



Regulator of
Social Housing

Fire safety remediation in social housing in England

Findings from the second survey on 11
metre plus buildings

22 February 2024



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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 part of meeting that responsibility, building safety remains a key priority, including ensuring that tenants living in multi-occupied, medium and high-rise buildings are safe from fire safety risks.
- 1.2 We recognise 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 In August 2023, 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 that they were responsible for.
- 1.4 On 16 November 2023, the Minister of State for Housing and Planning outlined in Parliament, in a [Building Safety Update](#), that landlords will be expected to provide quarterly updates on progress on Fire Safety Remediation for all 11 metre plus buildings. A second survey of providers commenced in December 2023.
- 1.5 The survey is to help provide an overview 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.
- 1.6 It is for boards and councillors to understand 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 second Fire Safety Remediation Survey (the survey) for 11 metre plus buildings opened on 1 December 2023 and closed on 31 December 2023, with data reported as of 30 November 2023. Landlords were asked to report whether they were 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. 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.
- 2.4 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).
- 2.5 Where landlords are the responsible entity, they were asked to provide information on any life critical fire safety (LCFS) defects, which were 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.
- 2.6 This report summarises findings from the November 2023 RSH aggregate level survey and progress made since the first 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 The second survey was issued to all large landlords⁴, small landlords⁵ who reported previously that they were responsible for 11 metre plus buildings and any landlord who did not respond to the first survey (in total 695 providers). We have data from 96% of landlords⁶, including from 100% of large PRPs and 100% of large LARPs. Large landlords account for 97% of all social units in the sector and are responsible for the vast majority of the 11 metre plus buildings.
- 3.2 The data submissions for the November survey demonstrate some overall improvement in providers' delivery of remediation from the first survey. There is an improved response rate to this survey compared to the first survey. Some landlords have also improved their data quality, reporting that they have undertaken further work to gain a clearer understanding of their stock which is in scope of the survey. The data provided in this summary are not directly comparable with the information provided following the first survey for these reasons. This is explored in more detail in the main section of the report.
- 3.3 Of the 1,437 landlords where we hold data, 30% identified themselves as being responsible for at least one 11 metre plus building, the majority of whom are large landlords.
- 3.4 In total, landlords reported 17,320 buildings over 11 metres in height. The majority of these, 12,467 (72%), are 11-18 metre buildings, with 4,853 buildings (28%) measuring 18 metres or more in height.
- 3.5 Fire risks assessments have been undertaken on 97.6% of all buildings reported, with a further 1.5% planned in the next nine months.
- 3.6 1,952 buildings were identified with a LCFS defect relating to the external wall system (EWS), which is 11.5% of all 11 metre plus buildings landlords are responsible for. Work is complete on 10% of these buildings⁷ and is underway on a further 27%. Work is due to commence on 24% of those buildings by September 2024.
- 3.7 Landlords report that 78% of buildings with EWS related LCFS defects are expected to be remediated within the next 5 years, including 18% of buildings by September 2024.

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

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

⁶ This includes data from the August survey of the small landlords who reported they did not have responsibility for any 11m plus buildings (who were not issued the November survey) and from five small landlords who had not responded to the November survey at the time of writing, but responded to the August survey with data.

⁷ Remediation works complete includes those where the works are complete but where building control sign off has not yet been secured.

4. Findings of the survey

Response rate

- 4.1 We hold (and report here) data for 96% of landlords, based on data gathered from the first and second surveys. All large PRPs and large LARPs submitted their data for the second survey. This gave a more comprehensive dataset than the first survey, where 14 LARPs had not submitted their data by the time the [first report](#) was produced. We have not received responses to either survey from 61 landlords, all of whom are small landlords, who are less likely to be a responsible entity for an 11 metre plus building.
- 4.2 30% (432) of all landlords where we hold data identified themselves as being the responsible entity for at least one 11 metre plus building. Although there has been a slight increase in the actual number of providers reporting they are responsible for such buildings, this is a reduction from the 32% reported following the first survey, due to a larger increase in responses from landlords without responsibility for such buildings.
- 4.3 Of the 70% of landlords who identified themselves as not being a responsible entity for any 11 metre plus buildings, 90% are small landlords (both PRPs and LARPs), many of whom will only manage a very small number of homes.

