



Regulator of
Social Housing

Fire safety remediation in social housing in England

Findings from a survey on 11 metre plus
buildings

16 November 2023



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1. Introduction

- 1.1 Ensuring that tenants live in good quality, safe homes is a fundamental responsibility of all social housing landlords (landlords). As the sector faces the effects of ongoing economic challenges, building safety must remain a top priority and ensuring that tenants living in multi-occupied, medium and high-rise buildings are safe from fire safety risks, brings a number of additional responsibilities.
- 1.2 We understand the seriousness with which landlords take these obligations and it is important that the work landlords are doing to address fire safety risks in buildings continues at pace.
- 1.3 All landlords, both private registered providers (PRPs) and local authority registered providers (LARPs) were asked to submit data to the Regulator of Social Housing (RSH) and the Department of Levelling Up, Housing and Communities (DLUHC) on the fire safety remediation of 11 metre plus buildings they are responsible for, to help provide an assessment of whether landlords:
 - are meeting their obligations under the Fire Safety (Regulatory) Order 2005 for assessing fire safety risks associated with the relevant parts of those buildings;
 - understand any risks they identify and how they should be addressed, particularly in relation to external wall systems (EWS) and;
 - have plans in place to remediate buildings they have identified as having life critical fire safety risks in a timely manner.
- 1.4 It is for boards and councillors to understand the landlords' legal obligations in relation to managing the safety of buildings and seek assurance that they are being met and that any identified risks are being well managed and promptly remedied. Ensuring organisations have robust systems and processes, underpinned by accurate and up to date data on fire safety and its management is a key aspect of ensuring that tenants are safe in their homes.

2. Overview

- 2.1 The Fire Safety Remediation Survey (the survey) for 11 metre plus buildings opened to all landlords on 23 August 2023 and closed on 15 September 2023, with data reported as at 31 August 2023. All landlords were asked to report whether or not they are responsible for any residential buildings measuring 11 metres plus or that have 5 storeys or more¹. LARPs were asked to complete the survey on a voluntary basis as this return is not currently on the Single Data List².
- 2.2 Landlords were asked to complete the survey on a registered group basis where this applies to them or as an individual return where it does not.
- 2.3 The survey required landlords to provide aggregate level information to RSH for all 11 metre plus buildings where they are the responsible entity. For the purposes of this survey, the definition of responsible entity is the organisation that has the legal obligation or right to carry out the remediation works, having primary responsibility for the repair of the property (as per the Building Safety Fund definition).
- 2.4 Where landlords are the responsible entity, they were asked to provide information on any life critical fire safety (LCFS) defects, which the survey defined as defects, shrinkages, faults or other failings in a building that give rise to fire safety risks. These are identified by:
- a Fire Risk Appraisal of External Wall construction (FRAEW) undertaken in accordance with PAS 9980³ that assesses the external wall construction or cladding as not “medium - tolerable” (or better); or
 - a fire risk assessment (FRA) that assesses the relevant parts of the building as high risk or medium risk or equivalent according to industry standards.
- 2.5 In addition to the survey return for RSH, landlords were asked to submit fire safety remediation data at an individual building level for assessment by DLUHC.
- 2.6 This report summarises findings from the RSH aggregate level survey.

¹ Where we refer to 11-18 metre buildings this includes those that have 5 or 6 storeys and where we refer to 18 metre plus buildings this includes buildings with 7 storeys or more.

² The [Single Data List](#) is a list of mandated data returns government has agreed with the local authority sector

³ [PAS 9980:2022](#) is a code of practice which sets out a method for competent professionals to conduct Fire Risk Appraisals of External Wall Construction (FRAEW) for existing multi-storey, multi-occupied residential buildings.

