



Regulator of
Social Housing

Fire safety remediation in social housing in England

Findings from the 2023-24 Quarter 4 survey
on 11 metre plus buildings

20 June 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. 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 Private registered providers (PRPs) and local authority registered providers (LARPs) were first 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 in August 2023. This survey is now issued quarterly, with providers reporting in line with financial quarters. This report summarises the findings of the 2023-24 Quarter 4 survey of providers, which gathered data as at 31 March 2024.
- 1.4 The data from the survey relates to:
 - landlords' obligations under the Fire Safety (Regulatory) Order 2005 for assessing fire safety risks associated with the relevant parts of those buildings;
 - risks landlords have identified, particularly in relation to external wall systems (EWS) and;
 - whether landlords have plans in place to remediate buildings they have identified as having life critical fire safety risks in a timely manner.
- 1.5 It is for boards and councillors to understand landlords' legal obligations in relation to managing the safety of buildings and to 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 2023-24 Quarter 4 Fire Safety Remediation Survey for 11 metre plus buildings opened on 25 March 2024, closing on 22 April 2024, with data reported as of 31 March 2024. 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; 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 Landlords were asked to report on the current remediation status of those buildings where the most recent FRAEW or FRA identified a LCFS defect, which could include buildings whose remediation work has been completed but awaits building control sign off and those awaiting a subsequent FRAEW or FRA.

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.

2.7 This report summarises findings from the Quarter 4 2023-24 RSH aggregate level survey.

3. Summary

- 3.1 The Quarter 4 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 previous surveys. We have data from 98%⁶ of landlords⁷, including from 100% of large PRPs and large LARPs. Large landlords account for 97% of all social housing units in the sector and are responsible for the vast majority of the 11 metre plus buildings.
- 3.2 The Quarter 4 survey had a similar response rate from providers to the previous survey (which was based on data as of the 31 November 2023). As such, the data from these two surveys can be easily compared, as differences in the data are less likely to be due to the improvements in the response rate.
- 3.3 The data submissions for the Quarter 4 survey provide a dataset consistent with the previous survey, showing continued overall improvement in providers' delivery of remediation, although there is still progress to be made.
- 3.4 Of the 1,460 landlords where we hold data, 29% identified themselves as being responsible for at least one 11 metre plus building, the majority of whom are large landlords.
- 3.5 In total, landlords reported 17,375 buildings over 11 metres in height. The majority of these, 12,447 (72%), are 11-18 metre buildings, with 4,928 buildings (28%) measuring 18 metres or more in height.
- 3.6 Fire risk assessments have been undertaken on 98.5% of all buildings reported, with a further 0.7% planned within the next six months of the survey (by the end of September 2024).
- 3.7 1,820 buildings were identified with a LCFS defect relating to the external wall system (EWS), which is 10.6% of all 11 metre plus buildings landlords are responsible for where an FRA has been completed. Work is complete on 6% of these buildings⁸ and is underway on a further 29%. Work is due to commence on a further 13% of those buildings in the next six months (by the end of 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 There were 1,496 registered providers on 31 March 2024, we hold data for 1,460 of these. This consists of 917 previously received nil returns and 543 Quarter 4 survey responses

⁷ This includes data from previous surveys of the small landlords who reported they did not have responsibility for any 11m plus buildings (who were not issued the Quarter 4 survey).

⁸ Remediation works complete includes those where the works are complete but where building control sign off has not yet been secured.

3.8 Landlords report that 88% of buildings with EWS related LCFS defects are expected to be remediated within the next 5 years.

4. Findings of the survey

Response rate

- 4.1 We hold (and report here) data for 98% of landlords. All large PRPs and large LARPs submitted their data for the Quarter 4 survey. We have not received any survey responses from 36 landlords, all of whom are small landlords, who are less likely to be a responsible entity for an 11 metre plus building.
- 4.2 29% (430) of all landlords where we hold data identified themselves as being the responsible entity for at least one 11 metre plus building.
- 4.3 Of the 71% 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