Building stock

- 4.4 Responding landlords reported being responsible entities for 17,320 11 metre plus buildings; including 12,467 buildings measuring 11 – 18 metres in height and 4,853 measuring 18 metres plus. This is a 12% increase from the first report, where responding landlords reported being responsible for 15,405 buildings over 11 metres. This increase reflects mainly an improved response rate from larger landlords and also improved data quality. An additional 1,770 11 metre plus buildings were reported in the second survey by providers who did not respond to the first survey by the time the first report was produced. PRPs are the responsible entities for 53% of the buildings reported and LARPs are the responsible entities for the remaining 47%.
- 4.5 Fire risk assessments have been undertaken on 97.6% of all buildings reported, with plans to assess a further 1.5% of buildings in the next nine months.
- 4.6 For buildings measuring 11–18 metres in height, 97.0% have a fire risk assessment and of the buildings measuring 18 metre plus, 99.1% have a fire risk assessment.

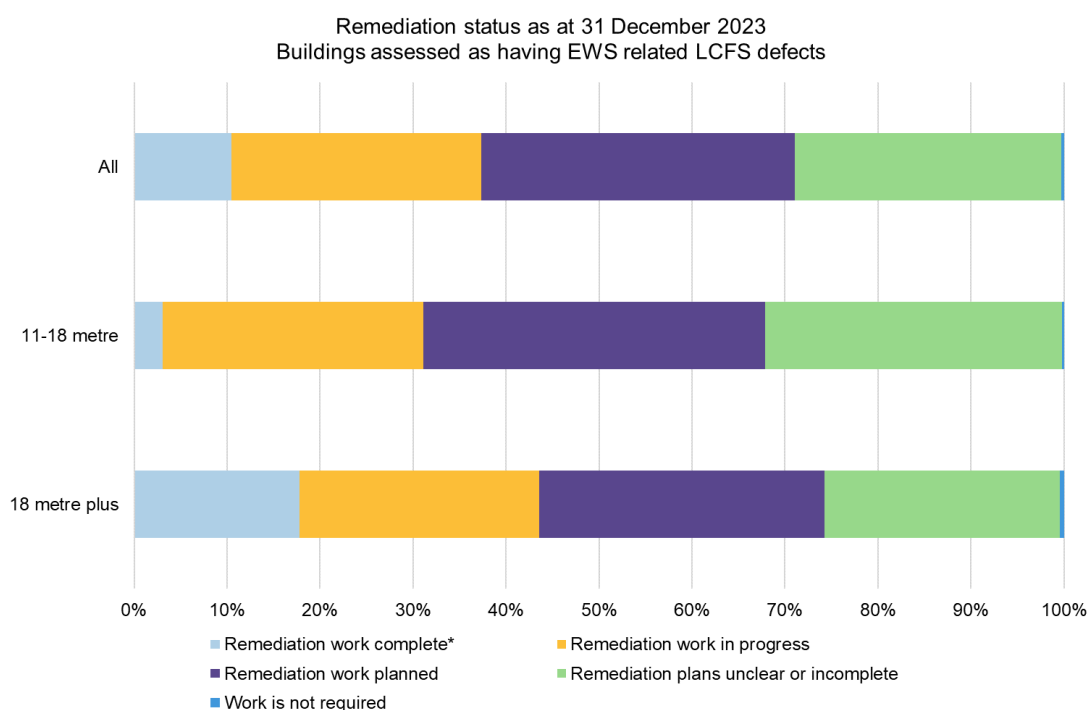
Building defects

- 4.7 The survey asked landlords to report buildings with LCFS defects related to EWS.

4.8 Of the buildings assessed, there were 1,952 affected buildings identified in their most recent assessment, a 21.5% increase from the 1,608 reported in the first survey. This was mainly due to the improved response rate - 249 of these buildings were reported in the second survey by landlords who did not respond to the first survey by the time the first report was produced.