3. Summary

- 3.1 We wrote to all landlords asking that they respond to the survey and received a response rate of 88%. 100% of large PRPs and 91% of large LARPs responded⁴. Large landlords account for 97% of all social units in the sector and will be responsible for the majority of 11 metre plus buildings.
- 3.2 Out of the 1,321 landlords that responded to the survey, 32% identified themselves as being responsible for at least one building that is 11 metre plus in height, the majority of whom are large landlords.
- 3.3 In total landlords reported 15,405 buildings over 11 metres in height. The majority of these, 11,230 are 11-18 metre buildings, with the remaining 4,175 buildings measuring 18 metres or more in height.
- 3.4 Fire risks assessments have been undertaken on 98% of all buildings reported, with a further 1.0% planned in the next six months.
- 3.5 1,608 buildings were identified with a LCFS defect relating to the external wall system (EWS). Work is complete on 7% of these buildings and is underway on a further 25%. Work is due to commence on an additional 29% of buildings by September 2024.
- 3.6 Landlords report that 77% of buildings with EWS related LCFS defects are expected to be remediated within the next 5 years, including 29% of buildings by September 2024.

⁴ Large providers own or manage 1,000 or more units

4. Findings of the survey

Response rate

- 4.1 We received an 88% response rate to the survey. 32% (426) of all landlords that responded identified themselves as being the responsible entity for at least one 11 metre plus building, the majority of whom are large landlords.
- 4.2 68% of landlords identified themselves as not being a responsible entity for any 11 metre plus buildings, 90% of whom are small⁵ landlords (both PRPs and LARPs), many of whom will only manage a very small number of homes.
- 4.3 Whilst the survey has been well responded to with all large PRPs completing the return, at the time of writing 14 large LARPs had not yet submitted their data (LARPs were asked to do so on a voluntary basis as this return is not currently on the Single Data List) and so the data is subject to change. Of the remaining non-respondents, 92%, were small landlords who are less likely to be a responsible entity for an 11 metre plus building.

Building stock

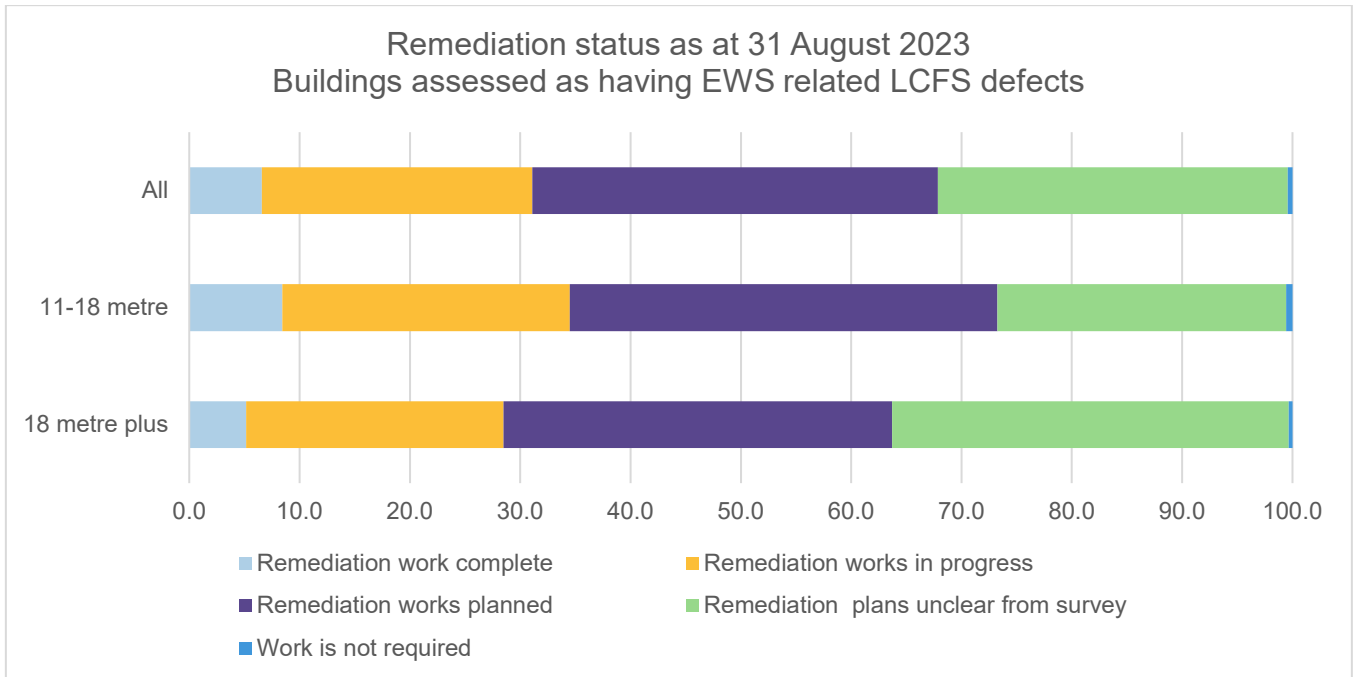
- 4.4 Responding landlords reported being responsible entities for 15,405 buildings; which includes 11,230 buildings measuring 11 – 18 metres in height and 4,175 measuring 18 metres plus. PRPs are the responsible entities for 58% of the buildings reported.
- 4.5 Fire risks assessments have been undertaken on 98% of all buildings reported, with plans to assess a further 1% of buildings in the next six months.
- 4.6 For buildings measuring 11–18 metre in height, 97% have a fire risk assessment and of the buildings measuring 18 metre plus, 99.6% have a fire risk assessment.

