

West Midlands Remediation Acceleration Plan

[DRAFT]

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Section A – Background

Aim:

To enable our delivery partners to effectively identify and fix unsafe buildings faster as our residents deserve to live in a safe home.

Context

The Grenfell Tower tragedy resulted in the death of 72 persons. On the same day (14 June 2017) the Prime Minister Teresa MAY immediately ordered a Public Inquiry into the reasons and cause why this 24-storey residential block of flats in West London became engulfed in fire. After a Phase 1 report (*events on the night*) was issued in October 2019, a concluding final Phase 2 report (*examination of how and why a fire spread so quickly*) was published on 4 September 2024.

On the 2 December 2024, Angela RAYNOR (Deputy PM and MHCLG Secretary) provided a government response to the Inquiry stating that *“more than seven years on from the Grenfell tragedy, thousands of people have been left living in homes across this country with dangerous cladding. The pace of remediation has been far too slow for far too long. We are taking decisive action to right this wrong and make homes safe”*.

In December 2024, the Ministry of Housing, Communities and Local Government (MHCLG) reported only 1,436 buildings from 4,234 unsafe buildings were remediated.

Freeholders (accountable persons) are expected to self-remediate unsafe cladding. To support freeholders, Government has made available over 5.1 billion, by setting up three government funding schemes and two programmes. Still some social and private landlords are reluctant to progress remediation, or have experienced process, works or funding blockers and challenges that halt building remediation progress.

In December 2024 Government published a policy paper [Remediation Acceleration Plan](#) (RAP). This national RAP set out new tough targets to fix unsafe buildings and increase the pace of remediation for buildings in England still found with unsafe cladding. It had 3 clear key objectives.

Objective 1: fix buildings faster

Objective 2: identify all buildings with unsafe cladding

Objective 3: support residents

In July 2025, this Government [RAP](#) was updated to outline additional measures. To include social landlord’s remediation funding, a new Remediation Bill with a ‘backstop’, compelling freeholders to remediate unsafe buildings, to establish a new National Remediation System and empowering metro mayors to enhance collaborative working and expertise at local levels by delivering a Local Remediation Acceleration Plan (LRAP).

Introduction

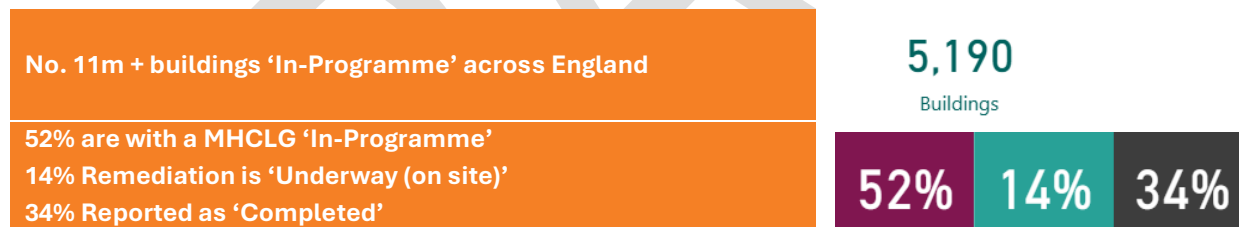
MHCLG have now empowered all Metro Mayors to work in partnership with local authorities and regulators to drive remediation, to outline deliverable local Remediation Acceleration Plans. Mayoral Strategic Authorities (MSAs) are central to delivering RAPs through collaborative working and coordination, by bringing together local expertise, knowledge and resources to create a regional strategy that tackles fire safety.

In response, the Metro Mayor of the West Midlands has brought together key stakeholders and regulatory partners from across the region to develop a regional Remediation Acceleration Plan (LRAP).

The key purpose of this plan is to outline a coordinated approach to expedite cladding remediation efforts within the West Midlands and to identify areas where central government support is essential.

Partners across the region, including West Midlands Fire and Rescue Services (WMFRS) and seven local housing authorities (LHAs) have already demonstrated significant dedication, hard work in tackling and addressing fire safety in a number of high rise (18m+) across the region. Their collaborative efforts have been pivotal in advancing the region's remediation progress and ensuring the safety of its residents.

MHCLG dashboard data report (June 2025) shows a bleak national overview of 11m+ buildings yet started in a government funded scheme or program.



Source: MHCLG website, remediation portfolio dashboard (20.08.25)

Over eight years on and regulators are expected to effectively enforce the law. Angela RAYNER endorsed by rallying Mayors to ensure *“All regulators – local authorities, fire and Rescue Services, and the Building Safety Regulator have a key role to play in using powers to compel building owners to fix their buildings. Regulators need to coordinate activity to make sure that their capacity is used to best effect”*

Now, the West Midlands Combined Authority (WMCA) is fully committed to developing, supporting and convening this RAP and will work with our local delivery partners, other national agencies and stakeholders to tackle this challenge head-on. Only by working collectively and across to accelerate remediation efforts and help safeguard communities across the West Midlands.

Cladding remediation now represents a new and critical focus area for the WMCA.

Scope, Targets and Objectives

Our West Midlands Remediation Acceleration Plan (LRAP) will outline a plan that considers how remediation will be accelerated in buildings across the region. All high-rise (18m+) and medium-rise (11- 18m) buildings (*as defined in the Building Safety Act 2022*) are in scope. This LRAP focuses only on remediating unsafe external cladding systems but aims to provide assurances to residents living with other known defects.

Priority 1 – Fix buildings faster - our LRAPs' first and foremost **Priority** focuses on our commitment to ensure all residential buildings above 11m in height have combustible and unsafe external cladding fully remediated or reduced to an 'tolerable' risk level.

Priority 2 – Identify buildings with unsafe cladding – our LRAP will prioritise identifying all existing (and new) 11m+ buildings with unsafe cladding in its EWS.

Priority 3 – Support our residents – our local residents and groups will be engaged and supported throughout the remediation process.

West Midlands RAP has set its '**Targets**' to align with government goals:

- ✓ Every known private residential high rise building above 18m, and medium rise building between 11– 18m will have undergone remediation works to remove unsafe ACM/non-ACM cladding in its EWS, by the end of **December 2029**.
- ✓ By the end of **December 2029**, every known 11m+ building with any existing unsafe ACM/ Non-ACM cladding in its external wall system shall either be (i) already within an approved remediation programme, (ii) shall already have a realistic date for completion, or (iii) the responsible owner/ primary accountable person will be the recipient of legal action or legal proceedings being taken against them that will culminate in a sentence.

WMCA will deliver its '**Objectives**' through an overarching 'Delivery Framework'. This framework will define how an accelerated remediation pathway looks and articulates how the pace of remediation will be increased across the West Midlands. This framework will focus on capacity and capability to deliver its five objectives. These are,

Objective 1 – Driving and monitoring remediation progress,

Objective 2 - Coordinate intervention activity,

Objective 3 - Work effectively with MHCLG/ CSS, and our delivery partners

Objective 4 - To create a trustworthy data set for high and medium rise buildings.

Objective 5 – Advocating for residents

Status of West Midlands Region

In 2024, Angela Rayner wrote to our Metro Mayor explaining that *“Many of the unsafe building that require the attention of regulators will be those that are failing to progress sufficiently quickly through the government’s remediation programmes.”*

Currently, the MHCLG and Homes England (Cladding Safety Scheme) are recording remediation data in national data sets. These data collections are referenced by WMCA.

In July 2025, a MHCLG West Midlands quarterly data set was released that confirmed the following. Numbers include buildings from tenures including, private, social, student, public and hotel. See *glossary B*.

- 715 buildings (11m+) are listed across all tenures
- 87 buildings are **‘In Programme - not started on site’**
- 70 buildings are **‘non-portfolio – not started on site’**
- 27 **‘unknown buildings’**
- West Midlands has a lower 39.1% of buildings recorded as **‘In Programme – not started on site’** as compared to the national average of 52%.
- West Midlands has a higher 61.5% of buildings recorded as **‘Completed’** as compared to the national average of only 34.05%
- From 715 known buildings across all tenures, only 273 buildings are involved in a government ran scheme or programme, leaving 442 buildings unaccounted for.

Table 1 - MHCLG Remediation comparison figures (July 2025) for 11m+

	In Programme	(%)	Underway	(%)	Complete	(%)	Grand Total
West Midlands	87	31.9%	18	6.6 %	168	61.5%	273
National average		52.02%		13.93%		34.05%	

MCHLG data confirms in Table 2, that 87 buildings fall across all government schemes, but have failed to start a remediation programme. Majority of eligible buildings are from private and social sectors. 18 buildings are covered under the CSS, whereas the highest proportion (36) are signed up to the Developer Remediation Contract (responsible actors scheme). The remaining 31 buildings are listed from social housing providers.

