



Home Office

**Personal Emergency Evacuation Plans  
in High-Rise Residential Buildings –  
recommendations from the Grenfell  
Tower Inquiry Phase 1 report**  
Government response

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# Introduction and Contact Details

This document is the Government's post-consultation response to the consultation paper 'Personal Emergency Evacuation Plans in high-rise residential buildings'.

It covers:

- the background to the consultation;
- a summary of the consultation responses;
- a detailed summary of the responses to free-text questions asked in the consultation;
- a summary of the points raised in the four PEEPs workshops held during the consultation period;
- a summary of discussions held with local authorities and housing associations, identified via the consultation, on existing work being undertaken in their areas supporting the fire safety of residents unable to self-evacuate;
- the next steps following this consultation, including plans for a new consultation published in parallel.

This report is available at <https://www.gov.uk/government/consultations/personal-emergency-evacuation-plans>

Further copies of this report and the consultation paper can be obtained by contacting the Fire Safety Unit at the address below:

**Fire Safety Unit**

**Home Office, 2 Marsham Street,**

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**Email:** [FireSafetyUnitconsultations@homeoffice.gov.uk](mailto:FireSafetyUnitconsultations@homeoffice.gov.uk)

Alternative format versions of this publication can be requested from:

[FireSafetyUnitconsultations@homeoffice.gov.uk](mailto:FireSafetyUnitconsultations@homeoffice.gov.uk)

## Complaints or comments

If you have any complaints or comments about the consultation process you should contact the Home Office at the above address.

# Background

The Independent Grenfell Tower Inquiry was established in August 2017 and is being conducted in two phases<sup>1</sup>. Phase 1, which has now concluded, and the associated report published in October 2019<sup>2</sup> focused on the events and actions taken on the night of the fire, including the emergency response. Phase 2 is looking into how the tower came to be so exposed to the risk of fire and will also focus on events and actions in the days following the fire.

The Personal Emergency Evacuation Plans in high-rise residential buildings consultation ('the consultation') was published on 8 June 2021 and closed on 19 July 2021. It set out how the Government proposed to implement the two relevant Grenfell Tower Inquiry Phase 1 Report recommendations (recommendations 33.22(e) and 33.22(f)):

e. that the owner and manager of every high-rise residential building be required by law to prepare personal emergency evacuation plans (PEEPs) for all residents whose ability to self-evacuate may be compromised (such as persons with reduced mobility or cognition);

f. that the owner and manager of every high-rise residential building be required by law to include up-to-date information about persons with reduced mobility and their associated PEEPs in the premises information box;

The consultation document included the rationale and sought views for the new proposals, and outlined the links to other recommendations made by the Inquiry in the Phase 1 report, which were covered in the Fire Safety Consultation response which was published on 17 March 2021 and which can be found at <https://www.gov.uk/government/consultations/fire-safety>. The consultation, therefore, did not seek views on other proposals which did not relate to Personal Emergency Evacuation Plans.

## Relevant Fire Safety Legislation

### Regulatory Reform (Fire Safety) Order 2005 ("Fire Safety Order")

The Fire Safety Order applies to all premises (as defined and save for those expressly excluded) including workplaces and the non-domestic parts of all multi-occupied residential buildings. Regulations made under Article 24 of the Fire Safety Order can impose requirements on Responsible Persons (RPs) or others, including building owners and

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<sup>1</sup> Terms of Reference | Grenfell Tower Inquiry

<sup>2</sup> Phase 1 report | Grenfell Tower Inquiry

building managers, in relation to risks to residents for specific premises<sup>3</sup>. Non-compliance with obligations set out in such regulations can be enforced in accordance with Part 3 (Enforcement) and where relevant, Part 4 (Offences and Appeals) of the Order.

The Fire Safety Order consolidated the previous range of legislation relating to fire safety in workplaces, reduced burdens on businesses and enforcing authorities from overlapping general fire safety regimes and brought other non-domestic premises into scope of fire safety legislation. The Fire Safety Order principally adopts a risk-based approach to fire safety requiring RPs to ensure that general fire precautions are in place.

RPs are also determine the use of a 'Stay Put' strategy in a multi-occupied residential building, and their strategy needs to be informed by the design, construction, and maintenance of the building along with the fire risk assessment completed under the Fire Safety Order. Instructions in the event of a fire should be communicated to residents and those legally on, or in the vicinity of, the premises by the RPs - in the case of flats, this is usually the owner, freeholder, landlord or managing agent.

## **The Fire Safety Act 2021**

The Fire Safety Act received Royal Assent on 29 April 2021. Section 1, which is not yet in force in England, amends part of Fire Safety Order. This section clarifies that the scope of the Fire Safety Order includes the structure, external walls, and individual flat entrance doors of multi-occupied residential buildings. This ensures that that owners or managers for multi-occupied residential buildings must assess the fire safety risks for the external walls; doors or windows in those walls; and anything attached to the exterior of the walls (including balconies); and flat entrance doors. Section 3 of the Act also introduced the concept of 'risk-based guidance' in order to support a proportionate approach towards assessing risk. The Act applies to England and Wales. Separate fire safety legislation is in place in Scotland and Northern Ireland.

## **The Fire Safety (England) Regulations 2022 - Grenfell Tower Inquiry Phase 1 Recommendations**

The Government has introduced regulations addressing the majority of the Grenfell Tower Inquiry Phase One recommendations that required a change in law to implement. These regulations set out new duties for building owners and managers of high-rise and other multi-occupied residential buildings, which will improve fire safety for residents and support Fire and Rescue Services (FRS) by ensuring they have the information they need to support their operational response.

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<sup>3</sup> Article 24 of the Fire Safety Order can apply specific precautions relating to risks to relevant persons in specific premises

## Building Safety Act 2022

The Building Safety Act 2022<sup>4</sup> will put in place a new and more stringent regulatory regime for high-rise residential buildings, taking forward the recommendations of the Independent Review of Building Regulations and Fire Safety.

The Fire Safety provisions in the 2022 Act will increase the transparency of RPs' activities to comply with the Fire Safety Order and will support effective enforcement action against those who fail to do so. RPs for the common parts of any building containing two or more domestic premises will be further required to share relevant and comprehensible information about fire safety matters with residents.

The new national Building Safety Regulator will lead implementation of the new regulatory framework for higher-risk buildings and also will oversee the safety performance of all buildings.

## Further Measures

The Building Regulations 2010 contain a series of Approved Documents, which provide general guidance on how specific aspects of building design and construction can comply with the regulations to ensure buildings are safe. Part B (Approved Document B) contains guidance on fire safety, including means of escape, fire detection and warning systems, compartmentation, and isolation to prevent fire spread, control of flammable materials, structural fire protection, fire service access and facilities for firefighting.<sup>5</sup>

The National Fire Chiefs Council (NFCC) advice, in their Simultaneous Evacuation Guidance, which was revised and published on 1 October 2020<sup>6</sup>, is that 'Stay Put' remains an appropriate strategy in most blocks of flats where compartmentation works to stop the spread of fire, and where there are suitably protected means of escape. It also provides fire safety advice in respect of blocks of flats where a stay put strategy was part of the original design but is no longer suitable due to the existence of issues that pose a life risk to individuals, such as having combustible cladding on the external wall system. This advice is regularly updated, and a new version is planned for publication in 2022.

A joint Home Office and Department of Levelling Up, Housing and Communities technical steering group has been set up to support a research project to review means of escape provisions in blocks of flats including the use of a 'stay put' strategy and evacuation. This research is considering a range of issues, including the risks associated with the evacuation of large numbers of people, in order to produce national guidelines for the FRS carrying out of full or partial evacuations of high-rise residential buildings. It relates to the implementation of recommendation 33.22(a) of the Grenfell Tower Inquiry.

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<sup>4</sup> Building Safety Act 2022

<sup>5</sup> [The Building Regulations 2010 Approved Document B](#)

<sup>6</sup> [Simultaneous\\_Evacuation\\_Guidance\\_october\\_2020.pdf \(nationalfirechiefs.org.uk\)](#)

# The Consultation

The Inquiry made the following recommendations in paragraph 33.22 of its report that this consultation addresses:

e) (...) that the owner and manager of every high-rise residential building be required by law to prepare personal emergency evacuation plans for all residents whose ability to self-evacuate may be compromised (such as persons with reduced mobility or cognition);

f) (...) that the owner and manager of every high-rise residential building be required by law to include up-to-date information about persons with reduced mobility and their associated PEEPs in the premises information box (p. 777).

The consultation included four proposals, along with 18 questions and two templates to support them:

**Proposal 1: We proposed to require the Responsible Person to prepare a Personal Emergency Evacuation Plan for every resident in a high-rise residential building who self-identifies to them as unable to self-evacuate (subject to the resident's voluntary self-identification) and to do so in consultation with them.**

**Proposal 2: We proposed to provide a Personal Emergency Evacuation Plan template (included in Annex B of the consultation) to assist the Responsible Person and the residents in completing the PEEP, and to support consistency at a national level.**

**Proposal 3: We proposed to require the Responsible Person to complete and keep up to date information about residents in their building who would have difficulty self-evacuating in the event of a fire (and who have voluntarily self-identified as such), and to place it in an information box on the premises to assist effective evacuation during a rescue by the Fire and Rescue Service.**

**Proposal 4: We proposed, in order to assist the Responsible Person and support consistency at a national level, to provide a template to capture the key information to be provided in the information box (included in Annex B of the consultation).**

The consultation period opened on 8 June and closed on 19 July 2021. This report summarises the responses to the consultation.

In total, the consultation received 382 responses, both using an online survey format (312 responses) and through individual submissions in an alternative format e.g. completed consultation documents sent in via email, postal responses, and a spreadsheet response (a further 70 responses). Respondents represent a wide range of interested groups and individuals which included: disability groups, residents' groups, Fire and Rescue Services,

local authorities and other responsible persons, fire safety professionals, and many responses from individuals including Grenfell survivors.

In addition to the written consultation, the Home Office also held four two-hour PEEPs workshops to discuss the proposals in more depth with relevant individuals and organisations. These discussions have been summarised on page 42 of this document.

The Home Office also maintains a regular dialogue with the National Fire Chiefs Council, the Local Government Association, and relevant technical experts to ensure we fully understand operational issues and keep up to date with the position on the ground, in order to set our consideration of the policy in context. We have taken care to ensure that these discussions have not affected unduly the conclusions of the consultation, but this engagement will likely assist with and inform further proposals in future.

# Methodology

Through this consultation we especially wanted to hear from those who would be affected by the proposals made within it, including residents of high-rise buildings; the Grenfell community; enforcing authorities; Responsible Persons; building owners / managers and their representatives; and fire safety professionals. To ensure that all respondents were able to respond as fully and effectively as possible, we used an online survey hosted on GOV.UK, whilst also allowing for hard copy or alternative formats on request.

Respondents could answer as many or as few questions as they wanted, and in some cases provided supplementary narrative. The figures set out in this document represent the number of total responses received to the consultation, as well as, where possible, the number of responses for each of the questions included in the consultation.

Some of the questions prompted respondents to select a level of agreement with particular proposals, some asked for respondents to pick from a choice of options, and some allowed respondents to write their response in a free text box. Where possible, the responses received are presented in table format. Where open questions were asked or free text boxes provided, or separate narratives were provided in covering letters, all responses were analysed to identify common themes and coded where possible to collate similar views and comments. Key themes or issues are presented to provide a summary of these responses.

All responses we received by the closing date have been considered, and this document provides a summary of those responses. The most common themes raised by respondents have been reflected in the summary data set out in each question.

Over 60 respondents submitted offline responses, and amongst these, some of the respondents did not follow the questions or sections as set out in the consultation document and online questionnaire. As a result, not all of these responses could be included within the quantitative data for specific questions and are not reflected in the summary data. However, they have all been considered as part of the analysis of the responses received to the free text questions for Q6, Q8, Q10, Q12, Q13, Q14, Q17 and Q18.

## **Limitations**

### *Quantifying*

In some cases, we have not been able to give the total numbers commenting on a specific point, where for example respondents supported part but not all of a proposal, or otherwise caveated support elsewhere in their response. Other respondents made the same point several times in response to different questions. This made quantifying the exact number of respondents who held the same view in the qualitative sections difficult. Where possible, we assigned a precise number to how many individuals and organisations agreed on the same point, but in some circumstances, it was not possible to do so. Therefore we describe the volume of respondents that made the same point, by using descriptive language such as “some” or “others”. We have also drawn-out specific points raised by individual respondents

where these have not been raised elsewhere or seemed to us to add to the range of considerations. We have aimed throughout to give our best sense of the different points raised, the numbers of persons commenting on them and the level of support to provide a comprehensive summary of the views held.

### *Interpreting the free text boxes*

There were points throughout the consultation where respondents were allowed to choose whether or not to submit detailed free text responses in addition to indicating their support or opposition to a proposal. We provided the opportunity for respondents to make those free text responses because we recognised that the consultation was aiming to gauge the overall numbers of responses in support of or in opposition to each proposal, and also the rationale for each view. Sometimes, for example, the extra detail in the free text box helped to explain or clarify a particular viewpoint. However, we have been cautious not to place undue weight on the free text boxes. We acknowledge that those who supported the proposals may have been less likely to fill out the free text box compared to those who did not accept the proposals. We have therefore sought to consider the views expressed in the round, taking into account the number of responses in favour or against any given issue, and also the quality of any reasoning and evidence presented in support of such responses.

