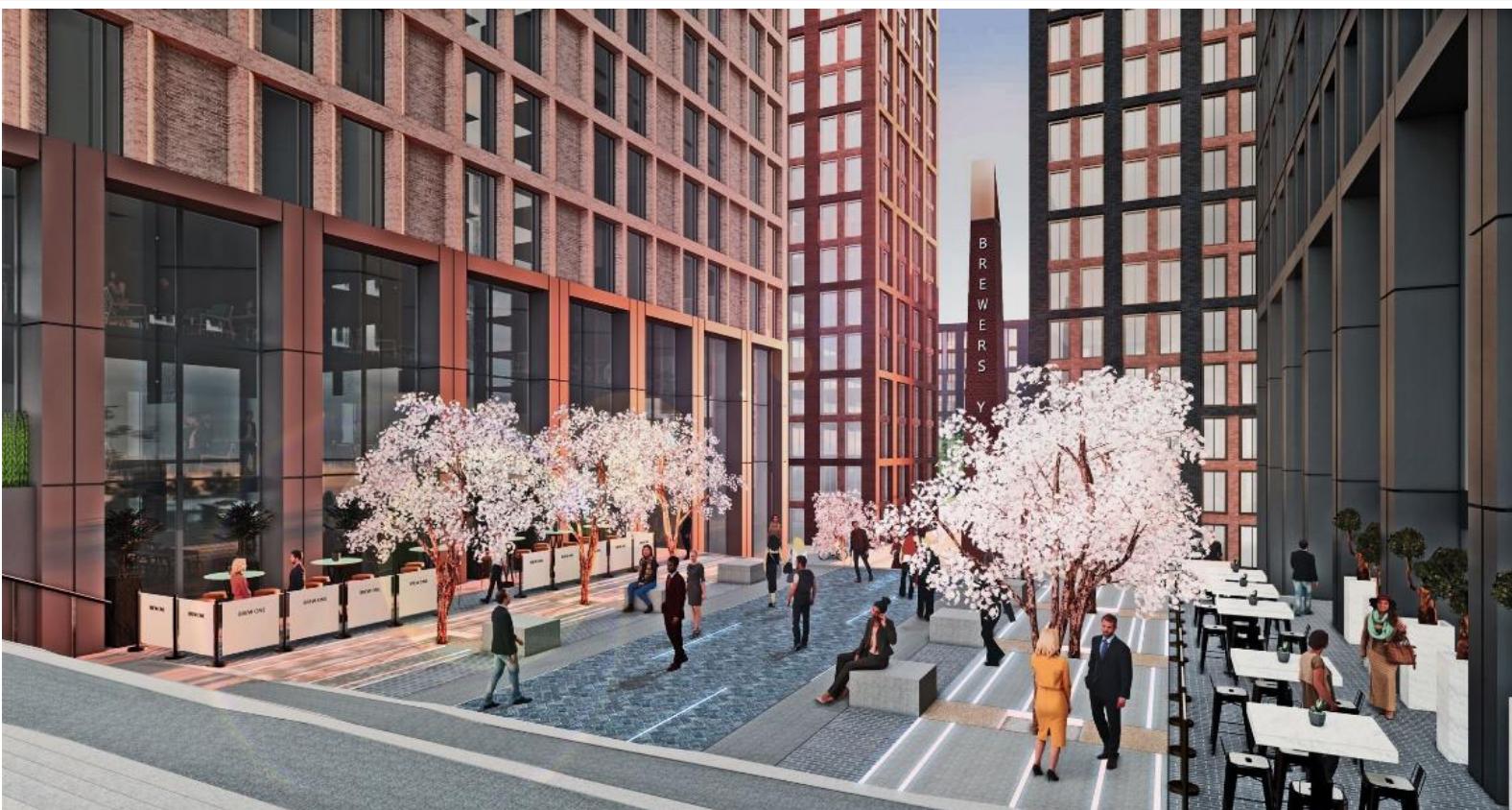




West Midlands
Combined Authority

West Midlands Remediation Acceleration Plan

December 2025



West Midlands Combined Authority, 16 Summer Lane, Birmingham, B19 3SD
Tel: 0345 303 6760 | wmca.org.uk