Table 2 - MHCLG Remediation Scheme Data: West Midlands (July 2025) for 11m+

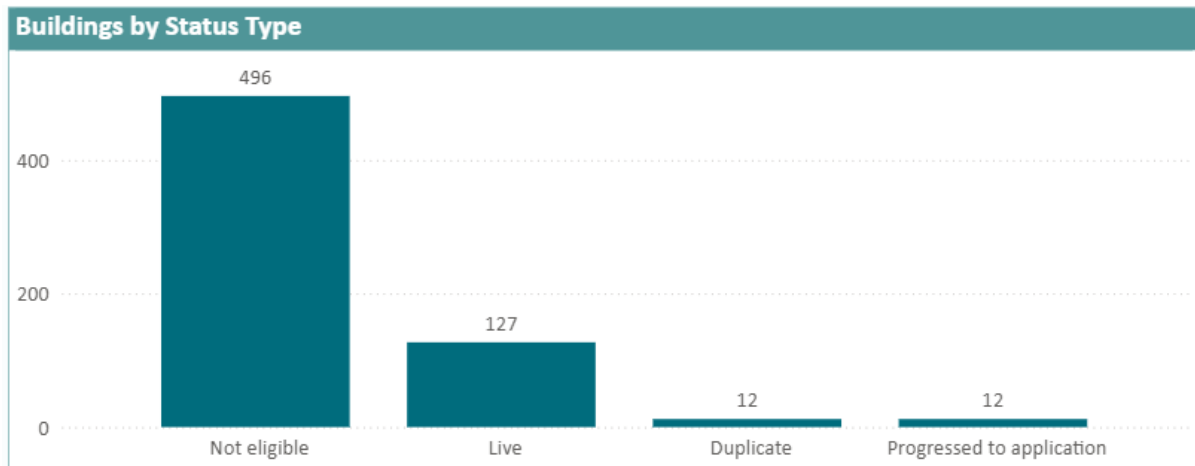
Scheme	In Programme	Underway	Complete	Grand Total
ACM	1	0	12	13
BSF	1	4	7	12
CSS	18	0	0	18
Developer	36	9	5	50
Social	31	5	144	180
TOTAL	87	18	168	273

Cladding Safety Scheme (CSS)

Cladding Safety Scheme (CSS) regional data in Figure 1 shows a number of buildings (496) do not meet CSS eligibility criteria for needing remediation so are unable to join the CSS remediation scheme. In comparison to 127 eligible buildings that were invited ('pull in') onto and accepted into the CSS remediation scheme. This plan will explore why these live applications are not advancing onto a CSS application stage.

Only 12 applications are reported as progressed to application stages.

Figure 1 - CSS Data: West Midlands (August 2025) above 11m



Section B – Stakeholders and Delivery Partners

MHCLG wrote to WMCA in late 2024 requesting the LRAP should ‘*convene regulators and other key partners to prepare a local remediation acceleration plan... and play a crucial role in driving this forward by bringing together regulators, local government and other key partners.*’ WMCA accepts this.

We recognize that making buildings safer requires a multi-disciplinary approach.

Confirming a building’s fire safety status and ownership is complex. To unravel these complexities requires expertise. Stakeholders hold valuable local knowledge on individual buildings, whereas delivery partners possess a range of experts, funding, legislative powers and authority with an armory of enforcement options. This plan, and its supplementary documents, will allocate resource and effort to where it can make an impact most efficiently and effectively and where powers can have the best outcome.

The following main ‘**stakeholders**’ have been identified as,

Freeholders own the building and land. Each building has a registered owner that is listed as a freehold under HM land registry. Freeholders have proprietary over the entire building to include all communal/common areas and the building structural fabric.

Managing Agents are hired by freeholders to provide a specialist property management service to the building. As a ‘responsible person’ they handle the responsibilities of the building, by maintaining the building’s upkeep, look after finances and legal obligations.

Right to Manage Groups (RTM) are comprised of leaseholders that setup a recognized and independent company, that have a legal right to take over the management of the building from the freeholder. RTMs make decisions on repairs and maintenance issues.

Resident Engagement Groups represent resident’s interests in a building. The aim is to enhance the voice of the residents in how the building is kept and serviced.

The following ‘**delivery partners**’ have been identified as,

West Midlands Fire and Rescue Services: who enforce the primary fire safety legislation. The Regulatory Reform (Fire Safety) Order 2005 (“the order”), the Fire Safety (England) Regulations 2022 (as amended), as well as other Regs. WMFRS has a dedicated Fire Protection department that undertakes fire safety inspections and compliance audits, undertakes prosecutions of those who are in breach of their legislative obligations. The Fire Protection department can also support operations who respond to emergencies.

Local Housing Authorities (LHAs): fall within 7 Metropolitan councils and make up the West Midlands region. Each LHA (sometimes called ‘Private Rented Sector’ depts.) have enforcement powers given under the Housing Act 2004. These powers are used to

tackle the ‘hazard of fire’ in housing. EHOs also have access to a variety of other supplementary legislation to bring about compliance. Local housing authorities have oversight and review their district housing stock. Private Rented Sector departments can execute enforcement actions to include ‘Orders’ and ‘Notices’ (example: Improvement Notices). Building owners and responsible persons are held accountable to improve building safety.

Joint Inspection Team: The national fire safety Joint Inspection Team (JIT) is hosted by the Local Government Association and funded by MHCLG. The JIT is a multidisciplinary team that comprises of fire engineers, environmental health officers, building control inspectors, that are supported by intelligence officers and external legal advisors. The JIT are invited and hosted by our local housing authorities to inspect high rise buildings under the Housing Act 2004. Specialist fire safety advice is received after inspection in a ‘HHSRS assessment,’ a ‘report of findings’, legal advice and fire safety training.

Building Safety Regulator (BSR): currently the BSR is a department of the Health and Safety Executive (HSE) but will soon transition to stand alone under the MHCLG. It was set up under the Building Safety Act 2022 to regulate high risk buildings, raise safety standards of all buildings and help professionals in designing, construction, and building control, to improve their competence. A BSR contingent is based at WMFRS HQ and sets out rules to protect the design and construction of higher-risk buildings. They help give residents confidence in the safety and standards of their building. BSR has a legal responsibility to consult with residents through the resident’s panel.

Regulator of Social Housing (RSH): regulates registered providers of social housing. RSH takes appropriate action if the outcomes of the standards are not being delivered. Following an expansion of powers, from 1 April 2024, they have begun carrying out regulatory inspections of social landlords. RSH objectives are set out in the Social Housing (Regulation) Act 2023.

Homes England: is the government’s housing and regeneration agency that delivers the Cladding Safety Scheme (CSS) on behalf of MHCLG. CSS provides funding to remediate buildings that are above 11m in height. They are responsible for reaching out to building owners to invite them into the scheme; managing the distribution of funds to buildings who have applied to the CSS; and monitoring and enforcing against buildings that have applied to the funds.

Health and Safety Executive (HSE): HSE is the body within which the Building Safety Regulator currently operates. They are also the regulator for the Health and Safety at Work regime, which monitors safety throughout the remediation stages of construction.

Section C – Remediation Blockers and Challenges

Some local enforcement authorities are already operating successfully together to tackle fire safety issues in unsafe high-rise and medium-rise buildings, across tenures. Yet numerous problem areas and obstacles are being experienced, reported, and fed back and discussed by our delivery partners (and stakeholders) exposing remediation slowdown, procrastination, limitations, or blockages that compromise progress.

To meet the government's national RAP, and our West Midlands RAP, this plan aims to highlight these obstacles, by confronting and combating these issues by providing workable solutions, that set a pathway to meet our desired **3 priorities** and **targets**.

Listed below are identified challenges and blockages, along with proposed actions, some already in progress, to resolve findings. Each issue is listed below against a key priority to ensure we 'fix buildings faster,' and 'identify buildings with unsafe cladding' and 'support residents'.

1. Remediation has stalled in developer, or freeholder-controlled buildings.

In the West Midlands there are 45 'Developer-led Remediation Contract' arrangements in place, with only 9 in progress, that leaves 36 not started. This equates to 80% of contracts are 'In Programme' and stalled, so failing to start (underway status).

Likewise, under the Cladding Safety Scheme (CSS) 127 buildings are eligible to apply and enter the CSS funding scheme, but to date only 12 buildings have progressed into a CSS application stage. It is unknown why freeholders are not applying for funding, or are delaying, stalling and not self-remediating buildings.

BLOCKER - Following a peer review of developer-led remediation programmes by a national managing agent operating regionally in the West Midlands, it was found that FRAEWs are becoming the point of contention and a matter of conflict between developers and freeholders. This translates directly as 60-70% of building stock cannot move forward, so presents a significant blocker to the remediation progress.

Blockage is caused by both the developer and freeholder having individually instructed a Fire Engineer to undertake a FRAEW on the same building. Once drafted and issued each party discusses findings, deficiencies and areas for remediation in each FRAEW. The developer and freeholder cannot agree on what works are required in a programme of remediation, as differences in each fire engineer's findings are significantly different.

ACTION – to **fix buildings faster** we will eliminate remediation blockers by working with each developer and freeholder for each of the 36 cases, to help restart each programme. Whether by offering (i) mediation, (ii) or our delivery partners provide additional expertise, (iii) or by working and liaising more closely with the case officer, at MHCLG (RAS dept), involved in monitoring each case.

Either way advice will need to consider applying the PAS:9980 guidance and risk matrix. These will be applied as used for completing a building assessment and rating existing risks associated with each fire engineer's FRAEWs findings, then matching these to the building's relevant design and combustibles found in the external wall systems.

2. Missing unsafe buildings

A key priority for West Midlands is to identify buildings with combustible and unsafe cladding, where owners have not already applied for remediation funds or been self-remediated. This plan will build on the MHCLG's 'Missing Buildings Strategy' by supplementing any data captured within its National Remediation System and ordnance survey data, with new data discovered and found locally on any existing unsafe buildings.

CHALLENGE In 2024 Government piloted a 'missing buildings project' to examine raw data on 11- 18m buildings. Birmingham provided a resource and location to test and trial the data. A methodology was established to compare government unsafe building raw data content and accuracy against Birmingham's data retrieved from site visits.