### *Workshops*

As described on page 42, the Home Office held four workshops during the consultation, with representatives from Fire and Rescue Services (FRS), Local Government, fire safety experts, leaseholders, housing associations, disability groups, vulnerable residents, and concerned citizens. These workshops allowed officials to respond to detailed questions, and for participants to present their own detailed views of the proposals, and for attendees to hear views and counter-views of other participants.

We were careful not to inadvertently put more weight on information provided at the workshops, over content received directly via the consultation document. Additionally, the meetings were chaired to avoid particular individual or viewpoints from dominating discussion inappropriately. To foster as open and balanced a conversation as possible, the Chair sought to encourage the full range of views represented to be expressed, and for points of disagreement to be debated, whilst avoiding particular individuals or viewpoints from dominating discussion. Consideration was also given to the capacity in which attendees were responding.

### *Use of the term PEEP*

Different stakeholders had differing interpretations as to what the term 'PEEP' entails, or used the term loosely to express a range of differing measures to support greater fire safety for those unable to self-evacuate, rather than in the specific terms laid out in the consultation. We have recognised throughout the limits of the consultation in this respect, and have aimed for a fair and balanced interpretation of the content received.

# Summary of Responders

## Who Responded?

Questions 1-4 requested the following information from the responders:

1. Whether they were responding as an individual or on behalf of an organisation;
2. In what capacity they were responding;
3. The details of the organisation they were responding on behalf of (if applicable);
4. The details of the representative group they were responding on behalf of (if applicable).

In total, 382 organisations and individuals (respondents) answered the questions in this consultation. Respondents could choose which questions they answered and not all respondents answered all the questions. The number of respondents (n) is noted in the tables throughout. In instances where total percentages do not sum to 100 or where combination percentages do not sum, this is due to rounding. In table 1, this is due to respondents selecting multiple categories.

Respondents were asked in which capacity they were responding to the consultation. Slightly more responded on behalf of an organisation (55% or 207) than as an individual (45% or 169).

The largest groups who responded to the consultation identified themselves as responsible persons (RPs), making up (15% or 56) of respondents, those who responded in the capacity of other resident or residential groups (14% or 53), enforcing authorities (14% or 51) and residents (13% or 49). The full breakdown is in Table 1. Respondents were able to select multiple options to this question in order to establish the capacity in which they were responding.

*Table 1: Breakdown of respondents*

Capacity of response|Definitions|No. of Responses (n=371)|% of respondents

-|-|-

- # Responsible Person|One who has control over a premises to which the Fire Safety Order applies, defined by Article 3 of the Fire Safety Order.|56|15%
- # Other resident or residential group|An individual or a collective body different than the 'resident' and 'residential group for a high-rise building' categories'.|53|14%
- # Enforcing authority|A body responsible for enforcing compliance with the Fire Safety Order, as referred to in article 25.|51|14%
- # Resident|An individual living in a high-rise residential building.|49|13%
- # Building owner|For the purposes of this consultation, a person or persons, company, corporation, authority, commission, board, governmental entity, institution, owner, lessee, or any other person or entity that holds title to the relevant premises.|46|12%
- # Duty-holder|One on which any duty is placed by the Fire Safety Order as referred to in article 5(3) of the order.|41|11%
- # Local authority|An administrative body in local government.|28|8%
- # Concerned Citizen|Individual concerned with fire safety in high-rise buildings.|25|7%
- # Fire Professionals (including Fire Engineers)|Fire safety consultants, fire engineers and other fire safety professionals.|23|6%
- # Property company|A company that buys, sells and/or rents properties.|20|5%
- # Professional body|An organisation that promotes, supports, and protects a particular profession.|18|5%
- # Disability Groups and Residents|Individuals or groups representing voices of disabled people|16|4%
- # Charity and other organisation|Charities and external bodies interested in fire safety precautions|13|4%
- # Grenfell Residents and Groups|Residents and groups representing voices from the Grenfell community.|8|2%
- # Construction company|A company that undertakes construction projects.|8|2%
- # Residential Group for a high-rise building|A collective body of those living in high-rise residential buildings.|7|2%
- # Trade Association|A body representing businesses of a particular sector.|7|2%
- # Building Control Body|A body responsible for ensuring compliance with the Building Regulations.|5|1%
- # Other|Any individual or organisation not covered above.|14|4%

**Resident Groups**

Responding residents' groups represented different numbers of people, ranging from those saying they represented fewer than 10 people to those which said they represented over 1,000. Residents' groups most often said they represented less than ten people (28% or 12), closely followed by groups saying they represented 1,000 or more people (26% or 11).

*Table 2: Respondents from residents' groups*

3d. If you are responding on a behalf of a residents' group, please indicate how many people the organisation represents? (n=43)|No. of responses|% of respondents

-|-|-

- # a. Less than 10|12|28%
- # b. 10–49|9|21%
- # c. 50–249|5|12%
- # d. 250–999|6|14%
- # e. 1,000 or more|11|26%

## Organisations

Half of all responding organisations (50% or 61) said they employ 50-249 people, but 20% (or 25) do not employ anyone.

*Table 3: Organisations employment numbers breakdown*

3e. How many people does the organisation employ? (n=122)|No. of responses|% of respondents

-|-|-

# a. None|25|20%

# b. Less than 10|20|16%

# c. 10–49|16|13%

# d. 50–249|61|50%

## Trade Bodies or Representative Groups

Most organisations responding on behalf of a trade body or another representative group or organisation said they had more than 50 members (78% or 29).

*Table 4: Membership numbers of trade bodies or representative groups*

4d. Number of members (of trade body or other representative group of individual or organisations) (n=37)|No. of responses|% of respondents

-|-|-

# a. Less than 10|5|14%

# b. 10–49|3|8%

# c. 50–249|8|22%

# d. 250–999|11|30%

# e. 1,000 or more|10|27%

# Summary of Responses

The main body of the consultation contained four proposals followed by 14 core closed questions. Respondents were also invited to elaborate on their position in free text.

This section sets out in chronological order, a summary of the responses to the proposals and questions put forward by this consultation. Each question included a text box where respondents were able to elaborate on their answers to the proposals. Responses that were specific to each question have been summarised under the relevant proposal. However, there was a significant amount of repetition across all questions, so these points have been summarised in the Recurring Themes section on Page 36.

## Proposal 1

Questions 5 and 6 invited views and comments on the following proposal:

**Proposal 1: To require the Responsible Person to prepare a PEEP for every resident in a high-rise residential building who self-identifies to them as unable to self-evacuate (subject to the resident's voluntary self-identification) and to do so in consultation with them.**

*Table 5: Responses to proposal 1*

Q5. To what extent do you agree with proposal 1: We propose to require the Responsible Person to prepare a PEEP for every resident who self-identifies to them as unable to self-evacuate (subject to the resident's voluntary self-identification) and to do so in consultation with them? (n=364)|No. of responses |% of respondents

-|-

# Strongly agree|218|60%

# Tend to agree|83|23%

# Neither agree nor disagree|22|6%

# Tend to disagree|10|3%

# Strongly disagree|30|8%

# Don't know|1|0%

Most respondents (83% or 301) agreed with proposal 1 as described in the consultation document, with three-fifths (60% or 218) strongly agreeing. Just over one in ten (11% or 40) respondents disagreed with the proposal.

**Q6. If you wish, please explain your position**

287 respondents provided an answer in the text box for Question 6. Many of these responses covered more than one issue.

The majority of responses support the proposal to require the Responsible Person (RP) to prepare a PEEP for every resident who self-identifies to them as unable to self-evacuate. Comments included the importance of every resident feeling safe in their own home. This included residents with disabilities, health, or cognitive issues whose mobility is limited and, some responses argued that they should be given additional support and protection.

As noted above in the methodology section, there were differing interpretations as to what the term 'PEEP' entails in the context of residential buildings. This affected respondents' views as to whether PEEPs would be appropriate

Some of the responses to this question are set out in the [Recurring Themes](#) section on page 36, but comments specific to this question are listed below:

### **Height threshold**

32 responses to this question covered the definition of height. Some of these comments objected to PEEPs only being available for those in high-rise residential buildings above 18 metres as proposed in the consultation. Some respondents said that this implied, for example, that a resident of the 6th floor of a 17m building would not be entitled to a PEEP but another resident on the 6th floor of a 28m building would be entitled to a PEEP. Therefore, these respondents believe that building height as an unsatisfactory measuring tool for who is eligible for a PEEP. Comments also included how an 18m threshold could create a two-tier level of safety, leaving vulnerable people who are living in buildings under 18m at risk. Where possible, these respondents argued, residents need to be able to safely evacuate from multi-occupancy buildings regardless of their height. Some of the responses believed the eligibility of PEEPs should apply to buildings of all heights.

### **Lack of Staffing**

Some responses expressed a view that PEEPs are not appropriate for residential premises because staff would not be present to help people evacuate if required. They note that buildings have few or no dedicated staff able to assist in preparing a PEEP or manage the evacuation process.

## Proposal 2

Questions 7 and 8 invited views and comments on the following proposal:

**Proposal 2: to provide a PEEP template (Annex A of the Consultation Document) to assist the Responsible Person and the residents in completing the PEEP, and to support consistency at a national level.**

*Table 6: Responses to proposal 2*

Question 7. To what extent do you agree with proposal 2: We propose to provide a PEEP template to assist both the Responsible Person and the residents in completing the PEEP, and to support consistency at a national level? (n=366)|No. of responses |% of respondents

-|-

# Strongly agree|249|68%

# Tend to agree|75|20%

# Neither agree nor disagree|17|5%

# Tend to disagree|7|2%

# Strongly disagree|17|5%

# Don't know|1|0%

Seven in ten respondents (68% or 249) strongly agreed with proposal 2 as set out in question 7, and a further fifth (20% or 75) tended to agree. Less than one in ten respondents (7% or 24) disagreed.

### **Q8. If you wish, please explain your position**

363 respondents provided an answer for the free text to Question 8. Many of these responses covered more than one issue.

Some of the responses to this question are set out in the [Recurring Themes](#) section on page 36, but comments specific to this question are listed below:

#### **Standardised consistent template**

Over 190 responses gave comments in which they supported the idea of a template to provide a clear framework, to support consistency at a national level and to guide communication between RPs and residents to accurately take account of their various needs. Some responses said that residents would need to have an assurance that RPs are following a nationally recognised standard and not creating their own template where standards could vary with poor quality PEEPs. 60 responses were content with the template as set. However, there was a difference of views on the details of the proposed PEEP template, with some responses suggesting the template included insufficient information, whilst others proposed it should be kept simpler and clear. In addition to the 190 responses which agreed the template would deliver consistency, ten responses thought the template

was insufficient. A majority of responses to this proposal agreed that whilst the template was a welcome proposal in principle, its substance required further development with relevant stakeholders.

### **Duplication**

Four responses said that the PEEP template replicates or cuts across similar forms used by some RPs. Comments included how some housing associations and local authorities already have templates for their premises with similar and additional information held by RPs.

### **Template Amendments**

A further 18 responses suggested additional information to be included in the template, such as: free text for varied responses; details of floor plan; location; refuge area; and contact details of another resident able to assist. Comments included that the template should also be available in plain English and available in alternative accessible formats to meet the needs of residents.

Some respondents proposed, in order to avoid a tick box exercise, that PEEPs be conducted by qualified fire risk assessors to ensure complete accuracy. Further comments included views that the template is not sufficiently informative to identify why a resident cannot self-evacuate. Some responses suggested further development with relevant stakeholders and end users to ensure the form is fit for purpose, and to ensure appropriate information is included to enable it to be used across a range of building types.

47 responses, also concerned the form risked becoming a tick box exercise, suggested it should be regularly reviewed, and the form's effectiveness monitored so that changes could be made if required.

One respondent with their own PEEP template said that it would be unlikely that anyone other than the fire service can do anything to help evacuate a highly vulnerable person from a high-rise building. They suggested the PEEP needs to be practical as an advice tool and should only be used to inform the fire service of priority residents during a phased or simultaneous evacuation situation. They argued that any on-site staff who have been advised to evacuate should not be asked to go back into the building in the event of a fire to evacuate others.

## Proposal 3

Questions 9 and 10 invited views and comment on the following proposal:

**Proposal 3: To require the Responsible Person to complete and keep up to date information about residents in their building who would have difficulty self-evacuating in the event of a fire (and who have voluntarily self-identified as such), and to place it in an information box on the premises to assist effective evacuation during a rescue by the Fire and Rescue Service.**

*Table 7: Responses to proposal 3*

Q9. To what extent do you agree with proposal 3: We propose to require the Responsible Person to complete and keep up to date information about residents in their building who would have difficulty self-evacuating in the event of a fire (and who have voluntarily self-identified as such), and to place it in an information box on the premises to assist effective evacuation during a rescue by the fire service? (n=363)|No. of responses|% of respondents

-|-

# Strongly agree|244|67%

# Tend to agree|81|22%

# Neither agree nor disagree|13|4%

# Tend to disagree|8|2%

# Strongly disagree|17|5%

# Don't know|0|0%

There were high levels of agreement in response to Question 9, with 67% or 244 of respondents strongly agreeing and 22% or 81 tending to agree. This compares to 7% or 25 disagreeing.