Building defects

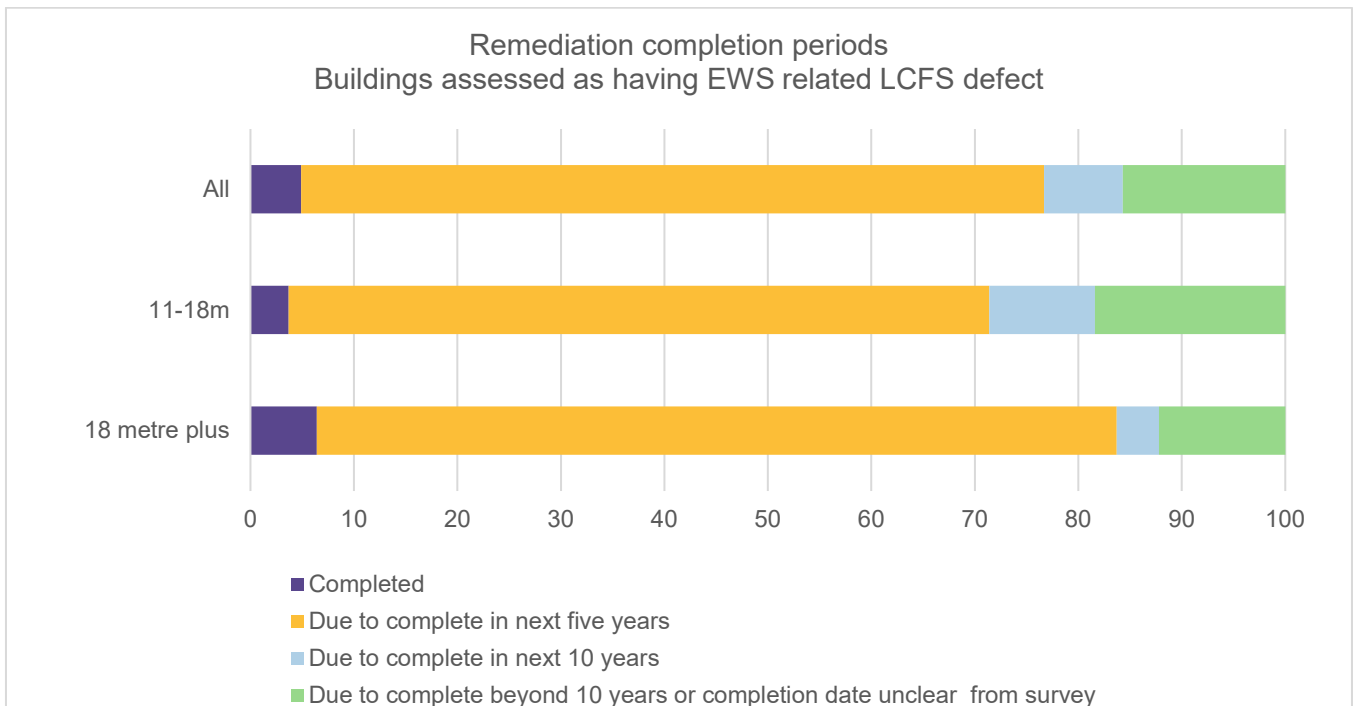
- 4.7 The survey asked landlords to report buildings with LCFS defects related to EWS.
- 4.8 Of the buildings assessed, there were 1,608 affected buildings identified in their most recent assessment.
- 4.9 11-18 metre buildings account for 57% and 18 metre plus buildings account for 43% of buildings with EWS related LCFS defects.

