

Written evidence submitted by the Association of British Insurers (ABI) (BSB22)

Building Safety Bill Public Bill Committee Call for Evidence

About the Association of British Insurers

1. The Association of British Insurers (ABI) is the voice of the UK's world-leading insurance and long-term savings industry. A productive and inclusive sector, our industry supports towns and cities across Britain in building back a balanced and innovative economy, employing over **310,000** individuals in high-skilled, lifelong careers, two-thirds of which are outside of London.
2. Our members manage investments of nearly **£1.7 trillion**, collect and pay over **£16 billion** in taxes to the Government and support communities across the UK by enabling trade, risk-taking, investment and innovation.
3. We are also a global success story, the largest in Europe and the fourth largest in the world.
4. The ABI represents over **200** member companies, including most household names and specialist providers, giving peace of mind to customers across the UK.
5. The ABI's role is to:
 - Get the right people together to help inform public policy debates, engaging with politicians, policymakers and regulators at home and abroad;
 - Be the public voice of the sector, promoting the value of its products and highlighting its importance to the wider economy and society;
 - Help encourage consumer understanding of the sector's products and practices; and
 - Support a competitive insurance industry, in the UK and overseas.

Executive Summary

6. We welcome the opportunity to provide a written submission to help inform the Public Bill Committee's scrutiny of the Building Safety Bill. We are also grateful for the opportunity to give oral evidence to the committee and the ABI's Director of General Insurance Policy, James Dalton, looks forward to discussing the Bill with Committee members on Tuesday 14th September.
7. The publication of the Building Safety Bill is a landmark moment and a once-in-a-generation opportunity to fundamentally reform the future building regulatory system in England. The ABI and our insurance company members have consistently supported the Government's legislative reform programme during the passage of the Fire Safety Act and during the HCLG Select Committee's pre-legislative scrutiny of the Building Safety Bill.
8. As the industry responsible for protecting people's homes and livelihoods, the UK's insurance industry has been arguing for many years, including well before the Grenfell tragedy, that the UK's building regulatory framework requires fundamental reform. Following Grenfell, the Government's Independent Review, carried out by Dame Judith Hackitt, determined the current regulatory system was 'not fit for purpose' and the ABI has been an active participant in the Government's consultations on reforms to building regulations with a view to seeking to improve the system.

9. Although the frequency of fires over the last 10 years has decreased, insurers have seen a significant increase in the damage and costs from fire spread – the average commercial fire claim increased in cost threefold between 2007 and 2017. In 2019 the total cost of commercial and industrial claims was £1.931 billion, with 52% (£1.011 billion) being made up of claims for fire damage (refer to Appendix One for further detail).¹
10. Following the Grenfell fire, we sadly now know that many buildings have been constructed and signed off with significant fire safety defects and combustible cladding. Since the Grenfell tragedy, we have seen fires in Barking², Manchester³ and, most recently, a residential block in East London⁴ where fire has spread faster than expected and major crises have been narrowly averted. The reality is that today, insuring a high-rise building of, for example, 60 flats is a very different proposition when the maximum property loss could well be the whole building. Insurers, therefore, need to work on the basis that the potential costs of fire in these buildings are significantly higher than may have previously been thought.
11. It is essential that industry, Parliament and the Government work together to ensure the Building Safety Bill delivers on its aims: to establish a framework that will create high quality, resilient buildings where people feel safe to live and, in doing so, restores confidence in the built environment for communities and wider society, including the insurance industry. We look forward to working with all stakeholders as the Bill progresses through Parliament, and with the new regulator once it is established.
12. This submission provides an overview of the insurance industry's priorities for the Building Safety Bill and our views on how the Bill can be improved. The submission provides further detail, beyond the content of the legislation, on how the industry has been responding to issues with cladding and historic fire safety defects as well as wider issues such as the availability of professional indemnity insurance and the industry's position on EWS1 forms.

Response to the Call for Evidence

Industry Priorities for the Building Safety Bill

13. The ABI gave evidence to the HCLG Select Committee's pre-legislative scrutiny in Autumn 2020. We have consistently supported the progress of the legislation and were grateful for the opportunity to contribute to the improvement of the draft Bill. During the pre-legislative scrutiny inquiry, we called for the Government to publish as much detail as possible on the secondary legislation that will be required to implement the detail of the Bill. We welcome the Government's commitment to provide further detail as part of this Committee Stage

¹ High rise residential buildings are insured under one buildings insurance policy and are therefore classified by insurers as a commercial claim. All other commercial property, from warehouses to hairdressers are also included within this category.