### **Q10: If you wish, please explain your position**

267 respondents provided an answer for the free text Question 10. Many of these responses covered more than one issue and therefore multiple categories of concern.

Some of the responses to this question are set out in the [Recurring Themes](#) section on page 36, but comments specific to this question are listed below:

#### **Content of the PEEP and obtaining this information**

The largest category, with over 100 responses, were views on the contents of a PEEP and the difficulties obtaining and updating this information. The majority of comments were concerns about paper copies of this information being out of date as well as the difficulties obtaining the information, with several of these responses highlighting this issue particularly in relation to short term rentals and private lets. There were also some views opposing the reliance on self-identification of those who feel they require a PEEP and the impact this would have on obtaining relevant information. Some respondents also flagged a potential

for erroneous information to be passed on to Fire and Rescue Services (FRSs) with some of these responses advocating a Person-Centred Fire Risk Assessment (PCFRA)<sup>7</sup> as an alternative. Some respondents said that the PEEP information provided to the FRS should focus on the need to support safe departure from the building. Some commented that it should not get bogged down in medical terminology and that the information to the FRS should simply state who the person is, where they are located, and how best to support evacuation, including access needs, along with risks of injury.

### **Accessibility for FRSs**

Respondents also commented on the need for the information contained in a PEEP to be accessible to FRSs. Responses generally focussed on the need for this information to be highly secure, accessible, and up to date. Overlapping with the online information theme, the need for this information to be available digitally to FRSs was also a frequently expressed view. For example, some respondents suggested the possibility of this information being available on the Mobile Data Terminal installed in standard fire appliances.

### **Inadequate Fire Safety in Buildings**

Six responses expressed the view that this proposal does not address the issue of inadequate fire safety in buildings. Their view was that the focus should be on improving fire safety and compartmentation in buildings.

### **Other comments**

55 respondents provided responses which either did not fit under the commonly raised themes or fell outside the scope of proposal 3. These comments varied considerably. Some questioned if PEEPs would include those who suffer from mental health difficulties. Several respondents said there was a need to ensure the FRS are not relied on to carry out the evacuation. There were also requests for further clarity on the difference between evacuation and rescue. Some others commented that proposal 3 was poorly constructed as it links three unrelated issues – keeping the PEEP up to date, voluntary self-identification nature of the PEEP and keeping the PEEP in an information box on the premises.

16 respondents said that information on mobility impaired individuals would be a useful addition to the wider information contained within an information box. These respondents said that any guidance to accompany the formulation of this information should consider the Fire Industry Association Code of Practice for Premises Information Boxes guidance<sup>8</sup>.

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<sup>7</sup> We have taken references to PCFRAs as referring to or equating to the [Person-Centred Fire Risk Assessments from the NFCC guidance](#).

<sup>8</sup> [https://www.nationalfirechiefs.org.uk/write/MediaUploads/NFCC Guidance publications/Protection/PIBS\\_Guide\\_06-21\\_V2.pdf](https://www.nationalfirechiefs.org.uk/write/MediaUploads/NFCC%20Guidance%20publications/Protection/PIBS_Guide_06-21_V2.pdf)

## Proposal 4

Questions 11 to 14 invited views and comments on the following proposal:

**Proposal 4: to provide a template to capture the key information to be provided in the information box to assist the Responsible Person and support consistency at a national level.**

*Table 8: Responses to proposal 4*

Q11 - To what extent do you agree with proposal 4: We propose, in order to assist the Responsible Person and support consistency at a national level, to provide a template, most likely in a one-page format, to capture the key information to be provided in the information box? (n=363)|No. of responses|% of respondents

-|-

# Strongly agree|273|75%

# Tend to agree|56|15%

# Neither agree nor disagree|14|4%

# Tend to disagree|5|1%

# Strongly disagree|13|4%

# Don't know|2|1%

Proposal 4 had the highest level of support across the consultation. Three-quarters (75% or 273) of respondents answering question 11 strongly agreed and 15 % or 56 tended to agree. 5% or 18 disagreed.

### **Q12: If you wish, please explain your position**

241 respondents provided a free text answer for Question 12. 115 of these responses provided comments of general support for the standardised template in the consultation document. 57 comments contained views on the design of the template.

Some of the responses to this question are set out in the [Recurring Themes](#) section on page 36 but comments specific to this question are listed below:

#### **Overly Simplistic Template**

There were 13 respondents who thought the template as presented in Annex A needed to contain additional information. Comments suggested that: the template does not allow enough scope for explaining an individual's particular needs; the template should also contain building or floor plans; and the template needs to be flexible to allow for differences in local areas (within the FRS) and for buildings or individuals). They noted that information that does not take these differences into account could lead to conflicting or contradictory information which may hinder rather than help; and, the template does not provide sufficient detail on the hierarchy of risk and how appropriate control measures can be applied.

#### **Template must be concise**

There were 11 comments to the effect that the template needs to be kept as concise or as simple as possible, conversely to the views noted above. Some comments suggested that: the template needs to be very light touch and only provide absolutely essential information; the template should only provide the basic information required to facilitate an evacuation or rescue of the residents in question; and, that the template currently provides too much detail and should only support the immediate operational needs at a live incident.

Further comments considered the form as it stands to be too complex for general needs. If copies of PEEPs were placed in the information box, FRSs would be unlikely to be able to read this large amount of detailed information and extract the information which they need when responding to an incident.

### **Guidance on Information Sharing**

There were over 30 responses that expressed concern that guidance would be needed to effectively comply with this proposal. Of these, six said that due regard should be given to the Fire Industries Association PIB Code of Practice on the provision of Premises Information Boxes in Residential Buildings (which includes proposals for the information to be contained as well as proposing specifications for the boxes themselves) to avoid unnecessary duplication or differing approaches adopted with further responses stating that consistency needs to be adopted across the sector to ensure this information is standardised.

### **Accessibility for FRSs**

There were 14 responses that commented on the importance of accessibility of this information to FRSs. These comments said there was a need for FRSs to have access to this information to carry out an effective rescue.

### **Q13: Do you think information other than in Annex A should be included in the PEEP template and if so, what?**

242 respondents provided a free text answer for question 13.

#### **Additions to the template**

Over 70 respondents made suggestions to include additional information to the template. Suggestions included: the addition of a field to record the next review date; means of contacting the RP should the PEEP information not be reviewed as identified, or individual circumstances change; details to identify evacuation or Stay Put strategy; relevant measures in the premises such as refuges and protected routes, if residents have pets in their household, mental health, medication, details of any care package and providers; where oxygen is stored and mobility impairment requirements; and, a section on the form to include information on what should not be attempted to avoid risk of injury.

Comments also included the need for additional space in the template to provide relevant information regarding residents' disabilities. The additional space on the form would also cater to residents with multiple disabilities. However, although some respondents wanted additional space on the form to include mobility issues and cognitive impairment, others said that medical information should not be disclosed in the form.

Other comments requested the addition of contact numbers for those named as assisting individuals, or details of others who can support them with evacuation. For example, whether they live with their partner or carer, or rely on a neighbour who can assist. Some responses wanted the template to draw a distinction between residents who have difficulty evacuating from those who are completely unable to self-evacuate. For example, one respondent suggested the form should include a question if residents can evacuate using the stairs without use of the lifts. Another respondent suggested questions to include in the template could be aimed at residents who have a charging mobility scooter in their home due to the battery combustion risk.

Ten responses said they supported a suggested amendment to parts of the template to include the following: Do you know what to do in case of a fire? Do you have difficulty self-evacuating? Do you use any equipment or devices?

#### **Accessibility and clarification**

A large number of responses said there was a need for the documents to be clear and accessible. The responses focused on the need for greater clarity about how the proposals are intended to be implemented and supported. This included 46 identical responses which said the template is contradictory and overly simplified in parts. Comments included: that the form should avoid technical language and be simple to read; the reason for difficulty in self-evacuating and the statement of impairment should not be separated; and that the form should be framed in terms of the resident's practical barriers and physical capabilities.

Four responses said there was a need to have the template in a range of formats including large print in plain English avoiding acronyms. One respondent said that the identification of

evacuation information should be available in pictorial or diagram formats to help the RP ensure that the PEEP is better understood by residents.

Some comments also suggested a need to ensure the individual's condition is well documented. Some respondents expressed the view that the template is not helpful because it focuses on medical conditions or impairments and there could therefore be scope for misunderstanding. For example, some wheelchair users can transfer, and some visually impaired people have sight. The focus should therefore be on the barriers and the assistance required. Further comments said that where evacuation risks injury or possible death, this should be noted as a separate area of the form and the review period should have the option for more frequent review if someone's condition is progressive.

### **Information boxes**

18 responses expressed views about information boxes, including the need for security of personal data and how a paper template would not be sufficient with the advancement in digital technology. Comments included: concern regarding keeping the list of residents regularly updated; that RPs should not be held responsible if residents decline to self-identify as requiring a PEEP; and, in the event of a fire there will be no guarantee that the information will be correct, or a person present in the residence. Further comments said that information boxes on premises already include rescue information for the FRS which is not the same as a PEEP. Some others suggest the need for the PEEP template and the information box template to be consistent, with plain language and tailored to address the range of impairments that some residents may have. Some comments said that the FRS would need a wider range of information in order to successfully rescue every resident that requires physical assistance.

Five responses raised GDPR issues, with comments suggesting that consideration be given to the security of private information stored within the information box. Residents may be concerned that their personal information could be shared more widely and did not want the template to require the provisions of personal data if it is to go in the information boxes. Storage of key codes may give rise to security concerns and vandalism of the information boxes. One respondent suggested a sub-note to explain where the information will be held and how it will be kept confidential.

### **Duplication and Person-Centred Fire Risk Assessments (PCFRA)**

There were 14 responses which suggested that the template duplicates some of what is already included in a PCFRA, with some emphasising the need to keep them separate. Some Housing Associations said they have already adopted a PCFRA approach for their residents. The addition of another form would needlessly increase workload if a standardised form is to be required.

Some of the respondents preferred an existing PCFRA template, prepared by the NFCC, whilst others suggested the PEEP should be one potential outcome of a PCFRA. Other respondents took a view that the requirement to undertake PEEPs is impractical in residential buildings and a Person-Centred Risk Assessment route is more pragmatic, achievable and will enhance the protection of those most vulnerable.

**Q14: Do you think information other than in Annex B is necessary for the Fire and Rescue Service to undertake a rescue and should be included in the information box; if so, what?**

225 respondents provided a free text answer for question 14.

**Support for additional information to include in the proposal**

53 respondents thought additional information should be included. Views varied on what the additional information should include, ranging from some respondents who thought the template is too detailed and would benefit from brief summary of assistance required. Other respondents thought the template was oversimplified and wanted to include details on the layout of the building plan and structure. For example, fire safety features in the flats and building that could protect the resident such as passive fire protection or sprinklers or misting systems to support the local Fire and Rescue Service (FRS) to undertake a rescue.

**Further comments on information sharing**

17 respondents said consideration should be given to the Fire Industry Association Premises Information Boxes Code of Practice to avoid unnecessary duplication and support consistency.

Several respondents also said the template be informed by the requirements of the FRS and that the information should be kept at a minimum. One response recommended that the NFCC should be consulted directly to provide specific information on what they would require in the template.

**Link between PEEP and information box templates**

50 respondents (including 45 similarly or identically worded responses) said the information box template does not sufficiently relate to the PEEP template from proposal 2 document. There were concerns that impairments are open to interpretation, for example, visually impaired could mean blind or partially sighted, and consequently FRS would not have a clear understanding of the conditions which may cause delay in the general evacuation of the building. All of these responses said that guidance should accompany the template with good and bad examples to support best practice.

Seven responses said that the template would duplicate information which would already be provided in other formats in an information box with one respondent flagging, for example, the number of floors and number of flats. Some comments also suggested that if the template is intended to provide the FRS with information about residents who may require a rescue, then it needs to be provided in a simple format that can be easily used during an incident.

Two respondents commented that duplication would cause confusion between the concept of evacuation and rescue, for example, how residents are supported to evacuate with specialist equipment, would be different to the actions taken by FRS during a rescue situation.

Two other respondents commented that residents could not rely on the template by itself and that it should be more aligned to the FIA Code of Practice as part of an emergency response requirement. One respondent thought more consideration should be given to NFCC guidance on information box contents, to ensure no duplication of information.

### **Q15: How often should the PEEPs be reviewed?**

Over half of respondents (56% or 195) thought PEEPs should be reviewed as soon as practicable, and a third (33% or 113) thought they should be reviewed every 12 months. 11 per cent (or 39) of respondents thought PEEPS should be reviewed every 6 months.

### **Q16: How often should the information in the information box on the premises be updated?**

The suggested frequency of updating information boxes largely mirrored that of reviewing PEEPs. More than half (57% or 196) thought information in the boxes should be reviewed as soon as practicable, and just under a third (30% or 104) thought this should be every 12 months. 13% or 44 of respondents thought information in the boxes should be reviewed every 6 months.

