

Impact Assessment, The Home Office	
Title: Emergency Evacuation Information Sharing (EEIS) consultation IA No: HO0418 RPC Reference No: N/A Other departments or agencies: N/A	Date: 18 May 2022
	Stage: Consultation
	Intervention: Domestic
	Measure: Secondary legislation
	Enquiries: FireSafetyUnitconsultations@homeoffice.gov.uk
RPC Opinion: N/A	Business Impact Target: Non qualifying regulatory provision (NQRP)

Cost of Preferred (or more likely) Option (in 2022/23 prices)					
Net Present Social Value NPSV (£m)	-4.2	Business Net Present Value BNPV (£m)	-1.8	Net cost to business per year EANDCB (£m)	0.2

What is the problem under consideration? Why is government intervention necessary?
 As part of Government's building safety reform and following the Grenfell Tower Inquiry Phase 1 report (GTI P1), legislative changes are required to ensure high and proportionate standards of fire safety in high-rise residential buildings. Government intervention is required to address fire safety of mobility impaired residents, and the Inquiry's recommendations in relation to evacuation of mobility impaired residents and evacuation plans.

What is the strategic objective? What are the main policy objectives and intended effects?
 The strategic objective is to improve public safety and reduce the impact of fires through fire reform which considers the findings of the GTI P1 report.
 The policy objectives are to address the GTI P1 recommendations related to the evacuation of mobility impaired residents and deliver meaningful change to assist residents in simultaneous evacuation / high-rise buildings who are unable to evacuate by themselves in the event of a fire incident. This aims to ensure that people feel safe and are safer in their homes. It also aims to ensure that those required to comply with, or enforce against, the FSO are clear on their roles and responsibilities.

What policy options have been considered, including any alternatives to regulation? Please justify preferred option (further details in Evidence Base)
Option 1: ('Do-Nothing'). This does not meet the Inquiry recommendations nor the objectives. For EEIS and evacuation plans, **five options are considered**. These differ on which buildings are in scope and whether there is an additional provision for an on-site individual in some buildings. **Three overarching options** are considered:
Option 2: EEIS **Option A** and evacuation plans **Option D** (Simultaneous evacuation buildings, SE)
Option 3: EEIS **Option B** (all high rise buildings) and evacuation plans **Option E** (all buildings)
Option 4: EEIS **Option C** (SE buildings and on-site individual) and evacuation plans **Option D**.

Main assumptions/sensitivities and economic/analytical risks	Discount rate (%)	3.5
The best available data is used in the analysis, but some assumptions are made. The proportion of individuals who are mobility impaired, and the proportion of these individuals who will self-identify are highly uncertain. The rate at which simultaneous evacuation buildings are upgraded and the number requiring an on-site individual (Option C and 4) are also uncertain due to a lack of specific data. Sensitivity analysis has been conducted on these assumptions. There is little data on benefits, therefore the NPSV does not accurately represent the benefits of this policy.		

Will the policy be reviewed? It will be reviewed. If applicable, set review date: October 2026

I have read the Impact Assessment and I am satisfied that, given the available evidence, it represents a reasonable view of the likely costs, benefits and impact of the leading options.

Signed by the responsible Minister:  Date: 18 May 2022

Summary: Analysis & Evidence

Policy Option 2

Description: EEIS proposal in all simultaneous evacuation buildings (Option A) and the provision of evacuation plans in all simultaneous evacuation buildings (Option D).

FULL ECONOMIC ASSESSMENT

Year(s):	Price Base	2022/23	PV Base	2023/24	Appraisal	10	Transition	1
Estimate of Net Present Social Value NPSV (£m)						Estimate of BNPV (£m)		
Low:	-1.3	High:	-10.6	Best:	-4.2	Best BNPV	-1.8	

COSTS, £m	Transition Constant Price	Ongoing Present Value	Total Present Value	Average/year Constant Price	To Business Present Value
Low	0.6	0.7	1.3	0.1	0.6
High	4.4	6.2	10.6	1.1	4.3
Best Estimate	1.8	2.4	4.2	0.5	1.8

Description and scale of key monetised costs by 'main affected groups'

Businesses, the public sector, and FRAs incur costs. Year 1 estimated transition cost lies in arrange of **£0.6 to £4.4 million**, with a central estimate of **£1.8 million**. Estimated ongoing cost lies in a range of **£0.7 to £6.2 million (PV)**, with a central estimate of **£2.4 million (PV)** over 10 years. Estimated total costs are **£1.3 to £10.6 million (PV)**, with a central estimate of **£4.2 million (PV)** over 10 years. Business costs are estimated at **£1.8 million (PV)** over 10 years (central estimate).

Other key non-monetised costs by 'main affected groups'

Residents may need to input their time to identify themselves to Responsible Persons (RPs) and contribute to the completion of person centred fire risk assessments (PCFRAs). This has not been monetised due to a lack of information. There may be costs to Fire and Rescue Authorities (FRAs) from: processing additional information and adjusting their response to incidents, but this is highly uncertain so has not been monetised.

BENEFITS, £m	Transition Constant Price	Ongoing Present Value	Total Present Value	Average/year Constant Price	To Business Present Value
Low	0.0	0.0	0.0	0.0	0.0
High	0.0	0.0	0.0	0.0	0.0
Best Estimate	0.0	0.0	0.0	0.0	0.0

Description and scale of key monetised benefits by 'main affected groups'

It has not been possible to monetise the benefits of these proposals.

Other key non-monetised benefits by 'main affected groups'

Option 2 aims to improve evacuations for those unable to evacuate themselves in SE buildings. This aims to reduce the danger to these individuals posed by fires and potentially the number of fire related injuries and fatalities. Breakeven analysis suggests that 2 fatalities or 18 injuries need to be prevented over 10 years for the policy costs and benefits to breakeven.

BUSINESS ASSESSMENT (Option 2)

Direct impact on business (Equivalent Annual) £m:									
Cost, £m	0.2	Benefit, £m	0.0	Net, £m	0.2				
Score for Business Impact Target (qualifying provisions only) £m:					N/A				
Is this measure likely to impact on trade and investment?					N				
Are any of these organisations in scope?		Micro	Y	Small	Y	Medium	Y	Large	Y
What is the CO ₂ equivalent change in greenhouse gas emissions? (Million tonnes CO ₂ equivalent)				Traded:	N/A	Non-Traded:	N/A		

PEOPLE AND SPECIFIC IMPACTS ASSESSMENT (Option 2)

Are all relevant Specific Impacts included?	Y	Are there any impacts on particular groups?	Y
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Summary: Analysis & Evidence

Policy Option 3

Description: EEIS proposal in all buildings over 18m, and all simultaneous evacuation buildings (regardless of height, Option B) and the provision of evacuation plans in all multi-occupied residential buildings (Option E)

FULL ECONOMIC ASSESSMENT

Year(s):	Price Base	2022/23	PV Base	2023/24	Appraisal	10	Transition	1
Estimate of Net Present Social Value NPSV (£m)						Estimate of BNPV (£m)		
Low:	-55.7	High:	-271.2	Best:	-136.4	Best BNPV	-81.2	

COSTS, £m	Transition Constant Price	Ongoing Present Value	Total Present Value	Average/year Constant Price	To Business Present Value
Low	18.1	37.5	55.7	6.3	35.2
High	72.4	198.8	271.2	30.9	150.1
Best Estimate	40.1	96.3	136.4	15.5	81.2

Description and scale of key monetised costs by 'main affected groups'

Businesses, the public sector, and FRAs incur costs. Year 1 estimated transition cost lies in arrange of **£18.1 to £72.4 million**, with a central estimate of **£40.1 million**. Estimated ongoing cost lies in a range of **£37.5 to £198.8 million (PV)**, with a central estimate of **£96.3 million (PV)** over 10 years. Estimated total costs are **£55.7 to £271.2 million (PV)**, with a central estimate of **£136.4 million (PV)** over 10 years. Business costs are estimated at **£81.2 million (PV)** over 10 years (central estimate).

Other key non-monetised costs by 'main affected groups'

Residents may need to input their time to identify themselves to RPs and contribute to the completion of PCFRAs, however this has not been monetised due to a lack of information. There may be costs to Fire and Rescue Authorities (FRAs) from: processing additional information and adjusting their response to incidents, but this is highly uncertain so has not been monetised.

BENEFITS, £m	Transition Constant Price	Ongoing Present Value	Total Present Value	Average/year Constant Price	To Business Present Value
Low	0.0	0.0	0.0	0.0	0.0
High	0.0	0.0	0.0	0.0	0.0
Best Estimate	0.0	0.0	0.0	0.0	0.0

Description and scale of key monetised benefits by 'main affected groups'

It has not been possible to monetise the benefits of these proposals.

Other key non-monetised benefits by 'main affected groups'

This option aims to improve evacuations for those unable to evacuate themselves in high-rise residential buildings. This aims to reduce the danger to these individuals posed by fires and potentially the number of fire related injuries and fatalities. Breakeven analysis suggests that 66 fatalities or 584 injuries need to be prevented over 10 years for the policy to breakeven.

BUSINESS ASSESSMENT (Option 3)

Direct impact on business (Equivalent Annual) £m:									
Cost, £m	9.2	Benefit, £m	0.0	Net, £m	9.2				
Score for Business Impact Target (qualifying provisions only) £m:					N/A				
Is this measure likely to impact on trade and investment?					N				
Are any of these organisations in scope?		Micro	Y	Small	Y	Medium	Y	Large	Y
What is the CO ₂ equivalent change in greenhouse gas emissions? (Million tonnes CO ₂ equivalent)				Traded:	N/A	Non-Traded:	N/A		

PEOPLE AND SPECIFIC IMPACTS ASSESSMENT (Option 3)

Are all relevant Specific Impacts included?	Y	Are there any impacts on particular groups?	Y
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Summary: Analysis & Evidence

Policy Option 4

Description: EEIS proposal in all simultaneous evacuation buildings, with the additional provision of an on-site individual in eligible buildings (Option C) and the provision of evacuation plans in simultaneous evacuation buildings (Option D).

FULL ECONOMIC ASSESSMENT

Year(s):	Price Base	2022/23	PV Base	2023/24	Appraisal	10	Transition	1
Estimate of Net Present Social Value NPSV (£m)						Estimate of BNPV (£m)		
Low:	-57.2	High:	-776.0	Best:	-195.4	Best BNPV	-97.4	

COSTS, £m	Transition Constant Price	Ongoing Present Value	Total Present Value	Average/year Constant Price	To Business Present Value
Low	11.3	45.9	57.2	6.4	28.6
High	151.6	624.4	776.0	86.5	387.0
Best Estimate	38.5	156.8	195.4	21.8	97.4

Description and scale of key monetised costs by 'main affected groups'

Businesses, the public sector, and FRAs incur costs. Year 1 transition cost lies in arrange of **£11.3 to £151.6 million**, with a central estimate of **£38.5 million**. Ongoing cost lies in a range of **£45.9 to £624.4 million (PV)**, with a central estimate of **£156.8 million (PV)** over 10 years. Estimated total costs are **£57.2 to £776.0 million (PV)**, with a central estimate of **£195.4 million (PV)** over 10 years. The central estimate of business costs is **£97.4 million (PV)** over 10 years.

Other key non-monetised costs by 'main affected groups'

Residents may need to input their time to identify themselves to RPs and contribute to the completion of PCFRAs, however this has not been monetised due to a lack of information. There may also be costs on FRAs from processing additional information, and from adjusting their response to incidents, however this is also highly uncertain so has not been monetised.

BENEFITS, £m	Transition Constant Price	Ongoing Present Value	Total Present Value	Average/year Constant Price	To Business Present Value
Low	0.0	0.0	0.0	0.0	0.0
High	0.0	0.0	0.0	0.0	0.0
Best Estimate	0.0	0.0	0.0	0.0	0.0

Description and scale of key monetised benefits by 'main affected groups'

It has not been possible to monetise the benefits of these proposals.

Other key non-monetised benefits by 'main affected groups'

This option aims to improve evacuations for those unable to evacuate themselves in simultaneous evacuation buildings. This aims to reduce the danger to these individuals posed by fires and potentially the number of fire related injuries and fatalities. Breakeven analysis suggests that 94 fatalities or 836 injuries need to be prevented over 10 years for the policy to breakeven.

BUSINESS ASSESSMENT (Option 4)

Direct impact on business (Equivalent Annual) £m:										
Cost, £m	10.9		Benefit, £m	0.0		Net, £m	10.9			
Score for Business Impact Target (qualifying provisions only) £m:							N/A			
Is this measure likely to impact on trade and investment?							N			
Are any of these organisations in scope?			Micro	Y	Small	Y	Medium	Y	Large	Y
What is the CO ₂ equivalent change in greenhouse gas emissions? (Million tonnes CO ₂ equivalent)					Traded:		N/A	Non-Traded:		N/A

PEOPLE AND SPECIFIC IMPACTS ASSESSMENT (Option 4)

Are all relevant Specific Impacts included?	Y	Are there any impacts on particular groups?	Y
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Evidence Base

A. Strategic Objective and Overview

A.1 Strategic Objective

1. This legislation fits within the Home Office's overarching strategic objective to improve public safety and security. Specifically, the policy aims to reduce the impact of fires by improving the protection against fire risks through the delivery of fire reform, considering the findings of the Grenfell Tower Public Inquiry's Phase 1 (GTI P1) report.