² Barking flat block fire, June 2019 (<https://www.bbc.co.uk/news/uk-england-london-48574044>)

³ University of Bolton student accommodation block fire, November 2019 (<https://www.bbc.co.uk/news/uk-england-manchester-50438177>).

⁴ East London tower block fire, May 2021 (<https://www.standard.co.uk/news/uk/fire-east-london-tower-block-b933758.html>)

and continue to call for as much detail as possible to be published on the supporting regulatory framework to enable effective scrutiny and improvement.

14. In our view the current Bill, presented to Parliament in July 2021, has not substantially changed from the draft Bill published for scrutiny in Summer 2020, other than the newly introduced proposals for retrospective changes to the Defective Premises Act 1972 and Buildings Act 1984. We remain deeply concerned that the proposals for the future building regulatory framework will still not apply to buildings under 18 metres in height and the Bill does not seek to address wider industry concerns around the use of Modern Methods of Construction, and the introduction of sprinklers for buildings such as schools, student accommodation, care homes or hospitals. We continue to call on the Government to address these wider fire safety issues with the Building Safety Bill and fully seize this significant opportunity for reform to ensure the safety of the built environment.
15. The Government has also made it clear that this prospective legislation is not designed to address the current issues faced by leaseholders living in buildings with dangerous cladding and wider historic fire safety defects. We sympathise with all those affected, and we continue to call for the Government to progress cladding remediation and to provide sufficient funding to address the historic issues that have led to the current building safety crisis.
16. The current regulatory regime, with its primary focus on evacuation before collapse, does not take into account the full impact of the destruction and misery a fire can cause. While loss of life is thankfully rare, following a fire, people may be left with nowhere to live and no possessions for a long period of time. The Building Safety Bill should ensure proportionate baseline health, safety, accessibility and sustainability (including energy efficiency) standards for buildings of the future. With the unknown impact of climate change on the built environment, minimum buildings standards must ensure greater levels of property protection to be afforded as a matter of course. The additional benefits of designing to a property protection baseline is that the social and economic impact of events such as flood, fire, escape of water and climate change are subsequently minimised.
17. **Scope of the Building Safety Bill:** We welcome the recent announcement that care homes and hospitals over 18 metres will be included within the definition of higher-risk buildings.⁵ However, we continue to call for the scope of the Bill to be extended to all buildings at high fire risk, not solely multi-occupied residential buildings, care homes and hospitals over 18 metres. While we understand that reform needs to start somewhere, consideration of fire risk should not be constrained to arbitrary height limits but should consider the vulnerability of the people using the building. In our submission, the Government needs to set out a clear plan and timetable on how the regulatory framework will be reformed for buildings that house vulnerable occupants no matter the height of the structure, including schools, care homes, hospitals and student accommodation of all heights. We must seize the opportunity this Bill presents to fundamentally reform the future regulatory system for the whole built environment. As the legislation will not apply to buildings under 18 metres, we also have concerns that the Bill may lead to a two-tiered regulatory framework between buildings over 18 metres and buildings under 18 metres in

⁵ Lord Greenhalgh, Minister of State for Building Safety, Fire and Communities, letter to Clive Betts, Chair – Housing, Communities and Local Government Committee, 31 August 2021 (<https://committees.parliament.uk/publications/7142/documents/75485/default/>).

height. There is an additional clear risk that in the future, developments are built just below 18 metres to avoid the more stringent regime for 'higher-risk' buildings.