Contents

| | Title | page |
|------------------|---|------|
| Section A | Background | 3 |
| | Context | 3 |
| | Introduction | 4 |
| | Scope, targets and objectives | 5 |
| | Status of West Midlands region | 6 |
| Section B | Stakeholders and Delivery Partners | 8 |
| Section C | Remediation Blockers and Challenges | 10 |
| Section D | Remediation Delivery | 20 |
| | Objective 1 – driving and monitoring remediation progress | 20 |
| | Objective 2 – coordinate intervention activity | 24 |
| | Objective 3 – working effectively with our MHCLG/ CSS & delivery Partners | 24 |
| | Objective 4 - to create a trustworthy data set for high and medium rise buildings | 26 |
| | Objective 5 – advocating for residents | 28 |
| Section E | Governance, Resource and Review | 29 |
| Section F | Supporting Leaseholders and Residents | 33 |
| Section G | The Future Plan (2026 - 2031) | 34 |
| Glossary A | Government Remediation Programmes | 35 |
| Glossary B | Remediation Stage Definitions | 36 |
| Glossary C | Definitions | 37 |
| Glossary D | Acronyms | 41 |

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 Theresa May immediately ordered a Public Inquiry into the reasons and cause as to 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 Rayner (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 that only 1,436 buildings from 4,234 unsafe buildings had been 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 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) have developed RAPs and are now facilitating how RAPs should be delivered 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 and; hard work in tackling and addressing fire safety in a number of high-rise (18m+) across the region. Their collaborative efforts are pivotal in advancing the region's remediation progress and continuing to ensure resident safety in its tall building stock.

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 together across all 7 local authority boundaries and by integrating services can remediation be effectively accelerated.

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

Scope, Targets and Objectives

Our West Midlands Remediation Acceleration Plan (LRAP) outlines 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 primarily on remediating those buildings with unsafe external cladding systems but will secondly alert regulators to other potential building safety defects to action accordingly. This will provide residents with an assurance that other building safety defects are identified and made known to the authorities.

Priority 1 – Fix buildings faster - our LRAPs' first and foremost **Priority** focuses on our commitment to ensure all residential buildings above 11m in height that have combustible and unsafe external cladding are fully remediated or reduced to an 'tolerable' risk level as in accordance with the BSI PAS 9980: 2022 methodology.

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 remediation works completed, or well underway 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 accountable person will already be the recipient of legal proceedings.

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. A framework will focus on capacity and capability to deliver its 5 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 medium and high-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 buildings 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
- 70 buildings are ‘**non-portfolio – not started on site**’
- 87 buildings are ‘**In Programme - 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, meaning 442 are unaccounted.

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+

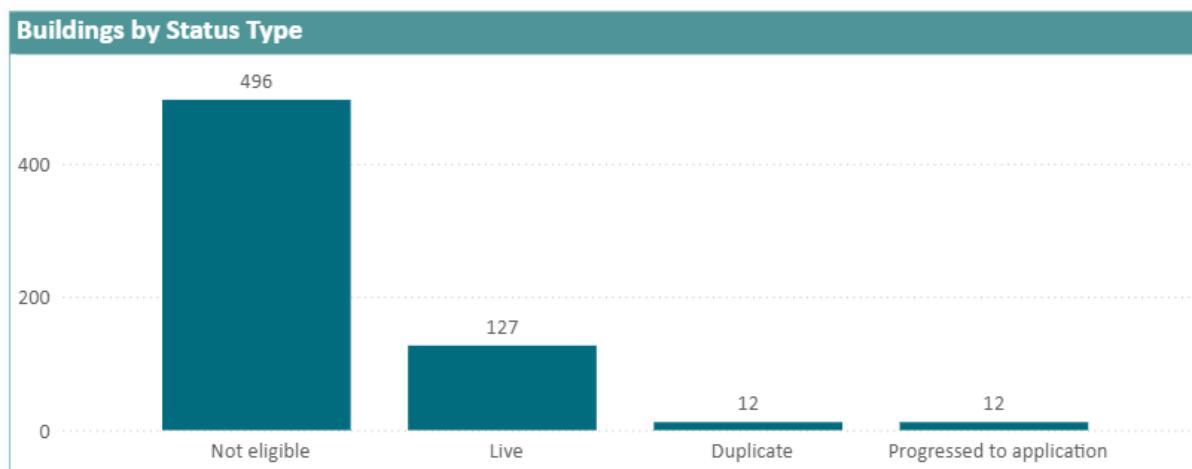
| Scheme | In Programme | Underway | Complete | Grand Total |
|--------------|--------------|-----------|------------|-------------|
| ACM | 1 | 0 | 11 | 13 |
| BSF | 1 | 4 | 7 | 12 |
| CSS | 18 | 0 | 0 | 18 |
| Developer | 36 | 9 | 5 | 50 |
| Social | 31 | 5 | 144 | 180 |
| TOTAL | 87 | 18 | 168 | 273 |