A.2 Background

2. The Grenfell Tower Fire (14 June 2017) was a national tragedy that resulted in the greatest loss of life in a residential fire since the Second World War. Following the fire a full public inquiry into it was commissioned. The Inquiry was split into two phases. Phase 1, which has now concluded, focussed on the events and actions taken on the night of the fire, including the emergency response.
3. The Government is determined to learn lessons from the fire and ensure that others do not suffer the loss and trauma that the Grenfell community have faced as a result of the events in June 2017. This is reflected in the actions taken in the years that have passed since the fire. These have included:
 - Setting up and acting on the recommendations of Dame Judith Hackitt's independent review of building and fire safety.
 - Commissioning the Grenfell Tower Public Inquiry.
 - Establishing a remediation programme supported by £5 billion investment in building safety (including £3.5 billion announced on 10 February 2021) to fully fund the cost of replacing unsafe cladding for all leaseholders in residential buildings 18 metres (m) and over in England.
 - Announcement of a generous financing scheme for the removal of unsafe cladding from buildings of 11-18m, under which leaseholders will contribute no more than £50 per month.
 - Establishing a Fire Protection Board, chaired by the Chair of the National Fire Chiefs Council, which is leading a programme of work, supported by £10 million of government funding, to ensure that all high-rise residential buildings in England are inspected or reviewed by the end of 2021.
 - Undertaking a public consultation on Fire Safety in 2020 which was open for 12 weeks.
 - Publishing the Government response to the Fire Safety consultation.
 - Committing to legislate to reform the regulatory system through the Fire Safety Bill and the Building Safety Bill.
 - Undertaking a public consultation on Personal Emergency Evacuation Plans (PEEPs) in 2021 which was open for six weeks.
4. On 30 October 2019, the GTI P1 report was published¹. It included a number of recommendations largely related to improvements in the way that high-rise residential buildings are constructed, refurbished, and managed, and in the way that fire and rescue services (FRSs) respond to fires in such buildings. These recommendations were accepted in principle by the Government on the day of the report's publication.

¹ Available at <https://www.grenfelltowerinquiry.org.uk/phase-1-report>

5. It also made a number of important recommendations relating to the safe evacuation of all residents in high-rise buildings, especially those who are unable to self-evacuate. The Inquiry's recommendations that are specific to this and require changes in law are recommendations 33.22 (e) and (f). These state:
 - "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."* (see p. 777)
6. Closely related (and addressed as well in this consultation) is:

33.22c: that the owner and manager of every high-rise residential building be required by law to draw up and keep under regular review evacuation plans, copies of which are to be provided in electronic and paper form to their local fire and rescue service and placed in an information box on the premise
7. To deliver change in law, it is proposed to use the power in Article 24 of the Regulatory Reform (Fire Safety) Order 2005 (FSO 2005) to address the recommendations by making regulations setting out precautions which will need to be taken, or observed, by those on whom such duties are conferred. The FSO 2005 applies to all premises (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 FSO 2005 can apply new requirements to Responsible Persons (RPs) and duty-holders, including building owners and building managers with control of premises.
8. Using the FSO 2005 through the regulation making power as described fits with the underpinning intention which is to ensure that those responsible for relevant buildings take the necessary steps to ensure that residents are safe. The responsibilities and requirements imposed on RPs (and/or duty-holders) will be generally linked to matters over which they have control. The RP will need to demonstrate that they have done all that could reasonably be expected of them to avoid committing an offence. Fire and Rescue Service will be able to take enforcement action against any relevant RP (or duty-holder) who does not comply with these requirements and failure to comply with regulations is a criminal offence where doing so places one or more relevant persons at risk of death or serious injury in case of fire. The relevant RP could be subsequently prosecuted and if found guilty could be liable to an unlimited fine, imprisonment or both.
9. The FSO 2005 places fire safety duties on persons with control of non-domestic premises – the RPs – and on others (duty holders) to the extent of their responsibilities under the FSO 2005. Therefore, RPs already have a duty to take general fire precautions as may reasonably be required to ensure, in relation to "*relevant persons*", that the premises are safe. In doing so, the RPs must also ensure that there are adequate means of escape from the building and that the means of escape can be safely and effectively used.² The term "*relevant persons*" includes anyone who is lawfully on the premises or in the immediate vicinity of the premises at risk from a fire on the premises. For multi-occupied residential premises, this includes residents.
10. The FSO 2005 principally adopts a risk-based approach to fire safety requiring RPs to ensure that general fire precautions are in place. This risk-based approach is further explained in Article 9 of the Order. The FSO 2005 also states that the RPs needs to record the prescribed information, specifically as outlined in article 7 (b) in relation to "*any group of persons identified by the assessment as being especially at risk.*"

² As stated in Article 4 of the Regulatory Reform (Fire Safety) Order 2005

A.3 Groups Affected

11. The proposed legislation would affect the following groups:
12. **Residents of residential buildings**³: Relevant residents, particularly those who are mobility-impaired, will be affected as they will be engaged by RPs to undertake risk assessments, and have details of where they reside made available to the local FRS. All residents will be affected should costs be passed on to them. The Emergency Evacuation Information Sharing (EEIS) and Evacuation Plans proposals are all directed at, at least, buildings under Simultaneous Evacuation (SE) strategies, so residents in these buildings will be affected. In some options, residents in other high-rise or multi-occupied residential buildings will also be affected.
13. **Responsible Persons for high-rise residential buildings and duty holders**. There will be new requirements for RPs, and they will be required to comply with the new legislation. This will affect both the private sector and the public sector (local authorities). As with the residents affected, RPs will be affected in all buildings under SE strategies, and in some options, RPs in high-rise or other multi-occupied residential buildings will be affected.
14. **Enforcement authorities**: These include fire and rescue authorities (FRAs) as the leading enforcement authority for non-domestic premises under the FSO 2005. Enforcement authorities will be able to take enforcement action against any relevant RP who does not comply with the new legislation.

A.4 Consultation

Within government

15. The Home Office has engaged with several government departments and devolved administrations as part of the development of the consultation, including:
 - Department for Business, Energy and Industrial Strategy (BEIS).
 - Ministry of Defence (MoD).
 - Department for Education (DfE).
 - Department of Health and Social Care (DHSC).
 - Department for Levelling Up, Housing and Communities (DLUHC).
 - Ministry of Justice (MoJ).
 - HM Treasury.
 - The Welsh Government.
 - The Scottish Government.
 - Northern Ireland Executive.
 - Health and Safety Executive (HSE).

Public consultation

16. The Government previously put forward proposals on PEEPs as part of the Fire Safety consultation which ran from 20 July 2020⁴ to 12 October 2020; and the subsequent PEEPs consultation last

³ As the Inquiry did not take a position on a height threshold for high-rise buildings, in the PEEPs consultation it was proposed that a high-rise residential building is defined as being at least 18 metres in height or having at least seven storeys and outlined the reasons for this position. In light of that consultation, the options proposed are risk-based, instead of height-based, and so include the targeting of Simultaneous Evacuation buildings, some of which are under 18 metres. The height threshold remains relevant for other options in the IA, which target all high-rise (Options B) or all multi-occupied residential buildings (Option E).

⁴https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/919566/20200717_FINAL_Fire_Safety_Consultation_Document.pdf

year⁵. Following the responses to that second consultation, further discussions with stakeholders, and additional research, new policy proposals to address the Inquiry's recommendations regarding PEEPs and Evacuation Plans have been developed.

17. A new public consultation exercise has been launched. This consultation is a central part of the considerations on how to take forward the proposals to implement the recommendations made in the GTI P1 report in relation to PEEPs.
18. Proposed implementation of the PEEPs proposals is intended to be enacted under Article 24 of the FSO 2005 which requires consultation with appropriate persons or bodies.
19. The Government is keen to seek the views of those affected by the proposals to ensure that they have broad support and practical value on the ground. The consultation is open to the public over a twelve-week period.

B. Rationale for intervention

20. The Grenfell Tower fire and the GTI P1 Report and specifically the PEEP recommendations indicate that there is more to do to ensure to the safety of all residents in high-rise residential buildings, and especially those who are unable to self-evacuate.
21. For context, in the year ending December 2021, FRSs attended 27,015 dwelling fires⁶ of which 767 occurred in purpose built high rise (10+ storeys) flats. There were five fire-related fatalities in purpose built high rise (10+ storeys) flats in the year ending December 2021⁷, and 40 non-fatal casualties requiring hospital treatment⁸.
22. To address these recommendations as set out in the GTI P1 report, legislative changes are required, which can be achieved by new regulations via Article 24 of the FSO 2005. The new regulations will also ensure that those required to comply with, or enforce against, the FSO 2005 are clear about their roles and responsibilities, and that those affected by it feel safe and are safe in their homes.
23. These proposals would create new duties with respect to simultaneous evacuation residential buildings. The coverage will be England.

C. Policy objective

24. The policy objective is to reduce the societal harm caused by fires. The legislation aims to improve fire safety for those unable to evacuate themselves, which should reduce the number of fire-related injuries and fatalities and help ensure these individuals remain safe from fire in their homes.
25. The policy also aims to ensure that:
 - Residents in high-rise residential buildings can feel reassured that government has learnt lessons from the Grenfell Tower tragedy and has taken the appropriate steps to ensure their safety so that they feel safe and are safe in their homes.

⁵ <https://www.gov.uk/government/consultations/personal-emergency-evacuation-plans>

⁶ Home Office (2022): FIRE STATISTICS TABLE 0205a: Dwelling fires attended by fire and rescue services in England. 10 + storeys used to provide context as the Home Office does not publish this data on dwelling fires in 18m+ high rise flats. [Fire statistics data tables - https://www.gov.uk/government/statistical-data-sets/fire-statistics-data-tables](https://www.gov.uk/government/statistical-data-sets/fire-statistics-data-tables)

⁷ Home Office (2022): FIRE STATISTICS TABLE 0205b: Fatalities in dwelling fires attended by fire and rescue services in England, by dwelling type. [Fire statistics data tables - https://www.gov.uk/government/statistical-data-sets/fire-statistics-data-tables](https://www.gov.uk/government/statistical-data-sets/fire-statistics-data-tables)

⁸ Home Office (2022): FIRE STATISTICS TABLE 0205c: Non-fatal casualties in dwelling fires attended by fire and rescue services in England, by dwelling type and severity of injury, England. [Fire statistics data tables - https://www.gov.uk/government/statistical-data-sets/fire-statistics-data-tables](https://www.gov.uk/government/statistical-data-sets/fire-statistics-data-tables)

- The RPs (including building owners and managers) and duty holders understand their roles and responsibilities to ensure compliance with the FSO 2005 and protect the safety of relevant persons, including residents.
- The Government delivers against its commitment to implement the Inquiry's recommendations in principle.

D. Options considered and implementation

26. A non-regulatory approach to encourage EEIS and evacuation plans to be put in place without legislating would not meet the recommendations or the Government's objectives, so is not considered here.

Option 1: To take no action and make no legislative changes (do-nothing).

27. Under **Option 1** there would be no legislative changes and no implementation of the GTI P1 recommendations in relation to the evacuation of residents. **Option 1** does not meet the Government's objectives. The inquiry was specific in making recommendations "*required by law*," therefore, this option does not meet the inquiry recommendations either.

Preamble to sub-options considered:

28. As set out in the Government response to the PEEPs consultation, and in the new consultation, the Government has not received evidence that in the general case, RPs would be able to evacuate mobility impaired residents in advance of the FRS attending in a way which is practical, proportionate and improves fire safety. The proposals considered in these options aim to meet these tests of practicality, proportionality, and safety. They look at providing the EEIS proposal for all SE buildings (**Option A**), and variations on this which include different groups of buildings, or which require staffing up of buildings with an on-site individual to support mobility impaired residents.
29. Background on PEEPs and their use in commercial buildings was given in the IA to the PEEPs consultation⁹. A full discussion of the work which has led to the EEIS proposal, and the wider proposals in the package being consulted on, are in the consultation document, and the Government response to the PEEPs consultation.

Option A: Emergency Evacuation Information Sharing (EEIS) proposal in all simultaneous evacuation buildings.

30. Under **Option A**, legislative change occurs to implement an EEIS proposal in buildings with a simultaneous evacuation strategy in place. This involves the:
- a) Identification of residents who would need support to evacuate in the event of a fire.
 - b) The provision of a person centred fire risk assessments (PCFRA) and connection to a home fire safety check (HFSC) for those individuals who are willing to undergo them.
 - c) The provision of interventions to mitigate any identified risks.
 - d) For those mobility residents where there are still issues preventing them from evacuating, the sharing of the residents' details with their local FRS for consideration in their operational response.

⁹https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/991912/PEEPs_consultation_IA.pdf

Option B: EEIS proposal in all buildings over 18m, and all simultaneous evacuation buildings (regardless of height)

31. **Option B** is the same as **Option A**, except it applies to all buildings over 18m, regardless of evacuation strategy, as well as all SE buildings (regardless of height¹⁰). The buildings in scope of the legislative change is being consulted on, so **Option B** presents an alternative scenario in which more buildings are in scope of the EEIS proposal.

Option C: EEIS proposal in all simultaneous evacuation buildings, with the additional provision of an on-site individual in eligible buildings.

32. **Option C** is the same as **Option A**, except it includes an extra provision that there can be a single on-site member of staff providing 24/7 cover in some buildings who will supply information, advice, and assistance in the event of a fire. The individual would use their knowledge of the building to:
- Prepare relevant information (like building plans and the location of mobility impaired residents) ahead of FRS arrival.
 - Provide information and reassurance to residents.
 - Be the point of contact to liaise with the FRS once they arrive.
 - Help direct evacuees out of the building.
33. They would not be there to assist with the physical evacuation of mobility impaired individuals but would instead try to keep these residents as safe and informed as possible ahead of their evacuation. The individual(s) would need the right knowledge, skills, experience, and competency to complete the tasks that are required of them. These responsibilities could be added to the duties of existing building concierges or already installed waking watches, but not all buildings have these, and waking watches are intended to be temporary arrangements. It is likely RPs would need to employ a new individual to carry out these duties.