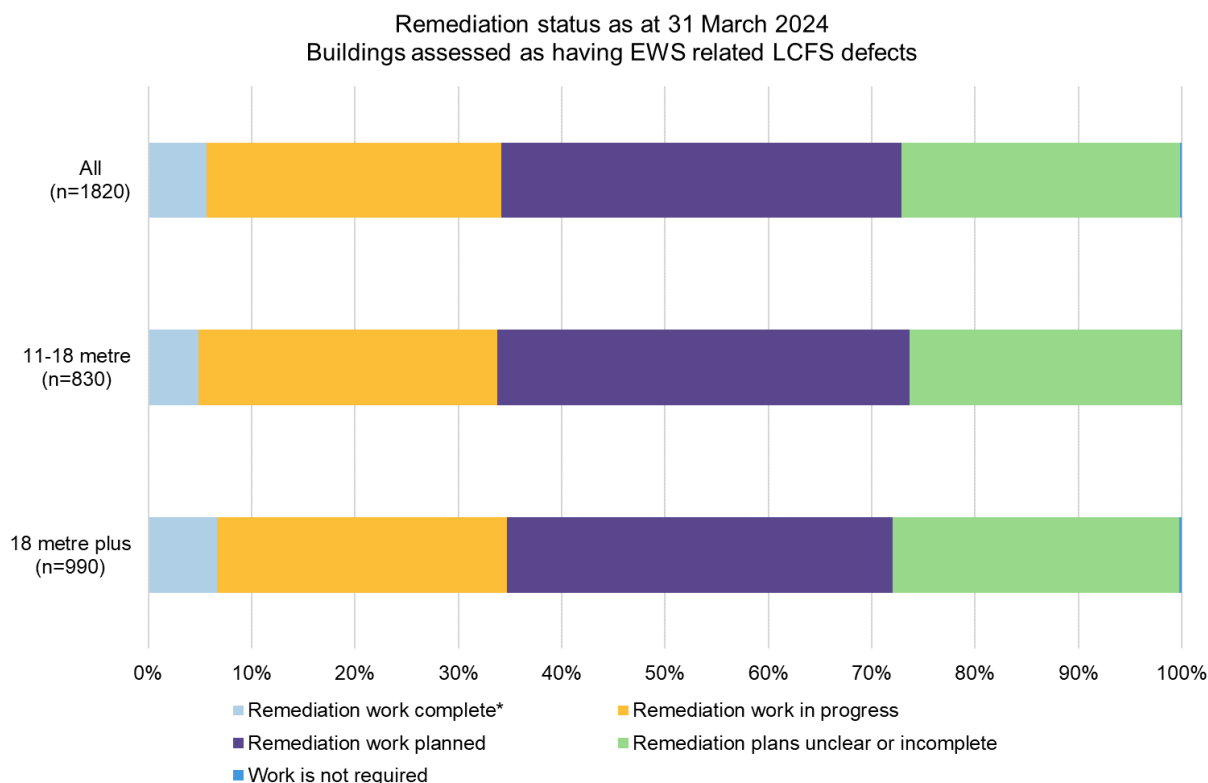
- 4.4 Responding landlords reported being responsible entities for 17,375 11 metre plus buildings; including 12,447 buildings measuring 11 – 18 metres in height and 4,928 measuring 18 metres plus. This is a small increase from the previous report, where responding landlords reported being responsible for 17,320 buildings over 11 metres. PRPs are the responsible entities for 54% of the buildings reported and LARPs are the responsible entities for the remaining 46%.
- 4.5 Fire risk assessments have been undertaken on 98.5% of all buildings reported, increasing from 97.6% reported in the November survey. There are plans in place to assess a further 0.7% by the end of September 2024.
- 4.6 For buildings measuring 11-18 metres in height, 97.9% have a fire risk assessment and of the buildings measuring 18 metre plus, 99.9% have a fire risk assessment, increasing from 97.0% and 99.1% respectively from the November survey.

Building defects

- 4.7 The survey asked landlords to report buildings with LCFS defects related to EWS.
- 4.8 Of the buildings assessed, 10.6% (1,820) were identified as being affected in their most recent assessment. This compares to 1,952 buildings reported in the previous survey (11.5% of buildings assessed). This reduction is at least in part to be due to remedial works being completed in some buildings and a subsequent FRA identifying no LCFS defects.

4.9 11-18 metre buildings account for 54.4% of buildings with EWS related LCFS defects. This shows a change from the previous quarter where 11-18 metre buildings and 18 metre plus buildings each accounted for 50% of buildings with EWS related LCFS defects. This is due mainly to a reduction in the number of 18m plus buildings which have been reported as having an LCFS defect relating to EWS.