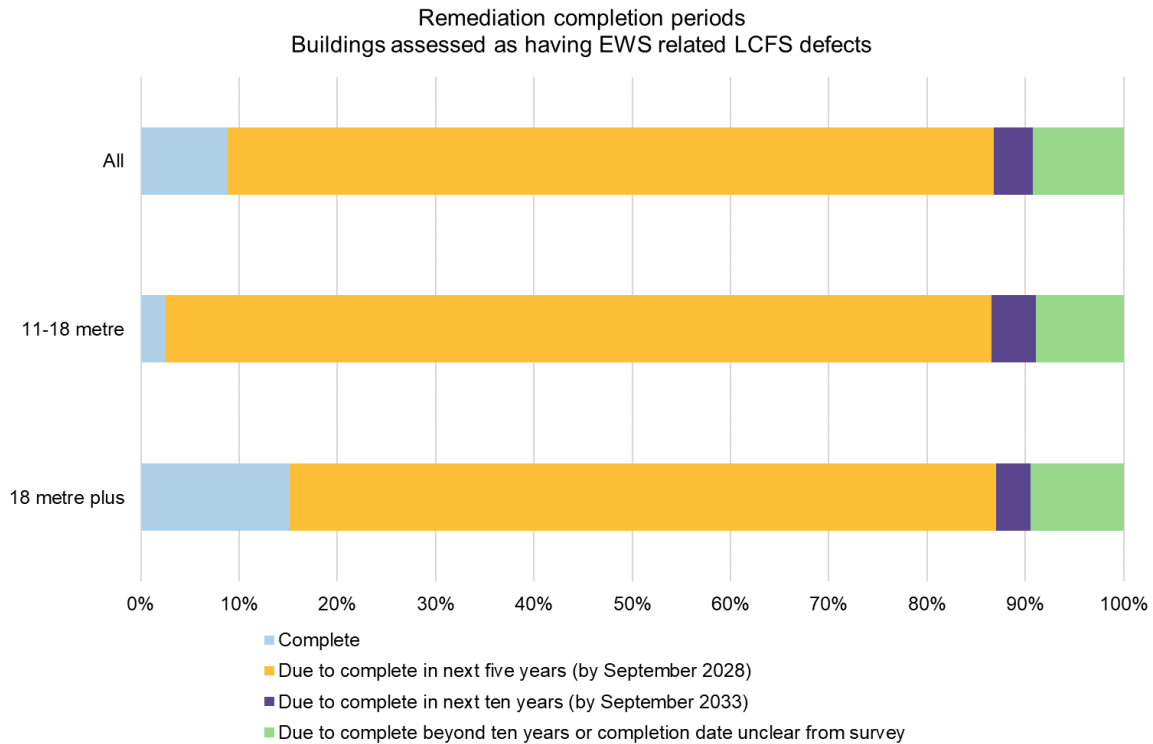
4.9 11-18 metre buildings and 18 metre plus buildings each account for 50% of buildings with EWS related LCFS defects.

Remediation status



*Remediation works complete in this chart includes those where the works are complete but where building control sign off has not yet been secured.

4.10 Landlords report that work is complete on 10% of buildings with a LCFS defect related to EWS (an increase from the 7% reported in the first survey). This includes buildings where works have been completed and are nearing completion as they await building control sign off. Work is underway on 27% of buildings and there are plans in place for the remediation of a further 34% of buildings. Remediation plans are unclear or incomplete for 29% of buildings. Reasons for this include landlords being in negotiations with developers over covering the costs of necessary remediations and working with consultants to complete these assessments. Landlords have reported that 0.3% of buildings are not requiring work, these are likely to be buildings planned for demolition.



4.11 Remediation work is complete or due to be completed for 87% of buildings with EWS related LCFS issues by September 2028. A further 4% of buildings are due to have remediation work completed by September 2033. The remaining 9% 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 – compared to 16% reported in the first survey. In some cases landlords have reported estimated completion dates though the detailed plans to deliver these dates are not yet clear from the survey (as covered in para 4.10 above).

Cost of remediation and non-EWS defects

4.12 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 delivered. Risks to tenants in any interim period before works are complete must be fully understood, with landlords taking mitigating actions required to protect tenants as necessary.
- 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. In the meantime, we continue to undertake follow up engagement with landlords whose returns indicate that they may be an outlier in progressing this work.

6. A note on data quality on the aggregate survey

- 6.1 The RSH survey returns were subject to an internal validation process through the NROSH+ system which helps to minimise data entry errors. We have found the aggregate level results of this survey to be broadly consistent with our regulatory understanding of landlords' progress on remediation and the results of the previous survey.
- 6.2 We hold the data for 96% of landlords. All large LARPs and PRPs responded to the second survey. We have included some data from the first survey in this report to ensure a more comprehensive dataset. The data included from the first survey are the responses from small landlords who reported not having responsibility for any 11 metre plus buildings (who were not then issued a second survey) and from the five small landlords who responded to the first survey but not the second. In total, 61 small landlords have not responded to either survey. This means that although response coverage is very good and data accuracy is improving, the data may not provide a complete picture of fire safety remediation plans across all 11 metre plus buildings in the sector. It should be noted that small landlords are much less likely to be a responsible entity for an 11 metre plus building.
- 6.3 As we analyse submissions, we monitor the quality of data provided and engage directly with landlords where we have concerns about data accuracy. Additional validations have been added to this survey which have helped improve data quality further. We expect landlords to follow the guidance provided with the survey to ensure responses are accurate. Landlords must also ensure their response to the Fire Remediation Survey fully match the DLUHC Building Level Survey response.



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