Option D: Provide evacuation plans in all simultaneous evacuation buildings

34. The RPs will be required to complete evacuation plans for their building if it has a SE strategy. They will also need to provide their local FRS with an electronic copy of an evacuation plan for their building and place a hard copy of this plan in the information box on site. They will be required to keep these plans under regular review.

Option E: Provide evacuation plans in all multi-occupied residential buildings

35. **Option E** is the same as **Option D**, however RPs in all multi-occupied residential buildings under the FSO 2005, regardless of height, will be required to draw up an evacuation plan for their building. Those in high-rise residential buildings (regardless of evacuation strategy), and medium-rise SE buildings will be required to share these with their local FRS and place a copy of the plan in the information box.

Overarching options

36. This IA costs five individual options (**Options A to E**). As per the consultation document, it is expected that a pairing of options, one related to EEIS (**Options A to C**) and one related to evacuation plans (**Options D and E**) would occur together. The following combinations are assessed in the appraisal section of the IA, as they are viewed as the most likely combinations which are helpful in presenting the scale of the potential costs. It is possible that any combination of **Options A to C, and D to E**, could be combined following the consultation, so these overarching options

¹⁰ The majority of simultaneous evacuation buildings are high-rise, however some are medium rise (11 to 18 metres in height).

should be viewed as indicative ways of representing the overall impact of both potential policy changes.

- **Option 2:** This is **Option A** on EEIS, and **Option D** on evacuation plans.
- **Option 3:** This is **Option B** on EEIS, and **Option E** on evacuation plans.
- **Option 4:** This is **Option C** on EEIS, and **Option D** on evacuation plans.

Options and implementation plan

37. This is a consultation IA and there is no preferred option at this stage. The purpose of IA is to capture the potential impacts of the policy, and the purpose of the consultation is to seek views from those likely to be affected by the proposals and/or have experience of the FSO 2005. These views will be used to further the Government's understanding and inform future policy considerations. **Option 2** is assessed to be a more effective and efficient option based on the analysis in this IA. However, this consultation is genuinely seeking meaningful engagement and views on what is the most effective option to implement EEIS and evacuation plans.
38. Subject to the outcome of the consultation, it is expected that the measures set out in this IA will require secondary legislation. These are likely to be introduced in autumn 2022, subject to the parliamentary timetable, and would consist of amendments to the (FSO 2005) together with supporting measures as noted in this consultation.

E. Appraisal

39. The following sections present the analysis of costs and benefits of the proposals in the consultation compared to the do-nothing option.
40. A previous IA was published on the 8 June 2021¹¹ which assessed the cost and benefits of PEEPs. The methodology in this section has been altered and improved to account for updated data on the number of residents living in high-rise and SE buildings, the number of buildings with SE strategies, and the updated EEIS proposals. Additional measures within this IA include the option for a 24 hour on-site individual to support the evacuation of vulnerable individuals (though not physically aiding such evacuation) in **Option C**. An additional change is that in the previous IA, an assumption was made that RPs were in the main undertaking PEEPs, so the costs calculated related to the administrative burden of carrying out PCFRAs/PEEP assessments, but not costs of implementing them. Responses to the PEEPs consultation indicate that RPs do not in the main implement PEEPs in residential buildings. This IA attempts to cost up the measures which may be taken as a result of the PCFRA process, considering both out of flat (common area) and in flat measures.
41. Proposals on evacuation plans (and PEEPs) were also considered as part of the Fire Safety consultation IA, published on the 9 July 2020.¹² The methodology on evacuation plans in this section is more analytically robust than the previous IA as additional information has been obtained which has allowed assumptions to be refined and improved here. Changes to the analysis have been made to account for updated data on the number of residents (as above) living in multi-occupied residential and SE buildings, and the changed proposals under **Options D and E**. There has also been an improved consideration of when costs are likely to fall, which considers further the difference between set-up and ongoing costs, and the impact of new builds.

¹¹https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/901866/20200708_Fire_Safety_Order_2005_Uplift_Consultation_IA.pdf

¹²https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/901866/20200708_Fire_Safety_Order_2005_Uplift_Consultation_IA.pdf

General assumptions and data

42. The best available data has been used for this IA. Costings for the appraisal section are based on data primarily from the National Fire Chiefs Council (NFCC), Department for Levelling Up, Housing and Communities (DLUHC), the Home Office, and from RPs identified through the PEEPs consultation (the local initiatives described in the government response to that consultation).
43. The appraisal period for measuring the impact of the EEIS proposals is 10 years in line with HM Treasury, Green Book (2022) guidance¹³. A social discount rate of 3.5 per cent is used to discount future values to present values. All costs and benefits are in 2022/23 prices (price base year, PBY) with a 2023/24 present value base year (PVBV).
44. Transition/set-up costs are assumed to occur in year 1 only, and ongoing costs are expected to occur from year two of the policy onwards. It is hoped that the consultation may provide further data and information to refine the estimates of costs and benefits presented here, as a specific question on the IA is included.
45. The main assumptions used in this IA are listed below, split out by proposal.

EEIS proposals (Options A – C)

- 1.1 Data obtained from DLUHC and the NFCC suggests that there are approximately 1,020 to 1,200 buildings over 11 metres (m) with simultaneous evacuation (SE) strategies in place. These estimates are highly uncertain, and as these only include buildings known to FRSs and DLUHC, these are considered to be the low and central estimates in this analysis, with a high estimate of 1,400 buildings taken. Work is ongoing to seek further data during and following the consultation to improve these estimates.
- 1.2 It is assumed that there are 12,000 high-rise 18m+ residential buildings, which consist of 691,000 dwellings and have 1,310,000 residents. It is assumed that there are 75,000 11 to 18m residential buildings, which consist of 1,629,000 dwellings and 2,930,000 residents. These were taken from DLUHC's March 2022 Building Safety Programme data release¹⁴. It is also assumed that there are 1,596,000 multi-occupied residential buildings under 11m in height.¹⁵ To estimate the number of residents in SE buildings, the average number of residents per building of different heights as per these assumptions is applied to the number of SE buildings. Using this approach, it is estimated that there are approximately range of 99,000 to 136,000 residents in SE buildings, with a central estimate of 116,000, residents in SE buildings.
- 1.3 The estimates for the number of vulnerable people eligible for a PCFRA and in-scope of the EEIS proposal is taken the 2020/21 Family Resources Survey.¹⁶ This states that between 15 to 22 per cent of people have a disability (low range taken from London data, high range from total England data. Of all disabled people, 46 to 63 percent are estimated to have a mobility impairment¹⁷. Multiplying the low and high values gives an eligibility range of 6.9 per cent in the low scenario, 13.9 per cent in the high scenario, and a central estimate of 10.1 per cent¹⁸. This assumption is uncertain, so is tested in the sensitivity analysis (see Section G: Risks).

¹³ The Green Book 2022 - <https://www.gov.uk/government/publications/the-green-book-appraisal-and-evaluation-in-central-government/the-green-book-2020>

¹⁴ DLUHC; Building Safety Programme: monthly data release - March 2022 - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1069181/Building_Safety_Data_Release_March_2022.pdf (pages 11-13)

¹⁵ Sourced from Fire Safety Consultation IA https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/901866/20200708_Fire_Safety_Order_2005_Uplift_Consultation_IA.pdf

¹⁶ Department for Work & Pensions: Family Resources Survey: financial year 2020 to 2021 - GOV.UK (www.gov.uk)

¹⁷ Department for Work & Pensions: Supporting table 4.6. All disabled people used as low estimate, state aged pension adults used for high estimate [Family Resources Survey: financial year 2020 to 2021 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/family-resources-survey-2020-21/family-resources-survey-2020-21)

¹⁸ Central estimate calculated by multiply high estimate of disabled individuals (22%) with the low estimate of those mobility impaired (46%), as both these values refer to all individuals in England, of any age.

- 1.4 The number of those self-identifying as requiring a PCFRA ranges from 60 to 80 per cent of vulnerable individuals, with a central estimate of 70 per cent. This has been uprated from the 35 per cent assumption used in the previous IA following discussions with the housing sector. This is also uncertain, so further data is being sought. The impact of changing this assumption is also covered within the assessment of the changes to assumption 1.3 in Section G: Risks. Table 1 below estimates the number of PCFRAs required, per building type.

Table 1, Number of in-scope residents who require a PCFRA, 2022.

Number of in-scope residents	Low	Central	High
SE buildings	4,100	8,200	15,100
Of which are 18m+	3,800	7,700	14,000
Of which are 11-18m	300	600	1,000
All buildings 18m+	54,200	92,800	145,300

Source: Home Office, own estimates, 2022.

Note: Values may not all sum due to rounding.

- 1.5 The wage of the RP is taken to be that of a private building safety manager in the Annual Survey of Households and Earnings (ASHE) 2021¹⁹, uplifted to include non-wage costs²⁰ and modified for the price base year using HM Treasury's GDP Deflator²¹. The gross hourly RP wage is assumed to be £22.89.
- 1.6 The RPs will be required to reach out to all residents in in-scope buildings to establish which who is eligible for a PCFRA and in-scope of the EEIS proposal. This is assumed to take on average five minutes (low estimate 2.5, high estimate 7.5) per resident. This range accounts for some RPs being able to easily contact all residents, and others being harder to contact. It also includes the time residents may need to establish if they are eligible.
- 1.7 The time to complete a PCFRA is assumed to take two hours across all scenarios, which matches the assumption in the PEEPs IA²².
- 1.8 The time for the FRS to do HFSC is assumed take one, two and three hours in the low, central, and high scenarios respectively. It is expected that on average, two individuals will carry out each HFSC, and they will be competent firefighters with a salary of £17.96 per hour²³. Multiplying these salary assumptions with the time required, and number of individuals, gives an average cost of £36 to £108 per HFSC, central estimate £72.
- 1.9 The number of HFSCs required is estimated to be between 20 to 50 per cent of the number of individuals requiring a PCFRA, with a central assumption of 35 per cent. Those individuals receiving both assessments have a downrated PCFRA time of 1.5 hours (instead of 2, see assumption 1.7). This is because it is expected in these scenarios, much of the assessment will be done by the FRS in the HFSC, instead of through the PCFRA.
- 1.10 Each year it is assumed that building stock will increase by three per cent each year, as a result of new-build residential properties being built²⁴.

¹⁹ ASHE: ONS Earnings and hours worked, occupation by four-digit SOC: ASHE Table 14 -

<https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/earningsandworkinghours/datasets/occupation4digitsoc2010ashtable14>

²⁰ Eurostat data, 2018, <https://ec.europa.eu/eurostat/web/labour-market/labour-costs> 18% of UK labour costs are non-wage costs. Therefore, a 22% uplift is applied to the hourly wage.

²¹ HM Treasury; GDP deflators at market prices, and money GDP - GOV.UK - <https://www.gov.uk/government/collections/gdp-deflators-at-market-prices-and-money-gdp>

²² PEEPs Impact Assessment -

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/991912/PEEPs_consultation_IA.pdf

²³ Hourly salary of a competent firefighter is £14.72 as per Pay settlement 2021, Fire Brigades Union - <https://www.fbu.org.uk/pay-rates/pay-settlement-2021>, and a 22% uplift is applied to account for non-wage costs.

²⁴ DLUHC estimates for Building Safety Bill IA. Paragraph 11. <https://publications.parliament.uk/pa/bills/cbill/58-02/0139/BuildingSafetyBillImpactAssessment.pdf>

- 1.11 In-flat measures as a result of a PCFRA/HFSC are modelled to consist of four potential items: Flame retardant bedding, a fire safe ashtray, a smoke alarm, and a fire blanket. From checking the prices of multiple online retailers, the cost of this bundle is approximately £77. In the low scenario it is estimated that 1 item will be implemented, with 2.5 and 4 items being implemented in the central and high scenarios. This is further explained in the costs section of the IA and may be an overestimate due to bulk discounts available to FRSs and RPs.
- 1.12 Out-of-flat measures as a result of a PCFRA/HFSC are modelled to consist of four potential items: emergency lighting, grab rails, emergency signage and hearing impaired alarms. From checking multiple online retailers, the cost of this bundle is approximately £250.
- 1.13 The range of buildings requiring an on-site individual (**Option C**) range from 10 to 40 per cent of simultaneous evacuation buildings, with a central estimate of 25 per cent. This is uncertain assumption, which is tested in Section G: Risks, and will be refined following the consultation.
- 1.14 It is assumed that for the costs relating to dwelling or resident numbers, approximately 50.2 per cent of costs to RPs fall to business, and 49.8 per cent of costs fall to the public sector. This is based off the assumption that there are 691,000 dwellings in high-rise residential buildings in England, of which 344,000 are in the social sector (49.8 per cent) and 347,000 (50.2 per cent) are in the private sector²⁵. For costs related to building numbers (familiarisation and information boxes), it is assumed that 50 per cent of the costs fall to the public sector, and the other 50 per cent of the costs fall to businesses. This is based off the assumption that there are 12,000 high-rise residential buildings in England, of which 6,000 are in the social sector, and 6,000 are in the private sector²⁶. The same split between private and social sector buildings is also assumed for buildings 11 to 18m as a reasonable proxy²⁷.
- 1.15 The ongoing costs to RPs to update PCFRAs consist of two components. Firstly, the residents who remain in high-rise residential buildings will need to have their PCFRAs reviewed annually or when their circumstances change to allow for revisions to be made. The length of these updates is expected to vary from person to person with the majority likely to be quick catch ups between the resident and the RP to establish that their circumstances have not changed. However, some updates may be longer if circumstances have changed. Secondly, some residents will move in and out of high-rise residential buildings over time. Some residents moving into high rise residential buildings will require new PCFRAs to be created, and when a resident with a PCFRA moves out of a high-rise building, their PCFRA will no longer need to be updated. There is no available data to suggest how often residents who require a PCFRA will move in and out of high-rise residential buildings, and how this compares with the number of residents who will only need short ongoing revisions to their PCFRA. It has been assumed that from year 2, the cost required to annually update each PCFRA is equal to 35 per cent of the cost of the original PCFRA assessment in year 1²⁸.
- 1.16 The RPs will be required to provide an information box in all in scope buildings (this excludes 18m+ buildings as they are covered in the Fire Safety (England) Regulations 2022. The range of cost for a box is £49, £350, and £650 in the low, central, and high scenarios. These figures were found based on market research and consultation with FRS as to the most likely choice an RP would make, and align with the figures published in the forthcoming fire safety regulations IA.