18. **Scrutiny of secondary legislation:** There is much to welcome throughout the Bill, but we are concerned that significant detail is left to secondary legislation. This is to some degree understandable given the technical nature of the Bill, however further detail and assurance from Government is required to restore confidence in the UK's building regulatory system for the insurance industry. We welcome the commitment from Government, in their response to the HCLG Select Committee, that they plan to publish further detail during the Bill's Committee Stage, and it is essential that all stakeholders are given sufficient opportunity to provide scrutiny and technical expertise.
19. **Golden thread of information:** We are particularly supportive of the Bill's ambition to deliver on the Hackitt Review's aim of creating a 'Golden Thread' of information throughout a building's life. The Bill intends to deliver this, but it does not set out in detail how this information will be recorded, stored and shared. It will be crucial for insurers to be able to access this information in order to rebuild their confidence in the built environment. It is currently proposed that this information will only be collected for those buildings over 18 metres subject to the more stringent regime for 'higher-risk' buildings – information that can be used to manage and minimise risk should not be limited to a height threshold but should reflect the risk and vulnerability of the building and those within it. If meaningful change is to be achieved, the 'Golden Thread' is a key component in all future construction that can enhance fire safety for all. The Bill will require all buildings to successfully pass a safety case, providing much needed certainty on a building's construction and risk profile. It is essential that the regulations and process for the safety case, and those who undertake it, are robust and clear. We support the use of a safety case for any alteration to a building as it is essential that a building continues to adhere to regulations throughout its lifetime. The new requirements set out in Gateway One, which came into force at the beginning of August 2021, are welcome.
20. **Standards and Certification of Construction Professionals and Products:** The ABI supports measures in the Bill to improve the standards of building construction and the framework for approved professionals to be regularly assessed, to ensure competence and quality. Certification should be mandatory and accredited by specified third parties to ensure a more robust system of testing and accreditation. The insurance industry would appreciate visibility and understanding of the tests for competence and quality of individuals and the assessment of product safety. The ABI supported amendments tabled during the passage of the Fire Safety Act that called for a database of qualified construction professionals to be established in order to increase transparency and accountability. Prior history of these professionals will also be helpful to aid transparency. We welcome measures in the Bill to review the UK's building testing regime and establish a new, independent regulator to guarantee construction product safety. It is important that product safety is tested against how it interacts with other products in the construction lifecycle along with the safety of the product if it has been damaged or repaired (as well as the acceptable methods used for repair).
21. **New Homes Ombudsman:** The industry supports measures in the Bill to establish the New Homes Ombudsman to increase the quality of homes built under the new regime.
22. **Implementation of the Bill:** To ensure that the reforms are implemented successfully, and that industry is fully prepared to operate under the new regulatory regime, it is

important to provide clarity on the timescales for implementing the reforms. We welcome the Transition Plan published alongside the Bill and urge the Government to provide regular updates as the Bill progresses. All transitional arrangements must be clear and not unduly delay the remediation of cladding. The transitional arrangements must also enable fundamental fire safety issues to be resolved for all buildings at high fire risk, regardless of height. Information on the transitional plan for buildings to comply with the new legislation and the liability position for duty holders should be made clear prior to the Bill being implemented.

23. **Building Safety Fund:** The ABI has been calling on the Government to urgently increase the pace of cladding remediation. We believe the scope of the Building Safety Fund should be extended to cover wider fire safety defects, not just cladding, and for sufficient funds to be committed to ensure that defects can be addressed as quickly as possible.
24. **Defective Premises Act:** The ABI and our members are concerned about suggested changes to the Defective Premises Act (DPA), as set out in the current Building Safety Bill. By seeking to extend the period within which legal action can be brought from six to 15 years on a retrospective basis, it will likely create new exposures on existing insured risks overnight, as well as creating the potential for a number of previously closed insurance claims to be opened up again. This would retrospectively impact the property liabilities and rights of insurers. The Professional Indemnity (PI) insurance market has hardened significantly over the last few years, with PI insurers already nervous about writing cover which includes fire safety risks. This significant change, which was introduced into the draft Bill without consultation, will likely materially impact the liabilities that insurers will be on risk for, will require them to recalculate their capital reserve requirements and may result in further policy exclusions in a market that is already extremely challenging for many construction professionals. Insurers will take commercial decisions on their risk appetite to cover DPA claims, but there is a risk that if legislation is introduced in the way currently set out in the Bill, insurance cover may be written on a more restrictive basis, potentially resulting in construction firms needing to pay any claims and defence costs themselves.
25. The DPA will also create strict liability linked to uninhabitable premises. Without a requirement to establish negligence it is reasonable to assume claimants will use the Act to access compensation if their home becomes uninhabitable. Again, policy wording and coverage will be a commercial decision for individual insurers to make, and in some cases policies may exclude strict liability incurred by insureds, or it may be the case that cover will not be available for such strict liabilities. Further clarity is also required as to the definition of 'uninhabitable premises' – for example, would a building be considered to be uninhabitable if it was awaiting remediation of dangerous cladding causing the building's occupants to suffer mental anguish.