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, 127 buildings are live in the pull-in process. HE are seeking further verification by assessing height and cladding status on other buildings, to establish eligibility and being incorporated into the CSS remediation scheme. This plan will recommend moving as many buildings as possible through the verification process, to either rule them out, or into the CSS application stage. This plan will explore reasons why a live application does not advance into an 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 recognise 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 armoury of enforcement options. This plan, and its supplementary documents, will allocate resources 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, looking after finances and legal obligations.

Right to Manage Groups (RTM) are comprised of leaseholders that setup a recognised and independent company, that may have a legal right to take over the management of the building from the freeholder. RTMs may be set up to 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.

WMFRS Fire Engineer’s operate a Primary Authority Partnership scheme with businesses. A partner can ask for highly specialized advice, under full cost recovery charges.

Local Housing Authorities (LHAs): fall within 7 metropolitan councils and make up the West Midlands region. Each LHA (sometimes referred to as 'Private Rented Sector' services) have enforcement powers under the Housing Act 2004 and associated legislation. These powers may be used to tackle the 'hazard of fire' in housing. Environmental Health Officers (EHOs) also have access to a variety of other supplementary legislation to bring about compliance of residential housing conditions. 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 can be held accountable to improve building safety where action has been identified.

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 **2 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 approx. 80% of contracts being 'In Programme' status. However, none of these contracts have started on site, or they have stalled and failed to start.

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 to a CSS application stage. Although this plan supports progress into the CSS 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 Fire Risk Appraisal of External Walls (FRAEWs) are becoming the point of contention and a matter of conflict between developers and freeholders. A regional managing agent reported approximately 60-70% of buildings cannot progress. This presents a significant blocker to 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 (Responsible Actors Scheme team), involved in monitoring each case.

The lead regulator will seek advice from a regulatory Fire Engineer and will apply the relevant guidance in PAS:9980. Points of contention and conflict will be evaluated against the relevant sections in PAS:9980 by the regulatory Fire Engineer who will make a final decision on what is needed to comply. Existing risks will be assessed against each party's fire engineer's FRAEWs findings, then matched against the building's relevant design and combustibles before a decision is made.

To support decision making WMCA is exploring setting up a Primary Authority Partnership with WMFRS. WMCA can then deploy fire engineers into a LHA to help resolve deficiency areas of conflict between the developer and freeholder. Fire engineers can then provide primary authority advice to the LHA on which enforcement actions can be taken.

2. Missing unsafe buildings

A key priority for West Midlands is to identify buildings with combustible and unsafe cladding where the responsible person (RP) has 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 External Wall Systems (EWSs) and rainscreens composed of and consisting of flammable products,
- c. if not already available, LHAs and Private Residential Sector (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 prioritising 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 departments (i.e. 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.
- b. to encourage the use of the Building Safety Act 2022, will increase enforcement opportunities
- c. understanding, working through and removing any 'conflicts of interest' and duplication will ensure each enforcement authority can operate simultaneously to limit scrutiny, repercussion, or to avoid of any legal recourse,
- d. ensuring any fiscal resources, or in-region expertise are made available to support any process that successfully drives effective remediation,
- e. ensuring the most appropriate legislation is used to accelerate remediation
- f. ensuring enforcing authorities can develop a joint working approach, using specific powers to tackle remediation issues on a 'case by case' basis.
- g. Utilise the National Remediation System (NRS)

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 Enforcement Actions/ Enforcement Notices (EA/ENs) are served and active, it is best practice for regulators to undertake mid-term compliance checks to monitor and check compliance.

BLOCKER There is currently a clear abuse of process as accountable persons are filing appeals with first-tier tribunals. Appeals provide a cheap and legal process to stall remediation 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 actions taken and compliance end dates. If enforcement actions expire and items are not followed up, the gravity of the notice's intention is severely undermined. The recipient then escapes any deserved sanction, through neglecting non-compliance and the enforcement notice.