A sample of MHCLG unsafe building raw data has been checked by officers in Birmingham carrying out observation visits against post codes. MHCLG raw data was analysed and found to be inconsistent, inaccurate with actual unsafe building findings, with a good proportion of buildings missing off the raw data sets. During a Fire Safety Group meeting LHAs discussed and shared findings. A consensus was reached confirming government data was incorrect, as the number buildings listed was an under estimation of actual buildings present. LHAs and WMFRS are discovering unsafe buildings, not listed on existing data sets.

ACTION to **identify buildings with unsafe cladding** each LHA will proactively create a master list of buildings above 11m+ across all sector industries (*private residential, social housing providers, public, student and hotel*) and make an appraisal of each building's EWS.

- a. in addition to already organised local fire safety training sessions (with the JIT), additional regional support will be offered to LHAs to be able to identify missing buildings within each district,
- b. support will be provided to identify EWSs and rainscreens composed of and consisting of flammable products,
- c. if not already available, LHAs and PRS officers (in conjunction with its partners) will gather intelligence on each building's EWS and coverings to determine whether these are 'safe', 'unsafe', or consist of a 'mixture of both', then make a decision on whether the building needs prioritizing for an inhouse fire safety inspection, a JIT inspection, **OR** referring/discussing with WMFRS.

3. Limited regulatory enforcement

Only authorised officers (incl. WMFRS/ LHAs and building control etc.) have appropriate powers to force freeholders and responsible persons to remediate unsafe buildings.

CHALLENGE To date only LHAs and WMFRS have exercised these powers to bring about remediation. We recognise that building control, through ACIVICO, are not yet fully engaged and utilised to help bring freeholders and responsible persons to account for failing to remediate unsafe buildings.

ACTION to fix buildings faster it is the intention of this plan that **all** enforcement authorities and agencies can operate and enforce individually, or collectively, to hold accountable persons liable by

- a. ensuring each enforcement authority (*including building control & building safety regulator*) plays a share, or equal part in helping bring about remediation. Increasing more applicable legislation (Building Safety Act 2022) to be used.
- b. understanding, working through and removing any 'conflicts of interest' to ensure each enforcement authority can operate simultaneously without scrutiny, repercussions, or to avoid of any legal recourse,
- c. ensuring any fiscal resources, or in-region expertise are made available to support any process that successfully drives effective remediation,
- d. ensuring the most appropriate legislation is used to accelerate remediation
- e. ensuring enforcing authorities can develop a joint working approach, using specific powers to tackle remediation issues on a 'case by case' basis.

4. Effective enforcement and Legal Services backing

To accelerate remediation progress and ensure a successful outcome against an accountable person/s, all enforcement actions (EAs), enforcement notices (ENs) or orders need following through to completion. This plan recognises that all formal notices, actions, or orders, need to be intelligence driven, technically correct, based on robust evidence and served on the correct recipient, or these face delays in process. Once EA/ENs are served and active, good practice dictates mid-term compliance checks should be undertaken to monitor and check compliance.

BLOCKER Accountable persons are filing appeals with first-tier tribunals, on grounds outside LHA control. Although sufficient intelligence gathering is undertaken on building ownership, some legal documents (long term leases, service agreements etc.) between legal entities (interested persons') pose difficult to access, are not easily interpreted, split defects and deficiency ownership between various legal entities and accountable persons use their own specialist fire engineers to counter formal actions to avoid liability. These issues delay remediation and detract and remove officer time away from other caseloads.

Not all enforcement authorities are taking enforcement action against building owners when sufficient evidence is available. Not all enforcing authorities are able to accept external fire safety report findings, to generate enforcement actions due to internal process. Not all enforcing authorities are following up on enforcement action

compliance end dates. When enforcement actions/notices expire and left compliance points left unattended that can undermine the severity and seriousness of any schedule of works provided.

In-house Legal Services are struggling and under capacity, overworked and sometimes lack the property and contract capability to support non-compliance of notices, actions and orders being served.

ACTION to fix buildings faster it is recognized that enforcement needs to be accelerated following any fire safety inspection. Time has passed for the graduated approach to enforcement. Now any accountable person shall be held accountable through authorities applying their enforcement procedures to remediate buildings.

To assist, this the plan will aim to,

- a. support and resource existing legal services by bolstering the existing regional WMFRS Legal Service department.
- b. provide additional legal capacity and resources to existing WMFRS/LHA legal teams, and support 'LHA PRS housing officers', the designated 'regional fire safety team' and designated 'tall buildings team', with property, contract and litigation related issues.
- c. specialist legal support (property & litigation) will assist in interpreting lease agreements and contracts and help establish demised ownership details.
- d. it will liaise with counsel and provide an enhanced legal service for future enforcement, to include supporting LHAs PRS teams in applying for 'enforcement supplementary funding' (2 options)
- e. all inspections carried out on unsafe buildings, shall automatically generate enforcement to explicitly require combustible and unsafe ACMs/non-ACM cladding to be removed.
- f. Enforcing Authority internal enforcement policies, procedures and processes shall be reviewed, revised, if necessary, to ensure these are fit for purpose.

All inspections carried out on unsafe buildings shall automatically generate enforcement that will explicitly require unsafe ACMs/non-ACM cladding to be removed.

Non-compliance shall be met with prosecution, or an equivalent serious sanction.

5. Limited enforcement capacity and capability

Unsafe buildings need visiting and inspecting if they are not self-remediating, or applying to government aided funding schemes, or involved in developer led remediation contract schemes.

Regulatory enforcement authorities (Environmental Health, Building Control, Fire and Rescue Services) are duty bound to use specific regulation to tackle the threat of fire hazards in 'unsafe' buildings. Each regulatory authority has powers to authorise officers to exercise these duties. Fire safety in high-rise and medium-rise buildings is complex

and requires highly trained competent, experienced and knowledgeable officers to complete these works.

BLOCKER - Regulatory Services are operating at full capacity and do not have the capacity or technical capability, or sufficient training to assess fire safety in all high-rise and medium-rise buildings within their respective districts. Competent staff are dwindling, leaving the profession and creating skill vacuums in teams. Unless intelligence on ownership is completed correctly, fire safety defects and deficiencies identified and assessed adequately, and the HHSRS: addendum for the profile for the hazard of fire and in relation to cladding systems on high rise residential buildings is followed correctly, it is likely a freehold owner, or its managing agent will challenge decisions.

Inspection work requires a multidisciplinary approach, to ensure all aspects of fire safety and non-compliance is sufficiently detected and discovered. Individual LHAs are at risk of failing to complete inadequate fire safety works if teams and officers are ill-prepared, under resourced, poorly trained and do not possess the competencies required to match opposing parties.

ACTION – To **fix buildings faster** we will resource already successful and existing regulatory teams (incl. BCC Fire Safety Team & WMFRS Tall Buildings Team) by strengthening and bolstering capacity and capabilities where remediation success is proven. Any enforcement team that can demonstrate capability and possess desired enforcement skill set and can hold to account responsible person/s will continue to receive support and resources.

Additional grant funding uplifts will ensure officers can continue operating and delivering regional work and enforce on unsafe buildings to ensure the West Midlands RAP is effectively delivered. Any enforcing authorities that receive funds to pay for officers' salaries will work solely for the region and be designated as regional officers, although hosted by employing enforcing authorities. Competent officers and teams will remain directly employed by each regulatory authority but collaborate together to help deliver the West Midlands RAP.

A **West Midlands fire safety team (WMFST)** will be created, that is modelled on and will replicate the highly successful JIT. This **West Midlands fire safety team** will be unique to the region as this can be deployed into any district, under invitation from a host LHA.

The **WMFST** will consist, and comprise, of fully authorised regulatory officers under their employing authorities. Officers will be sourced from LHA teams, **WMFRS** and inhouse Building Control departments (or outsourced companies, ACIVICO). Together they will provide a multidisciplinary team, and in partnership provide a multi-skilled team of officers that provide expert competencies that will collaboratively tackle fire safety issues collectively. The **WMFST** will hold a full complement of officers, when deployed, to satisfy competencies to carry out any fire safety inspection.

Officers to be included in the **WMFST**,

- principal, or senior EHO (lead officer),
- fire safety inspector (*minimum – Watch Commander band 3*),
- building control inspector (*minimum - category 3 inspector*),
- intelligence officers

6. Lack of a lead regulator and a coordinated approach

It is the experience that some regulators are working hard to accelerate remediation, some are working under capacity and other regulators are absent.

CHALLENGE –All regulators are required to pursue the accountable person/s to make unsafe buildings safe. There are no grounds, or guidance for deciding which regulator shall be ‘lead regulator’, or take a lead on specific deficiencies, or fire safety defects. Each regulatory body is operating individually, working uncoordinated and without clear direction on what fire safety defects it can and cannot enforce on.

ACTION – To **fix buildings faster** a new MoU will be developed and drafted between at least 9 existing authorities (7 LHAs/ WMFRS/ WMCA) but also look to include building control depts. to tackle fire safety in high rise and medium rise buildings. This MoU will build on and enhance the ‘*protocol between Local Housing Authorities within the West Midlands County boundary and West Midlands Fire Service to deliver improved fire safety (ref: FS11005222, ver.4)*’ but will still remain relevant. This MoU will provide clearly defined lead regulator responsibilities and delegate key tasks to each regulator. It will be developed to follow governments [guidance for regulators](#), and will aim to standardize and dictate which regulator will lead on enforcing categories (‘means of escape’ etc.) for fire safety defects, yet accept case by case scenarios.

