estimates for the numbers of dwellings in these sectors for both remediated and yet to be remediated buildings. Where the range is up to and including 300 dwellings, it is reported as a combined number. Otherwise, as in the case of private sector buildings – both remediated and yet to be remediated – we report the range. Where we do not yet have an estimate of dwellings, these are not included in calculating the range. For both sectors, where buildings are known to have vacated their residents, the dwellings estimates include the dwellings in these buildings unless stated otherwise.

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, quality assures the data and the accompanying published data tables. 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 are consistent,
- checking for inconsistencies compared to any previous data releases,
- ensuring the data release map is accurate,
- performing checks related to disclosure so that any ACM clad buildings are not identified in areas with fewer than ten high-rise buildings, 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.

Definitions

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 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.

Energy Performance Certificates (EPC) 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 floor level, tenure, and street address/postcode.

Houses in Multiple Occupation (HMO): A building, or part of a building, consisting of one or more units of living accommodation that is not a self-contained flat or flats. The living accommodation must be occupied by more than one household who share one or more of the basic amenities (toilet, washing facilities and cooking facilities). This definition of HMO is consistent with the standard test. As defined by local authorities in the data provide by the Ordnance Survey ®.

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

Ordnance Survey (OS ®): Ordnance Survey **(OS ®)** is Great Britain's national mapping agency. It carries out the official surveying of Great Britain, providing accurate and up-to-date geographic data.

Care Quality Commission (CQC): The Care Quality Commission (CQC) is an executive non-departmental public body, sponsored by the Department of Health and Social Care. It regulates all health and social care services in England.

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 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.

Residential Education: A building is classified as a residential education if the tenancy specifically states that it must be let exclusively for the purposes of boarding school accommodation and halls of residence, as defined by local authorities in the data provide by the Ordnance Survey ®.

Sheltered accommodation: Buildings are classified as sheltered accommodation if made available exclusively to the elderly, disabled and vulnerable people, as defined by local authorities in the data provide by the Ordnance Survey ®.

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.

Topographic Identifier (TOID): A topographic identifier is a unique and persistent identifier used to uniquely identify real world objects by the Ordnance Survey ®.

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.

Revisions policy

This policy has been developed in accordance with the UK Statistics Authority's Code of Practice for Statistics and the Ministry of Housing, Communities and Local Government Revisions Policy and can be found at https://www.gov.uk/government/publications/statistical-notice-dclg-revisions-policy

It covers two types of revisions that the policy covers, as follows:

Non-Scheduled Revisions

Where a substantial error has occurred as a result of the compilation, imputation or dissemination process, the statistical release, live tables and other accompanying releases will be updated with a correction notice as soon as is practical.

Scheduled Revisions

Where new information becomes available post publication, this is incorporated into the next scheduled Data Release, data tables and any other accompanying documents.

Other information

Uses of the data

The data in this release is used to help the Building Safety Programme make buildings safe and to make people feel safe from the risk of fire, now and in the future. Ministers and officials in the Ministry of Housing, Communities and Local Government use this information to understand progress with the remediation of buildings with ACM cladding systems unlikely to meet Building Regulations and to consider possible policy responses.

User engagement

Users are encouraged to provide feedback on how these statistics are used and how well they meet user needs. Comments on any issues relating to this statistical release are welcomed and encouraged. Responses should be addressed to BuildingSafetyData2@communities.gov.uk

The Department's engagement strategy to meet the needs of statistics users is published here: <u>https://www.gov.uk/government/publications/engagement-strategy-to-meet-the-needs-of-statistics-users</u>

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 the statistics in MHCLG's Building Safety Programme Data Release have been designated as management information rather than 'official statistics', the principles of transparency of high-quality analytical outputs to inform decision making and the public underpin this data release.

Trustworthiness: trusted people,	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
processes and analysis	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. <u>A 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.
	All data collections which have contributed to the analysis of the buildings over six storeys but under 18 metres tall have been provided by the Ordnance Survey ® (OS ®) and Energy Performance Certificates (EPC). Responsibility for the data lies with the data provider.
	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. Periodically, new data are added to the data release once we are content with the quality. Data are also removed if they do not add to understanding of building safety or are superseded by other data in the data release. Where a proposal is made to remove data, this is flagged in the data release with a period of one month given for users to express an interest. User views are then taken into account before final decisions are taken on removing data.
	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.