Additional areas the Building Safety Bill should cover

26. While the industry has strongly welcomed the publication of the Bill and the Government's ambitions, we have concerns that the Bill as currently drafted does not fully seize the opportunity for meaningful reform in a number of important areas.
27. There are a wide range of measures which are needed to fully address fire risk, and there is an opportunity to implement these in the Bill. In particular, we have long been calling for Government to:

- Mandate the installation of automatic fire sprinklers in all new-build, high-rise and high-risk buildings and in particular for schools, care homes, student accommodation, warehouses and hospitals.
- Rigorously test the long-term durability, resilience and reparability of buildings developed using Modern Methods of Construction to ensure these buildings are built and maintained in a way which enables them to access affordable insurance for the lifetime of the property.
- Develop a publicly accessible database of buildings developed using Modern Methods of Construction which provides information on the materials used, methods of construction and relevant standards or certification.
- Mandate the installation of high integrity fire alarms in all new developments to address the high number of false alarms for the Fire and Rescue Services.

28. At the moment the Bill does little to address these industry priorities and we call on the Government to take action to address these points as the Bill progresses.

Availability of Professional Indemnity Insurance for construction professionals and new duty holders

Availability of Professional Indemnity Insurance for Construction Professionals

29. Many Professional Indemnity (PI) insurers in the construction sector are asking a greater number of questions of prospective and current clients relating to potential exposures (for both high-rise and high-risk properties in particular). There is a level of industry caution in providing insurance to the construction industry, which continues to operate in a regulatory environment that was found by Dame Judith Hackitt, as part of her independent review, to be “not fit for purpose”.
30. The construction industry as a whole has a long history of major insurance claims, meaning it is a sector that often presents unattractive risks to PI insurers. These market issues existed before the Grenfell Tower fire or the insolvency of Carillion. With long and varied supply chains in the sector, the issues can be complex, particularly when it comes to the establishment of negligence and potential liability. In addition to this, the Lloyd’s market has taken a tougher stance on loss-making syndicates, meaning that the availability of PI has reduced, and syndicates have been asked to hold more capital against PI risk than in past years.
31. This is not an issue that is unique to the UK, liability markets around the world have hardened significantly over the last few years, with construction being the most affected industry. While competition and capacity still exist in the PI insurance market in the UK, we recognise that there are concerns around the availability and/or affordability of cover for fire safety works. The market will generally reflect any changes in risk and the potential is clear for significant PI claims in the sector in a post-Grenfell environment. Claims may result from the installation of cladding in a way that is not in accordance with specifications, an untested combination of materials, or inadequate supervision of the installation process, as well as a number of other fire safety issues unrelated to cladding specifically. It may be many years before the full consequences of these liabilities are known.
32. Insurers will be doing more diligent risk assessments. This greater level of scrutiny is most likely to relate to cladding and other fire safety issues. As with any risk, insurers will be

more attracted to good businesses who they can establish a long-term relationship with. Firms in the construction sector with accurate record-keeping, good knowledge of the materials they use, robust internal procedures and protocols, with a risk management process for current and future projects will be more attractive to PI insurers. Insurers expect firms to be actively managing their supply chain, which is often an area of focused conversation between insurers and their policyholders. Of particular concern is that often claims manifest themselves many years after the contract is completed and some businesses are no longer in existence.

33. The ABI has emphasised the importance of meaningful change through the review of building regulations to provide greater confidence to the PI market. We welcome the Government's establishment of a state-backed indemnity scheme for qualified professionals unable to obtain PI insurance for the completion of EWS1 forms. However, while insurers are working closely with Government to help operationalise this state-backed scheme and providing assistance to businesses to help manage their risks, they are not regulators. The regulatory frameworks on which PI insurers had previously relied to assure themselves that the firms and individuals that they are insuring are competent, but which ultimately have proven to be flawed, are in need of fundamental reform.