*Table 9: Response to information review frequencies*

||6 months|12 months|As soon as practicable once the resident indicates a change in circumstances to the Responsible Person.

-|-|-

# Question 15: How often should the PEEP be reviewed (n=347) |11%|33%|56%

# Question 16: Information in the information box on the premises be updated (n=344)|13%|30%|57%

### **Further Responses to Q15 & Q16**

57 qualitative responses were received with regards to questions 15 and 16. These comments were made in response to question 17, as questions 15 and 16 did not provide for the opportunity to elaborate.

Of the respondents who gave additional information to question 15, 36 said that PEEPs as set out in proposals one and two should be reviewed every 12 months or as soon as practicable when a change in circumstances was identified (by either the RP or resident). Some commented that the request should be driven by the resident and not be the responsibility of the RP. 13 responses suggested different alternatives to those in question 15, with one of those responses being that a review should take place weekly.

All respondents who gave further responses to question 16 agreed that the contents of the box should be reviewed as soon as practicable after the PEEP review. 47 responses were in favour of the '12 month / as circumstances changed' review period.

Most of the comments said there was a need for a blended approach to reviewing a PEEP, with an expectation for a regular review (the most common being at least every 12 months) as well as a review when there was a change in circumstances.

A small number of responses gave examples of what they thought a change in circumstances meant. Some respondents commented that changes to the building (triggered by the Fire Risk Assessment or building and maintenance works) should also be

reasons for reviewing any PEEPs. Most of these responses seemed to indicate that after initial engagement it should be for the resident themselves to request a review as requiring RPs to regularly reach out to residents to check if a review was needed was overly burdensome. Groups representing elderly residents suggested that PEEPs should be refreshed weekly in order to make sure they were up to date. A small number of responses felt that RPs should play no part in encouraging or engaging with residents and said that Government should place the legal onus on individuals to request a PEEP.

A widespread view was that any information in the information box should be updated at the same time as the PEEP was reviewed, or at least as soon as possible afterwards.

## **Q17: Do you have any further comments that you think would be important for policy officials to consider as part of this consultation?**

280 respondents answered this question. Due to the nature of the question many respondents covered several of the below themes in their responses. Responses relating to questions 15 and 16 are covered in the previous section as noted.

### **Height threshold**

51 responses specifically addressed the issue of height. All of these responses disagreed with the PEEP proposals being limited to high-rise buildings. (The recommendation from the Grenfell Tower Inquiry Phase 1 report was for high-rise buildings).

No responses supported limiting the proposals to high-rise buildings. This was considered to be arbitrary and discriminatory. Some responses made the point that someone with mobility issues residing on the second floor of a four-storey building (who would not be eligible for a PEEP) faces the same difficulties as someone on the second floor of a 18-storey building (who would be eligible).

There were 59 responses that commented on the proportionality of the proposals and the costs set out in the Impact Assessment (IA). Six of the 59 considered the proposals to be a disproportionate response to the issue of the risk of fatality for disabled residents of high-rise residential buildings.

### **Costs**

Other responses commented on the issue of cost. The answers given were often multi-faceted and covered several points. 72 responses said that costs should not be passed to those residents who need a PEEP (56) or leaseholders via the service charge (16) although responses tended to assume that leaseholders were the most likely who would end up paying. Responses tended to assume that this second group were the most likely (in the absence of any central fund provided from general taxation via the Home Office) to bear the costs. Most of those who did express an opinion on who should pay (53 out of 55) felt that Central Government should cover the costs of PEEPs.

35 respondents expressed the opinion that the costs reflected in the IA were not indicative of the real cost of a PEEP. Some responses commented on the narrowness of the consultation in relation to the cost of PEEPs. They disagreed that PEEPs would not be a driver of costs as it would not be possible to restrict costs only to planning and that implementation costs (the purchasing of equipment, training and/or any reasonable adjustments to the building) should be considered in the consultation/impact assessment.

### **Additional Comments on the Templates**

There were 14 responses which specifically mentioned the templates included in the consultation document. Seven suggested that further work was needed to improve the templates. Two stated that the information needed be clear and concise.

Whilst there was support for the templates in principle, some responses said that the template for the PEEP and the template to be placed in the information box did not align;

and information which would be useful to the Fire and Rescue Service (FRS) was missing from the information box template. Barriers to safe evacuation/rescue arising from disability should be made clear in both templates.

Some respondents said that the PEEP templates should not be completed in isolation but should form part of a whole building assessment for evacuation. Another response said that there would be residents whose ability to self-evacuate would vary and this needed to be accounted for on the template; some would be able to self-evacuate during daytime hours but not at night and the impact of environmental conditions. Some respondents said the PEEP should contain information on the specific circumstances in which a resident might need assistance to evacuate.

### **Use of Third Parties**

All 16 responses which raised the participation of or reliance on third parties (neighbours and friends) had concerns about its implementation. Concerns focussed on the possibility that the good intentions of those who were willing to volunteer could increase the risk to those who the PEEP was intended to help, as well as the volunteers themselves. Housing Providers and Local Authorities were concerned with questions around liability and commented that indemnity needed to be assured should arrangements involving third parties fail.

One respondent made a different point which expanded on the training issue. People volunteer to “do” things and it is the act of doing that thing which keeps people motivated. Therefore, it might be hard to keep people engaged with the plan; to refresh any training; or undertake new training when resident needs change. This may result in their PEEP becoming more complex limiting its implementation.

### **Building Solutions**

50 responses commented on issues relating to buildings themselves. Most (40) were mixed responses suggesting the need for better building regulations and better provision of fire suppression systems (mostly sprinklers) to ensure people were safe in their own homes. Four of the remaining responses called for a review of housing policy to ensure those who could not self-evacuate were not housed in high-rise buildings.

Some responses said that some adjustments to buildings could be better value than PEEPs, mainly sprinkler systems.

Refuge areas were also raised by some respondents as a possible option rather than a PEEP being something that offered full evacuation from a residential building. Contrary to this view were some respondents who called for a full review of stay-put and installation of evacuation lifts in all premises.

Issues with equalities adjustments in the built environment were also commonly raised. This included the view that equalities legislation (as it interacts with buildings) has traditionally been focussed on access not evacuation. Also, there were several responses which said

that design assumptions for general needs blocks of flats were rooted in what was termed “1950s” assumptions about residents being able-bodied.

Those responses which looked at building solutions linked back to issues with proportionality and costs. It was clear from the responses provided that costs being placed on leaseholders or disabled residents to pay for expensive remediation work to buildings was not supported and that their preference was for any such burden to fall on the general taxpayer.

### **PEEPs Terminology**

Seven responses did not consider the use of the term PEEP to be appropriate in residential buildings.

Some responses were opposed to the use of PEEP as a term in a residential setting. They were concerned that a PEEP, as understood in an office environment, would be nearly impossible or disproportionately expensive to implement effectively in general needs buildings. They argued that using the term PEEP therefore sets an unrealistic expectation of what can be achieved in a residential setting.

### **FRS Role and Enforcement**

24 of the responses specifically addressed the role of the FRS in implementation or enforcement of PEEPs. 10 of these responses said that the FRS should have a broader role in the implementation and execution of PEEPs from signing them off to undertaking the PEEP assessments. Nine responses said that there should be greater clarity around expectations on enforcement (and dispute resolution) and five said there would be an increased burden on the FRS.

Several responses called for the involvement of the FRS in preparing and implementing PEEPs. Groups representing elderly residents said that local FRSs should be responsible for signing off fire safety plans in buildings, including PEEPs. Those responses which addressed the role of the FRS called for greater involvement of the service or said that the proposals were in essence only useful for identifying those who needed to be rescued in the event of a fire.

Some responses said that without a proper complaints and dispute resolution mechanism the proposals were not sufficient. There were questions asked about what happens in cases where a resident does not agree with the PEEP offer or how to prove that an RP has or has not engaged with residents. Responses included that without clear guidance of what a PEEP was, and ultimately who was responsible for it and what it was supposed to achieve, then enforcing it would be impossible.

### **Information Boxes**

22 responses addressed the issue of information sharing (including digital information). Just over half of those (12) said that the information should be clear and consistent. Eight responses touched on concerns around the security of information and/or GDPR issues. Two responses called explicitly for digital solutions and one disagreed with information boxes entirely on the grounds that basic information regarding the building itself should be

displayed clearly on signs within the entrance to the building and not locked away in an information box.

Several responses raised concerns about the security of Information Boxes and that supporting guidance on GDPR issues would be needed from either the Information Commissioner or the Home Office. Generally, there was recognition of the risk of vandalism to the box and the potential risk to vulnerable residents depending on the information that was included in the box.

Conversely some respondents called for more information to be placed in the box including contact details of residents with a PEEP and key box codes to assist FRSs with rescues.

A small number of responses to this question called for a greater role for digital information, suggesting that more work should be undertaken on exploring this option.

### **Other Issues Raised**

Where respondents were supportive of the proposals, they said that they were surprised PEEPs were not already in place or expressed surprise that a consultation was needed to secure disabled residents what they said were their human rights.

Several responses also said there was a lack of focus on groups other than the disabled; the elderly and those whose mobility has been temporarily reduced, such as through injuries or pregnancies.

Some responses called for disabled residents to be re-housed away from high-rise residential buildings. Others said the proposals had a focus on fire and not the risks from smoke/gas. Some other responses said PEEPs could potentially pose a danger to residents who would be safer remaining in their flats (in buildings where there is a “stay-put” policy).

Some responses called for the involvement of residents and disability experts in taking this work forward with one (who described themselves as working in the Fire Safety Industry) stating that the Fire Sector were deliberately “digging their heels in” on an issue (disability) they did not understand, whilst other responses said that it should be recognised that fire safety was a technical area and best left to the experts.

Several responses questioned the consultation’s use of language, asking for clarity on what ‘self-evacuate’, ‘evacuate’ and ‘rescue’ mean. There were also some comments on the application of PEEPs in single staircase buildings (that they could not be introduced), questioning whether responsibility should lie with the RP for PEEPs and examples where RPs and building owners were deemed to be not interested in implementing PEEPs.

### **Identical Responses**

46 identical responses strongly disagreed with the height requirement and the period of review (12 months or when circumstances changed). These responses sought prohibition on costs being passed onto disabled people (under S20 of the Equality Act 2010). They said that the consultation did not address costs of facilitating a plan (evacuation chairs) and noted

the Equalities Impact Assessment (EIA) acknowledging the possibility for resentment amongst leaseholders towards disabled residents should costs be passed on more broadly across leaseholders in the building. They favoured a central taxpayer-funded mechanism to meet the costs of PEEPs. They also asked how PEEPs would be monitored and enforced and said there was a danger of RPs not fulfilling the duty properly and asked about a mechanism for resolving disputes.

Some responses supported the principle of PEEPs and that those who want to evacuate a stay-put building, in the event of a fire, should be able to do so if they wish. They called for better building design and said that the cost of retrofitting sprinklers to improve building safety compared favourably to other measures. They also said there were loopholes and lack of accountability in the Building Regulations.

## **Q18: Do you have any comment on or data to support the impact assessment?**

There were 202 responses to question 18. There were two large groups of identical or near-identical responses. One of those groups (containing 50 responses) focussed on issues relating to the Equalities Act 2010 and the other (17 responses) covered issues regarding the scope of the Impact Assessment.

### **Height threshold**

There were eight responses that raised the height issue. All (eight) disagreed with the decision to limit the proposals to high-rise buildings only. As in question 17, responses focussed on general disagreement with the decision to limit PEEPs to high-rise buildings only. The threshold was considered arbitrary and the arguments about people living on the same floor of different height buildings was made again.

### **Equalities Impact Assessment**

17 responses addressed the Equalities Impact Assessment (EIA). Of these, six addressed the height issue, three were concerned with RPs not making assumptions and two stated that not enough consideration was given to matters of individuals with more than one protected characteristic. The other issues were individual responses.

On height, it was questioned why the EIA did not consider the discrimination of those who live in buildings under 18m in height. Concerns were raised about the part of the EIA which says that RPs should not make assumptions about people needing a PEEP on certain protected characteristics.

Some responses suggested the EIA did not take into account situations where multiple protected characteristics are involved, and how it might be a barrier to self-identification. Some responses also questioned the lack of specific data on groups with specific protected characteristics and also the lack of data on fire fatalities for those with different protected characteristics.

### **Calculations and Assumptions in the Impact Assessment**

25 responses specifically addressed the costs and assumptions made in the Impact Assessment (IA). One response considered the benefits of PEEPs were outweighed by the costs. The others held the view that the true nature of costs were not addressed in the IA and so the assumptions were flawed.

The predominant view of responses which addressed the IA said that it was incomplete due to its focus on the administrative costs of preparing a PEEP. They said the absence of any consideration of the practical costs of implementing a PEEP were not suitably addressed in this IA. One response said that the proposals were only an encouragement to have a conversation and not a PEEP.

Responses also said that the IA did not comment on where the costs associated with a PEEP were going to fall. As with question 17, several responses said that costs should not be met by leaseholders or disabled residents (also mirroring Q17 where some respondents felt that this was illegal under the Equalities Act 2010).

Some responses questioned whether PEEPs in residential buildings was a proportionate response to increasing fire safety, considering the low number of fatalities from fires in high-rise residential buildings.