²⁵ DLUHC Building Safety Programme: monthly data release - February 2021 - GOV.UK (www.gov.uk) page 11.

²⁶ DLUHC estimates, page 11. Building Safety Programme: monthly data release - March 2022 - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1069181/Building_Safety_Data_Release_March_2022.pdf

²⁷ DLUHC estimates, page 13. Building Safety Programme: monthly data release - March 2022 - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1069181/Building_Safety_Data_Release_March_2022.pdf

²⁸ Matches assumption made in the PEEPs IA PEEPs Impact Assessment - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/991912/PEEPs_consultation_IA.pdf

- 1.17 The time taken for an RP to add PCFRA information to the box is estimated as being 10, 15 and 20 minutes per PCFRA in the low, central, and high scenarios.

Evacuation Plans (Options D and E)

- 2.1 It has been assumed that in a building 0 to 11m in height, it will take 15 to 45 minutes (central estimate 30 minutes) to create an evacuation plan. In buildings 11 to 18m in height, it has been assumed it will take one to two hours to create an evacuation plan (central estimate 1.5 hours) and in buildings 18m+, it is assumed it will take four to eight hours (central estimate six)²⁹. It is expected that evacuation plans will take longer to create in taller buildings, as they will likely have more complexities. Building Safety Managers are expected to create the evacuation plans (see assumption 1.5)
- 2.2 It is assumed that four per cent of evacuation plans will require a major review every year. The major review process has the same assumptions as the initial plan creation. The other 96 per cent will undergo a minor review each year, with a time range of two, five, and ten minutes in the low, central, and high scenarios. These times are the same for each building height.
- 2.3 It is assumed it will take 15 to 45 minutes (central estimate 30 minutes) for RPs in SE or other high-rise residential buildings to provide their local FRS with an electronic copy of an evacuation plan for their building and to place a hard copy of this plan in the information box on site. It is assumed that these tasks will be completed by a private sector administrative processing role, with a wage of £15.94 per hour³⁰. These assumptions come from the NFCC.
- 2.4 It is assumed that approximately 17 per cent of the costs to RPs in buildings under 11ms fall to the public sector, with the remaining costs falling to business.³¹ In buildings over 11, assumption 1.14 applies.

Appraisal

COSTS

Option 1: To take no action and make no legislative changes (do-nothing).

46. This is the do-nothing option and so no costs have been monetised. For **Option 1**, no legislation is undertaken and so there is no impact of the proposals. This is the baseline against which all options are measured.

Option A:

Set-up costs

47. There will be set-up costs in year 1 of the appraisal period as opting-in vulnerable individuals that live in in-scope buildings will require a PCFRA, and potentially a HFSC.

Familiarisation

48. RPs will be required to familiarise themselves with the guidance. The costs associated with reading the accompanying guidance were not estimated in the previous IA published on 7 June 2021, due to the inability to separate out the specific time spent familiarising with PEEP guidance from other measures. Familiarisation costs have been calculated within this IA due to the ability to now separate out this cost. Some RPs will potentially be responsible for multiple buildings, and so wouldn't need

²⁹ Internal Home Office estimates.

³⁰ Wage calculated from average private sector admin processing wage (ASHE dataset), uprated to 2022/23 prices.

³¹ Based on 2018 data on proportion of individuals living in social housing: <https://www.ethnicity-facts-figures.service.gov.uk/housing/social-housing/renting-from-a-local-authority-orhousing-association-social-housing/latest>

to read the guidance for every building, however due to the lack of data on this and low expected overall cost impacted, this is not accounted for.

49. The guidance is expected to be approximately 10 to 18 pages in length, with a central estimate of 14 pages and it is estimated there will be approximately 200 to 300 words per page, with a central estimate of 250 words. Multiplying these together and accounting for average reading speeds of 600 to 800, using a central estimate of 700 words per minute, plus re-read and comprehension time, gives an average familiarisation time of 3 to 14 minutes, with a central estimate of 7 minutes per building.
50. The cost to RPs of familiarising themselves with the guidance accompanying these measures is calculated as: (see assumption 1.5)

Time to read the guidance (hrs) x Total volume of in-scope buildings x RP wage (£/hr)

51. The estimated cost of familiarisation for option A lies in a range of **£1,100 to £7,300**, with a central estimate of **£3,000**, (2022/23 prices) and occurs in year 1 only.

Cost of finding eligible residents and conducting PCFRA

52. In order to conduct a PCFRA, RPs first need to know which residents need one. This represents a time cost. The cost to RPs of finding eligible residents from their tenants is calculated as: (see assumptions 1.2, 1.5 and 1.6)

Volume of residents in simultaneous evacuation buildings x time to contact (hrs) x RP wage (£/hr)

53. The estimated cost of determining eligible individuals for **Option A** lies in a range of **£0.1 to £0.4 million**, with a central estimate of **£0.2 million** (2022/23 prices) in year 1 only.
54. Once identified, individuals in-scope who require a PCFRA will need to have one carried out. The cost to RPs of conducting the PCFRA is calculated as: (see Table 1, and assumptions 1.5 and 1.7)

Volume of in-scope residents in SE buildings x time to conduct a PCFRA (hrs) x RP wage (£/hr)

55. This cost is then downrated to account for the residents which are expected to have a HFSC carried out for them instead. In this scenario, the time to conduct a PCFRA is only 1.5 hours, not 2 hours (see assumption 1.9)
56. The estimated cost of conducting PCFRAs for **Option A** lies in a range of **£0.2 to £0.6 million**, with a central estimate of **£0.3 million**, (2022/23 prices) in year 1 only.

Information boxes

57. For the output of PCFRAs to be used by an FRS during a fire incident, they must be able to easily access the information. The RPs are required to install secure boxes, in which, to put the relevant PCFRA information for the FRS to access when needed. Only the cost of in-scope buildings 11 to 18m are included in these costs as although high-rise buildings are expected to put information into their information box, the requirement (and cost impact) of these buildings having information boxes is covered by the Fire Safety (England) Regulations 2022 (see assumption 1.16)
58. The RPs are expected to install an information box containing information from PCFRAs for use by FRS when needed in medium-rise buildings. This is calculated as: (see assumptions 1.1 and 1.16)

Number of SE buildings 11 to 18m x cost of box (£)

59. The cost to RPs of installing information boxes for **Option A** is expected to be between **£0.01 and £0.16 million**, with a central estimate of **£0.07 million** (2022/23 prices) in year 1 only.
60. There is also a time cost to the RP of adding PCFRA information to the information box. This applies to all buildings, regardless of height, and is calculated as: (see Table 1, and assumptions 1.5 and 1.17).

Volume of in-scope residents in SE buildings x RP wage (£/hr) x time to enter information (hrs)

61. The cost to RPs of add the information for **Option A** is estimated to be between **£0.02 and £0.12 million**, with a central estimate of **£0.05 million**, (2022/23 prices), in year 1 only.

Measures resulting from PCFRAs and/or HFSCs

62. Following a PCFRA and/or a HFSC, a range of in and out of flat measures may be implemented to cater to the needs of the vulnerable individual; these represent a direct cost to the individual, to all residents of the block, or to the RP. For the purposes of this IA, it is assumed for simplicity that all costs fall onto the RP, as they will likely enact any changes. It is likely that, depending on the conditions of each specific lease, on which measures are implemented, and whether the RP deems that the measures will benefit multiple residents, that these costs could be passed on to either specific residents, or all residents in the building. This is considered in the Wider Impacts, Section I, of this IA.
63. The exact in-flat measures that will be taken following a PCFRA and/or HFSC are uncertain and will depend on the individual and the outcome of their PCFRA. To estimate the cost of these measures, four potential measures that could be taken have been estimated and costed. These are detailed in Table 2. Prices of these items were found from major retailers³², with an average cost being taken being found. These averages were then summed to estimate the total cost of all potential measures.

Table 2, Estimated cost of potential In-flat measures following a PCFRA, £ 2022/23 prices.

Measures	Low	High	Average
Fire blankets	16	27	22
Smoke alarms	12	19	16
Flame retardant bedding	12	13	13
Fire safe ashtrays	5	48	27
Total	-	-	77

Source: Home Office, own estimates, 2022/23

Note: All estimates summed to the nearest whole number.

64. As not all vulnerable individuals have the same needs, the low to high scenarios have been modelled based on the average cost per item (£19), and the number of measures required. In the low scenario, it is assumed that only one in-flat measure will be implemented per PCFRA. This is equivalent to one item in the bundle of four above, so the cost of the bundle (£77) was multiplied by 25 per cent to get the low scenario cost of £19. In the high scenario all four measures are implemented (£77) and for the central scenario, an average of these costs is taken (£48, equivalent to 2.5 measures).
65. It is assumed that this cost is incurred by RPs whenever a PCFRA occurs. The in-flat measures resulting from a PCFRA are calculated as (see Table 2):

Cost of measures by scenario x Volume of in-scope residents in SE buildings

66. The cost to RPs from providing in-flat measures is estimated to be in a range of **£0.1 to £1.2 million**, with a central estimate of **£0.4 million**, (2022/23 prices) in year 1 of the policy. This is expected to potentially be a high overall estimate, as it may be the case that some residents do not need any measures to be taken at all, and that RPs may be able to benefit from cheaper bulk purchasing agreements, below the estimated market prices. Evidence from some FRSs suggest that this cost exceeds their usual activity and expenditure following a HFSC, and so this is considered to be a conservative estimate at this stage, with further information on the accuracy of these costs being sought during the consultation.
67. Out of flat measures are calculated using the same method as in-flat measures, though with a different bundle of items. From discussion with the FRSs and RPs, out of flat measures of this type

³² A wide range of major retailers considered including Seton, Screwfix, Amazon, and other online sources. The accuracy of these costs was also considered by the NFCC and RP groups.

are not currently a common occurrence following PCFRAs or HFSCs, so assumptions have had to be made on the sort of measures that will be implemented. As with the in-flat measures, major online retailers have been used to proxy likely prices³³. Further data collection is ongoing so an improved estimate of potential measures should be available for the final IA.

Table 3, Out of flat measures, volume and £, 2022/23

Measure	Average cost estimate £	Number of items	Total £
Signage	10	2	20
Lighting	43	2	86
Handrails	20	5	100
Alarm for hearing impaired	45	1	45
Total for whole bundle	-	-	250

Source: Home Office, own estimates, 2022/23 to be further refined following the consultation.

Note: Total may not sum due to rounding.

68. Unlike in-flat measures, not all of those receiving a PCFRA will require out of flat measures. As discussed above, evidence from FRSs and RPs suggests that out of flat measures are less frequently required than in-flat measures. So, it is assumed that out of flat measures will occur at a quarter of the rate of in-flat measures (6% in the low scenario, 16% in the high scenario, and 25% in the central scenario). This gives an average cost of out of flat measures per in-scope individuals as £16 to £63, central estimate £39. This assumption will be further refined following the consultation.
69. The total cost of out-of-flat measures is calculated as: (see table 1)
- Cost of measures by scenario x Volume of in-scope residents in SE buildings*
70. The cost to RPs from providing out-of-flat measures is estimated to be in a range of **£0.1 to 0.9 million**, central estimate **£0.3 million**, (2022/23 prices) in year 1 of the policy

Impact on FRSs.

71. Following a PCFRA, some individuals will also need a HFSC from their local FRS to assess the safety of their residence. This represents a time cost to the FRS. As FRAs are the ultimate budget holders for FRSs, they incur the cost. It is not expected that all in-scope will need a HFSC in addition to a PCFRA (see assumption 1.9). The cost to FRSs of conducting HFSC for requiring individuals is calculated as: (See table 1 and assumptions 1.8 and 1.9)
- Volume of in-scope residents in SE buildings x cost per HFSC (£) x proportion of residents needing a HFSC (%)*
72. The estimated cost of conducting HFSCs for option A lies in a range of **£0.03 to £0.8 million**, with a central estimate of **£0.2 million** (2022/23 prices) in year 1 only. All of this cost is to the public.

Total set-up costs

73. Total set-up costs are presented in Table 4.

³³ Major online retailers like Screwfix and other online fire safety stores considered.

Table 4, Total set-up costs Option A, £ million (2022/23 prices).

	Low	Central	High
Familiarisation	0.0	0.0	0.0
Cost of finding eligible residents	0.1	0.2	0.4
Conducting PCFRA	0.2	0.3	0.6
Buying information box	0.0	0.1	0.2
Put information into information box	0.0	0.0	0.1
Out of flat measures	0.1	0.3	0.9
In flat measures	0.1	0.4	1.2
Impact on FRSS	0.0	0.2	0.8
Total	0.5	1.6	4.2

Source: Home Office, own estimates, 2022/23 prices

Note: All values rounded to the nearest £million. Familiarisation costs expected to be £1,100, £3,000, and £7,300. The low estimate of buying an information box is £8,700, but rounded to £0.0 million in the table, and the low and central estimate for putting information into an information boxes are £15,700 and £47,200, also rounded to £0.0 million.