Insurance cover for Accountable Person and Building Safety Manager roles

34. During the pre-legislative scrutiny on the Bill the ABI was asked to set out the insurance industry's understanding of the potential for the newly formed 'Accountable Person' (AP) and 'Building Safety Manager' (BSM) roles, as set out within the Hackitt recommendations and draft Building Safety Bill, to obtain PI insurance when established. This is a difficult question to answer, both because of the current PI insurance climate (as set out earlier), but also a lack of specific detail about the liabilities that flow from such roles. The general view from the insurance industry is that the range of responsibilities that the AP and BSM are proposed to cover is very broad and there's potential for confusion around the level of liabilities that the role could cover.
35. It is currently unclear if the BSM has more of a co-ordination role, rather than one where liability for all aspects of ensuring a building's fire safety risk is managed by a single person (who may struggle to obtain meaningful PI cover). Clarity on this issue is needed. This may be more manageable if the role was considered under the umbrella of an organisation instead of a single individual. In regards to the AP, during the passage of the Fire Safety Act, and during the HCLG Committee's inquiry on the Building Safety Bill, there was also some uncertainty about the legal position where there may be multiple APs responsible for a building. Further clarity is also needed here.
36. To be able to advise on underwriting the PI insurance aspects of these roles, insurers require a better understanding of the liabilities that flow from it and how these would be split between the BSM and the AP. Some of the liabilities, particularly those that rest with the AP, may be criminal ones and not usually within scope of PI insurance. However, our current understanding is that the BSM may be exposed to civil liability at a quantum greater than PI insurance may cover. In addition to the impact on PI insurance, there is potential for increased liabilities to impact on the liability cover within a building insurance policy.

37. Without knowing what the actual role of the BSM will be and the detail of the secondary legislation that is required to inform decisions about the role of PI insurance, it is hard to make any concrete observations. However, it is clear that the current market conditions make it a sub-optimal time to be launching any kind of new regulatory framework requiring mandatory PI cover. Some form of cover may become available once the detail on the scope of the role has been identified and understood, and any cover offered may still have significant exclusions relating to fire safety.
38. Regular dialogue between MHCLG, ABI and the British Insurance Brokers' Association (BIBA) is important, so that whatever roles and regulatory responsibilities come out of the current consultative and legislative process, is well understood. In this context, we repeat the ask we made at the HCLG Committee evidence session on the pre-legislative scrutiny of the Building Safety Bill that it will be important to consult with all stakeholders, including the insurance industry, on the secondary legislation that will underpin the critically important roles of BSM and AP to ensure that the detail is well understood and the regulatory provisions are accurate.

Additional issues relating to existing high-rise residential buildings

Insuring high-rise residential buildings

39. We appreciate that this Bill is going through Parliament at a time of stress and anxiety for those leaseholders who are living in buildings with highly dangerous, flammable cladding awaiting remediation. The ABI is aware that some leaseholders are facing significant premium increases due to fire safety issues within their buildings, including, but not limited to combustible cladding. While we are very sympathetic to the challenges leaseholders are facing, we strongly believe that the ultimate solution is for the dangerous cladding to be remediated as quickly as possible. The role of insurance is to price policies based on risk, which means that where buildings have flammable cladding, or other fire safety issues have been identified, premiums are likely to reflect the increased risk of those properties.
40. The systemic failure of the regulatory framework for buildings has also highlighted problems with building design, product testing and construction methods, especially where wall cavities allow fire to move almost freely around a building. As such, insurers are taking a more detailed risk-based assessment to buildings, reflecting the potential for a total building loss given the issues identified with cavities leading to greater fire spread, following the Grenfell tragedy. While the total loss of a building may be rare, we have seen increasing incidents of major fires resulting in the total loss of, or significant damage to, a building (Appendix One provides data on ABI commercial fire claims).
41. The cost of premiums will likely reflect the increased risk until remediation takes place, but a number of insurers continue to offer cover for high-rise buildings with combustible cladding and insurance risk management teams will continue to work with owners to support efforts aimed at improving a building's fire risk management options, such as installing high integrity fire alarms or sprinklers. We are committed to continuing our engagement with leaseholder action groups to hear directly from them about their concerns and what the insurance industry can do to help.