In-house Legal Services are usually struggling with capacity and resource issues, may be overworked and sometimes lack the property and contract specialist knowledge of the workstreams to support regulators with non-compliance of notices, actions and orders being served.

ACTION to fix buildings faster it is recognised 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 current 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. provide additional legal resource to support inhouse legal team administration to include applying for 'enforcement supplementary funding'.
- e. all inspections conducted on unsafe buildings, will likely generate enforcement actions that explicitly require combustible ACM/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.
- g. Continue to access the [remediation enforcement support fund](#) where appropriate for the most complex cases that need legal advice

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 will likely 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 operate at full capacity and have limited capacity or technical capability, or sufficient training to assess fire safety in all high-rise and medium-rise buildings within their respective districts. There are only a few experienced and competent fire safety staff in PRS, while others are 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 specifically set out clearly defined regulator responsibilities under the various legislations and will delegate key tasks to each regulator with regards to identifying, inspection buildings in scope, taking the most appropriate course of action, monitoring progress and taking further action when required. It will clearly define lead regulator responsibilities and follow government’s [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. Discrepancies on the same data set causes confusion and doubt. Data qualitative discrepancies also run within the various Government programmes (ACM, BSF, CSS, RAS etc.). Fields of data differ between each programme, as each programme presents the same data but differently due to different programme criteria and eligibility factors. Neither is there any data captured on newly constructed buildings that have received a building safety certification from building control and are now occupied.

ACTION to **identify buildings with unsafe cladding** a dedicated resource (post) will be created to provide data collection, integration, capture and sharing. A data analyst 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 undertaken self-remediation programmes.

Some buildings that are already undergoing remediation work appear to have stopped or halted, which may be due to insufficient funds, causing delays as project teams and work men down tools.

BLOCKER - delivery partners are finding many instances where freeholders and managing agents are entering into long-running disputes over who funds remediation work. Both parties accept and recognise the importance of undertaking work to safeguard residents but sometimes cannot agree who should pay for a 'survey' or the 'work'. If surveys are completed these may then be withheld and not shared. It is evident parties cannot agree on what constitutes either as compliant, or non-compliant (i.e. poorly fitted fire door sets) or deciding on an agreed 'scope of works'. There is a lack of agreement on each party taking accountability as to whether building safety defects are original 'construction related' defects or caused by subsequent 'maintenance/ service' works.

Parties may be reliant on advice. There are many external façade surveys being carried out, and not all are compliant with PAS:9980:2022 (FRAEW). Level of cladding surveyors and reports differ significantly. Findings based on the same building also differs between surveyors, making reports and FRAEWs difficult to assess. Some surveyors will confirm combustibles some will only presume. Qualified fire engineers may use different methodologies to inspect, identify and report on defects. Advice may be offered with a different perspective on opinions and show differences in opinion as to whether a EWS is safe, or unsafe. Internal fire safety defect reports (compartmentation surveys etc.) may also differ on what works are required to achieve compliance, 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 a significant blocker to progress; as variation notices need submitted and additional funding requires a new application. Also, multiple other non-compliant defects (*incl. compartmentation, poor fire stopping, poor emergency lighting etc.*) are being discovered and identified once an internal survey is completed. These new, or additional, defects add to the buildings

‘unsafe’ status, unless counteracted by certain mitigating measures (i.e. sprinkler systems). These additional defects add to creating an unsafe building.

There is occasionally a lack of clarity in agreement paperwork as to which certain responsible entities have the repairing obligation where there are managing agents, property, or ‘right to manage’ companies all involved.

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.

To **support residents** a lead organisation will provide support to progress funding to finish off remediation works on buildings already started and expedite remediation by those companies already on site. We will always consider the residents first by seeking to clarify from Government what constituted as being 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 positively and negatively 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 known unsafe buildings, and buildings of concern, can be inconsistently given. It is important that leaseholder campaign groups (such as Birmingham Leaseholder Action Group: BrumLAG) does need to be better informed of top down and bottom-up issues and has a stronger public accountability.

ACTION - to **support residents’ WMCA** will be open and transparent as to how remediation is being progressed across 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 and collaboration 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 are currently developing and drafting a tall buildings strategy that aligns its operations to this West Midlands RAP.