⁵ Small providers own or manage fewer than 1,000 units

Remediation status



4.10 Landlords report that work is complete on 7% of buildings with a LCFS defect related to EWS. This includes buildings where works have completed and are nearing completion as they await building control sign off. Work is underway on 25% of buildings and there are plans in development for a further 37% of buildings. Landlords have signalled the 0.4% of buildings reported as not requiring work are buildings planned for demolition.



4.11 Remediation work is complete or due to be completed for 77% of buildings with EWS related LCFS issues within the next 5 years (by September 2028). A further 7% of buildings are due to have remediation work completed within the next 10 years. The

remaining 16% of buildings consists of those where remediation is due to be completed in over 10 years or completion dates were not clear from the survey. In some cases landlords have reported estimated completion dates though the detailed plans to deliver these dates (as covered in para 4.10 above) are not yet clear from the survey.

- 4.12 Remediation work is completed or due to be completed in the next five years for 71% of 11-18 metre plus buildings and 84% of 18 metre plus buildings assessed as having an EWS related LCFS defect.

Cost of remediation and non-EWS defects

- 4.13 The survey also collected information about non-EWS defects and the costs of remediation. This data is subject to further cleansing and analysis. We expect to provide information on these issues in a subsequent report.

5. Next steps

- 5.1 Landlords are expected to take timely action to remediate LCFS defects from the buildings they are responsible for so that tenants are safe and can feel safe in their homes. It is for boards and councillors to ensure these plans are fulfilled. Risks to tenants in any interim period before works are complete must be fully understood, with landlords taking mitigating actions where required to protect tenants.
- 5.2 We will continue to monitor the performance of landlords in remediating 11 metre plus buildings and the progress they are making against their plans. We will engage with landlords in the course of our regulation including through our programme of inspections from April 2024 where necessary. In the meantime, we are undertaking follow up engagement with providers whose returns indicate that they may be an outlier in progressing this work.
- 5.3 We will write to providers again before the end of the year requesting they provide an update to the Fire Safety Remediation Survey.

6. A note on data quality

- 6.1 RSH survey returns were subject to an internal validation process through the NROSH+ system which helps to minimise data entry errors and we have found the aggregate level results to be broadly consistent with our regulatory understanding of providers' progress on remediation.
- 6.2 An 88% response rate to the survey including non responses from 14 large LARPs means that the data does not provide a complete picture of fire safety remediation plans across all 11 metre plus buildings in the sector.
- 6.3 As landlords adjust their systems to provide the requested data in the required format and the survey becomes more refined over time, we expect data quality across returns to improve. As we work to analyse any future data submissions we will monitor the quality of data provided and engage directly with providers where we have concerns.



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Any enquiries regarding this publication should be sent to us via enquiries@rsh.gov.uk or call 0300 124 5225.

or write to:

Regulator of Social Housing

Level 2

7-8 Wellington Place

Leeds LS1 4AP

The Regulator of Social Housing regulates registered providers of social housing to promote a viable, efficient and well-governed social housing sector able to deliver and maintain homes of appropriate quality that meet a range of needs.