Some responses also questioned the data on future years, noting the aging population and therefore likely increased demand for PEEPs. Assumptions in the IA about the split between private and social housing were questioned. The labelling of costs in privately owned buildings as “private business costs” was questioned, due to the nature of leaseholders.

One response said that the modelling on numbers was too low and gave some figures based on their own modelling. They felt that potential costs could not be well estimated due to the self-identification proposal.

### **Suggestions for Additional Data**

Five responses asked for more data to be included. Two asked for more data without being specific. Responses called for greater depth in the data provided on those who might need a PEEP. One asked for fatalities by fire spread and one on numbers of vulnerable persons in high-rise buildings.

### **Other Responses**

30 responses covered a variety of other issues across disparate theme. It is not possible to quantify this data further or identify further themes in a more granular way in which to group these. There were calls for a central Government communications campaign on PEEPs as part of a wider public information drive on fire safety. There was a call for greater involvement of the Fire and Rescue Service (FRS) to stop RPs acting as evacuation managers as the FRS are the fire safety experts. One respondent said that similar arguments were being used which were in the greyed-out section of the Government’s purpose-built blocks of flats guide<sup>9</sup> and expressed surprise they were being repeated. The difficulty of implementing a PEEP in a single stair general use building was raised. One response called for greater consideration for long term tenancies as people’s needs would change over time. Other responses expressed disappointment that PEEPs were being considered for residential buildings at all.

### **Identical Responses**

There were two large groups of responses to this question with identical or near-identical wording. One related to potential costs from Tribunal Rulings on breaches of the Equality Act 2010 and Article 14 of the FSO as they do not make exemptions regarding RP duties towards disabled residents and apply to all buildings regardless of height. Another was about the Impact Assessment’s focus on the preparation of the PEEP as a paper-based exercise and not the wider costs and impact of implementation. This response also said that if a PEEP was a duty for a RP then its impact would be felt across all residential buildings and that there was a disparity due to the height criterion. This response also said that the number of disabled people was underestimated and that the Impact Assessment did not consider an aging population and likely increasing demand for PEEPs.

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<sup>9</sup> [Fire safety in purpose-built blocks of flats – GOV.UK](https://www.gov.uk/guidance/fire-safety-in-purpose-built-blocks-of-flats)

## Recurring Themes

This section outlines the recurring points made where respondents were invited to expand upon their response to each proposal or question. It is divided into headings of self-identification; proportionality and costs; alternatives to PEEPs as described in the consultation; guidance for PEEPs; security and General Data Protection Regulation (GDPR); and digital solutions. Under each heading below, we have identified in which proposal or question these points were made. Respondents did not always comment directly on the specific proposal being put forward, but we have included this section to cover general themes which emerged throughout the consultation.

### Self-identification

81 respondents to [Proposal 1](#) expressed concern over the requirement for residents to self-identify. Overall, responses were mixed with some views that the proposal placed the burden on residents to self-identify, when it should instead ensure that Responsible Persons (RPs) are proactively offering advice to all residents in the event they require a PEEP. Other responses wanted to record information on those who the RP considered to be vulnerable even if residents had chosen to decline a PEEP.

44 of these 81 responses to this proposal were similarly or identically worded, and considered it wrong for residents to be required to self-identify for a PEEP. They proposed that the RP, with knowledge of the building and understanding of the residents, should lead the process.

11 respondents to [Proposal 3](#) said there was a need for a PEEP to be available for all who require one, whether they self-identify or not. A few responses called for clarity as to whether there would be an expectation for (RPs) to add information that they have been made aware of, for example, where they have been notified about a person with mobility impairments who has not self-identified or has refused a PEEP. Some respondents said thought should be given to visitors who may require assistance evacuating a building.

Furthermore, in response to [Question 17](#), 53 responses expressed their opposition to the principle of self-identification, stating that PEEPs should be mandatory for all who are unable to self-evacuate. Some of these responses highlighted the sometimes-difficult relationship that existed between disabled tenants or leaseholders and building managers or landlords. They said there is the risk of individuals being reluctant to request reasonable adjustments to their homes, or being reluctant to ask for a PEEP, so as not to appear to be a difficult tenant. Some of these responses called for it to be mandatory for everyone who needed a PEEP to have one, regardless of if they wanted one or not.

One response said that their experience of running a PEEPs pilot in their housing stock demonstrated that not all those who might need a PEEP would self-identify. This response questioned the assumptions made in the Impact Assessment (IA) where adaptations to buildings had been used to identify the potential size of the group who may need a PEEP. They said that this would not include those with cognitive or other non-physical barriers to self-evacuation.

## **Proportionality and Costs**

40 responses to [Proposal 1](#) raised concerns about proportionality and costs. Views included concerns about who would pay if structural changes, such as evacuation lifts, are required for a PEEP. Resources would also be required to prepare and test a PEEP. Some were concerned that the cost would be passed to the resident requesting a PEEP, or to all residents in a premises. Others felt that it could lead to resentment and discrimination, encouraging vulnerable people to choose not to self-identify.

Furthermore, in response to [Proposal 2](#), five responses covered the issue of proportionality and costs. Comments were made about how the proposed PEEP template would be difficult to introduce without the right resources in place to support its completion. Some other comments said PEEPs would also be highly impractical to operate in an environment where there are no staff available on site, and RPs may need to enlist volunteers, such as neighbours to help someone in the event of a fire. Some responses said that the use of neighbours has practical implications and would be an administrative burden for RPs, posing potential liability issues as there is no guarantee the volunteer would be present to aid the resident with a PEEP in the event of a fire.

33 respondents to [Proposal 3](#) expressed varying views on the burden and cost associated with the PEEPs proposals as set out in the Consultation Document. 13 respondents said the associated costs of obtaining and maintaining information, as well as ensuring it is accurate would be too costly. Some responses noted that this will be a particular issue where properties are privately sublet or are used for short term rentals. Other respondents said that the measures were disproportionate as the Fire and Rescue Service (FRS) were unlikely to rely on the information in an information box.

59 responses to [Question 17](#) commented on the proportionality of the proposals and the costs set out in the Impact Assessment (IA). Six of the 59 considered the proposals to be a disproportionate response to the issue of the risk of fatality for disabled residents of high-rise residential buildings.

The rest of the responses commented on the issue of cost. The answers given were often multi-faceted and covered several points. 72 responses said that costs should not be passed to those residents who need a PEEP (56) or leaseholders via the service charge (16). Responses tended to assume that this second group were the most likely (in the absence of any central fund provided from general taxation) to bear the costs. Most of those who did express an opinion (53 out of 55) felt that Central Government should cover the costs of PEEPs.

35 respondents expressed the opinion that the costs reflected in the IA were not indicative of the real cost of a PEEP. Some responses commented on the narrowness of the consultation in relation to the cost of PEEPs. They disagreed that PEEPs would not be a driver of costs as it would not be possible to restrict costs only to planning and that implementation costs (the purchasing of equipment, training and/or any reasonable adjustments to the building) should be considered in the consultation/impact assessment.

Some respondents were concerned about the practicality of implementing PEEPs in a general needs building where there was only a single staircase and no other means of egress from the building. The solutions to make the proposals work (evacuation support staff in buildings 24/7, retrofitting evacuation lifts) were considered too costly to implement.

A number of responses raised issues of proportionality, saying that Grenfell was a singular tragic event and the potential impact of these proposals were not proportionate to the impact that they would have on the overall fire safety of residents of buildings which primarily had a “stay-put” strategy.

### **Alternatives to PEEPs as described in the consultation document**

24 responses to [Proposal 1](#) suggested alternatives to PEEPs such as effective evacuation strategies, or Person-Centred Risk Assessments (PCRAs), or Person-Centred Fire Risk Assessments (PCFRAs)<sup>10</sup>. Some comments said they preferred these as a more effective tool to support residents and to improve fire safety. It was suggested that PCFRAs are based on rounded dialogue with residents and the assessment of multiple factors which may contribute to fire risk. The PCFRA process includes an assessment of the ability of the resident to escape unaided and the provision of appropriate advice and guidance to support resident safety. PCFRAs allow for more low-intervention measures to be introduced, such as heat detection alarms or sprinklers in individual properties in order to support someone to live safely and reduce the risk of fire. Undertaking PCFRAs was felt by these respondents to be a more appropriate tool than PEEPs. Comments included how PCFRAs are considered to be more cost effective and would mitigate against the potential for heavy costs to be passed on to leaseholders.

Further, nine responses to [Proposal 2](#) offered views on alternatives to PEEPs as described in the consultation document. Generally, these respondents preferred a PCFRA as a better option or a “stay put” strategy. In this instance there would not be any need for PEEPs. One respondent recommended a new RP role in drawing up practical PEEPs delivered through a new duty assigned to Fire and Rescue Authorities; or have a surveyor designated the RP for an apartment block.

In response to [Question 17](#), there were 17 responses which included a reference to PCFRAs as a solution. 12 of those responses felt that a PEEP should be undertaken alongside or as part of a PCFRA. Five considered that a PCFRA was more suitable in general needs<sup>11</sup> buildings than a PEEP.

PCFRAs were raised in responses as a possible alternative or as a necessary precursor to a PEEP. Some responses said that PCFRAs are more common than PEEPs amongst housing providers as a way to ensure the safety of vulnerable residents.

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<sup>10</sup>Person-Centred Risk Assessments and Person-Centred Fire Risk Assessments were terms used interchangeably in responses to the consultation. As noted on page 20, we take these as referring to [Person-Centred Fire Risk Assessments from the NFCC guidance](#).

<sup>11</sup> ‘General needs’ buildings is used to distinguish buildings for the general population, as opposed to ‘specialist needs’ buildings which typically are staffed and may have special features to aid people with specific disabilities.

PCFRAs are primarily focused on ensuring vulnerable people are safe in their own homes and that appropriate measures are taken to ensure their safety in the event of a fire. They do not always result in plans for an evacuation. Some responses advocating PCFRAs did say that a PEEP could be part of a PCFRA or could follow on from one, but the majority would not lead to a plan for evacuation. Information on PCFRAs, it was suggested, could also be placed into an information box.

## **Guidance for PEEPs**

12 respondents to [Proposal 1](#) advocated the need for training and guidance to be available to RPs to ensure they understood their new obligations and the information required to assist the Fire & Rescue Services.

Over 130 responses to [Proposal 2](#) made a comment about the need for further clarity and guidance, including training. 14 of those responses were identically worded. Comments included that guidance for RPs would help to ensure they understand their responsibilities and requirements; and if residents have a PEEP this should not imply that a successful evacuation will always be possible, or a rescue never needed.

Other comments said that the RPs preparing the PEEP would be unfamiliar with the potential difficulties and barriers that disabled residents may experience, and they would need to receive appropriate training and guidance notes to accompany the form, and this could include Frequently Asked Questions (FAQs).

Furthermore, over 50 responses to [Question 13](#) said there should be guidance. 46 respondents provided an identical response asking for a guidance note, with good and bad practice examples of PEEPs to assist RPs and residents when completing the template. Three respondents also proposed training to accompany the guidance.

36 responses to [Question 17](#) mentioned the need for supporting guidance or training. Almost all (29) said that guidance should be clear and use examples/scenarios to support delivery. Seven called on the Government to ensure that there were training programmes in place to assist RPs in completing PEEPs and for those involved to correctly operate associated equipment. Five responses made clear that guidance should be accessible to all residents and RPs. Three responses called for guidance to set out how disputes should be resolved.

Several responses outlined the need for clear guidance on how to complete a PEEP with worked examples. There were some responses which called for a Government led communications campaign to engage with residents to encourage them to self-identify to RPs (this was rather than, instead of complimentary to, efforts made by RPs themselves). There were several comments that guidance would be needed to assist RPs in engaging with disabled residents and identifying the right levels and types of support that would be needed and who to engage with (carers, adult support services etc). Some commented that guidance would also need to make sure that PEEPs did not replace other existing forms of support for disabled residents in general needs buildings.

There were also responses that said there was a need for guidance for residents themselves which would need to consider individual needs (braille was noted as well as those with

cognitive impairments). Treating residents thoughtfully and with respect was often raised as well as involving disabled residents (and others, including the elderly) in drafting guidance.

Seven responses to [Question 18](#) which mentioned guidance. Four related to the templates mentioned in the consultation document and three questioned how this guidance would be enforced.

### **Security and General Data Protection Regulation (GDPR)**

Seven responses to [Proposal 1](#) had concerns over the process of gathering PEEP information and the accuracy or completeness of the information that would be supplied.

10 responses to [Proposal 2](#) raised concern about the security of information boxes on premises and saw a need for the information to be digitalised and accessible by the FRS. Comments included views that this information should not be kept on paper and held in the information boxes because it could be susceptible to unauthorized access. Other views were that keys are often lost or stolen; the Fire Service do not have adequate security measures to protect them; the information held in the information boxes on premises could be used by criminals to target vulnerable residents; and that personal details of the resident's issues, disability, cognitive impairment or vulnerability and those assisting the resident in the event of an incident would not be secure.

In response to [Proposal 3](#), over 60 respondents cited GDPR concerns and the importance of complying with GDPR. 10 of these responses said there was a need to consider where information boxes are located in a premises and the level of security associated with the box. Some responses flagged the GDPR implications if a box was stolen or damaged. Several responses suggested the need for the level of security associated with information boxes on premises to be prescribed and held to an accredited standard.