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. However, currently, as identified in Section C, the following issues will be integrated and actioned as quickly as possible.

- 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 engage with this plan and accelerate objectives
- Enforcement will be progressed, but in a fair, proportionate, timely manner.
- Enforcement will be in line with each LHA enforcement policy, the regulators code and the enforcement concordat.
- All enforcement authorities will be better directed and coordinated (MoU)
- Resident's voices will be better 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.

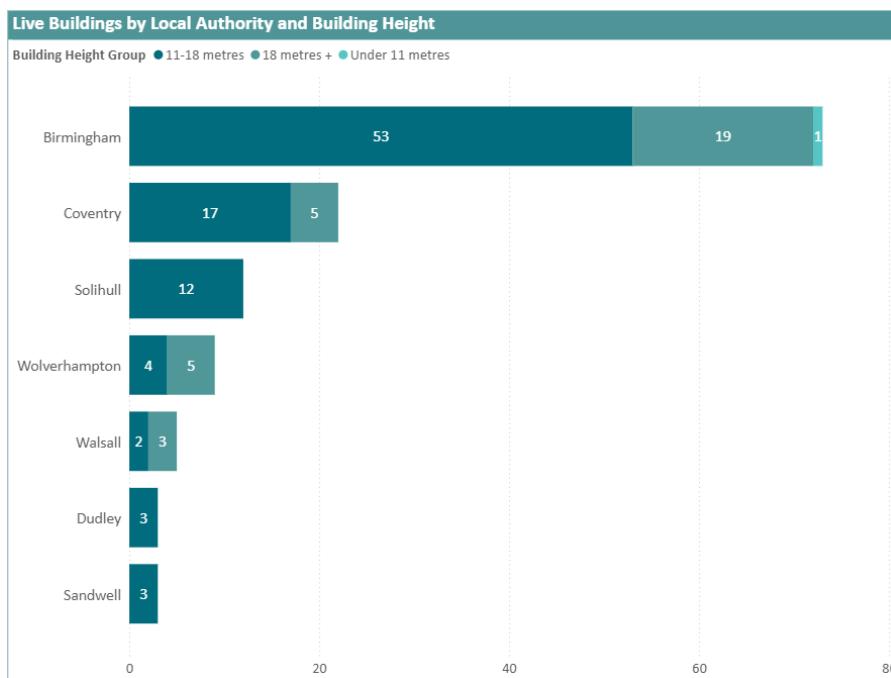
Table 3 - Remediation Scheme Data: West Midlands for 11m+ (MHCLG)

| 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 reasons why only 127 eligible buildings (figure 2) only have 12 buildings progressed into an application stage. LHAs will engage and work with each building owner to encourage the remaining 115 eligible buildings to join the CSS programme. The majority (57.5%) of eligible and live buildings are based 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 (resource dependent).

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 will 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 provide a regional service to other LHAs by undertaking an inspection, providing an assessment (HHSRS), will identify deficiencies and list these findings in a basic compliance report to the host LHA, 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).

A full suite of Notices served under the Housing Act 2004 will be utilised, to ensure the WMFST have authority to access all areas of the premises being inspected. Fire safety inspections can only be undertaken if host LHAs are 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' (fire safety defects), and a 'schedule of work' (list of actions needed to meet compliance), 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 monitor the 18 buildings currently underway within the 5 government funded remediation schemes. LHAs will also monitor the 12 buildings currently being brought into the cladding safety scheme, to ensure are progressing well. Frequency of monitoring (engagement) will be decided by the respective LHA. However, LHAs will aim to monitor each building every three months.

If an LHA has carried out enforcement on an identified responsible persons' 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. LHAs will need to undertake regular compliance visits to track works are being completed. If LHAs do not undertake regular compliance visits there will be an increased probability of non-compliance and Notices which in turn will lead to a higher chance of progression to prosecution. Prosecutions are labour intensive, time consuming and complex.

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.

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

WMCA is tasked by MHCLG to enable, coordinate and finance a response to tackle and accelerate the region's remediation progress. WMCA has no enforcement powers, but government has financed WMCA to support and enable its local enforcing authorities to operate effectively and together.

See figure 3 (below) 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*).