42. It is also important to note that the final cost of the insurance premium that leaseholders are asked to pay also includes various fees and charges from brokers and managing agents/freeholders – it is therefore important that all those involved in the supply chain play their part in helping to mitigate the costs for leaseholders.
43. While ABI members continue to offer insurance cover and individual firms are developing new and innovative commercial products, it is important to note that there is no ‘silver bullet’ solution to the problem of the cost of insurance for un-remediated high-rise residential buildings. The ‘eco-system’ of solutions set out by the commercial market should all complement each other. However, market-led intervention by itself will not “solve” the problem – there is likely to be a need for the Government to intervene to provide support for the relatively small number of buildings that are simply too risky for the market to insure at prices that are affordable to the majority of leaseholders.
44. Following the fundamental reform of the building regulatory system and remediation of dangerous cladding, the risk profile of these buildings should improve, which in turn should increase the competitiveness of this market and benefit customers through associated effects on premiums. However, we know that current timescales are significant for some buildings, including those out of scope of the current Building Safety Fund. Failure to improve the quality of the built environment and establish standards backed up by large scale system testing may impact the future availability and accessibility of insurance for larger developments regardless of height.

EWS1 forms

45. External Wall System (EWS1) forms have been developed to help lenders and valuers understand how the external wall system on residential buildings has been assessed for safety. The form has not been designed to be used by insurers and we are not aware that any insurers are systematically using the results of the EWS1 form as a way of determining building insurance cover. However, we are aware that in some cases those professionals who are completing the form are unable to do so with fire safety cover from PI insurance, and we are working closely with the Government on their state-backed indemnity scheme for qualified professionals unable to obtain professional indemnity insurance for the completion of EWS1 forms. This should help to allow professionals to assess, high risk buildings, helping make it easier for those wanting to sell or re-mortgage their homes.
46. In addition to this, we are also in discussions with Government around the potential of wider Government support for other professionals who are struggling with accessing affordable PI cover for fire safety works, with the aim to increase the speed of remediation.

‘Cladding Re’

47. Following the concerns that some leaseholders have had with the increasing cost of insurance premiums for some high-rise buildings with combustible cladding on, some stakeholders have been advocating for a reinsurance type scheme akin to Flood Re to assist leaseholders.
48. We do not believe that a reinsurance scheme is the answer to this issue, for the following reasons:

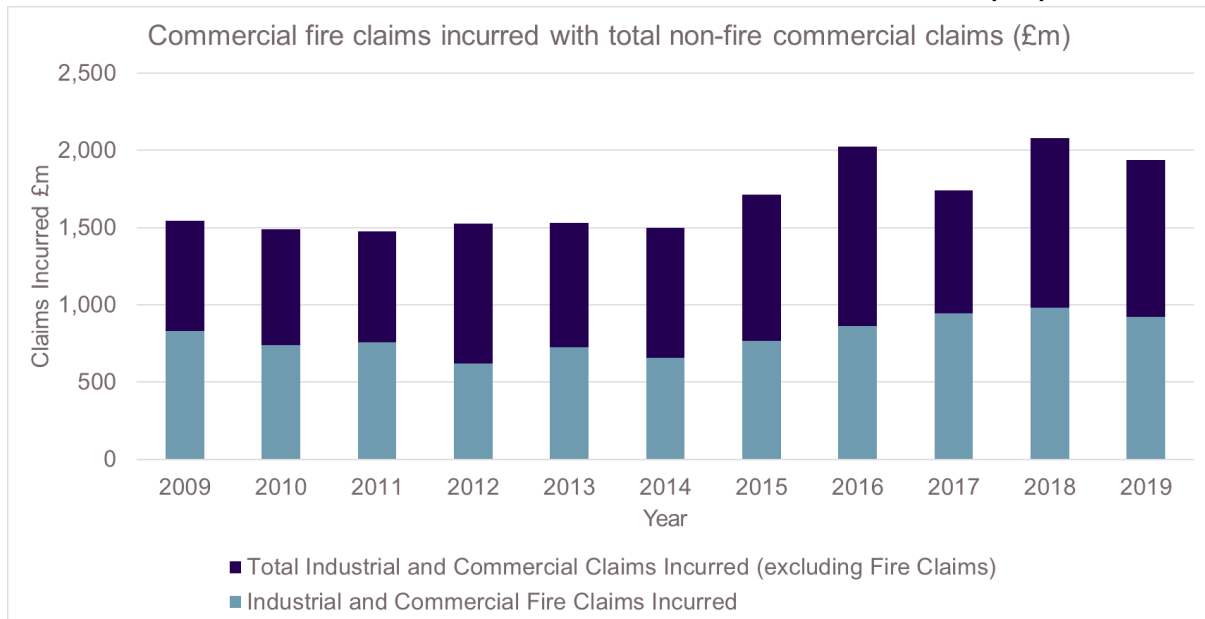
- Although we are aware that there are a number of high-rise residential buildings that are experiencing an increase in premiums due to the increased risk, there is no current indication of a systemic, widespread failure relating to buildings insurance.
- Simply replacing inappropriate cladding is not something that a standard buildings insurance policy would respond to, as there is no damage caused to the property. It is therefore difficult to envisage how a reinsurance scheme could help as cladding replacement or, fixing other fire defects, is not something usually covered by standard buildings insurance.
- Buildings insurance is purchased by freeholders who are usually commercial businesses and may in many cases be able to cross-subsidise through other buildings in their portfolio.