74. The total set up costs for **Option A** are estimated to be between **£0.5 to £4.2 million**, with a central estimate of **£1.6 million** (2022/23 prices) in year 1 only. Of these, private business cost are **£0.7 million** costs (in a range of **£0.2 to £1.7 million**) and estimated public sector costs lie in a range of **£0.2 to £2.5 million**, with a central estimate of **£0.9 million** (2022/23 prices) in year 1 only.

Ongoing costs

75. The ongoing costs from **Option A** come from the need to update PCFRAs as individuals move or need revisions to their provision. This is estimated to be approximately 35 per cent of set-up costs, as per assumption 1.15. It is also expected that the number of buildings with SE strategies will fall per year. It is assumed that the number of buildings falls by 10 per cent annually, until a steady state of 30 per cent of the current stock. This is a highly uncertain assumption, made for the purposes of this IA so the calculation of 10 year costs is possible. It is tested in the sensitivity analysis section.
76. The total ongoing cost from years 2 to 10 lies in a range of **£0.7 to £6.2 million (PV)**, with a central estimate of **£2.4 million (PV)**. Table 5 presents the total costs of **Option A**.

Table 5, Total costs of Option A, £ million (PV) over 10 years and 2022/23 prices per year.

	Low	Central	High
Set-up	0.5	1.6	4.2
Ongoing	0.7	2.4	6.2
Total	1.2	4.0	10.3
Of which is public	0.6	2.2	6.2
Of which is private	0.5	1.7	4.2
Average cost per year (2022/23 prices)	0.1	0.4	1.1

Source: Home Office, own estimates, 2022/23

77. The total estimated cost of **Option A** lies between **£1.2 to £10.3 million (PV)**, with a central estimate of **£4.0 million (PV)**. Of the total cost, **£1.7m million (PV)** over 10 years are private business costs (between **£0.5 and £4.2 million (PV)**) and public sector costs are estimated to be between **£0.6 and £6.2 million (PV)** over 10 years, with a central estimate of **£2.2 million (PV)**. The average per year cost is estimated to be between **£0.1 to £1.1 million**, with a central estimate of **£0.4 million** (2022/23 prices).

Option B

Set-up costs

78. **Option B** is calculated in the same way as **Option A**, however all high rise buildings are now in-scope, as well as all SE buildings. All the calculations in **Option A** are updated to include an additional 12,000 high-rise buildings³⁴, or updated numbers for individuals in scope (see Table 1). The cost for purchasing information boxes is unchanged, because only building 11 to 18m in height are in-scope of this cost. Total set up costs are presented in Table 6.

Table 6, Set up costs of Option B, £ million (2022/23 prices) in year 1 only.

	Low	Central	High
Familiarisation	0.0	0.0	0.0
Cost of finding eligible residents	1.3	2.5	3.8
Conducting PCFRA	2.4	3.9	5.9
Buying information box	0.0	0.0	0.2
Put information into information box	0.2	0.5	1.1
Out of flat measures	0.9	3.7	9.2
In flat measures	1.0	4.5	11.2
Impact on FRSS	0.4	2.3	7.8
Total	6.1	17.5	39.3

Source: Home Office, own estimates, 2022/23

Note: All values rounded to the nearest £million. Familiarisation costs expected to be £13,000, £29,800, £62,300 and the low estimate of buying an information box is £8,700.

79. The total set up costs for **Option B** are estimated in a range of **£6.1 to £39.3 million**, with a central estimate of **£17.5 million** (2022/23 prices) in year 1 only. Of these, **£7.6 million** are private business costs (a low and high of **£2.9 and £15.8 million**) and public sector costs lie in a range of **£3.3 and £23.5 million**, with a central estimate of **£9.9 million**.

Ongoing costs

80. The ongoing costs of **Option B** are calculated using the same 35 per cent ongoing assumption as **Option A**. SE buildings 11 to 18m are assumed to move out of the scope of the proposal in the same way as all buildings in **Option A** do, however high-rise buildings do not move out of scope. Even if high-rise buildings move from SE strategies to other ones, they remain in scope of the policy. The number of high-rise buildings in scope of the policy actually increases by 3 per cent annually, in line with assumption 1.10 on the new build rates. This means the overall annual cost of this policy will rise from year 3 onwards (after an initial fall in year 1).
81. The total ongoing cost from years 2 to 10 lies in a range of **£19.9 to £126.5 million (PV)**, with a central estimate of **£56.5 million (PV)**. Table 7 presents the total cost of **Option B**.

³⁴ DLUHC Page 9: Safety Programme: monthly data release - March 2022 -

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1069181/Building_Safety_Data_Release_March_2022.pdf

Table 7, Total costs of Option B, £ million (PV) over 10 years and 2022/23 prices per year.

	Low	Central	High
Set-up	6.1	17.5	39.3
Ongoing	19.9	56.5	126.5
Total	26.0	74.1	165.7
Of which, public	13.8	41.9	99.2
Of which, private	12.2	32.2	66.5
Average cost per year (2022/23 prices)	3.0	8.5	19.0

Source: Home Office, own estimates, 2022/23

82. The total estimated cost of **Option B** lies between **£26 to £165.7 million (PV)**, with a central estimate of **£74.1 million (PV)**. Of the total cost, **£32.2 million (PV)** are private business costs (between **£12.2 and £66.5 million (PV)**) and public sector costs are estimated to be between **£13.8 and £99.2 million (PV)**, with a central estimate of **£41.9 million (PV)** over 10 years. The average per year cost is estimated to be between **£3.0 to £19.0 million**, with a central estimate of **£8.5 million** (2022/23 prices).

Option C

Set-up costs

83. **Option C** is the same as **Option A** with the additional provision of an on-site individual in eligible buildings. This individual is required to be on site at all times in order to aid in the evacuation of vulnerable individuals for whom the previously mentioned measures, costed in **Option A** are not sufficient to their needs.
84. To cost a person to being on-site at all times (working in shifts), a range of hourly costs proxied using waking watch data³⁵, were considered. The low hourly estimate used is £12, the central estimate is £14, and the high estimate is £30. As an individual is required to be on-site 24 hours a day, 365 days a year, each hourly cost was multiplied by 24, then 365. This gave an annual cost range of £105,000 to £263,000, with a central estimate of £123,000 per building³⁶.
85. This, like others in this IA, is assumed to fall on the RP for simplicity. It is calculated as: (see assumptions 1.1 and 1.14)
- Number of buildings in scope x proportion of buildings impacted (%) x cost of on-site individual (£)*
86. The estimated cost to RPs of having an on-site individual lies in a range of **£10.8 to £147.2 million**, with a central estimate of **£36.8 million** (2022/23 prices) in year 1 only

Total set-up costs

87. As **Option C** is the same as **Option A**, just with the additional provision of an on-site individual, the cost of the on-site individual is added to the total set-up costs of **Option A** to get the total set up costs for **Option C**. The total set up costs for **Option C** are estimated in a range of **£11.2 to £151.4 million**, with a central estimate of **£38.4 million** (2022/23 prices) in year 1 only. Of these, **£19.1**

³⁵ <https://www.gov.uk/government/publications/building-safety-programme-waking-watch-costs/building-safety-programme-waking-watch-costs>. These are total costs so include any non-wage additional salary cost.

³⁶ This is equivalent to £8,800 to £21,900, central estimate £10,200 per month per building. This works out at approximately £199 (central estimate) on average per dwelling per month in simultaneous evacuation buildings (using an assumption of 51 dwellings on average per building). This is broadly consistent with the most recent DLUHC waking watch costs, which are a proxy for the level of costs RPs could incur. DLUHC estimate Waking Watch measures in buildings to be approximately £166 on average per dwelling per month. DLUHC Page 33 Building Safety Programme: monthly data release - March 2022 - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1069181/Building_Safety_Data_Release_March_2022.pdf

million are private business costs (a low and high of **£5.6 and £75.3 million**) and public sector costs are estimated to lie in a range of **£5.6 and £76.1 million**, with a central estimate of **£19.3 million**, all in 2022/23 prices.

Ongoing costs

88. The ongoing costs for **option C** are calculated using the same method and assumptions as those in **Option A** (see paragraph 75) just with the addition of the cost of an on-site individual. It is assumed the on-site individual is required in buildings for as long as they are under a SE strategy, and so this cost is not multiplied by 35 per cent, it is just down rated using the annual fall of 10 per cent, until a steady state of 30 per cent assumption in **Option A**. This is a highly uncertain assumption, made for the purposes of this IA, and so the impact of changing this assumption on the total costs of **Option C**, is presented in the Section G: Risks.
89. The total ongoing cost from years 2 to 10 lies in a range of **£45.9 to £624.4 million (PV)**, with a central estimate of **£156.8 million (PV)**. The total costs of **Option C** are presented in Table 8.

Table 8, Total cost of Option C, £ million (PV) over 10 years and 2022/23 prices per year.

	Low	Central	High
Set-up	11.2	38.4	151.4
Ongoing	45.9	156.8	624.4
Total	57.1	195.2	775.7
Of which, public	28.6	97.8	388.8
Of which, private	28.5	97.4	386.9
Average cost per year (2022/23 prices)	6.4	21.8	86.5

Source: Home Office, own estimates, 2022/23

90. The total estimated cost of **Option C** lies between **£57.1 to £775.7 million (PV)**, with a central estimate of **£195.2 million (PV)** over 10 years. Of the total cost, **£97.4 million (PV)** are private business costs (between **£28.5 and £386.9 million (PV)**) and public sector costs are estimated to be between **£28.6m and £388.8 million (PV)**, with a central estimate of **£97.8 million (PV)**. The average per year cost is estimated to be between **£6.4 to £86.5 million**, with a central estimate of **£21.8 million** (2022/23 prices).

Option D

91. **Option D** is to legislate to require RPs of all simultaneous evacuation buildings, regardless of height, to draw up an evacuation plan for their building. Instructions on this plan will then be provided to residents³⁷ in all buildings. There will be a requirement RPs in all simultaneous evacuation buildings to provide their local FRS with an electronic copy of an evacuation plan for their building and to place a hard copy of this plan in the information box on site. RPs will be required to keep these plans under regular review.

Set-up

92. The set-up costs will fall to RPs and result from the creation of evacuation plans and from providing their local FRS with an electronic copy of the evacuation plan and placing a hard copy in the information box on site. It is likely that some SE buildings may already have evacuation plans completed, and others may have partial plans in place, and so the costs presented in this analysis present the maximum expected cost of evacuation plans.

³⁷ This aligns with the instructions to residents' proposal in the Fire Safety (England) Regulations 2022 IA.

93. The cost to RPs of creating evacuation plans is calculated as: (see assumptions 1.1, 1.5 and 2.1)
Volume of SE buildings x time to create plan at that height (hrs) x RP wage (£/hr)
94. This cost was split by building type, with the total estimated cost to RPs being **£0.14 million** (2022/23 prices) in year 1 only, in a range of **£0.08 to £0.22 million**.
95. The RPs will also need provide their local FRS with an electronic copy of an evacuation plan for their building and to place a hard copy of this plan in the information box on site. This set-up cost is calculated as: (see assumptions 1.1 and 2.3)
Volume of SE buildings x Admin processing RP wage (£/hr) x time required (hrs)
96. The cost to RPs of providing this information is estimated to lie in the range of **£4,000 to £17,000** with a central estimate of **£10,000** (2022/23 prices) in year 1 only.
97. The total set up costs for **Option D** are estimated to be in a range of **£0.09 to £0.24 million**, with a central estimate of **£0.15 million** (2022/23 prices) in year 1 only. The total costs are assumed to be split equally between private and public costs, with a central estimate of **£76,000**, and a range of **£43,000 to £120,000**.

Ongoing costs

98. The ongoing costs of **Option D** will be incurred when RPs have to annually update or review instructions that they created in the first year of the appraisal period. The ongoing costs of **Option D** will also fall annually to account for the number of buildings with SE strategies falling (using the same assumptions as **Option A and C**)
99. It is assumed that the RPs will have to update evacuation plans following major refurbishment work, and annually review all plans to confirm the information within them is correct. It is assumed that four per cent of buildings undertake major refurbishment work each year³⁸ and so will require a full review of their evacuation plan. These buildings will undertake the same process as outlined in the set-up costs section, with the same assumptions for the completion of building plans and the provision of information to FRSs. The annual cost of these updates is 3.6 per cent of the set-up costs in year 2³⁹, and fall annually as the building stock falls. In the remaining 96 per cent of buildings, an annual review of their building plans will still be required to check for, and make, any required changes. It is assumed that this review will take approximately 2 to 10 minutes, with a central estimate of 5 minutes (see assumption 2.2) and be undertaken by the RP (Building Safety Manager wage assumption used, see assumption 1.5). The review only occurs in 96 per cent of buildings, as the update following major refurbishment will be classed as an annual update for the remaining four per cent of buildings. This cost also falls annually to account for falling building stock.
100. The **total ongoing cost of Option D** is estimated be **£0.03 million (PV)**, in a range of **£0.02 to £0.05 million (PV)** over the last nine years of the appraisal period. The total costs are presented in Table 9.

³⁸ MHCLG estimates for Building Safety Bill IA. Paragraph 246. <https://publications.parliament.uk/pa/bills/cbill/58-02/0139/BuildingSafetyBillImpactAssessment.pdf>

³⁹ 4 per cent of the set-up costs, multiplied by 0.9 to account for falling building numbers.

Table 9, Total costs of Option D, £ million (PV) over 10 years and 2022/23 prices per year.