The existing West Midlands Fire Safety Strategic Group (Strategic Group) is the primary forum that facilitates strategic direction, collaboration and partnership working between WMCA, its regulators, key partners and HCLG. The Strategic Group provides the backbone to help drive and steer the private residential sector high-rise building safety regime within the region. This group will continue as pivotal to deliver the West Midlands RAP.

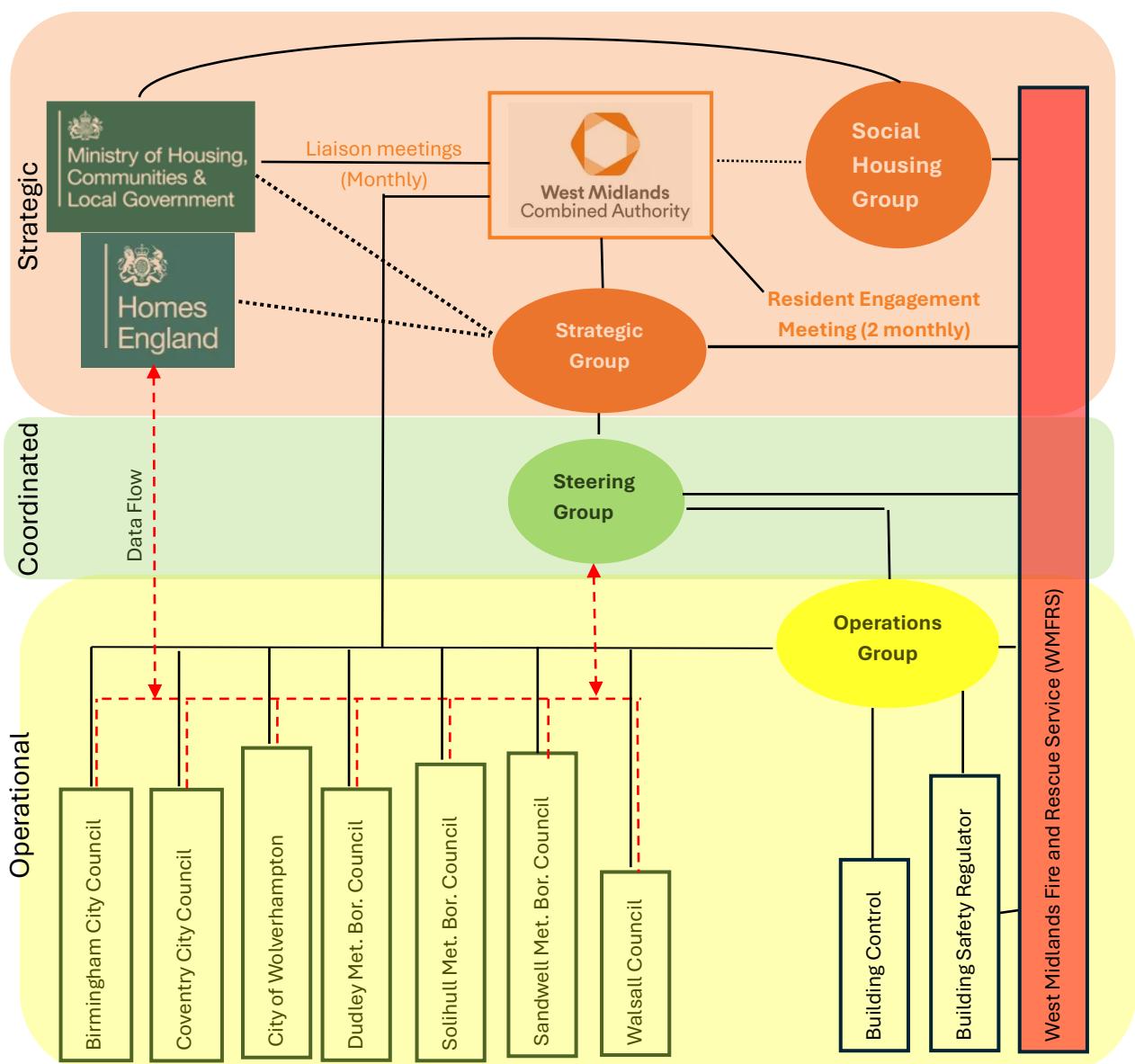
Official

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 into the 'Pull In' stage at CSS. Unsafe building data will be uploaded using the 'Tell us Tool', or NRS. Likewise, missing building data (top-down) will need to be transferred and notified through the HE dashboard database.