7. To establish data sharing arrangements for partners within a duty of candour.

Data sets and collections are still not flowing freely between participating partners and agencies, especially with a ‘Protection of life’ exemption on GDPR not being applied routinely. A system is required to track remediation status and upload data.

CHALLENGE All our partners use different IT systems and premises management databases, or platforms (Tymly, M3, NRS etc.). Systems are not compatible across authorities, or with other partners, making data sharing impossible. Each partner’s digital and IT security departments have stringent security and access policies that prevent external user access, again making sharing data problematic. Even the Homes England’s National Remediation System (NRS) limits LA and MSA access only to their respective area. There is no central or regional system available giving all partners the access required,

ACTION - to **fix buildings faster** this plan will aim to set up an effective data sharing agreement between all LHAs, WMCA, WMFRS. Information on government funding

programmes will be shared equally over an easily accessible platform with dashboard capability. A new data sharing agreement will be signed and dated by all partners.

An existing WMFRS database (Tymly) provides a local and best option, but application and rights needs exploring. It is intended to explore whether Tymly, or an alternative system, can offer a full data sharing capability and used for the following purposes,

8. Qualitative data, integration and accelerator functions/posts

West Midlands requires a centralised system to capture Govt and local data that is accurately recorded, useful and that represents a 'single source of truth'.

CHALLENGE Each partner records data fields differently according to its authority's needs. When comparing top line data sets from government sources and local authority obtained data it is common that figures don't match, or approaches to collection show discrepancies and indifferent figures. Incorrect figures cause confusion and doubt. Coupled with various programmes (ACM, BSF, CSS, RAS etc.) that are all running simultaneously pose a varied and volumetric issue with qualitative data being accurate. Neither is there any data captured on newly constructed buildings that have received a building safety certification from Building control depts and now occupied.

ACTION to **identify buildings with unsafe cladding** a dedicated resource (post) will be created to provide data collection, integration, capture and sharing. The plan will look to support procurement of digital tools that help build up a picture of missing buildings, including reviews of different building control registers, EPC registers and radar mapping surveys, and will use tools coming forward from Homes England under CSS.

To meet this data challenge this plan will also aim to,

- a. use (existing) or create a regional database with agreed standardised data that provides a 'single source of truth' for mid/high-rise buildings,
- b. it will track the status of an individual building's fire safety defects and remediation status,
- c. it will monitor progression within government funded/supported programmes
- d. it will provide a centralised collection point for all building safety data from WMFRS (*audits etc.*) / LHA records (*HHSRS assessment/scoring etc.*)
- e. it will provide a central repository capability for all fire safety documentation records to be uploaded onto
- f. it will be compatible with Govt depart, to allow data collections and returns
- g. it will provide easy access to all regional partners (authorities) on all matters relevant to the building's remediation status (*building safety defects, enforcement actions, building case officers etc.*)

9. Resolution of freeholder/managing agent disputes, including broadening scope of current funds.

After gathering intelligence on unsafe building, delivery partners are engaging with responsible persons to establish ownership accountabilities and identify why buildings have not started progressing self-remediation.

Some buildings already undergoing remediation work is being stopped or halted, due to insufficient funds, causing delays as project teams and work men down tools.

BLOCKER - delivery partners are finding many instances of freeholders and managing agents are entering into long-running disputes over who funds remediation work. Both parties accept and recognize the importance of undertaking work to safeguard its residents but sometimes cannot decide who should pay for a 'survey' or the 'work'. If surveys are completed these are withheld and not shared. Scope of work cannot be agreed between parties, or there is disagreement on known non-compliance (i.e. poorly fitted fire door sets). Decisions fail on decisions as to whether defects are construction related building safety defects or are caused by lack of service or maintenance.

Parties are reliant on advice. There are many external façade surveys being carried out, and not all are compliant with PAS:9980:2022 (FRAEWs) so will generate different EWS findings, some will identify combustibles, some will presume. Fire engineers (qualified and competent) use different methodologies to inspect and identify defects. Advice is offered with a different perspective on opinion, as to whether EWSs are safe, or unsafe. Internal fire safety defect reports (compartmentation surveys etc.) also differ on what works are required to comply, so causing disagreement between different parties.

If new building safety defects are found, or uncovered after funding is agreed, any subsequent defect will not be in scope or included in work specifications and therefore not costed for. This is proving both challenging for residents and significant blocker to progress. As variation notices need submitted and additional funding requires a new application. More importantly when internal surveys are being completed many other non-compliance areas (*incl. compartmentation, poor fire stopping, poor emergency lighting etc.*) are identified, making the building 'unsafe' if other mitigating measures (i.e. sprinkler systems) are not evident. It is not clear what constitutes a safe building.

Reasons even This is Guidance note or mediation function to define which Responsible Entity has a repairing obligation, in instances where there are resident managing companies, right to manage agreements.

ACTION - to **fix buildings faster** where other 'associated work' is identified and outside the scope of current funds (e.g. internal compartmentation works), but essential to make the building safer; we will push for MHCLG to amend the terms of current funds such as BSF and ACM that only covers issues relating to cladding. Likewise, we will appeal to HE to try to resolve individual cases 'in application' by seeking additional funding from the CSS scheme to cover additional defects. We will aim to try and provide a form of mediation to decide on what works should be covered to ensure the building is considered as compliant by applying Government guidance, or seeking regional, or national expertise to resolve areas of dispute.

and **support residents** by providing a lead on progressing funding to finish off remediation works on buildings already started, to expediate the time building companies are on site. We will always consider the residents first by seeking to clarify from Government confirms as constituting a safe building.

10. Improved community engagement and transparency (WMCA)

It is recognised that all the blockers, challenges and actions listed above will directly impact both negatively, and positively, on residents. This plan aims to both indirectly support our residents throughout the remediation process and ensure its residents and resident groups are heard and are given the opportunity to communicate experiences, provide real intelligence and engage in the remediation process.

CHALLENGE Communications with residents in unsafe buildings, and buildings of concern, can be inconsistent, and leaseholder campaign groups (such as BRUMLAG) need to be better informed, with better public accountabilities.

ACTION - to **support residents'** WMCA will be open and transparent as to how remediation is being progressed within the region. WMCA will provide engagement opportunities through regular in person meetings to table concerns and issues, so these can be heard and actioned, where possible. WMCA will continue to keep our residents informed and well versed on remediation challenges and blockers at the higher levels, so they are kept informed of Government and local authority relevant issues. WMCA will also be working with managing agents held responsible for facilitating the safe evacuation from buildings in the event of fire, by ensuring all residents are kept well informed, kept safe, and kept fully informed of any planned, in application and remediation programmes by their managing agents.

11. Plain English review of relevant legislation & definitions to enhance understanding

Multiple government agencies and authorities are involved in the remediation process. Consultations on newly proposed legislation, Bills, guidance and reviews, are continuing to be released and each provides new directions and definitions.

CHALLENGE - With multiple agencies working in overlapping but distinct regulatory regimes, a review of terminology for mutual comprehensibility would be beneficial. With new primary legislation, regulations and guidance material comes new terminologies and definitions. RAG rating systems used between government support funding schemes (ACM, BSF etc.) to assess and monitor application and remediation progression are evaluated differently to CSS 'application overview' RAG rating systems. Different departments consider the characteristics of 'unsafe' differently.

ACTION – WMCA will continually lobby central government and any ministerial department involved in building safety to seek clarity on which terminology and definitions should be pursued to champion plain English.

Section D – Remediation Delivery

Objective 1 – Driving and monitoring remediation progress.

WMCA is expected by government to provide a convening role by bringing together all delivery partners and stakeholders to help remediate unsafe buildings within the region.

WMCA covers the seven metropolitan authorities of the West Midlands: Birmingham, Coventry, Dudley, Sandwell, Solihull, Walsall and Wolverhampton. The West Midlands metropolitan authorities are each served by WMFRS. Each one of our metropolitan authorities has stock falling within its private and social housing sectors. Each authority already has a robust plan in place that manages and monitors buildings in their district. While WMFRS is developing a tall buildings strategy that aligns to this LRAP.

This plan is focused on accelerating remediation by tackling already experienced issues, but to be relevant in the future this plan will need to be revised as a living document, so it can change according to needs. But currently, as identified in Section C, the following key areas will receive intervention and integration.

- All relevant data will be augmented into a single source of useful and true data
- Harnessed data will be transparent and shared
- All unsafe 11m+ buildings across all tenures will be found
- All enforcement authorities will be optimally used
- Enforcement will be increased and tightened up
- All enforcement authorities will be better directed and coordinated (MoU)
- Resident's voices will be heard

Other issues that need attention include

- Working with MHCLG/ CSS to remediate other known building safety defects (i.e. compartmentation), when defects are not self-remediated, or eligible for funding with government schemes or programmes.

LHA Intelligence gathering

Each LHA is limited by capacity, but Coventry has employed 1 designated building safety officer, whereas Birmingham started setting up a team in June 2023, that now comprises of 5 building safety officers (1 administration, 2 intelligence and 2 EHOs).

All LHAs will undertake the necessary intelligence gathering for known 'unsafe' buildings or 'buildings of interest', using existing PRS staff, or any designated building safety officers employed within their respective districts. Buildings are regularly being identified with ACM, and non-ACM combustibles (HPL, spandrel panels), or both, and many buildings have missing, incorrectly installed, or failed EWS cavity barriers (horizontal, or vertical).

Each LHA will continue gathering intelligence to identify whether accountable persons are progressing self-remediation, or not. LHAs will also continue gather intelligence on why building owners are not engaging with government funding support programme, if eligible. In either cases LHAs will discuss inspection, or enforcement options with other enforcing authorities to decide appropriate intervention to help accelerate remediation.