	Low	Central	High
Set-up	0.09	0.15	0.24
Ongoing	0.02	0.03	0.05
Total	0.10	0.18	0.28
Of which, public	52,000	91,000	142,000
Of which, private	52,000	91,000	142,000
Average cost per year (2022/23 prices)	11,000	19,000	29,000

Source: Home Office, own estimates, 2022/23

101. The total estimated cost of **Option D** lies between **£0.1 to £0.3 million (PV)**, with a central estimate of **£0.2 million (PV)** over 10 years. The total costs are presumed to be split equally across public and private costs, with a central estimate of **£91,000 (PV)**, and a range of **£52,000 to £142,000 (PV)** over 10 years. The total average per year cost is estimated to be between **£11,000** and **£29,000**, with a central estimate of **£19,000** (2022/23 prices).

Option E

Set-up costs

102. The set-up costs for **Option E** are calculated using the same method as **Option D**, though with all multi-occupied residential buildings under the FSO 2005, regardless of height, in scope (see assumption 1.2 for total numbers). The time required for the creation of evacuation plans will differ by building height (see assumption 2.1), and only simultaneous evacuation and high-rise buildings will need to provide this information to the local FRS and put it into an information box.
103. The set-up cost for **Option E** is estimated to be **£22.6 million**, in a range of **£12.0 to £33.2 million** (2022/23 prices) and occurs in the first year of the appraisal period only. The majority of this cost is as a result of creating evacuation plans. The cost of creating evacuation plans is estimated to be **£22.5 million**, in a range of **£11.9 to £33.0 million**. Only **£97,000** (in a range of **£49,000 to £146,000**) is expected to arise from informing FRSs and placing a hard copy of the plan in the information box.

Ongoing costs

104. The ongoing costs for **Option E** are calculated in the same way as **Option D**, though as with set-up cost, all buildings of any height under the FSO 2005 are in-scope (see assumption 1.2 for the number of buildings). The one difference in method, is that in this scenario, the number of buildings in-scope does not fall (as in **Option D**), because buildings are in-scope regardless of evacuation strategies. Therefore, the creation of evacuation plans in new build properties (and the updating of these plans in new builds) is included in the total ongoing cost of **Option E**.
105. In new build properties, it is assumed that creating the evacuation plans each year will take the same amount of time as presented in the set-up cost section, and that they will be created by a Building Safety Manager (see general assumption 1.5). By multiplying these assumptions with the number of new builds built annually (see assumption 1.10), the total annual cost of creating plans can be calculated. This annual cost will increase each year by three per cent, in line with the new build rate.
106. The **total ongoing cost** for **Option E** is estimated to be **£39.8 million (PV)**, in a range of **£17.7 to £72.4 million (PV)** between the second and tenth years of the appraisal period. The average annual ongoing cost is estimated to be £5.3 million, in a range of £2.3 million to £9.6 million (2022/23 prices). Total costs are presented in table 10.

Table 10: Total costs of Option E, £ million (PV) over 10 years and 2022/23 prices per year.

	Low	Central	High
Set-up	12.0	22.6	33.2
Ongoing	17.7	39.8	72.4
Total	29.7	62.4	105.5
Of which, public	6.7	13.3	21.9
Of which, private	22.9	49.0	83.7
Average cost per year (2022/23 prices)	3.3	7.0	11.9

Source: Home Office own estimates, 2022/23

107. The total estimated cost of **Option E** lies between **£29.7 to £105.5 million (PV)**, with a central estimate of **£62.4 million (PV)** over 10 years. Of the total costs, **£49.0 million (PV)** over 10 years are private business costs (between **£22.9 and £83.7 million (PV)**) and public sector costs are estimated to be between **£6.7 and £21.9 million (PV)**, with a central estimate of **£13.3 million (PV)**. Private and public costs for buildings under 11m are calculated using assumption 2.4. The average per year cost is estimated to be between **£3.3 to £11.9 million**, with a central estimate of **£7.0 million (2022/23 prices)**.

Overarching options

108. This IA has costed five individual options (3 on EEIS, and 2 on evacuation plans). However in implementation, it is expected that a pairing of options, one from EEIS and one from evacuation plans will be brought in together. The following combinations are proposed as indicative examples, assuming that the buildings in scope will likely be consistent between options⁴⁰. Following the consultation, six potential options could be taken forward (3 combinations of **Options A to C**, combined with 2 combinations of **Options D and E**). It has not been seen as proportionate to model all these overarching options in this IA, and so instead three overarching combinations of options are modelled. These three overarching options are:

- **Option 2:** This option consists of **Option A** from EEIS, and **Option D** from evacuation plans.
- **Option 3:** This option consists of **Option B** from EEIS, and **Option E** from evacuation plans.
- **Option 4:** This option consists of **Option C** from EEIS, and **Option D** from evacuation plans.

109. The total costs of **Options 2 to 4** are presented in Table 11.

Table 11, Total cost of overarching options 2 to 4, £ million (PV) over 10 years, 2022.

	Low	Central	High
Option 2	1.3	4.2	10.6
Of which, Option A	1.2	4.0	10.3
Of which, Option D	0.1	0.2	0.3
Option 3	55.7	136.4	271.2
Of which, Option B	26.0	74.1	165.7
Of which, Option E	29.7	62.4	105.5
Option 4	57.2	195.4	776.0
Of which, Option C	57.1	195.2	775.7
Of which, Option D	0.1	0.2	0.3

Source: Home Office own estimates, 2022/23

⁴⁰ SE buildings are in scope of **Option A, C and E**, and then a larger number of buildings are in scope of **Option B** (high-rise) and **Option E** (All buildings in scope of the FSO, regardless of height).

Non-monetised costs

110. There are some additional potential costs as a result of this policy, which it has not been possible to monetise. These include
- **Potential cost on residents:** It is possible that there may be a cost on residents through the time it takes them to identify themselves to the RP, and then interact with the RP as part of the PCFRA process to explain their requirements. This impact is uncertain, and so has not been monetised in this IA. It is also possible some of the costs borne by the RP will fall to individual residents. This impact is further discussed in section I, Wider Impacts.
 - **Wider impact on FRSs:** It is possible that there may be some additional costs on FRSs, however the volume and likelihood of these is uncertain and so has not been monetised as part of this IA. It is possible some RPs will opt to share the information from the PCFRA electronically with FRSs, instead of placing it in the information box on premises. However, under the proposals this electronic sharing could only be done when the FRS agreed to it. Where this does occur, it is possible FRSs will incur a time and potential IT cost from processing and receiving this information. There may be an impact on FRS response from the additional availability of emergency evacuation information. From initial discussions with FRSs, it is possible that some may adjust their pre-determined appliance numbers if they know about the existence of mobility impaired residents or may have to adjust their response numbers once, they get this information from the information box. This may have a cost on FRSs, however this is very difficult to quantify and monetise. The potential impact on FRSs will be further refined following the consultation.

BENEFITS

111. It has not been possible to monetise any benefits from these proposals due to a lack of information on their impact. The intent of the EEIS proposal is that the FRS has information on where those who would need assistance to evacuate are located, in higher risk buildings. It is hoped that through the sharing of evacuation plans, FRSs should become better informed about different buildings. This should support and improve the operational response of FRSs when dealing with incidents within in-scope buildings.
112. Numerous potential non-monetised benefits of these options have been identified, which are outlined below.
113. There is some evidence to suggest that evacuation is more difficult for some individuals, and that firefighters should provide direct assistance to those unable to evacuate independently.
114. For example:
- Multiple evidence reviews of evacuation strategies have found that buildings should have tailored plans which consider the characteristics and composition of residents⁴¹.
 - Studies have found that stair movement (in the context of evacuations) is slower in buildings which house older or mobility-impaired individuals⁴²
 - An experiment with 45 older and disabled residents living in a six-storey assisted living facility in the US, identified the importance of firefighters providing direct assistance to those unable to evacuate independently⁴³

⁴¹ Groner, N.E. (2016) 'A decision model for recommending which building occupants should move where during fire emergencies', *Fire Safety Journal*, vol. 80, pp. 20-29, Ronchi, E. and Nilsson, D. (2013) 'Fire evacuation in high-rise buildings: a review of human behaviour and modelling research', *Fire Science Review*, vol. 2(7)

⁴² Peacock, R.D., Reneke, P.A., Kuligowski, E.D. and Hagwood, C.R. (2016) 'Movement on Stairs During Building Evacuation', *Fire Technology*, vol. 53, pp. 845-871

⁴³ Kuligowski, E., Peacock, R., Wiess, E. and Hoskins, B. (2015) 'Stair evacuation of people with mobility impairments', *Fire and Materials*, vol. 39, pp. 371-384

115. However, none of the above studies specifically discuss an EEIS proposal or use cost-benefit analysis. Therefore, there are no monetised benefits in this IA due to a lack of evidence around the specific impact of the EEIS and evacuation plan options, and the difficulty in robustly estimating the number of fire-related injuries or fatalities that could be avoided as a result of these proposals.

Break-even analysis

116. It is standard practice in IAs to carry out an appraisal that compares costs against benefits. In this case it has not been possible to quantify the benefits of the proposals. A break-even analysis has been completed to make comparisons between the options and illustrate the magnitude of benefits required in order for this policy to have a positive Net Present Social Value (NPSV).
117. To do this, DfT's value of a road traffic fatality or casualty is used as a proxy for the cost to life in fire⁴⁴. The published DfT value for a fatality (over a lifetime) is £2,094,259, and the value given for an average casualty is £233,779 (2022/23 prices).
118. Dividing the estimate of the total cost of **Option 2, £4.2 million (PV)** over 10 years, by the value of a life illustrates that **2 fire related fatalities need to be avoided over 10 years**. Using the low and high cost estimates (£1.3 and £10.6 million PV) in this calculation produces a range of 1 and 6 fire related fatalities need to be avoided over 10 years.
119. Similarly, **18 fire related casualties requiring hospital treatment need to be avoided over 10 years**. Using the low and high cost estimates in this calculation produces a range of 6 and 46 fire related casualties requiring hospital treatment need to be avoided over 10 years.
120. Using the same calculation for **Option 3**, where the estimated cost **was £136.4 million (PV)** over 10 years, suggests that **66 fire related fatalities need to be avoided over 10 years**. Using the low and high cost estimates (£55.7 and £271.2 million PV) in this calculation produces a range of 27 and 130 fire related fatalities need to be avoided over 10 years.
121. Similarly, for **Option 3**, **584 fire related casualties requiring hospital treatment need to be avoided over 10 years**. Using the low and high cost estimates in this calculation produces a range of 239 and 1,161 fire related casualties requiring hospital treatment need to be avoided over 10 years.
122. Using the same calculation for **Option 4**, where the estimated cost **was £195.4 million (PV)** over 10 years, suggests that **94 fire related fatalities need to be avoided over 10 years**. Using the low and high cost estimates (£57.2 and £776.0 million PV) in this calculation produces a range of 28 and 371 fire related fatalities need to be avoided over 10 years.
123. Similarly, for **Option 4**, **836 fire related casualties requiring hospital treatment need to be avoided over 10 years**. Using the low and high cost estimates in this calculation produces a range of 245 and 3,320 fire related casualties requiring hospital treatment need to be avoided over 10 years.
124. For context, in the year ending December 2021, fire and rescue services attended 767 dwelling fires in purpose built, high rise (10+ storeys) flats⁴⁵. Over the last two years, from year ending December 2020 to the year ending December 2021, there have been eight fire-related fatalities in these buildings⁴⁶. The annual figures for fatalities in purpose built high rise flats (10+ storeys) over the two year period are three and five respectively (all figures year ending December), leading to an average of four per year. Over the last two years, from year ending December 2020 to the year ending

⁴⁴ Department for Transport (2019) Tag Data Book, May, v1.12, Table A4.1.1, Average value of prevention of a casualty, (2010 prices uprated to 2022 prices and values) including lost output, human costs, and medical/ambulance cost. See: <https://www.gov.uk/government/publications/tag-data-book>

⁴⁵ Home Office (2022): FIRE STATISTICS TABLE 0205a: Dwelling fires attended by fire and rescue services in England. 10 + storeys used to provide context as the Home Office does not publish this data on dwelling fires in 18m+ high rise flats. [Fire statistics data tables - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/statistics/fire-statistics-data-tables)

⁴⁶ Home Office (2022): FIRE STATISTICS TABLE 0205b: Fatalities in dwelling fires attended by fire and rescue services in England, by dwelling type. [Fire statistics data tables - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/statistics/fire-statistics-data-tables)

December 2021, there were 84 fire related non-fatal casualties requiring hospital treatment in purpose-built high-rise (10+ storeys) flats. With the annual figures for non-fatal casualties requiring hospital treatment 44 and 40 each year (all figures year ending December) giving an average of 42 per year⁴⁷.

125. The breakeven analysis demonstrates that **Option 2 is the most effective option**, in terms of the number of fire fatalities or fire-related casualties avoided, given the total estimated cost of Option 2 compared to Option 3 and Option 4

NPSV, BNPV, EANDCB

126. The NPSV, BNPV and net cost to business (defined as EANDCB) of this policy are presented in Table 12.

Table 12, Summary of monetised benefits and costs, NPSV, BNPV, EANDCB, £ million (PV).