HE is updating its dashboard data to soon incorporate Developer, Social and illegible data. At present the CSS dashboard is not populated with or does not provide 'missing building' data.

Figure 3 – 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, and will continue to support the NRS, that will be accessible to 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 Ordnance 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 external providers of data (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

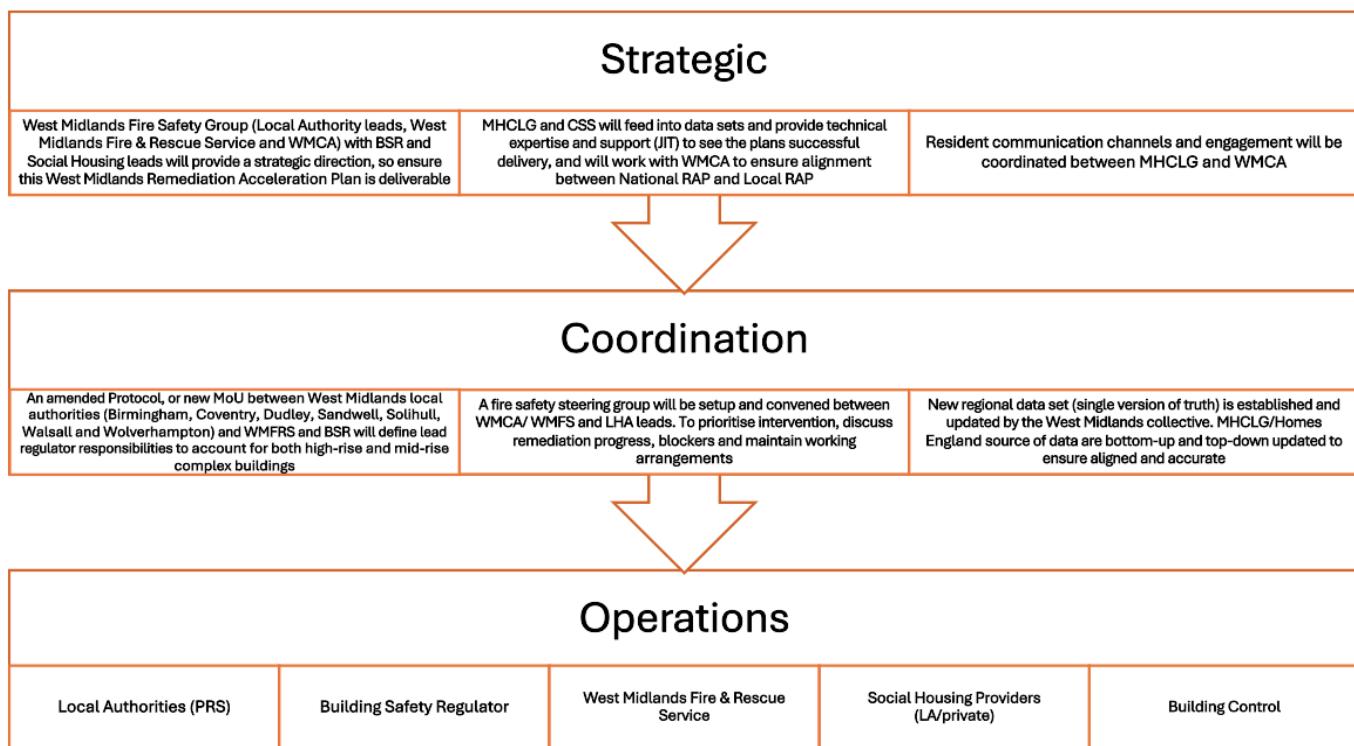
WMCA aims to enhance its advocacy services for our residents, and groups. A new focus will help to protect our residents' safety, continued spiraling costs and ensure residents are kept better informed, by tackling key areas that include,

- 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 intention to protect against increased costs (i.e. leaseholder protections and building insurance premiums), were possible.

Section E – Governance, Resources & Review

Governance

A combination of insight and full engagement with existing delivery partners and stakeholders provides 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**).



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

Official

| format | frequency | members |
|---|-------------------|--|
| West Midlands Fire Safety Strategic Group (Strategic Group) (Regulators) | Every 4 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/quarterly | 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 (Steering Group) (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 a New Burdens grant funding (£450k) directly to WMCA. This grant 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 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 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. But priority will still be focused on high rise buildings first.