49. The development of a Government-backed scheme is a complex and lengthy process, requiring primary legislation. Remediation of these buildings should be the ultimate priority and, once completed, this should enable building owners, and ultimately leaseholders, to obtain more competitively priced premiums, reducing the need for any form of broad Government backed scheme. We do, however, believe that there is some merit in the Government considering a Government-backed scheme for the most risky and difficult buildings to insure. The ABI will continue to work with MHCLG to look at options to support those leaseholders experiencing increases in their buildings insurance premiums while they await the remediation of dangerous cladding.

Association of British Insurers
September 2021

Appendix One: ABI commercial fire claims data

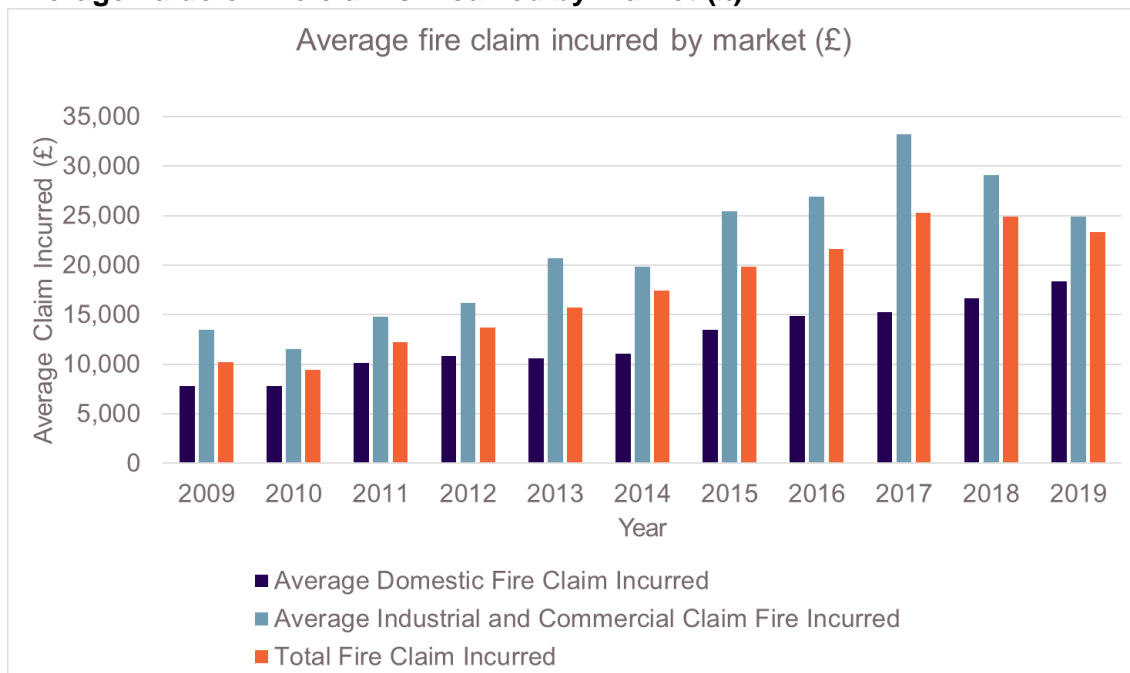
Commercial fire claims incurred with total non-fire commercial claims (£m)



This chart shows that fire related claims costs make up a significant proportion of the total industrial and commercial claims incurred for UK insurers. For example, in 2019 the total cost of commercial and industrial claims was £1.931billion, with 52% (£1.011billion) being made up of fire claims.