Currently 87 (Table 3 below) privately owned 11m+ residential buildings within government's 5 remediation programmes are in programme, yet remediation has not started on site.

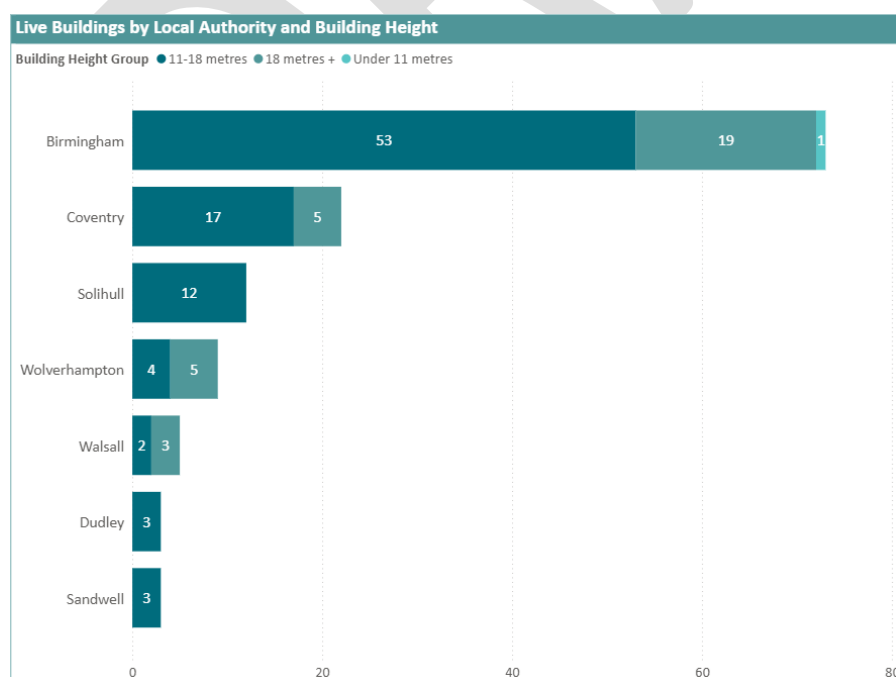
Table 3 - MHCLG Remediation Scheme Data: West Midlands for 11m+

LA	In programme	(%)	Underway	(%)	Complete	(%)	Grand Total
Birmingham	43	20%	18	8.40%	154	71.60%	215
Coventry	13	100%	0	0%	0	0%	13
Dudley	1	100%	0	0%	0	0%	1
Sandwell	0	0%	0	0%	4	100%	4
Solihull	13	65%	0	0%	7	35%	20
Walsall	8	100%	0	0%	0	0%	8
Wolverhampton	9	75%	0	0%	3	25%	12
TOTAL	87		18		168		273

(July 2025, MHCLG figures)

LHAs will explore why only 127 eligible buildings listed below in figure 2 only have 12 progressed to application, leaving questions as to why the remaining 115 eligible buildings are not in limbo. With the majority (57.5%) being in Birmingham.

Figure 2 – CSS Remediation Scheme Data: West Midlands (August 2025) for 11m



(August 2025, Homes England figures)

All 11m+ building data found across all tenures (*incl. new missing buildings*) will be uploaded to a new regional data set, the existing DELTA (government) collections and local enforcing authority LHA premises databases (M3 etc.).

LHA enforcement and inspection work

All 11m+ residential buildings identified and given a 'unsafe' status will form part of a fire safety inspection programme, that will all need inspecting, in addition to WMFRS fire audits.

A list of all complex and unsafe 11m+ buildings will be evaluated and assessed in a new Risk Matrix (TBD), scored then ranked according to risk posed. It is likely criteria will include,

- I. level of combustibles in EWS, vs. available mitigating factors
- II. height of building & number of occupants
- III. LHA intelligence & compliance history on WMFRS records
- IV. site management compliance
- V. is building owner engaged
- VI. West Midlands Fire Safety Steering Group decisions

Results will determine when an unsafe building will be scheduled for inspection.

Buildings with a significantly increased risk will be selected and scheduled first. Priority buildings will be evaluated and scheduled for inspection by the West Midlands Fire Safety Steering Group who coordinate fire safety inspection work programmes. Where demand is high; unsafe buildings will receive a fire safety inspection based on the following order,

First = by the relevant **LHA**

Second = by the **JIT**, as hosted by the relevant LHA

Third = by the **West Midlands Fire Safety Team**, as hosted by the relevant LHA

The WMFST will only inspect an unsafe building and provide a HHSRS, and basic compliance report, if required.

In order for a fire safety inspection to occur the host LHA will furnish the WMFST with all relevant fire safety documentation made available (*as retrieved under s.235 HA2004*). This will ensure the WMFST can make suitable and sufficient preparations, pre inspection (if desktop research is needed).

Access by the WMFST is ONLY permissible if 'authority to enter' notices (s.239, HA 2004) are first served on all residents and interested persons' (*example: Freeholder & Managing Agent*). A fire safety inspection can only be undertaken if host LHA is present on the day of inspection and available all day. A brief 'WMFST report of findings' will be generated by the WMFST, discussed with the relevant LHA officer, then issued.

A 'WMFST report of findings' shall only contain the identified 'deficiencies' and 'fire safety defects', a 'schedule of work' to remediate the identified deficiencies and defects' and any other advice the lead officer agrees to support with.

The host LHA will ultimately be responsible for taking any formal action against the accountable person.

LHA monitoring

LHAs along with government agencies will both monitor the 18 buildings currently underway within the 5 government funded remediation schemes. LHAs will also monitor the 12 buildings currently underway with the cladding safety scheme, to ensure are progressing well. Frequency of monitoring (engagement) will be decided by the respective LHA. But LHAs will aim to monitor each building every three months.

If an LHA has carried out enforcement on a building owner recipient, then any active notice (Improvement Notice) will need to be regularly checked for compliance. This ensures works are progressing well at a suitable pace and the compliance deadline is met. If LHAs ignore carrying out compliance visits and works are delayed, this will increase the probability of prosecution, that is labour intensive, time consuming, complex and delays remediation.

It is expected an onsite 'compliance visit' should be completed every three months, and evidence collected of levels of compliance against the required items on the schedule of work.

Each LHA will monitor the buildings progress and report any problems, or concerns, back through the West Midlands Fire Safety **Steering** Group to ensure issues can be acknowledged and secondly intervened to try and rectify any problem, if resolvable.

Objective 2 - Coordinate intervention activity

There are already existing arrangements in place between our enforcing authorities to coordinate enforcement activities. West Midlands Fire and Rescue Service (WMFRS) and the 7 local authorities in the WMCA geography (Birmingham, Coventry, Dudley, Sandwell, Solihull, Walsall and Wolverhampton) have a written protocol in place, namely the '*protocol between Local Housing Authorities within the West Midlands County boundary and West Midlands Fire Service to deliver improved fire safety (ref: FS11005222, ver.4)*', that outlines responsibilities for each body. This existing protocol is geared towards premises types other than complex buildings and privately-owned residential high-rise buildings.

Intervention and enforcement will primarily be led through a new MoU. That will be drafted before the end of 2025. When finally approved by all LHAs and WMFRS, the MoU will be effective from 1 April 2026, or preferably before.

This will address issues raised in points 5 and 6 in Section C above and provide effective joint working partnership arrangements, that will strengthen the existing working relationship between the WMFS and local Housing authorities. It will ensure both high-rise and mid-rise buildings are considered as complex buildings and consider different complex scenarios and interconnected building types. The MoU will also take stock of the [Remediation Enforcement Guidance](#) for regulators.

It will also address working alongside the Building Safety Regulator (BSR) and Building Control.

Objective 3 – Working effectively with MHCLG/ CSS & Delivery Partners

WMCA is recognised by the MHCLG (and HE) set a roadmap to enable, coordinate and finance a response to tackle remediation progress. WMCA has no enforcement powers, but government has financed WMCA to support and convene its local enforcing authorities to operate effectively and together.