In response to [Proposal 4](#), there were 22 responses with views on the location of the information box and GDPR concerns. Concerns included the accessibility of the information box and that it could be vandalised or stolen; medical information should not be stored on site as the information box was not designed to store this sensitive data; due regard must be paid to GDPR protections; the template should only explain the practical evacuation assistance required by individuals; and that information could be provided to the local FRS on a confidential basis, but not held in the information box. 11 of these responses held the view that this information should be passed on digitally by RPs to provide additional protection and ease of access and updating by RPs and FRSs.

Four respondents to [Question 14](#) flagged data protection issues and made comments about accuracy or how maintaining the template would prove difficult without the resident's consent. Providing it is GDPR compatible, it was suggested that there was value in adding a contact number for residents to assist the FRS. Another comment said personal information that identified residents and their medical conditions should not be included as information boxes are not designed to store such personal details.

## **Digital Solutions**

Five respondents to [Proposal 2](#) thought further consideration should be given to a template that could be completed by RPs as an electronic copy. One respondent suggested this could help reduce the additional burdens on RPs and minimise the costs that would need to be met through service charges in the private sector and housing revenue accounts in the social sector.

Three other responses suggested a national database or portal to provide a single point of reference, along with guidance and the templates to ensure a consistent national approach is adopted. A respondent also suggested a national database would ensure the FRS have consistent information when providing a cross-border or national response to an incident; and be an effective tool to measure compliance against a national standard and provide a consistent approach to enforcement.

37 responses to [Proposal 3](#) suggested a national database accessible by the FRS or a digital solution as a better alternative for the storage of PEEPs in information boxes. Some responses flagged that if the information was provided digitally via an on-line database, it would be easier to check that information was being updated on a regular basis.

# PEEPs Workshops

During the consultation, the Home Office held four stakeholder engagement workshops to seek in-depth views on and further exploration of the PEEP proposals. These workshops were held between 15 June and 8 July 2021 with representatives from Fire and Rescue Services (FRS), Local Government, fire safety experts, leaseholders, housing associations, disability groups, those who described themselves as vulnerable residents, and concerned citizens. The Home Office reached out to these individuals and organisations in order to gain a more comprehensive understanding of the attitudes towards the proposals, and to understand how they would work in practice. This helped the Home Office obtain views from a wide range of stakeholders, with varied - and sometimes opposing - views on the PEEP proposals.

The workshops were chaired by a Home Office official who set out the proposals in detail at the beginning of each session, before asking for views from participants. The workshops gave participants the opportunity to provide detailed comments and discuss the themes together, including where there were strongly differing views. As these views were expressed by those who spoke on each topic, unlike with the consultation responses, we cannot give numbers for those who may have supported any particular view.

A summary of the key areas of interest discussed are summarised below:

## **18-metre threshold**

As with most of the responses to the consultation, participants at the workshops questioned the proposed 18-metre threshold for PEEPs. It was suggested that the consultation proposals were unfair as they would introduce a legal requirement for a disabled resident on the 2<sup>nd</sup> floor in a high-rise building to have a PEEP, but not for a disabled resident living on the 6<sup>th</sup> floor of a mid-rise building. On this, one participant said that there was a risk that PEEPs, as proposed in the consultation, was driven by economic motives rather than an engineering-based or safety decision. Concerns were raised that any limitation by height could be seen as a cost saving measure, rather than being a distinction based on risk. Some participants believed PEEPs should apply to anyone who wanted one regardless of height.

## **Costs**

The potential for significant costs of implementing PEEPs was raised and participants questioned where the burden for these costs would lie. There were also concerns that training and equipment would be costly for a Responsible Person and potentially passed on to leaseholders and residents. An example of who would pay for an evacuation chair and the associated training to use it correctly in the event of a fire was given.

There was concern that this could lead to resentment from other leaseholders who could be required to meet this cost through their service charge. To counter this, there was a suggestion that there could be a grant scheme for the general taxpayer to fund the reasonable adjustment costs so that the costs did not fall to leaseholders. There was also a

discussion as to whether disabled people requiring a reasonable adjustment should have to pay or see costs being added to service charges as a shared cost and related concern that this might lead to harassment towards disabled people.

Some participants thought that RPs would be reluctant to meet additional costs and did not believe they should be passing costs associated with evacuation onto residents. Therefore, they thought the proposals would be unworkable if there were (likely significant) costs to provide staff to undertake evacuation, which could ultimately be passed onto resident or leaseholders.

### **Staffing of buildings**

Participants at all the workshops noted that residential buildings normally were not staffed and so there is likely not to be personnel who could be deployed to support the evacuation of those who need assistance. It was recognised that PEEPs, as most people understand them, are most straightforward within staffed buildings where people can be nominated, equipped, and trained to assist those identified as needing assistance and that implementing them to this level in general needs housing without staff would be impractical. However, a live working example was also discussed where a building was employing staff on site in a residential setting 24 hours a day who could support with evacuation if required. The individual who gave the example saw no reason why other RPs couldn't consider this as a way forward to support evacuation.

Some participants said that providing staff in a residential setting would not be required and where neighbours were available and willing to provide support in a PEEPs situation. However, some suggested this could be a dangerous policy to take as neighbours would not always be readily available and there would be liability concerns should any harm come to an individual requiring assistance in evacuation. Other participants noted the difficulty of training neighbours to undertake duties that would be expected of a fire fighter, for example evacuating a resident in a smoke-filled environment.

However, it was also argued that many high-rise buildings are “communities in the sky” and that neighbours would all provide support to someone if they knew they were unable to self-evacuate. The individual arguing this point referenced research conducted by the Building Research Establishment where they said they found that in real life situations neighbours help each other. One participant explained that a PEEP could identify a neighbour or group of neighbours who are prepared to provide assistance. The PEEP could include what the assistant is prepared to do, when they are available and what training they will require to undertake the role. It was noted however, that the RP would be unable to guarantee that other residents would be available, suitable, and trained to do evacuations in the event of a fire.

In one workshop, participants questioned the type of competency needed for a RP to prepare a PEEP and asked what assurance they would need and raised issues such as liability and how to identify suitable individuals to help with evacuation.

## **Compatibility with ‘Stay Put’**

Concerns were raised regarding the compatibility of PEEPs in residential settings with ‘stay put’ policies where these were in place. This included the view that a high-rise which has a single stairway where residents are trying to evacuate despite a ‘stay put’ strategy could impact the local FRS firefighting tactics they need to put into place in an emergency situation, especially where evacuation chairs are concerned. In this regard, it was felt that they are often difficult to use and may restrict passage of other residents evacuating the building, and firefighters accessing the building via the stairway. Some attendees also saw PEEPs as incompatible with ‘stay put’ buildings and that encouraging people to evacuate would send mixed messages.

Other participants noted that with ‘stay put’ buildings that have compartmentation, residents should be safe to stay in their flats, however that means of escape are provided and should be available to all residents who wish to leave the building, regardless of disability or the evacuation strategy of the building.

The issue of escape routes was discussed in one session, focussing on the issues of single staircase buildings and the lack of evacuation lifts. There was also a concern raised that some ‘stay put’ properties are designed without communal alarms – so residents would not know when they need to evacuate.

## **Role of the FRS**

Participants were asked for views on the role of the FRS in delivering PEEPs. Some participants saw the information sharing aspect of the proposals as the most vital, ensuring the local FRS were aware of residents unable to self-evacuate. They said that they already hold regular meetings with the FRS so they are already broadly aware of the residents they need to evacuate before they arrive to the fire emergency.

There was also a view that the FRS should have no role in the PEEPs and that people should not rely on FRS intervention. They said firefighters should not be assisting with evacuation as they should focus on firefighting.

Concerns were raised that the FRS would not have time to read a large amount of information that could potentially go into a PEEP unless the template was made more straightforward and contained only basic details. It was argued that the FRS do not necessarily need to know why an individual cannot self-evacuate, just what equipment might be needed and where they are.

There was also an argument supporting a greater role for the FRS, that a residential PEEP template should be about information gathering for the FRS to utilise and to inform their strategy to evacuate the building.

## **Security of Information and Digital Solutions**

The issue of ensuring the security of an individual’s personal information was raised and discussed in all sessions, with concerns expressed about the security of information boxes. Some participants supported the need for digitally shared information, particularly to ensure

the details of vulnerable people and where they lived were not available in the information box on site. Examples of boxes being vandalised or removed were discussed, potentially making it less likely that vulnerable people would want to put their personal details in the information box.

It was also argued that it is too easy for paper going missing or lost in an emergency and that a single sheet in an information box with sufficient abbreviated information for residents of concern until such time there is a national digital system might be sufficient. Other participants suggested that whilst a digital solution would be ideal, it is not yet implementable and keeping information regularly updated would be difficult and resource intensive.

### **Keeping the PEEPs up to date**

Concerns were raised that PEEPs could be redundant or even damaging if they were not kept up to date on a regular basis. Others thought that keeping the information live would be impossible, but that it was necessary to update as much or as regularly as is practically possible so as not to put any resident in danger, or waste the time of the FRS. It was argued that the duty to keep this information up to date should rest with the RP and not the FRS, but that there would be practicalities in doing so. For example, a RP would not necessarily know all the leaseholders because some leaseholders are not the residents, and this would include short term lettings. Concerns were also raised over how resource intensive it would be to keep PEEPs regularly updated.

### **Self-Identification**

Some participants believed the onus should not be on the resident to self-identify, and for the RP to have a duty of care in offering PEEPs to those who need them. Social landlords had concerns about self-identification because of the difficulties of identification of vulnerable residents who are in hard-to-reach groups and may not be willing to self-identify. There was concern that the PEEP template does not include referrals or include details for family, friends, or neighbours to identify the vulnerable person, so it was highlighted that residents with dementia may not be identified, for example. One participant raised a concern about the mandatory nature of PEEP and becoming too intrusive on residents to self-identify.

### **Other Fire Safety Measures**

It was frequently argued that current high-rise buildings should be designed with more fire safety measures for example, fire alarms, sprinklers, multiple staircases, and evacuation lifts rather than focussing on evacuation.

It was also suggested that PEEPs should be linked to Fire Service visits to flats or used in combination with Person-Centred Fire Risk Assessments (PCFRAs). Another participant explained that they used a trained housing official to identify residents whose mobility or poor health was compromised and they conducted a PCFRA with the individual on their ability to react to the fire, evacuate from the fire, and their ability to hear the alarm.

# Discussions with Local Authorities and Housing Associations

## Overview

As part of the consultation process, RPs were encouraged to provide information on how (if at all) they were currently providing PEEPs. As part of the follow up work from the consultation, the Home Office held a series of meetings with local authorities and housing associations which had suggested they already have evacuation initiatives in place in their written responses or the workshops. The National Housing Federation also provided several of their member organisations for Home Office to meet. These meetings were designed to examine the practical approaches which these Responsible Persons were taking on the ground to improve fire safety for mobility impaired residents.

With the knowledge gathered from the consultation, officials engaged with these organisations to examine how PEEPs (or viable alternatives) could already be in place, despite some of the difficulties and concerns set out in previous sections. Key areas of interest included:

- How individuals are identified and assessed for the initiatives;
- How regularly the information from these assessments is updated;
- PEEPs and the provision and use of physical equipment to support evacuation;
- The use of neighbours, waking watch and other on-site staff to assist in evacuation; and
- Alternative measures in place to improve the fire safety of mobility impaired residents.

Home Office officials held meetings with seventeen organisations, with representation from every region in England.

## Identification and Assessment of Individuals

The ways in which it was determined whether individuals may require enhanced support differed across the various housing providers and local authorities but most followed a similar pattern.

The majority of Responsible Persons (RPs) that were met with send out communications to their residents either via newsletters, message boards, emails, or leaflets to supplement their existing on the ground intelligence. These communications request that residents contact them if they believe they require assistance evacuating in an emergency. Other

RPs have used existing teams (e.g. housing officers) to acquire the relevant information from all residents either via a 'new tenant meeting' when a flat is first occupied or via a regular visit or call with the tenant.

Should residents self-identify, most RPs will then make sure that some form of assessment of their needs takes place. The format of these assessments, and the templates used in completing them, vary and can range from a simple checklist to record answers to key questions, right up to a comprehensive Person-Centred Fire-Risk Assessments (PCFRA) or wider risk assessment.

Who carries out these assessments varies between initiatives. Some were carried out by the housing or building managers, but other RPs have employed occupational therapists, fire risk assessors or other professionals to help with assessing abilities and needs. This information is then relayed to the RP or the relevant team in the organisation who will make a decision as to what should be done to support their fire safety.

These processes were in addition to the Home Fire Safety Visits provided by local FRS' and there were examples of individuals benefitting from both, especially where issues related to a resident's behavioural issues, for instance hoarding or substance abuse.

Some RPs said the uptake was surprisingly low when requesting that residents self-identify and it often took numerous attempts to gather this information from residents. It was common for RPs to say that many residents were either not willing to self-identify or not interested in self-identifying. The reasons suggested for this also differed, from apathy through to concerns about being made to move flats or pay for expensive alterations.