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 have the capacity to tackle hundreds of cases per year – including criminal and civil sanctions for inaction. Government's RAP announced the intent to legislate to compel responsible entities to remediate unsafe cladding by statutory deadlines. This means those who should take action, but don't, will face 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, emerging threats, or circumstances can be properly addressed.

Section F – Supporting Leaseholders and Tenants

WMCA recognises leaseholder protections are available and loosely being followed. We accept also that remediation work is necessary but will look to limit any adverse impact on leaseholders and tenants affected by aiming to ensure measures are planned and properly and fully implemented to provide there intended purpose.

WMCA are aware leaseholders and tenants experience a range of detrimental circumstances that compromise a person's physical and mental health, fire safety and financial status, before, during and after any remediation work. Leaseholders and tenants are experiencing burdens of hiked buildings and contents insurance premiums, ground rent and services charges. Some residents are even feeling anxiety caused by being unable to take control of their own home. It is evident some leaseholders and tenants are thought of as secondary to remediation works. This is unacceptable and leaseholders have explained these protections have not gone far enough to offer the protection needed.

WMCA will look to proactively engage planning processes, using its regional delivery partners to intervene and influence plans, where possible, and lobby government to ensure leaseholder protections are fully implemented and considered at all gateway stages. WMCA will support its leaseholders and tenants, by ensuring all official channels are exploited and progressed that use various government issued guidance, to include [code of practice for the remediation of residential buildings](#). This code entitles our leaseholders and tenants to come first rather than second place. This code also sets a standard which requires those overseeing and controlling remediation to engage, communicate, report and even provide some decision-making opportunities to its residents throughout the design and development process.

WMCA will also work alongside the new single building safety regulator (BSR) once up and operational and look to promote and publicise best practice where possible.

WMCA endorses new Cladding Safety Scheme (CSS) guidance that was updated on the 18 Dec 25, and provides [Information for Leaseholders and Residents](#). CSS was set up to serve as the government's sole remediation funding partners and provider, so it can influence how recipients of government funded schemes should conduct its practices. WMCA will encourage and empower leaseholders or residents under a CSS backed remediation programme by encouraging and empowering persons to engage directly with CSS in using a feedback [forms](#) to record experiences. More importantly we will advise leaseholders and tenants to record and report buildings with unsafe cladding directly to CSS using a ['tell us' feedback form](#), and WMCA will back up legitimate cases.

WMCA will look to lobby and work with insurance companies and freeholders to reduce premiums and look to ways we can retrospectively reclaim lost costs already spent on remediation work that was unjustly taken from leaseholders.

Section G – The Future Plan (2026- 2031)

WMCA received a £450k financial settlement (April 25- 31 March 26) to help bolster the region's regulatory partners to provide a regional response to tackling remediation. In the same period MHCLG issued grant funding directly to LHAs. These also expire on the 31 March 2026. After 01 April 2026, no additional grant funding has yet been allocated to continue tackling remediation.

West Midlands LHAs and WMCA have forecasted and projected what budget is expected to ensure this programme continues its momentum to meet its WM RAP. Unless properly financed, outcomes will be compromised and target dates not met.

In December 2025, MHCLG could not underpin, guarantee or advise WMCA on what multi-year (3) funding settlement was due after 01 April 2026. A new Minister for Building Safety, Fire and Democracy only took up office in Sept 2025. This appointment has hampered key financial decisions at a time when LHAs are planning how LRAPs should be implemented within the remediation calendar. MHCLG is now awaiting approval from an investment sub-committee in January 2026 before a national 'new burdens' funding package is decided. West Midlands will then receive its financial settlement. It is expected each LHA will directly receive new burdens grant funding based on its known number of unsafe buildings. WMCA will also receive a new burdens' financial package to provide additional grant funding where its delivery partners can demonstrate it is effective at bringing about remediation.

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 plan is a one chance opportunity to make buildings safe again.

This programmes success is wholly dependent on West Midlands receiving an adequate financial settlement from government.

WMCA and its delivery partners are all committed to delivering outcomes of this plan and to see its targets come into fruition and conclude with its 2029 targets being 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 |

Official

| | |
|---|--|
| 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 |