£ million (10 yr PV)	Low	Central	High
Option 2			
Total benefits	0.0	0.0	0.0
Total set-up cost	0.6	1.8	4.4
Total ongoing cost	0.7	2.4	6.2
Total cost	1.3	4.2	10.6
NPSV	-1.3	-4.2	-10.6
Of which, public	-0.7	-2.3	-6.3
BNPV	-0.6	-1.8	-4.3
EANDCB	0.1	0.2	0.4
Option 3			
Total Benefits	0.0	0.0	0.0
Total set-up cost	18.1	40.1	72.4
Total ongoing cost	37.5	96.3	198.8
Total cost	55.7	136.4	271.2
NPSV	-55.7	-136.4	-271.2
Of which, public	-20.5	-55.2	-121.1
BNPV	-35.2	-81.2	-150.1
EANDCB	4.0	9.2	17.1
Option 4			
Total Benefits	0.0	0.0	0.0
Total set-up cost	11.3	38.5	151.6
Total ongoing cost	45.9	156.8	624.4
Total cost	57.2	195.4	776.0
NPSV	-57.2	-195.4	-776.0
Of which, public	-28.6	-97.9	-389.0
BNPV	-28.6	-97.4	-387.0
EANDCB	3.2	10.9	43.1

Source: Home Office, own estimates. Totals may not sum due to rounding.

⁴⁷Home Office (2022): FIRE STATISTICS TABLE 0205c: Non-fatal casualties in dwelling fires attended by fire and rescue services in England, by dwelling type and severity of injury, England. [Fire statistics data tables - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/statistics/fire-statistics-data-tables)

Total Costs, benefits, NPSV, BNPV and EANDCB

Option 2

127. The set-up cost is estimated to be in a range of **£0.6 to £4.4 million**, with a central estimate of **£1.8 million** (2022/23 prices) in year 1 only. The ongoing costs are estimated to be in a range of **£0.7 to £6.2 million (PV)**, with a central estimate of **£2.4 million (PV)** over 10 years. The **total cost of Option 2** is estimated in a range of **£1.3 to £10.6 million (PV)**, with a central estimate of **£4.2 million (PV)** over 10 years.
128. No benefits have been monetised for this policy, so the **Net Present Social Value (NPSV)** is estimated to be in the range of **-£1.3 to -£10.6 million (PV)**, with a central estimate of **-£4.2 million (PV)** over 10 years.
129. The **Business Net Present Value (BNPV)** is estimated to be in the range of **-£0.6, to -£4.3 million (PV)**, with a central estimate of **-£1.8 million (PV)** over 10 years. The **net cost to business per year** expressed as the (**EANDCB⁴⁸**) is **£0.2 million** In the high scenario the **EANDCB** increases to **£0.5 million** per year, and in the low scenario it is **£0.1 million** per year.

Option 3

130. The set-up cost is estimated to be in a range of **£18.1 to £72.4 million**, with a central estimate of **£40.1 million** (2022/23 prices) in year 1 only. The ongoing costs are estimated to be in a range of **£37.5 to £198.8 million (PV)**, with a central estimate of **£96.3 million (PV)** over 10 years. The **total cost of Option 3** is estimated in a range of **£55.7 to £271.2 million (PV)**, with a central estimate of **£136.4 million (PV)** over 10 years.
131. No benefits have been monetised for this policy, so the **NPSV** is estimated to be in the range of **-£55.7 to -£271.2 million (PV)**, with a central estimate of **-£136.4 million (PV)** over 10 years.
132. The **BNPV** is estimated to be in the range of **-£35.2 to -£150.1 million (PV)**, with a central estimate of **-£81.2 million (PV)** over 10 years The **EANDCB** is **£9.2 million per year**. In the high scenario the **EANDCB** increases to **£17.1 million** per year, and in the low scenario it is **£4.0 million** per year.

Option 4

133. The set-up cost is estimated to be in a range of **£11.3 to £151.6 million**, with a central estimate of **£38.5 million** (2022/23 prices) in year 1 only. The ongoing costs are estimated to be in a range of **£45.8 to £624.4 million (PV)**, with a central estimate of **£156.8 million (PV)** over 10 years. The **total cost of Option 4** is estimated in a range of **£57.2 to £776.0 million (PV)**, with a central estimate of **£195.4 million (PV)** over 10 years,
134. No benefits have been monetised for this policy, so the **NPSV** is estimated to be in the range of **-£57.2 to -£776.0 million (PV)**, with a central estimate of **-£195.4 million (PV)** over 10 years.
135. The **BNPV** is estimated to be in the range of **-£28.6 to -£387.0 million (PV)**, with a central estimate of **-£97.4 million (PV)** over 10 years The **EANDCB** is **£10.9 million per year**. In the high scenario the **EANDCB** increases to **£43.1 million** per year, and in the low scenario it is **£3.2 million** per year.

Value for money

136. For a policy to be considered value for money (VfM), it must meet its strategic and policy objectives.
137. **Options 2, 3 and 4** meet the objectives of reducing the impact of fires and improving evacuations for those unable to evacuate themselves. **Option 3** goes further than **Option 2 and 4** as all buildings

⁴⁸ Defined as the Equivalent Annual Net Direct Cost to Business. This is calculated by dividing the total undiscounted cost to business over the 10-year appraisal period, by the number of years in the appraisal period (10).

over 18m are in scope of the EEIS proposal, and all multi-occupied residential buildings, regardless of height, are in scope of the evacuation plans proposal. Hence, it is expected to have a higher overall cost estimate. Whilst **Option 4** is narrower in scope than **Option 3** in terms of buildings impacted, it does include the provision of an on-site individual measure for those with severe mobility impairments, which could improve the ability of the policy to meet the policy objectives. However, this would come at a great cost to both private and public sector RPs. As **Option 2** and **Option 4** are the same except for the on-site individual, the value that these individuals would bring for the difference in cost (£191 million (PV) over the 10 year period) is open to question. **Option 2** has all SE buildings in scope for both EEIS and evacuation plan measures, which arguably means it is focussed on the buildings most in need of the measures as they have evacuation requirements in place. So, whilst it is **Option 2** goes the least furthest of the three options in terms of scope, it may achieve the strategic and policy objectives at a lower cost than the **Options 3 and 4**. With a lower cost and more targeted outcome, this suggests that **Option 2** may be better VfM compared to **Option 3** and **Option 4**. The consultation will be used to better understand if this the case.

138. Costs accrue to RPs and FRSs and benefits mainly accrue to residents and FRSs. However, RPs may indirectly benefit if residents feel safer in the in-scope buildings because of this policy. Benefits are not monetised, so it is not possible to accurately determine which option offers a higher benefit-cost ratio. This also makes comparisons between the options difficult.

Place-based analysis

139. This measure does not have any specific spatial objectives; however the impact will be greater in urban areas (cities) compared to rural because urban areas have a higher number of high-rise residential buildings, and therefore likely a higher number of simultaneous evacuation buildings. This disproportionate impact is inevitable for interventions of this type which target buildings of a certain height. London contains approximately 61 per cent of all high-rise residential buildings, the highest concentration of any region⁴⁹, and also likely contains a similar proportion of all SE buildings. So, it is likely that these options will have a disproportionate impact on London compared to the rest of England. Other areas such as the South East (10 per cent of all high-rise residential buildings), the North West (7 per cent) and West Midlands (6 per cent) have a larger amount of high-rise residential buildings and so will also likely have a greater associated cost than other areas. Some areas have very few high-rise buildings, and it is expected that some FRSs may have no SE buildings.
140. However, these areas will also disproportionately incur the benefits of the proposals. The aim of the policy is to improve the evacuation of individuals unable to evacuate themselves, which could lead to an increase in social welfare.

Impact on small and micro-businesses

141. These proposals are expected to lead to costs to business, some of which will be small and micro-businesses. Business costs will be incurred by those who act as RPs, such as residential managing agent firms, residential management companies, right to manage companies or landlords. These businesses are varied, and there is limited available data on the residential block property management sector, especially when specifically looking at high-rise multi-occupied residential buildings, and buildings with SE strategies in place.
142. The DLUHC estimate that 50 per cent of residential buildings over 18m in height are private sector residential, and that these buildings contain solely leasehold dwellings⁵⁰. It has been assumed in this

⁴⁹ DLUHC Page 9 Building Safety Programme: monthly data release - March 2022 - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1069181/Building_Safety_Data_Release_March_2022.pdf

⁵⁰ DLUHC: Page 11 Building Safety Programme: monthly data release - March 2022 - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1069181/Building_Safety_Data_Release_March_2022.pdf

IA that this is the same in SE buildings. It is expected that many leasehold dwellings will be managed by a residential managing agent firm, who act as the RP. The Association of Residential Managing Agents (ARMA) undertook analysis of their members⁵¹ and found that “*the managing agent industry is dominated in terms of number of firms by smaller businesses.*” It is likely that most residential managing firms have between 10 to 49 employees, as on average a residential managing agent firm employs 28.9 individuals. So, they would be defined as a small business⁵². Over 80 per cent of ARMA member firms manage fewer than 4,000 units, and so would likely be small businesses. Only the top ten firms in the industry are very large, managing 500,000 units between them. This data is only available for all ARMA members, who manage leasehold dwellings of all heights and is considered the best available proxy for the industry at this stage as it is not possible to adjust these figures to only account for businesses which manage high-rise multi-occupied buildings, or simultaneous evacuation buildings. It is acknowledged that not all managing agents in ARMA will manage high-rise or simultaneous evacuation buildings, and so the proportion of small and micro-businesses managing these buildings may be different. There is limited evidence on the size of other businesses that may act as RPs, however by nature, right to manage and residential management companies are likely to be small or micro-businesses. There is not enough accurate data to robustly estimate the proportion or volume of overall cost that would fall to small and micro-businesses, but it is likely that the *majority of businesses impacted* will fall into this category.

143. It is not expected that small or micro-businesses will be disproportionately impacted by these proposals as any additional burdens imposed on these businesses would also fall on larger businesses. The costs to each business from these options will be proportionate to the number of buildings they manage (either high rise or simultaneous evacuation), as each option will have to be undertaken for each building. It is possible that buildings with more mobility impaired residents may incur higher costs, but it is not possible to ascertain how and if this cost will related to the size of the business.
144. Given the number of buildings impacted which may be run by small or micro-businesses, and the importance of these options in improving evacuations for those unable evacuate themselves, it is not possible to give small and micro-businesses an exemption from these measures whilst still achieving the policy and strategic objectives. Any exemptions for small and micro-businesses could compromise fire safety in high-rise and SE buildings and could potentially create loopholes in any potential legislation. Business RPs already work in a highly regulated industry and are subject to some fire safety regulations, and any properties owned are already subject to the FSO 2005. These proposals build on this legislation, and many businesses will already be taking steps to make sure fire and building safety measures are up-to-date and comply with the latest regulation and best practice guidance
145. On receipt of consultation responses the impact on small and micro-businesses will be further examined to understand any concerns from these businesses.

F. Proportionality

146. The level of analysis in this IA is considered proportionate to the GTI P1 recommendations in relation to the evacuation of individuals. Appropriate resource and time were applied to the analysis. The consultation will seek input from stakeholders and the public, and also attempt to obtain more data. It is hoped that this will allow refinement and a strengthened assessment of the potential impacts of these policy changes in the final IA, ahead of any legislation.

⁵¹ ARMA: Page 4-5 https://arma.org.uk/downloader/tx7/ARMA_Overview_of_Block_Management_Sector.pdf. Note that ARMA covers England and Wales, whereas this legislation only covers England.

⁵² RPC Guidance: Page 2 RPC SaMBA - August 2019.pdf -

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/827960/RPC_Small_and_Micro_Business_Assessment__SaMBA__August_2019.pdf

G. Risks

Proportion of individuals eligible for a PCFRA

147. The exact proportion of individuals in who will be eligible for a PCFRA is uncertain. In this IA, a range of 6.9 to 13.9 per cent, central estimate 10.1 per cent is used (see assumption 1.3), which is based on estimates for the proportion of mobility impaired individuals. These estimates are based on samples of the whole population, and there is no available data to suggest if the figures will be higher or lower specifically in high-rise residential buildings. These estimates do not account for individuals who may be vulnerable in the short-term and therefore be entitled to a PCFRA.
148. To account for this uncertainty, sensitivity analysis has been conducted. Table 13 demonstrates the impact on the central estimate of the NPSV for **Options 2, 3 and 4** when the proportion of individuals who are eligible for a PCFRA changes. The proportion of individuals who self-identifying as requiring a PCFRA (see assumption 1.4) is held constant in this analysis. However if that were to change, similar impacts would be seen on the total NPSV.

Table 13, Sensitivity analysis on the proportion (%) of individuals who would be eligible for a PCFRA, £million (NPSV over 10 years, £million).

Proportion of individuals (%)	5	10.1	15	20	25
Option 2 £m (PV)	-2.5	-4.2	-5.7	-7.4	-9.0
Option 3 £m (PV)	-104.5	-136.4	-166.8	-198.0	-229.2
Option 4 £m (PV)	-193.7	-195.4	-197.0	-198.6	-200.2

Source: Home Office, own estimates. **Central estimates (10.1%)** and assumptions used.

149. This demonstrates that the NPSV in some options is sensitive to the proportion of individuals who qualify for a PCFRA. Currently, the central estimate is that **10.1 per cent of residents are eligible for a PCFRA**. But, if the true proportion is 25 per cent, then this more than doubles the cost of **Option 2** (115 per cent increase) and significantly increases the cost of **Option 3** (a 68 per cent increase). The cost of **Option 4** only increases by a small amount (2 per cent), because it is assumed that the proportion of buildings which require an on-site individual remains the same. If this were to increase, there could be a significant fall in the NPSV of **Option 4**. This insight is important as if the proportion of individuals eligible is under-estimated, then costs for **Options 2 and 3** could be considerably higher than the estimate used throughout this IA.

Rate at which simultaneous evacuation buildings move to stay put.

150. Another uncertain assumption is the rate at which buildings currently using a SE strategy are moved out of interim measures and to a stay put strategy. It is currently assumed in this IA that the number of SE buildings will fall over time as steps are taken to improve the safety of these buildings. It is highly uncertain how the number of SE buildings will change over time, and this IA has assumed the number of buildings will decrease by 10 per cent each year after year 1 to 30 per cent of the current total. This is a purely indicative assumption made for the purposes of this IA so the calculation of 10 year costs is possible. Sensitivity analysis has been carried out to see the impact on costs of both slower and faster movement of buildings, as the rate of change could be faster or slower than this.