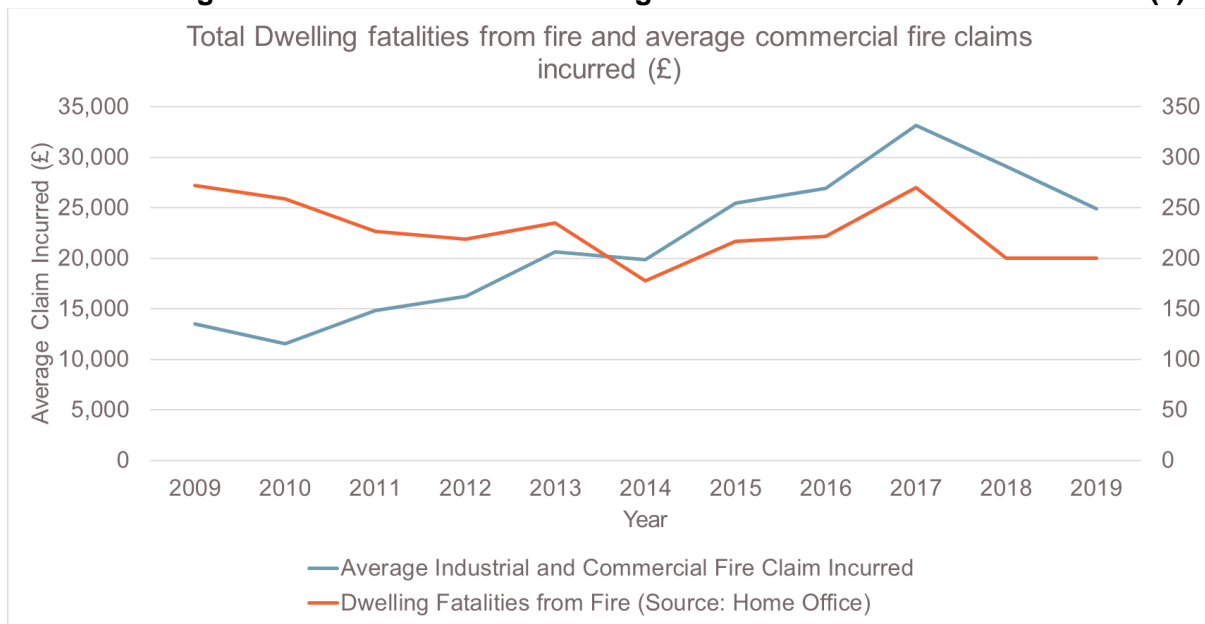
Note – High rise residential buildings are insured under one buildings insurance policy, and are therefore classified by insurers as a commercial claim. All other commercial property, from warehouses to hairdressers are also included within this category.

Average value of fire claims incurred by market (£)



This chart sets out the last ten years of fire related claims, including domestic fire claims.

Total Dwelling fatalities from fire and average commercial fire claims incurred (£)



This chart sets out that although fatalities from fire have been decreasing year on year, buildings insurance is based on damage to property from fire, and the industry have seen a significant increase in the average cost of fire claims (threefold from £11,000 in 2010 to £33,000 in 2017). The decrease since 2017 may be due to a number of major fires in 2017, relating to insurers more detailed review and understanding of the risks associated with fire, improved awareness of fire safety and mitigation measures, or something else.

It is important to note that this chart is not comparing like for like – commercial fire claims include all commercial property (high rise residential buildings along with warehouses and hairdressers), and dwelling fatalities include high rise, low rise and single dwelling properties. However, we have included this graph to demonstrate that the decrease in deaths is not comparable to the increase in premiums.