Others said that their residents welcomed the intervention RPs were making to ensure they were safe in their own homes. RPs noted that residents who did identify themselves were responsive and grateful for any support offered by their RP. Some RPs found that the more involvement residents had in deciding what was right for their personal circumstances, the better the outcome was for all parties. There was general consensus that even the initial conversation or assessment about fire safety had helped individuals consciously think about their fire safety and made them more secure, without any major interventions or alterations needed.

The regularity of reviews varied between organisations but was generally found to be between six months and a year, or when there was a major change in situation for the resident. Some providers were able to update the information via annual tenant visits (which discussed issues broader than just fire safety), whilst others would carry out specific exercises to update this information alone.

### **PEEPs and the provision and use of equipment to support evacuation**

Where organisations said the information garnered from these assessments went into forming a PEEP, it became clear that the measures outlined in that PEEP did not generally focus on how the individual would fully evacuate from the building and did not cover what equipment and support they might need to do so. Instead, the PEEP most often focussed

on other methods of ensuring the safety of mobility impaired residents such as fire prevention and suppression measures, or how an individual might get to a place of relative safety.

For example, some RPs did not consider evacuation chairs to be a practical or proportionate intervention given their reliance on (often more than one) trained persons to operate them; the length of time it takes and the physical strength required to descend the staircase in a chair; the lack of appropriate storage for them and the potential for them themselves to become fire hazards in a hallway; and the impact they could have on other residents evacuating or firefighters entering the building. Others suggested that given these problems, evacuation chairs did not represent the best use of their fire safety budgets, and that resources could be better spent elsewhere to ensure the fire safety of vulnerable residents such as in-flat prevention measures or ensuring effective compartmentalisation. RPs tended to think that evacuation chairs could be useful in work environments where staff are available on site to provide assistance, but that in residential properties, this is rarely practical as it would mean 24/7 staff on site.

There were examples of supported or assisted living environments with more traditional PEEPs in place but these were always supported by on-site staff during office hours, on-call teams outside of office hours, and supplemented with personal alarm systems like lifeline or care-call.

Some examples were given where evacuation chairs were provided. However, these were rare and employed only in very specific circumstances where the risks were low such as if the individual was in an end of corridor flat that was slightly separate from the other flats, so the chair could be stored safely; they were right by the stairwell and only on the first floor, so wouldn't pose too much risk to others when evacuating; and the individual had a partner who was willing and physically able to take on the responsibility for operating the chair, so wouldn't require on-site staff.

Some RPs are looking to upgrade at least one of the lifts in each of their buildings to act as a firefighting lift, which could be used to aid evacuation for a limited time. However, these works are highly expensive and were mainly being done on a very bespoke basis. This was not something these RPs felt would be practical to apply to all buildings given the variation in building design. For example, where existing lift shafts are not wide enough or there is no appropriate place for a separate power supply, and the high costs involved. None of the RPs said they had plans to install evacuation lifts (as opposed to firefighting lifts).

### **Reliance on third parties**

RPs said that PEEPs cannot facilitate full evacuation of a residential building to the same standard as workplace environments due to a lack of readily available and reliable third parties on site to assist with evacuation.

Some RPs said they employed waking watches in buildings with simultaneous evacuation strategies in place, which could assist in an evacuation for so long as the waking watch was retained, but others expressed concern over how much they could be relied upon in an emergency situation, the extent of their training, their high turnover and their temporary nature. There were also concerns about the substantial costs of waking watches.

One RP stated they have hired waking watch, but that they do not physically evacuate individuals due to concerns over safety and liability. Another said that their waking watches undertake a wide range of assistance activities within the building such as admin, concierge support, vulnerability checks, health and safety patrols and refer situations to the emergency services where appropriate. They also ensure the waking watches are trained in fire safety, assessing risks, evacuation procedures and drills. Other RPs said that waking watches do sometimes assist with evacuations but that this is generally focussed on escorting or guidance, rather than physical evacuation. However, even RPs who employ waking watches for a range of services note the significant costs of employing these staff full time.

More often than not, waking watches were not significantly involved in the evacuation of a specific individual(s). Instead they were utilised for confirmation of the zone of fire, commencing evacuation, and to provide information where necessary to the FRS on arrival. In any event, even if relied upon now, these RPs said that their temporary nature and high costs would not make them a long-term solution.

Some RPs also said that it would not be beneficial to have people on site on standby to assist in evacuation as this could impact on the ability for FRS to fight fires, or rescue individuals, and would see them as essentially acting as a proxy-fire service. In a lot of cases RPs said that the FRS would most likely arrive before any on-site personnel could implement any truly effective measures to evacuate mobility impaired individuals. There was one example of an organisation who had employed 'evacuation stewards', based on site 24/7, who are partnered to mobility impaired tenants (on a 1-to-1 basis) and who are there to assist that individual to evacuate in the event of a fire. However, they said it was clear that this was not a sustainable long-term solution given the high costs involved which would likely have to be passed onto leaseholders if it became a more long-term requirement.

RPs also suggested that reliance on neighbours to assist in evacuation is not an ideal situation. Some RPs said that it is not a reliable or controlled measure, so have discounted reliance on neighbours as a possibility entirely. RPs also shared liability concerns held by both themselves, and other residents, over the idea of neighbours providing assistance in PEEPs. Should evacuation lead to increased risk or injury there is debate over who is liable, creating an added burden on reliance on third parties to evacuate other residents. One RP however, said that they are willing to include neighbours, family members and carers as helpers in evacuation situations.

Some RPs noted that if PEEPs were to be mandated in all their high-rise buildings, they would need to staff them all, leading to a significant financial burden.

## Alternative measures

One of the most popular alternative approaches was for an RP to gather key information on their mobility impaired residents, most commonly - where their flat is in the building and to a lesser extent, the level of their mobility. This information would then be shared with their local FRS, who would use it to better inform their emergency response. This approach is often on top of a range of other fire safety activities such as provision of in-flat prevention and suppression measures, and ensuring the safety of the built environment. These included effective compartmentalisation, automatically opening air vents to release smoke, effective fire alarms, sprinklers and regular inspection of common parts. The focus in these examples was not on evacuation of residents but on making them safer in their own homes without any need for FRS assistance.

RPs often cited the impracticality and disproportionality of PEEPs (without having staff on-site to implement them) and their incompatibility with a 'stay put' policy building as reasons to focus their resources on an alternative approach. Some also do not want to be seen to be encouraging evacuation in buildings designed for residents to stay put and that it could even be hazardous if people started to evacuate against the agreed approach. RPs shared numerous examples of this alternative information sharing approach working well thanks to much valued engagement and input from their local FRS. In most cases, the information was held in an information box on the building premises, with the FRS having access to it when they arrive on site. Other RPs were providing this information to their FRS digitally (or working towards this) so they could access it on the way to an incident and start factoring it into their plans at the earliest available opportunity.

Where information was placed in boxes, security of that information was a concern of the RPs. In most cases, RPs said that they took precautions to make sure the information was secure, for instance the box itself is placed out of reach of ordinary members of the public, or under CCTV surveillance or with a concierge service. Additionally, the information inside the box is often either coded or redacted where necessary, sharing only what is absolutely necessary for the FRS to do their job. Most initiatives agreed that a full detailed PEEP-like document would be far too much information for the FRS to process, and a concern from a GDPR standpoint.

Most RPs expressed the desire to share information digitally directly with the FRS rather than in the on-site information box. Some already stored their gathered information on a database or cloud-based system owned by themselves, then would seek to share it with the FRS as appropriate. However, several have encountered pushback from the FRS, whose preference was to keep information in the on-site information box. There was concern that digitally sharing this information with the FRS would be too resource intensive with too many regular updates. One RP does both digital and physical updates to their information, with the view that physical updates will be phased out. Some RPs also shared this information with their waking watches to be used in an emergency.

Some initiatives noted that updating information is resource intensive, but for the large part, manageable. However, they did express concern that if there was an increase in the

numbers of individuals self-identifying, it could be a struggle to keep the information up to date on a regular basis. It was said that it is not only resource intensive, but quite costly, and these costs would go up the more people who self-identified.

When in discussion with residents, RPs found that if effectively communicated, the decision to focus on in flat measures and information sharing with FRS was agreeable to residents, and RPs have not experienced significant push back from residents demanding measures to evacuate.

Some RPs suggested that there is also a greater role for more communication of fire safety information and increased education on the provisions in place in the relevant building. Most RPs found that the initial conversations and assessments themselves would often spur residents into considering fire safety when they would not necessarily have done so otherwise. Similarly, Home Fire Safety Visits from the FRS would also help to increase awareness levels what they can do to make themselves safer. One RP said that what they call PEEPs in reality means a discussion about managing personal fire risks, sharing information on mobility impaired people with the FRS and efforts to provide a greater awareness about personal fire safety.

### **Other considerations**

Some RPs highlighted a disconnect between provision of measures for tenants or leaseholders. RPs often felt it was sometimes difficult to get leaseholders to engage with fire safety measures and that they lacked the legal power to compel them to act. Concerns were also raised about the sub-letting of properties by leaseholders and the potential high turnover of these sub-let properties. This causes a challenge for RPs in understanding the make-up of their resident population and highlights the importance of regularly updating information alongside repeated attempts to engage residents.

One RP said that if PEEPs were mandated, they believed it would lead to private landlords evicting disabled people or not giving them a flat in the first place due to cost concerns of PEEPs, or not being able to effectively implement a PEEP in the specific building. Another RP said if PEEPs were mandated and it becomes clear that there would be no way a resident could evacuate, then the conversation turns to relocating them in a more suitable flat, but that this is a really difficult conversation that residents do not want to have and they can't force them.

### **Conclusions**

The information provided by local authorities and housing associations on their local initiatives in the consultation and in our follow up meetings has given us valuable understanding what is currently being done by these RPs to support the fire safety of residents unable to self-evacuate in an emergency. Clearly these conversations do not cover all local authorities, housing associations or other RPs but the number, variety and geographic spread of RPs we have spoken with gives us a degree of confidence that we have captured leading thinking by RPs.

We have not heard evidence for PEEPs as described in the consultation being pursued without requiring use of on-site staff to facilitate evacuation. Instead, most 'PEEPs' as described to us focus on raising awareness of fire safety and the provision of in-flat measures to prevent or suppress fires. Some RPs have also put in place an alternative approach that is centred around information sharing with the FRS which aims to improve the operational FRS response with regards to evacuating or rescuing mobility impaired residents. This approach is often supplemented by in-flat fire prevention or suppression measures and a focus on improving the fire safety of the building as a whole. Generally, those RPs engaged with who considered they already implemented PEEPs were not in fact providing PEEPs which amounted to an evacuation plan.

There were real concerns raised about implementing full workplace style PEEPs, namely that mandating PEEPs would require staff in all buildings; the impact they might have on rescue by the FRS; the lack of other suitable third parties to assist in evacuation; and its perceived incompatibility with 'stay put' policies.

# Impact Assessment and Equalities

## Impact Assessment

An Impact Assessment<sup>12</sup> was completed and published alongside the consultation, and identified which groups were likely to be particularly impacted by the proposals, including (but not limited) to:

- Residents in high-rise buildings, other multi-occupied residential buildings, and their representative groups including disability support groups.
- Building Owners, Managers and Responsible Persons (RPs) and their representative groups.
- Fire and Rescue Services, the National Fire Chiefs Council and fire safety professionals.

Where appropriate, comments and data provided in response to question 18 will be used to inform potential future Impact Assessments.

## Equalities

As part of the consultation planning process, policy officials also considered the impact that any proposals related to this consultation might have and whether the proposals would or would not be likely to lead to discrimination or disadvantage, based on the protected characteristics as specified in the Equality Act 2010. An Equality Impact Assessment<sup>13</sup> was completed and published alongside the consultation.

The proportionate equality analysis which accompanied the consultation has now been updated in light of the consultation responses to consider likely impacts on people with protected characteristics: disability, race, sex, gender reassignment, age, religion or belief, sexual orientation, pregnancy and maternity, marriage, and civil partnership.

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<sup>12</sup> PEEPs Impact Assessment ([publishing.service.gov.uk](https://publishing.service.gov.uk))

<sup>13</sup> PEEPs equality impact assessment ([publishing.service.gov.uk](https://publishing.service.gov.uk))

# Conclusion and next steps

The consultation included four proposals: two proposals that intended to effect change through legislative requirements and two proposals for additional guidance to support the proposed legislative changes. During the consultation, policy officials also undertook four stakeholder engagement workshops to seek wider views on and further exploration of the proposals to enable a better understanding of their application and any consequential issues. Home Office officials also met with local authorities and housing associations who identified themselves during the consultation as currently running schemes similar to PEEPs, in order to understand what was currently being done at a local level, to support the fire safety of vulnerable people. We are very grateful to all those who responded to the consultation, took the time to take part in workshops, and local authorities and housing associations who met to discuss their existing fire safety measures.

The proposals included within the consultation set out the Government's suggestions to implement the Grenfell Tower Inquiry (GTI) Phase 1 Report recommendations in relation to Personal Emergency Evacuation Plans in high-rise residential buildings. The responses received have informed proposed policy aimed at improving fire safety.