Table 14, Sensitivity analysis on the proportion (%) of buildings moving from SE to stay put per year (NPSV over 10 years, £million).

Yearly rate of change from SE to stay put (%)	5	10	15	20
Option 2 £m (PV)	-5.1	-4.2	-3.8	-3.6
Option 3 £m (PV)	-136.5	-136.4	-136.3	-136.3
Option 4 £m (PV)	-254.8	-195.4	-169.2	-155.6

Source: Home Office, own estimates. **Central estimates (10%)** and assumptions used. Figures still based on a minimum 30% steady state being reached. The 30% steady state is reached in year 6 (for 15% fall) and 5 (for 20% fall)

151. As can be seen in Table 14, the rate at which buildings move from SE, and out of scope of the policy, has a significant impact on the costs of **Option 4** due to the on-site individual measure being aligned with SE buildings. Altering the percentage a year assumption to 5 per cent reduces the NPSV by 30 per cent, whereas increasing it to 20 per cent, increases the NPSV by 20 per cent. **Option 2** also sees a large percentage variation across the different rates, whilst **Option 3** is only minimally impacted. Should the proportion of buildings moving from SE be largely different to the estimates in this IA, **Option 2** or **4** could have a large change in the NPSV.

The proportion of buildings in Option 4 which require an on-site individual

152. The on-site individual aspect of the EEIS proposal in **Option 4** requires an individual to be present in an eligible building 24 hours a day, 365 days a year, to aid in the evacuation of vulnerable persons. This is a major cost driver and makes **Option 4** the costliest of all the options. The proportion of buildings requiring this measure is estimated in a range of 10 to 40 per cent, with a central estimate of 25 per cent. This cost is highly uncertain, so sensitivity analysis has been conducted.

Table 15, Sensitivity analysis on the proportion of in-scope buildings requiring an on-site individual (Option 4, NPSV over 10 years, £million).

Proportion of buildings requiring on-site individual (%)	5	10	15	25	35	45	55	65	75
NPSV of Option 4 £m (PV)	-42.4	-80.7	-118.9	-195.4	-271.9	-348.3	-424.8	-501.3	-577.8

Source: Home Office, own estimates, 2022/23 All other central assumptions applied.

153. The percentage of buildings requiring an on-site individual has a significant impact on the cost of **Option 4**. If the proportion were to increase by 200 per cent, to 75 per cent, the NPSV of **Option 3** would fall by 196 per cent. This is a highly uncertain assumption, which will be further refined during the consultation.
154. An area with very little information associated with it is the realisation of monetised benefits from these options. The expectation is that there will be improved evacuation plans for vulnerable individuals, residents and employees should feel safer in their homes and ultimately there should be a reduction in fire fatalities and casualties. Additionally, there may be a greater awareness of fire safety for all parties.

H. Direct costs and benefits to business calculation

Table 16: Costs to business for Options 2 to 4, £ million (PV) over 10 years, 2022/23

	Low	Central	High
Option 2 (Option A and D)			
Total Benefits	0.0	0.0	0.0
Total set-up cost	0.3	0.8	1.8
Total ongoing cost	0.3	1.1	2.5
Total cost to business	0.6	1.8	4.3
BNPV	-0.6	-1.8	-4.3
EANDCB	0.1	0.2	0.5
Option 3 (Option B and E)			
Total Benefits	0.0	0.0	0.0
Total set-up cost	11.9	24.9	41.4
Total ongoing cost	23.3	56.3	108.8
Total cost to business	35.2	81.2	150.1
BNPV	-35.2	-81.2	-150.1
EANDCB	4.0	9.2	17.1
Option 4 (Option C and D)			
Total Benefits	0.0	0.0	0.0
Total set-up cost	5.6	19.2	75.4
Total ongoing cost	22.9	78.3	311.6
Total cost to business	28.6	97.4	387.0
BNPV	-28.6	-97.4	-387.0
EANDCB	3.2	10.9	43.1

Source: Home Office, own estimates. Note: figures may not sum due to rounding

I. Wider impacts.

Leaseholder impacts

155. It has been assumed in this IA that the costs from these options will fall on RPs. It is likely that any financial burdens on RPs will be passed onto leaseholders. The exact amount of this cost will depend on exact terms specified in leases and contracts, however it is likely that leaseholders will be impacted by these proposals.
156. The cost in this IA includes both economic and financial cost. It is likely that only additional financial burdens on RPs would be passed onto leaseholders⁵³, however it is difficult to split these costs out per building. It is acknowledged that there will be differing costs per building for each option. Costs in a building which, for example, had few mobility impaired residents and evacuation plans in place would be lower for residents when compared to a building which have neither of these. The costs

⁵³ Economic costs may already be covered in existing service charge agreements.

presented in this section estimate the potential impacts on leaseholders and are the average cost across all buildings.

157. To quantify the costs on private leaseholders it has been assumed that all costs will be passed on, so this is the maximum expected impact on leaseholders. The DLUHC assume that all buildings over 11m in height in the private sector are leasehold⁵⁴ and so the private costs in buildings over 11m have been assessed. To calculate the impact on individual leaseholders, the number of residents and dwellings in these buildings have been used as the best available proxies. It is difficult to estimate the number of buildings below 11m which are leasehold, but it is expected that some of the costs falling to these buildings may be passed through to leaseholders or other residents, especially as in these buildings some residents may act as their own RPs. As only **Option E** applies to buildings under 11m, impacts are expected to be small.
158. The DLUHC estimate that there are approximately 1,310,000 residents in buildings 18m or over, and 2,930,000 residents in buildings 11 to 18m in height⁵⁵. It is estimated that, of these, approximately 658,000 of the residents in buildings 18m or over are in private dwellings, and 1,478,500 residents in buildings 11 to 18m in height are in private dwellings⁵⁶. The DLUHC estimates that there are approximately 1,629,000 dwellings in buildings 11-18m in height, and 691,000 in buildings that are 18m or more⁵⁷. It is estimated that, of these, approximately 347,000 of the dwellings over 18m are private leasehold, and 822,000 of the dwellings 11 to 18m are private leasehold. These proportions are applied to the number of SE buildings to estimate the number of private dwellings to be 26,000 to 36,000, central estimate 31,000 and the number of private residents to be 50,000 to 68,000, central estimate 58,000. Total costs are calculated by doing total costs divided by number of residents or dwellings and are presented in Table 17. These estimates are indicative to get a scale of potential costs as they do not account for the movement of residents in and out of dwellings over the 10-year period (which will reduce the average burden incurred).

⁵⁴ Page 12: Building Safety Programme: monthly data release - March 2022 -

<https://www.gov.uk/government/publications/building-safety-programme-monthly-data-release-march-2022>

⁵⁵ DLUHC Page 13 Building Safety Programme: monthly data release - March 2022 -

<https://www.gov.uk/government/publications/building-safety-programme-monthly-data-release-march-2022>

⁵⁶ DLUHC Safety Programme: monthly data release - March 2022 - <https://www.gov.uk/government/publications/building-safety-programme-monthly-data-release-march-2022> estimates show that 347,000 of the 691,000 dwellings over 18 metres are private dwellings. These are all leasehold. There are 1.31 million residents across all 691,000 dwellings and it is assumed that there are the same number of residents per dwelling across all properties. Therefore, it is assumed that there are 658,000 residents in private leasehold dwellings. The same method is used for 11 to 18 metre buildings, where 822,000 of the 1,629,000 dwellings are private leasehold. Using this proportion, an estimate of 1,478,500 residents in private leasehold buildings is reached.

⁵⁷ DLUHC Page 11-12 Building Safety Programme: monthly data release - March 2022 -

<https://www.gov.uk/government/publications/building-safety-programme-monthly-data-release-march-2022>

Table 17: Costs of Options 2 to 4 by resident and dwelling, £ million (PV), 2022/23

	Private total costs PV (£m)	PV (over 10 years) cost per resident	Of which is set-up	Of which is ongoing	PV (over 10 years) cost per dwelling	Of which is set-up	Of which is ongoing
Option 2							
Low	0.6	12	5	7	23	10	13
Central	1.8	31	13	18	59	25	34
High	4.3	63	27	37	120	50	70
Option 3 (high rise only)							
Low	13.1	20	5	15	38	10	28
Central	33.5	51	13	38	96	24	72
High	68.1	103	25	78	196	48	148
Option 4							
Low	28.6	573	113	460	1,082	214	868
Central	97.4	1,666	328	1,339	3,147	619	2,528
High	387.0	5,673	1,105	4,568	10,714	2,087	8,627

Note: Only the cost of high-rise buildings included in **Option 3** for simplicity. Costs for **Options 2** and **4** align with Table 16.

159. These are an average cost across all residents/dwellings, assuming all leaseholders incur the same proportion of costs, and for **Option 2 and 3**, represent a relatively low potential burdens on leaseholders. **Option 4** has a significantly higher cost per resident and dwelling. As these are an average cost, actual costs to individual leaseholders may be significantly higher or lower so these figures are purely for illustrative purposes to indicate the scale of potential impact. It is likely that some costs may be passed on to all residents, if the RP deems that they are beneficial to all, however other costs, especially in-flat measures, may be borne by specific individuals and not spread equally across dwellings. Some of the economic cost of the time required to complete a PCFRA in a private building may also be borne by individuals, as they will have to assist with the completion of the PCFRA. These costs are expected to be funded by leaseholders, not central government. There is no current fund available for leaseholders to use to fund these costs, as they are seen as reasonable in order to improve the fire safety of buildings.
160. The cost per dwelling and resident is significantly higher for **Option 4**, because of the inclusion of an on-site individual. However, the cost in Table 17, significantly underestimates the expected cost of an on-site individual per building where it occurs because this cost is an average, so accounts for the proportion of buildings which do not have an on-site individual, and therefore incur no costs. As outlined in the appraisal section of this IA, it is expected that the cost of an on-site individual will be approximately cost range of £105,000 to £263,000, with a central estimate of £123,000 per building. This is equivalent to £8,800 to £21,900, central estimate £10,200 per month per building. This works out at approximately £199 (central estimate) on average per dwelling per month in SE buildings (using an assumption of 51 dwellings on average per building), with a range of £171 to £426. This is potentially a very significant cost on leaseholders and residents which will recur monthly until the building no longer requires an on-site individual. These calculations also assume the cost is spread equally across all dwellings in a building, which may not be the case in practice. As mentioned earlier in this IA, it may be the case that specific residents are expected to incur more of the cost of the individual than others.

J. Trade Impact.

161. There are no expected trade impacts from this policy.

K. Monitoring and evaluation (PIR if necessary)

162. Subject to the outcome of the consultation, new regulations of the FSO 2005 secondary legislation are proposed to be introduced in autumn 2022; implementation would depend on how swiftly these progress through Parliament.

163. The Home Office and FRSs collect data on fire safety audits and other fire and rescue service activity and incident data. This will be closely monitored.

164. Success will be measured against the policy and strategic objectives, and so will be demonstrated by an improvement in the fire safety of mobility impaired individuals within in-scope buildings. It will also be seen through an improved operational response to fires, and improved assistance for these residents. This is expected to make people feel safer in their homes, and also make them safer, so the policy could result in a reduction in the number of fire related injuries and fatalities.

165. The enforcement of this legislative change will be the same as for other issues which are covered by the FSO 2005.

166. It is likely that this policy will be evaluated in October 2026.

L. Annexes.

Impact Assessment Checklist

Mandatory specific impact test - Statutory Equalities Duties	Complete
Statutory Equalities Duties Home Office officials are actively considering the impact of these proposals, how it might or will affect people with protected characteristics. This is an ongoing process. At this stage, having considered the equality duties and the equality implications of these proposals, policy officials anticipate that the likely overall impact will be positive. Policy officials will regularly review the Equality Impact Assessment (EIA) closely as the policy options develop. An EIA has been completed as part of the consultation planning process. A summary of its findings is that the policy is likely to mean that the majority of PCFRAs will be completed for those residents whose self-identification is related to one or more protected characteristics (notably age, disability or pregnancy and maternity). Policy officials expect that the proposals will have a greater impact on those groups due to the nature of these protected characteristics than other groups who do not share these characteristics. This, however, is due to these groups being disproportionately likely to need a PCFRA and require assistance evacuating when compared to others. The SRO has agreed these summary findings from the Equality Impact Assessment.	Yes

Economic Impact Tests

Small and Micro-business Assessment (SaMBA) A SaMBA has been completed in the 'impact on small and micro-businesses', see Section E: Appraisal in this IA. Given the number of buildings impacted which may be run by small or micro-businesses, and the importance of these options in improving evacuations for those unable evacuate themselves, it is not possible to give small and micro-businesses an exemption from these measures whilst still achieving the strategic and policy objectives. Any exemptions for small and micro-businesses could compromise fire safety in high-rise and simultaneous evacuation buildings and could potentially create loopholes in the legislation. On receipt of consultation responses the impact on small and micro-businesses will be examined further, to understand any concerns from these businesses. For final legislation the SaMBA will be updated.	Yes
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New Burdens Doctrine

The new burdens doctrine is part of a suite of measures to ensure Council Tax payers do not face excessive increases. It requires all Whitehall departments to justify why new duties, powers, targets and other bureaucratic burdens should be placed on local authorities, as well as how much these policies and initiatives will cost and where the money will come from to pay for them.

Some of the costs noted in this IA will fall on the public sector, specifically local authorities. Policy officials are actively considering whether any of these costs are new burdens, and this will be further assessed following the consultation.

**To be
completed**