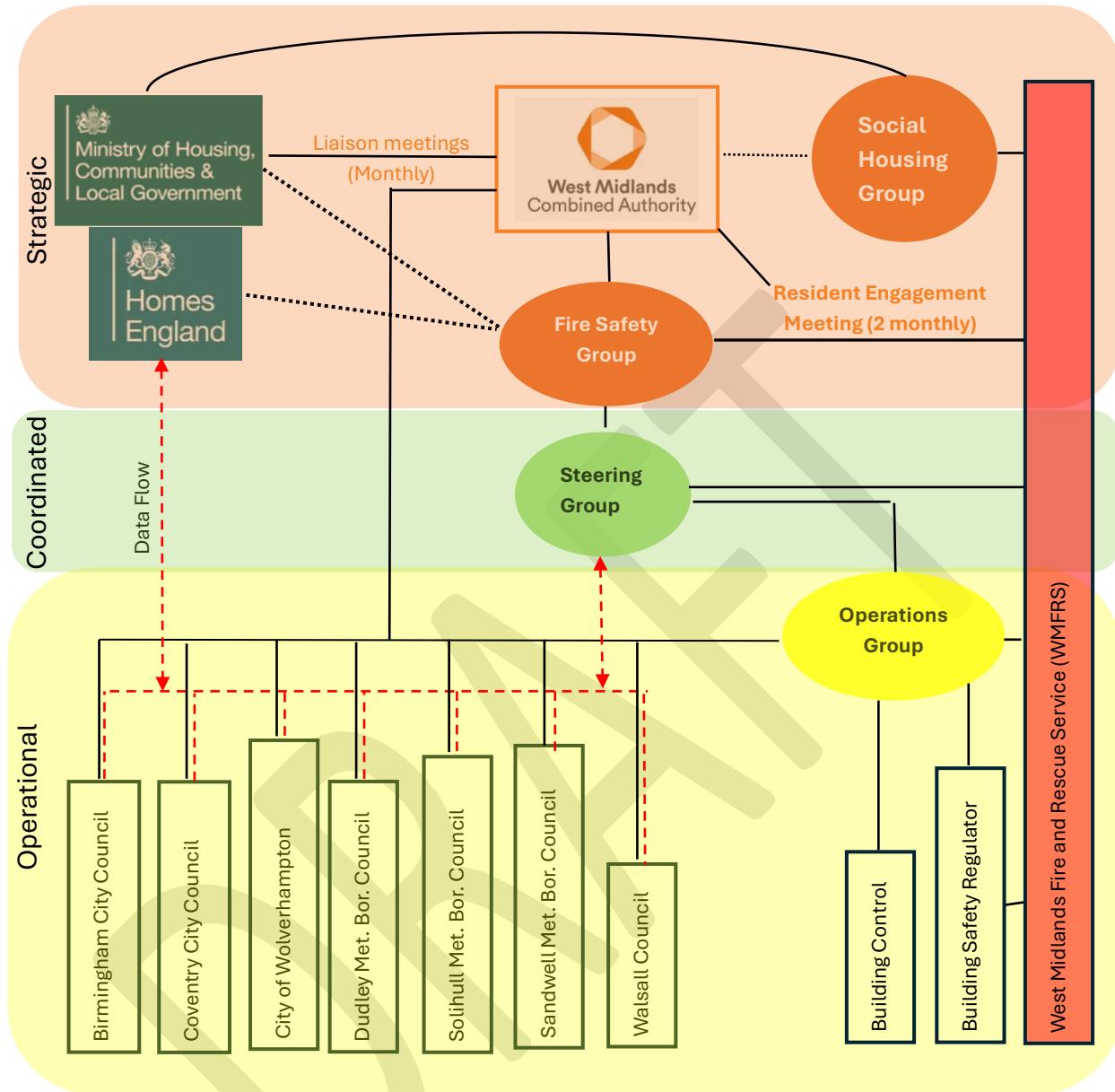
See diagram 1 for the new West Midlands **Remediation Framework**, that shows how all groups and meeting interrelate and flow.

Two existing groups (Fire Safety Group and Social Housing) will become **strategic** groups. Previously these have offered a networking and liaison opportunity for its members and provided access to MHCLG expertise, and a Q&A forum and receive up to date news from the ministry. Two new **operational** groups (steering and operations) will be set up (see *Section E* for remit details).

A West Midlands Fire Safety Group (WMFSG) is the primary forum that facilitates collaboration and partnership working for regulators and key partners. Set up and convened by Birmingham City Council this quarterly meeting provides the only meeting space and backbone to help drive and steer the private residential sector high-rise building safety regime within the region. This group will continue as pivotal for the LRAP.

A West Midlands Social Housing Group (WMSHG) meets quarterly and is attended by social sector asset management leads that oversee progress in high rise building progress and provides a discuss forum. This group is convened by a Professor Mike Leonard who has ties with Birmingham City University and Building Alliance CIC. WMCA already has a strong working relationship with MHCLG.

It will be crucial that WMCA can notify and upload unsafe building (bottom-up) data that is unknown to either MHCLG, or CSS, so these can be incorporated in the ‘Pull In’ stage at CSS. Likewise, missing building data (top-down) will need to be transferred and notified through the HE dashboard database. At present the HE dashboard is not populated with or does not provide ‘missing building’ data.

Diagram 1 – Remediation Framework

WMCA and its delivery partners are strengthening new ties and will work more closely with both the Building Safety Regulator (BSR) and Building Control (BC).

Building Safety Regulator (BSR) and Building Control (BC)

While engagement with the BSR has thus far been limited it is understood the BSR has a key role for HRRBs, as defined in the Building Safety Act 2022.

There are two aspects of work this plan will look to the BSR for assistance.

Firstly, all unsafe buildings in the region will be directed to apply for a Building Assessment Certificate (BAC) at some point over the next five years. All buildings with unmitigated ACM will be directed to the regional BSR team to consult on applications,

so will be able to provide advice and guidance in an applications' early stages. In future years, discussions are ongoing about which buildings will be called and when, but will be based on risk profile, and at a national level. The BAC process will assess whether those responsible are taking all reasonable steps to reduce and manage the risks of fire spread and structural collapse, and assessment is through a Multi-Disciplinary Team made up of fire expertise (usually from WMFRS) and structural engineers.

Secondly, the BSR is the Building Control (BC) authority for all new high-rise builds, or refurbishments of existing high-rise buildings. All applications to remediate combustible cladding in unsafe buildings will require approval from the BSR in its role as the BC Authority. Although national BSR capacity is limited, WMCA is now working more closely with our regional West Midlands BSR team, where transparency is vital in understanding how we can work more effectively together to support and accelerate individual remediation applications.

Objective 4 - To create a trustworthy data set for high and medium rise buildings

Two government data sets (CSS: National Remediation System – NRS/ MHCLG quarterly data collections) are currently available. Although majority of data provides a useful guide, many data fields show an indifference, incorrect figures, each system is incompatible with the other, each system provides different definitions, each system uses the same tool (RAG) but with inherently different uses and ratings to confuse the user. Combined with each delivery partner's individual premises database and unique data causes additional uncertainty and confusion as to which data set is correct and which data is incorrect.

WMCA has its own MSA regional dataset, as provided through the HE data dashboard. This data has different fields and data in comparison to the HE data dashboard used by each metro council, that is also different to fields and data available on the WMFRS dashboard.

Other datasets at present do not feed into a dashboard include the BSR data, and building control data. Neither are any of the LHA premise database systems compatible with each other, unless software systems (M3) use the same system. Even if they did IT security systems prevent external users accessing the system.

All delivery partners are simply asking for is a 'single source of data' that is trustworthy for its medium and high-rise buildings.

A database will hold data representing the region's single version of the truth. This plan attempts to incorporate all data onto a regionally owned, user-friendly central repository system, that is accessible by all. First, the WMFRS 'Tymly' database will be considered, as remains the only existing and viable option available and is already used by our WMFRS partners.

Missing buildings data

To target unknown and missing buildings, we will be working in partnership with Homes England (the grant delivery team). Our local LHAs will be working with Homes England resources to utilise the case management system to access the 4-story database to help identify buildings under the Missing Building Strategy. Findings from their investigation work, using Ordinance Survey datasets, will further rule buildings in, or out, of the 'pull in' process to ensure every building is either ruled out, or has a remediation route. The system will enable the sharing of local knowledge direct with the programme through their remediation case management system.

As well as the ability to hold a single version of truth, the system will allow programmes to escalate cases of concern to regulators directly, ensuring they have all case history for those units and documentation allowing rapid action.

To support, accelerate and increase the pace of remediation in the West Midlands, we will work closer with the HE and interrogate its remediation case management system (NRS) that provides the official building data, but will seek better quality data. All LHAs, WMFRS and MWCA now have access to their own building dashboard data.

This plan is also considering using an external company (example: [WhenFresh](#)) to find missing buildings, as previously used by Coventry City Council. WhenFresh specialises in pulling together proprietary, private and public residential property datasets to deliver innovative data-driven solutions. This plan will look to establish the most effective ways to discover these buildings, along with using our officers on the ground.

We will also promote the use of the Homes England '[Tell us tool](#)' to give concerned residents a route to request an audit of their building. So, a building's information can be gathered and taken through our new risk matrix.