It is clear from the quantitative analysis that a large majority of respondents support the proposal to require the Responsible Person (RP) to prepare a PEEP for every resident who self-identifies to them as unable to self-evacuate and do so in consultation with the residents. Many comments stressed the importance of every resident being able to get out of a building in an emergency, and that residents with disabilities, health, or cognitive issues whose mobility is limited should be given additional support and protection. Others suggested that the residents should be regularly surveyed to identify whether they want to self-identify as requiring a PEEP and that the PEEP should coincide with an annual review of the Fire Risk Assessment for their building.

Respondents were also generally supportive of RPs being required by law to include up-to-date information about persons with reduced mobility in the on-site information boxes. There were different views on whether this information would best be stored and shared via physical information boxes, or through electronic means.

However, it is evident from the consultation responses, workshops and meetings that where individuals and organisations were able to elaborate on their responses, they highlighted significant concerns over the proportionality, the practicality, and the fire safety case for PEEPs in all high-rise residential buildings. The responses show that whilst respondents are strongly in favour of any measures that improve the fire safety of residents who are unable to self-evacuate in an emergency situation, there are serious concerns over the consequences of PEEPs being introduced as proposed in this consultation.

The key concerns with implementation of the PEEPs proposals set out in the consultation can be marshalled under three broad headings:

## **Safety Case**

When launching the consultation, we were conscious that PEEPs may need to reflect the fact that high-rise residential buildings differ, being built at different times, using different techniques and standards and with different evacuation strategies in place. The majority have a 'stay put' strategy in place, whilst others require 'simultaneous evacuation' in the event of a fire. It was expected that the consultation would provide a wider evidence base on the implications of implementing PEEPs in the variety of circumstances, in different types of buildings.

Written responses to the consultation, and views from the workshops show there is disagreement over whether evacuation is safer than 'stay put' in most buildings, except where a fire is in the resident's own flat, when evacuation out of the building is not generally needed.

Were people to evacuate at that point (particularly with aids such as an evacuation chair) it might hinder firefighting strategy. For example, some responses raised concerns over blocking of the stairwell – which may be the only stairwell – for example by a slow-moving evacuee in an evacuation chair, slowing the evacuation of other residents, and hampering FRS rescue operations which would require the stairwell. Conversely it has been said that some modern evacuation chairs are small and allow a second stream of people to go past. There were also concerns that placing a person in an evacuation chair may in some cases cause injury, and that one or more assistants is required to operate the chair.

Some respondents to the consultation also advocate a different approach, based on making a resident's home safer to live in. They argue that measures to make the whole building safer and strengthen 'stay put' will help to avoid the need for evacuation.

Some point to evidence that the majority of fires start and remain in a single flat, as a rationale for Person-Centred Fire Risk Assessments (PCFRAs) to support at-risk residents from starting fires in their own homes, or suppress such fires if they take place. Measures range from inexpensive to costly ones such as in-flat misting apparatus which typically cost several thousands of pounds.

These findings show the difficulties in implementing PEEPs in buildings that are not necessarily designed for simultaneous evacuation. The consultation also highlights concern that not only could evacuation not always be necessary, but it could also increase the risk of harm to those being evacuated, or those assisting in the evacuation: these concerns support that 'stay put' may often be the safest option in some buildings or with some fires.

## **Practicality**

### Staff to support evacuation

When launching the consultation, we were already aware of some of the situational differences between the implementation of PEEPs in the workplace, and PEEPs in a high-rise residential setting. One of these differences was the availability of personnel to support evacuation: some buildings may employ staff, where others will not. The consultation and follow up meetings with those already implementing PEEPs or other fire safety initiatives for

mobility impaired residents has helped to explore solutions to the lack of consistent and readily available individuals to support evacuation.

The responses to the consultation confirmed that general needs residential high-rise blocks will not always have staff in situ to support evacuation. In those cases where there are staff, it was clear that these will generally be few in number, not full time, and not qualified for the purposes of evacuating residents. Staff who are present and located on the ground floor could be ill equipped and unable to assist in evacuation if there was a significant fire without putting themselves (and others) into danger. In those buildings where staff were present, and properly trained and equipped, there might not be enough existing staff to facilitate a successful whole building evacuation if a building had multiple PEEPs. Responses highlight that employing additional staff to support evacuation would be expensive and the costs could be passed to leaseholders (in a similar way to the current waking watch arrangements).

Engagement with local authorities and housing associations identified via the consultation also revealed difficulties with providing and relying on staff to enact PEEPs. RPs noted concerns over the ability of on-site staff to perform evacuation of sometimes multiple residents in an emergency situation. Furthermore, should RPs be required to staff all their high-rise buildings, it would lead to a significant financial burden that would not be sustainable long-term.

#### The use of neighbours or other third parties to support evacuation

During the consultation, we found that assistance from neighbours to residents who cannot self-evacuate is advocated by disabilities groups and some others responding to the consultation. Such persons could, in principle, operate any evacuation chairs for immobile residents, and escort those with health conditions but who can walk downstairs if aided, such as sight-impaired or cognitively impaired individuals. Advocates of this in the consultation point to personal experience where a resident has people they can trust nearby, and to academic research which shows that often in emergencies, people pull together and help each other.

However, several concerns were raised in the consultation responses and in the workshops on assistance by other residents that raise issues of practicality. Firstly, that such a plan would be 'best efforts' rather than guaranteed support as helpers may not be present on the day or time of the emergency, or an individual may not have neighbours/others willing to do this. In an emergency, such individuals may behave differently than agreed, even panic, and not provide the planned-for support. Neighbours who may be willing to agree to a principle of support in an emergency may be reluctant to sign-up in a formal plan to do this as they do not wish to over-commit. Planning to rely on neighbours would therefore be a risk reduction exercise rather than be an assurance of support on the day, unlike a trained responder.

Secondly, if an evacuation plan relies on neighbours, there are issues of liability for the RP and the neighbour. While a resident may know and deeply trust some neighbours, it is difficult for the RP to establish their reliability. For the neighbour, if they promise to provide assistance and then do not do so, or provide assistance and the resident being helped comes to harm, there is also a liability concern. There is also the issue of liability for

accidents during an emergency, where there is the concern that if a needless evacuation is undertaken (because the fire did not spread) and the resident comes to harm, the assistant and RP could be at fault.

Thirdly, a level of training would be needed for neighbours, and this would be an ongoing commitment, management requirement, and expense.

These findings from the consultation confirm the difficulty in translating PEEPs as understood in the workplace into a high-rise residential setting where individuals are not always readily available to assist in an evacuation.

### **Proportionality**

The cost of putting PEEPs in place would, some consultation responses argue, be much higher than envisaged prior to the consultation. The costings of the PEEPs proposals in the consultation were calculated as the administrative costs of producing the plans, but not the costs of purchasing kit and building modifications for evacuation. Responses to the consultation do not indicate that RPs have generally supplied such kit and modifications, or that practical evacuation for those who cannot manage stairs when the lifts do not work is generally in place in residential buildings. There were therefore significant concerns that the costs of PEEPs in the consultation had been underestimated, and adding in the costs of purchasing of equipment, training and/or any reasonable adjustments to the building would increase these substantially.

If PEEPs are implemented poorly then that may then lead to disproportionate burdens on RPs; which would likely feed through to disproportionate expense on current leaseholders through service charges, or on future leaseholders through RPs factoring in these costs into new service charge agreements.

Where disproportionate costs fall on other leaseholders, either directly or through being passed on in future increased service charges, there is a concern that this may lead to discrimination against leaseholders with some protected characteristics. This is because neighbours may see their bills rise to pay for measures to support evacuation of disabled, elderly, injured or pregnant residents. This is of particular concern given the consultation responses suggesting costs would be greater than those in the Impact Assessment which accompanied the PEEPs consultation.

Nearly all those who expressed a view in the consultation on height did not support an introduction limited to 18 metres and above. Respondents argue that the case that a person on a low floor of a high rise would have a right to a PEEP, while if they were in a shorter building it would be voluntary, was unfair. In principle there could be a height of resident's apartment threshold for PEEPs, rather than height of building, but this is unattractive: as noted in consultation responses, a mobility impaired person on the first floor may still be stuck if the lifts do not work, the same as someone on a higher floor (though there may be more remedies available), and such an approach would go against regulatory alignment.

If the PEEPs requirement were extended to all multi-occupied buildings, as advocated by some responses to the consultation, it would increase the number of buildings covered from around 12,000 buildings, to approximately 1.7 million in England.

The issue of proportionality was also raised in the discussions with local authorities and housing associations. Whilst they are currently covering the costs for all fire safety measures, it is not clear if this is a sustainable approach. There was also significant concern that mandating PEEPs as set out in the consultation would fundamentally result in the requirement to have staff in all of their buildings. They noted the significant costs of hiring waking watches compared to the positive impact they would have in an emergency situation when compared with other fire safety measures.

## **Summary**

Policy in relation to residents who are unable to self-evacuate needs to be practical, proportionate and to support fire safety. This consultation has identified that despite quantitative support for the proposals, significant issues with respect to these three measures in taking forward PEEPs as proposed in the consultation. The responses received in the written consultation, informed by the stakeholder workshops and follow up discussions with those already implementing fire safety initiatives for mobility impaired residents, have led to the conclusion that the evidence base for PEEPs is not sufficient to mandate their implementation in high-rise residential buildings at this stage.

We have given careful consideration to the general equality duty, but the concerns around practicality, proportionality, and the safety case have led us to conclude that mandating PEEPs as described in the consultation at this time could in fact have a detrimental effect on those with certain protected characteristics: in particular, disabled individuals, the elderly, and those who are less mobile due to pregnancy or maternity. Compelling RPs to administer PEEPs at this point could prove counterproductive because it could increase the risks posed to vulnerable people (as set out in the safety case section above), as well as impact on the good relations between disabled residents and non-disabled residents if disproportionate costs were passed on to the latter (as set out in the proportionality section above). Conversely, the response to the consultation makes no immediate changes to the existing status quo. Therefore the current ability for RPs to implement PEEPs (if they believe it is proportionate and of assistance to do so) is not hampered.

These conclusions have also led us to conclude that the GTI recommendations regarding placing information about persons with reduced mobility and their associated PEEPs in a premises information box (proposals 3 and 4) should also not be implemented at this time. The evidence from the consultation suggests that whilst this recommendation could be implemented now, we consider that it is not a stand-alone recommendation in advance of deciding on the policy solution for the initial PEEPs related GTI recommendation. A requirement to mandate RPs to acquire and store this information, should accompany rather than precede the setting out of what they are expected to do with it. Proceeding now would also carry the risk that duties may have to be amended at a subsequent date when proposals have been developed. It is also important to recognise that this step raises an important privacy issue, as it creates a register of potentially vulnerable people in applicable buildings. We believe that any collating and sharing of data in this manner needs to be justified i.e. the

risks involved in collating and storing the information must be commensurate to fire safety risks doing so mitigates against.

The initial recommendation from the GTI, and subsequently explored in this consultation, was that these proposals should be implemented in all high-rise buildings. Many of the responses to the consultation do not agree that the eligibility for PEEPs should be based on this measurement. In order for any future proposals to address the safety of vulnerable residents, in a proportionate way, we therefore will consider implementing proposals based on building risk rather than height. This would involve examining the specific profile of buildings, as well as their approach to 'stay put' or 'simultaneous evacuation.'

### **Next steps**

The PEEPs consultation has informed, and will continue to inform, policy decisions in this vitally important area of work. However, it revealed issues which we consider need further exploration. More work is therefore required to implement proposals that are practical, proportional and support the fire safety of vulnerable residents.

The Government has therefore today launched a new consultation on alternative proposals to support the fire safety of residents whose ability to self-evacuate may be compromised. This can be found on GOV.UK.

The new consultation includes a proposal on Emergency Evacuation Information Sharing (EEIS). This proposal focuses on residential blocks of flats with a simultaneous evacuation strategy in place. In these buildings, RPs would be required to ask residents to make themselves known if they feel they might need support to evacuate in the event of a fire. The RP would then be required to offer a Person-Centred Fire Risk Assessment (PCFRA) and connect them with a home fire safety visit from their local FRS. Once completed, the RP and resident would review the risk assessment and consider what interventions might be reasonable for them to implement to mitigate against the risks identified. Information about residents who could still not self-evacuate would then be shared with the local FRS who would factor it into their operational response, and could prioritise resources to further assist and effect these evacuations.

Other measures are also explored in the consultation, including a toolkit (for all RPs but with a particular focus stay put buildings) and a call for evidence for examples of practical, proportionate and safe PEEPs and other fire safety initiatives being undertaken in residential settings that meet these criteria. These measures will form a more holistic approach to ensuring fire safety that builds upon information gathered in this consultation.

We will ensure future proposals keep central the three areas highlighted by the consultation: they must be practical to achieve; we must be sure they enhance safety; and they must be proportionate to avoid unduly burdening the residents or the general taxpayer. These measures will form part of the broader package of Government activity to improve the safety of all buildings, as outlined at the beginning of this consultation response, and which together will make all residents of high-rise residential buildings safer.

# Consultation principles

The principles that Government departments and other public bodies should adopt for engaging stakeholders when developing policy and legislation are set out in the Cabinet Office Consultation Principles 2018:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/691383/Consultation Principles 1 .pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/691383/Consultation_Principles_1_.pdf)





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