Remediation status



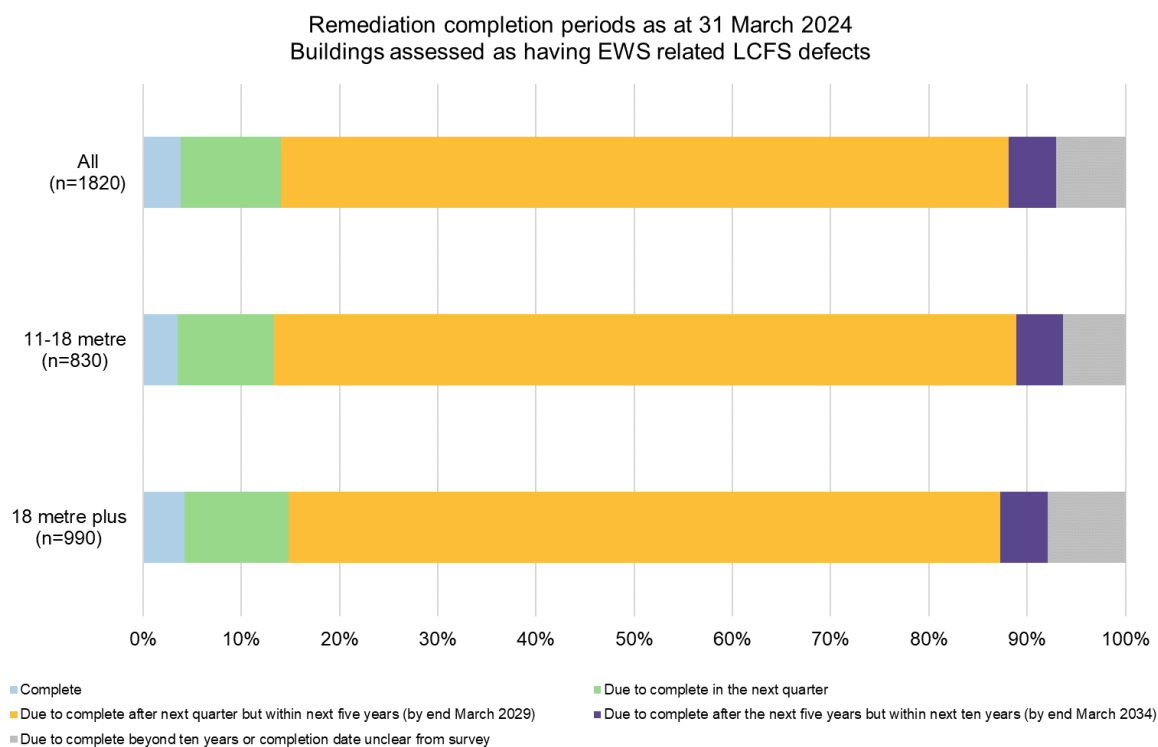
*Remediation works complete in this chart includes those where the works are complete but where building control sign off has not yet been secured.

4.10 Landlords report that work is complete on 6% of the buildings reported as having a LCFS defect related to EWS in the Quarter 4 survey (a change from the 10% reported in the November survey). This change is because the data reported is a snapshot of the number of buildings assessed as having a LCFS defect as at 31st March 2024. Some buildings reported as having works complete in the November 2023 survey will have a subsequent FRA identifying no further work is required, meaning they are no longer reported in this part of the survey.

4.11 Work is underway on 29% of buildings with LCFS defects (compared to 27% in November) and there are plans in place for the remediation of a further 39% of buildings. Remediation plans are unclear or incomplete for 27%⁹ of buildings, compared

⁹ Figures may total to over 100% due to rounding

to 29% in December. Reasons given by some landlords for remediation plans being unclear or incomplete include landlords being in negotiations with developers over covering the costs of necessary remediation works, prioritising works on higher risk buildings and working with consultants to complete these assessments. Landlords have reported that 0.2% of buildings with LCFS defects do not require remediation work, these are likely to be buildings planned for demolition.



4.12 Remediation work is complete or due to be completed for 88% of buildings with EWS related LCFS issues within the next five years (by March 2029). A further 5% of buildings are due to have remediation work completed by March 2034. The remaining 7% of buildings consist of those where remediation is due to be completed in over 10 years or completion dates were not clear from the survey – compared to the 9% reported in the previous survey. In some cases landlords have reported estimated completion dates without confirming from the survey that they have a plan in place.

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 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 continue to monitor the performance of landlords in remediating 11 metre plus buildings and the progress they are making against their plans. We engage with landlords in the course of our regulation, including through our programme of inspections which commenced in April 2024. 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 with the results of the previous survey.
- 6.2 We hold the data for 98% of landlords. All large LARPs and PRPs responded to the Quarter 4 survey. We have included some data from previous surveys in this report to ensure a more comprehensive dataset. The data included from previous surveys are responses from small landlords who reported not having responsibility for any 11 metre plus buildings (who were not then issued subsequent surveys). In total, 36 small landlords have not responded to any 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.
- 6.4 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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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.