Objective 5 – Advocating for Residents

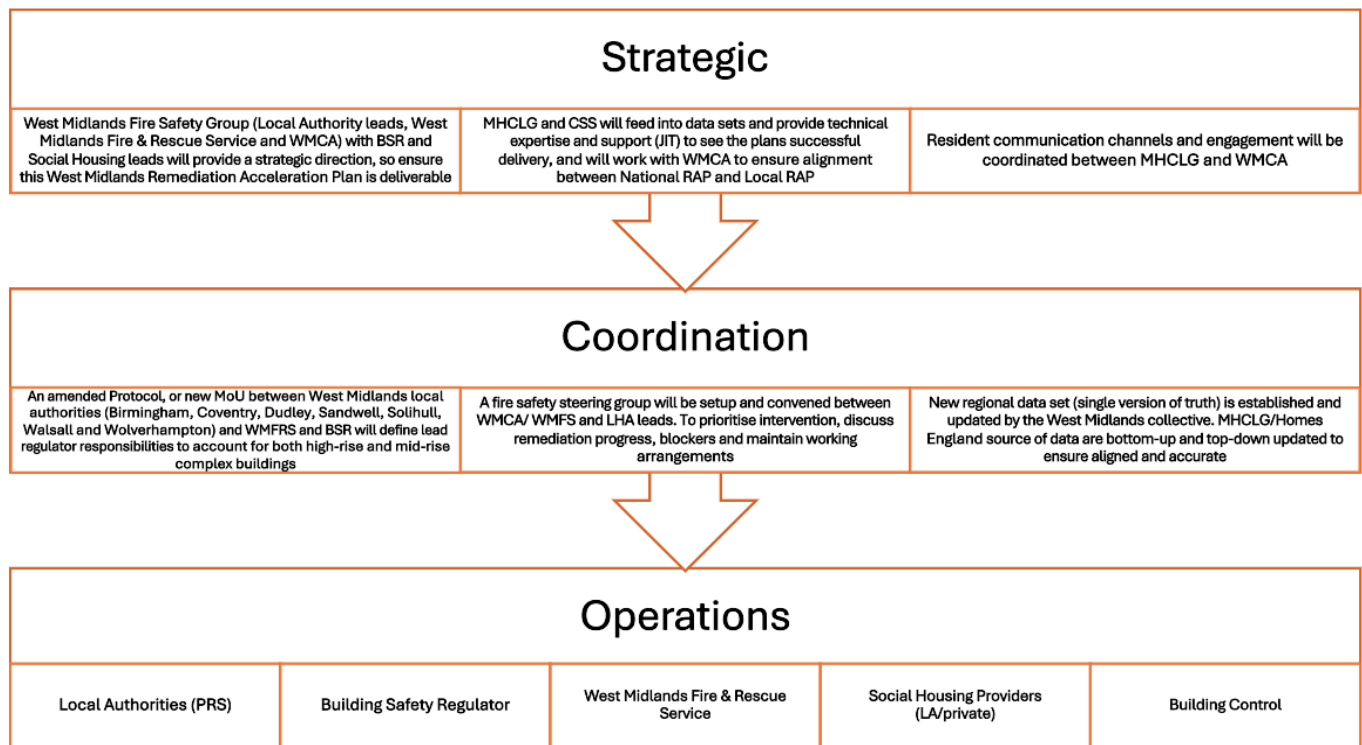
WMCA aims to enhance its advocacy services for our residents, and groups. A new focus will help to protect our residents' safety, continued spiraling costs and ensure residents are kept better informed, by tackling key areas that include,

- lobbying the MHCLG, by ensure resident voices are heard
- to establish better communication channels with regional local enforcing authorities, to ensure resident voices are heard by regulators and acted upon.
- by promoting and setting up available and accessible information, using different media types (i.e. resident webpage), that provide advice and guidance (example: *what to expect in a building undergoing remediation* [code of practice](#))
- making enquiries with organisations that control resident and leaseholder costs with the intension to protect against increased costs (i.e. leaseholder protections and building insurance premiums), were possible.

Section E – Governance, Resources & Review

Governance

Insight and engagement with existing delivery partners and stakeholders has provided the basis for co-developing a governance system for the region. We envisage a coordinated model for accelerating cladding remediation works across all high and medium rise buildings. A governance framework will be broken down into three key distinct areas (**Strategic, Coordination & Operations**).



This coordinated model provides a number of already established groups (and new groups) that can effectively collaborate. Members are all committed to accelerate the progress of remediation across their specific works areas.

Strategic remit covers,

- Boards/ Committees updates
- Accountability and responsibility
- Communication management and control
- Data provision
- Resources and Finances (budgets)
- Confirms West Midlands RAP is aligned to National RAP
- Oversight of remediation progress across all tenures
- Platform between WMCA and Government

- Resident Groups are engaged, updated and receive feedback

format	frequency	members
West Midlands Fire Safety Group (WMFSG) (Regulators)	Every 3 months	WMCA (convenor), LA PRS leads, BSR, WMFRS leads, MHCLG, non-members - SMEs (CSS)
West Midlands Social Housing Group (WMSHG) (Providers)	Every 3 months	BCU (convenor), LA SH leads, private SH asset leads,
Resident Engagement meeting (REM) (Residents)	Every 2 months	WMCA and Resident Community Groups (i.e. BrumLAG)
Government Liaison Meeting	monthly	WMCA and MHCLG (CSS)
Developer Liaison Meeting	infrequent	WMCA and Developer Contracts Team

Coordination remit covers,

- Data collections, accuracy, and updates
- Escalations and enforcement
- Assessment of formal enforcement actions
- Prioritisation of unsafe buildings
- Missing buildings arrangement
- Arrangements to address 'blockers and challenges'
- Lead is appointed to update strategic group on emerging matters

format	frequency	members
West Midlands Fire Safety Steering Group (WMFSSG) (Regulators)	Every 6 weeks	WMCA (convenor), LA PRS leads, BSR, WMFRS lead, social housing (LA/private) leads

Operations remit covers,

- Remediation progress on individual buildings
- 1-1 discussions between SPOC (single point of contact) and LHA lead
- Prioritising buildings for fire safety inspection
- Risk matrix - ranking and scoring risk for inspection purposes
- Enforcement
- Consultation meetings (s.10, HA 2004)
- Inspection and monitoring planning

format	frequency	members
West Midlands Fire Safety Operations Meeting (Regulators)	Monthly/ every 6 weeks	WMFRS SPOC, and one LHA lead officer

Resources

The government has directly issued finance support settlements to a number of LHAs in the West Midlands, using new burdens grant funding for the 2025/26 financial year. Finance is only issued where remediation is accelerated within an LHAs respective district. Each LHA is given freedom to use this support fund as they see fit but is expected to submit quarterly returns to justify any spending. Although uncoordinated these finances will directly fund operational teams that make a difference. WMCA is aware these 25/26 funds fell significantly short of projected yearly costs, as budgeted for by our LHAs.

To prevent compromising ongoing remediation programmes, the government decided to provide an uplift grant (£450k) directly to WMCA. This uplift was given to WMCA to support LHAs needing extra funding for the latter part of this financial year (2025/26).

Table 4 – Roles receiving additional uplift grant funding for 25/26

Any role financed by WMCA will automatically become a regional role. Each role will be able to operate across all districts, where a host LHA officer is present.

Roles	Lead employing organisation
Regional programme lead	WMCA
Regional intelligence officers (2 FTEs)	BCC
Administration (0.5 FTE)	BCC
Regional senior EHOs (2 FTEs)	BCC
Station commander (FTE)	WMFRS
Watch commander B (FTE)	WMFRS
Watch commander A (2 FTEs)	WMFRS
Legal interns (2 FTEs) proposed	All
Data analyst (1 FTE) proposed	All

Two grant funding agreements are issued to support 8.5 FTEs (Table 4) within two enforcement authorities of 25/26. WMFRS and BCC can now provide designated staff to operate regionally across all districts to help accelerate this West Midlands RAP.

Each grant funding agreement was agreed between the recipient authority and WMCA as these roles will specifically meet the plan's remediation objectives (Section C). Any fund recipient will evidence costs and meet milestones and in-term evaluation targets that will be monitored. This plan will bring bad actors and responsible persons to account, by allocating resources to where accelerated remediation can be proven.

This West Midlands RAP will invest in enforcement to ensure LHAs, WMFRS and the BSR have the capacity to tackle hundreds of cases per year. New legal obligations now compel landlords to remediate unsafe cladding, with severe penalties – including criminal and civil sanctions for inaction.

Legal interns

To support our delivery partners, this plan is looking to secure 2 law interns to support our legal depts (WMFRS), for the last 6 months of 25/26. WMCA is in advanced discussions with Birmingham City University (BCU) and its Employer Engagement & Careers team consultant. A pool of up to 20 potential candidates has been singled out. It is the aim to deploy 2 interns who have an interest in 'property law' and 'contract law' to support regional work and will be hosted in either WMFRS or WMCA legal departments. Each intern will provide some additional legal support and be trained on the job.

It is then anticipated that a lawyer (FTE) will be appointed from a future West Midlands fund settlement from 01 April 2026.

Data analyst, or data integrated function

To support our delivery partners, this plan is also looking to secure one (if contracted, or seconded), or maybe 2 (interns) persons for the remainder of 25/26.

This role will be pivotal and lead on establishing data with a 'single source of the truth'. We are keen to draw data off from and utilise the WMFRS Tymly database. This role would be responsible for aligning building data fields sourced from all our different delivery partners, facilitate efficient data sharing and ensure all data is accurately completed, up-to-date and entries are collated succinctly from all unsafe and safe buildings of interest. This role will support the prioritisation of LHAs/ WMFRS and oversee all monitoring and reporting from all responsible entities, including data retrieved from LHA officers who are on the ground collating remediation data from across all districts.

Review

Our West Midlands RAP will be subject to an annual review to ensure remediation progress is being effectively delivered on scale and to our target timeframes. This will ensure any changes, or emerging threats, or circumstances can be properly addressed.

Section F – The Future Plan (2026- 2031)

Currently, Government has only financed a regional response team through the Combined Authority until 31 March 2026. All government new burdens grant funding agreements issued directly issued to our LHAs also expire on the 31 March 2026.

Recently the government advised all MSAs that multi-year funding (3 year) settlements are being proposed, planned for and details are expected to be released in the autumn. This follows ministerial roundtable meetings come September/October 2025.

WMCA will continue to lobby government to underwrite its policies and intentions to fix buildings faster, identify buildings with unsafe cladding and support residents. Until additional funding is committed and new fiscal settlements issued to West Midlands regional teams, only then can we assure our residents their homes will be made safe, and lives protected from the real threat of fire spread. Currently, an unknown number of accountable persons, or legal entities, have decided not to remove combustible products found in external wall systems, by choice, and have accepted that residents are being put at high risk from being enveloped in flammable wall coverings.

This is wrong, and this is a one chance opportunity to make buildings safe.

WMCA is committed, along with its delivery partners to see this plan come into fruition and ensure its 2029 targets are fully met.

Glossary

Glossary A

Government Remediation Programmes	
Type	Description
ACM	The ACM government-funded scheme refers to an initiative aimed at addressing unsafe Aluminium Composite Material (ACM) cladding in residential buildings. Funding covers the cost for remediation of unsafe ACM cladding on buildings over 18m in height.
Building Safety Fund (BSF)	The BSF is a funding mechanism established to address the costs of addressing life-safety fire risks associated with cladding on high-rise residential buildings. It was opened in June 2020 and aims to provide financial support to responsible entities, such as freeholders or management companies, to remediate unsafe cladding systems.
Cladding Safety Scheme (CSS)	The CSS is a government-funded initiative in England aimed at addressing life safety fire risks associated with cladding on residential buildings over 11m in height. It provides funding for the remediation or mitigation of these risks, particularly where the developer cannot be identified or held responsible. Applications for the CSS can be made by the responsible entity for the building's external repairs or their representative. The scheme is part of a broader Building Remediation Portfolio to ensure residents are safe from fire safety risks.
Responsible Actors Scheme (RAS)	These are residential buildings that (1) have life safety fire risks associated with unsafe cladding (2) that are over 11m (3) that are supported by a Fire Risk Appraisal of External Walls assessment following PAS9980:2022 methodology and (4) that are either in the process of applying for or have already been accepted into the CSS fund. This information serves to demonstrate that the buildings have applied to the fund.
Social	Social government-funded scheme typically refers to initiatives where government funding is allocated to support social services or housing. These schemes aim to address social needs and improve living conditions for vulnerable populations. For example, affordable housing is a key component of such schemes, providing homes for those whose needs are not met by the private market. Additionally, local welfare provision schemes help individuals facing unexpected crises or support vulnerable people to re-settle or stay in the community. These schemes are designed to promote the public good and support policy objectives, often involving registered providers of social housing

Glossary B

Remediation Stage Definitions	
Remediation Stage	Definition
1 - In Programme - Not started on site	Remediation works have not commenced on site and has unsafe cladding defects.
2 – Underway	Remediation work has commenced on site and is currently ongoing on a building with unsafe cladding defects.
3 - Remediation Complete	Remediation works have been completed and are either waiting on or have completed sign-off on a building with previously unsafe cladding defects.
4 - Non-portfolio - Not started on site	Remediation works have not commenced on site and on a building that has unsafe non-cladding defects or is subject to be confirmed.
5 - Non-portfolio – Underway	Remediation work has commenced on site and is currently ongoing on a building that has unsafe non-cladding defects or is subject to be confirmed.
6 - Non-portfolio – Complete	Remediation works have been completed and are either waiting on a building that has unsafe non-cladding defects or is subject to be confirmed.
7 - Not applicable	The building is either safe, to be confirmed, or has non-life critical non-cladding defects.
8 – Unknown	The remediation status is unknown to the department and is subject to be confirmed in subsequent data updates.

Glossary C

Definitions	
Category	Definition
11m+ with Unverified ACM	An 11m+ building identified by the department that has unverified ACM and is not in a government remediation programme
ACM	A high-rise building with unsafe ACM cladding being monitored by the ACM monitoring programme only
ACM / BSF	A high-rise building with unsafe ACM cladding being monitored by the ACM monitoring programme but also with non-ACM unsafe cladding being remediated via the Building Safety Fund
ACM / CSS	A high-rise building with unsafe ACM cladding being monitored by the ACM monitoring programme but also with non-ACM unsafe cladding being remediated via the Cladding Safety Scheme
ACM / Developer	A high-rise building with unsafe ACM cladding being monitored by the ACM monitoring programme where the developer of the building has signed the developer contract
ACM / Developer / BSF expected transfer	A high-rise building with unsafe ACM cladding but also with non-ACM unsafe cladding currently in the Building Safety Fund but which is expected to be transferred in future to the developer monitoring scheme
ACM / Developer - transferred from BSF	A high-rise building with unsafe ACM cladding also with non-ACM unsafe cladding in the Building Safety Fund but which has transferred in future to the developer monitoring scheme
ACM / Developer / BSF refund	A high-rise building with unsafe ACM cladding also with non-ACM unsafe cladding in the Building Safety Fund where the funding is expected to be returned from the developer who has signed the developer contract
BSF	A high-rise building with unsafe non-ACM cladding being remediated via the Building Safety Fund

BSF / CSS	A high-rise building with unsafe non-ACM cladding previously remediated via the Building Safety Fund but newly eligible for remediation via the Cladding Safety Scheme
BSR	A building that has an upcoming inspection by the Building Safety Regulator (BSR)
CSS	An 11m+ building with unsafe cladding being remediated via the Cladding Safety Scheme only
CSS - transferred from BSF	An 11m+ building with unsafe cladding that was previously being remediated by the Building Safety Fund but is now the responsibility of the Cladding Safety Scheme
Developer	An 11m+ building with unsafe cladding being remediated via a developer who has signed the developer contract
Developer - non-cladding defects	An 11m+ building with unsafe non-cladding defects being remediated via a developer who has signed the developer contract
Developer - safe	An 11m+ building which is the responsibility of a developer who has signed the developer contract but which does NOT have life-critical fire safety defects
Developer - transferred from BSF	A high-rise building with unsafe non-ACM cladding which was previously being remediated via the Building Safety Fund but is now the responsibility of a developer who has signed the developer remediation contract
Developer / BSF expected transfer	A high-rise building with unsafe non-ACM cladding which is being remediated via the Building Safety Fund but is expected to be transferred to be the responsibility of a developer who has signed the developer remediation contract
Developer / BSF refund	A high-rise building with unsafe non-ACM cladding which is being remediated via the Building Safety Fund where the developer who has signed the developer remediation contract will refund the BSF
Developer / BSF refund and transfer	A high-rise building with unsafe non-ACM cladding which was being remediated via the Building Safety Fund where the developer who has signed the developer remediation contract will refund the BSF for funds already paid but also take over responsibility for the remediation

Developer - Unknown	An 11m+ building not yet identified as Developer, Developer non-cladding defects, Developer safe, Developer transferred from BSF, Developer / BSF expected transfer, Developer / BSF refund, Developer / BSF refund and transfer
Interim Measures - Unmatched	Interim Measures taken from NFCC's Interim Measures dataset from Q3 23-24 that are unmatched to the department's building list
Missing Buildings Cohort 1 - non-responders not in portfolio	A high-rise building previously written to as part of missing buildings exercise not matched to a building being monitored via a government remediation scheme that was originally identified as potentially having IM or ACM
Missing Buildings Cohort 1 - responders not in portfolio	A high-rise building previously written to as part of missing buildings exercise where response indicated the presence of IM or ACM and the potential for being in scope of the BSF
Missing Buildings Cohort 2 - non-responders not in portfolio	A high-rise building previously written to as part of missing buildings exercise not matched to a building being monitored via a government remediation scheme that was originally identified as potentially having IM or ACM
Missing Buildings Cohort 2 - responders not in portfolio	A high-rise building previously written to as part of missing buildings exercise where response indicated the presence of IM or ACM and the potential for being in scope of the BSF
Social	An 11m+ building with unsafe cladding being remediated via a social housing provider
Social - non-cladding defects	An 11m+ building with unsafe non-cladding defects being remediated via a social housing provider
Social - safe	An 11m+ building which is the responsibility of a social housing provider but which has been remediated and has NOT identified life-critical fire safety defects in the most recent building works assessment
Social / Developer (non-cladding / safe / unknown)	An 11m+ building identified by both a developer who has signed the remediation contract and a social housing provider but which does not have unsafe cladding
Social - no reported defects	An 11m+ building with no current reported defects that is the responsibility of a social housing provider

Social - Unknown (awaiting assessment)	An 11m+ building not yet identified as Social, Social non-cladding defects, Social safe or Social / Developer (non-cladding / safe / unknown) that is awaiting a specialist assessment
Social - Unknown	An 11m+ building not yet identified as Social, Social non-cladding defects, Social safe or Social / Developer (non-cladding / safe / unknown)

Glossary D

Acronyms	
ACM	Aluminum Composite Material
BAC	Building Assessment Certificate
BC	Building Control
BrumLAG	Birmingham Leaseholder Action Group
BSA	Building Safety Act 2022
BSF	Building Safety Fund
BSR	Building Safety Regulator
CSS	Cladding Safety Scheme
EWS	External Wall System
FRAEW	Fire Risk Appraisal of External Walls
FRS	Fire and Rescue Service
HHSRS	Housing Health and Safety Rating System
HMG	His Majesty's Government
HMICFRS	His Majesty's Inspectorate of Constabulary and Fire & Rescue Services
HRRB	High-Rise Residential Building (18m+)
JIT	Joint Inspection Team
LA	Local Authorities
LGA	Local Government Association
LHA	Local Housing Authority
LRAP	Local Remediation Acceleration Plan
MRRB	Medium-Rise Residential Building
MHCLG	Ministry of Housing, Communities and Local Government
NFCC	National Fire Chiefs Council
PAP	Principal Accountable Person
PD	Principal Designer
PSH	Private Sector Housing
RAU	Remediation Acceleration Unit
RBI	Registered Building Inspector
RO	Remediation Order
RCO	Remediation Contribution Order
RMC	Resident management companies
RP	Registered Provider
WMCA	West Midlands Combined Authority
WMFRS	West Midlands Fire and Rescue Service
WMFSG	West Midlands Fire Safety Group
WMSHG	West Midlands Social Housing Group

Appendix 1

Fire Safety Inspection Programme

DRAFT