

# **Fire safety responsibilities under the Fire Safety (Residential Evacuation Plans) (England) Regulations 2025**

Table of Contents	
1. Introduction	2
2. The scope of the Regulations	4
3. Relevant Residents	5
4. Representatives	6
5. Trusted persons	7
6. Identify relevant residents	8
RP responsibilities	8
The resident's consent to participate	8
Record keeping	8
7. Person-Centred Fire Risk Assessments and Emergency Evacuation Statements	9
RP responsibilities	9
Planned RP responsibilities in future legislation	11
Guidance on Person-Centred Fire Risk Assessments	11
Reasonable and proportionate measures	13
Costs	14
Recording the emergency evacuation statement	16
The resident's consent to the person-centred fire risk assessment	16
Record keeping	17
Summary of the person-centred fire risk assessment process and resultant emergency evacuation statement	17
8. Reviewing Residential PEEPs and emergency evacuation statements	17
RP responsibilities	17
9. Sharing information with the local Fire and Rescue Authority	18
RP responsibilities	18
Personal information	19
The resident's consent	20
Digital vs hard copy format sharing of information	20
Fire and Rescue Authorities requesting further information from RPs	21
10. Preparing Building Emergency Evacuation Plans	22
RP responsibilities	22
Required information in the Building Emergency Evacuation Plan	22
11. Enforcement of Residential PEEPs	24
12. RP Toolkit	24
13. Sharing examples of good practice	25

## 1. Introduction

1.1 The Fire Safety (Residential Evacuation Plans) (England) Regulations 2025 (hereafter referred to as “the Regulations”) aim to improve the fire safety and evacuation of residents of specified residential buildings in England who would have difficulties evacuating the residential building by themselves in the event of a fire.<sup>1</sup> This may be due to a physical mobility issue, some other disability such as having a sight or hearing impairment, or a cognitive condition.

1.2 The Regulations are the outcome of two Government consultations on this policy area and sustained engagement with a wide range of stakeholders, with the conclusions of the latest consultation – the Emergency Evacuation Information Sharing Plus (EEIS+) Consultation,<sup>2</sup> held in 2022 – informing the development of the Residential Personal Emergency Evacuation Plans (Residential PEEPs) policy. The Residential PEEPs policy addresses three recommendations from the Phase 1 Report of the Grenfell Tower Inquiry: two recommendations concerning Personal Emergency Evacuation Plans (recommendations 33.22.e and 33.22.f) and one recommendation concerning building emergency evacuation plans (33.22.c).

1.3 The consultation responses and our wider engagement with stakeholders (such as the National Fire Chiefs’ Council, Fire and Rescue Services, local authorities and other housing providers, and various disability advocacy groups) revealed that some Responsible Persons (RPs: typically a building owner or manager, or an employer, landlord, Residents Management Company or Right to Manage Company) under the Regulatory Reform (Fire Safety) Order 2005 (the ‘Fire Safety Order’) ) have well-established local initiatives in place to improve the fire safety and evacuation of disabled or vulnerable residents. These initiatives set out a variety of approaches to resident

---

<sup>1</sup> The Regulations apply to all buildings in England that are high-rise residential buildings, that is, buildings containing two or more sets of domestic premises (‘multi-residential’) that are at least 18 metres above ground level or have at least seven storeys, and to all multi-residential buildings more than 11 metres in height above ground level that have simultaneous evacuation strategies in place.

<sup>2</sup> <https://www.gov.uk/government/consultations/emergency-evacuation-information-sharing>.

engagement and conducting risk assessments for residents concerning their fire safety and evacuation needs. The initiatives typically involve implementing measures in the resident's flat, as well as the common areas of the building, to improve the fire safety of the resident. Initiatives often include methods to share relevant information with local Fire and Rescue Authorities to inform their operational response to a fire emergency if necessary.

1.4 Through the consultations and engagement, Government also heard from individual residents who detailed arrangements that they had implemented themselves in which they arranged for their partners or carers to support their evacuation. The shared aim across these various initiatives used by RPs and residents is to improve the fire safety and support the evacuation of those residents who are unable to follow the building's evacuation plan. These initiatives informed the design of Residential PEEPs, and some of them are included in the [Responsible Persons Toolkit](#) (a resource that provides real-life examples of initiatives already put in place by RPs, to help other RPs in considering interventions and strategies to support the fire safety of their relevant residents). We encourage RPs to engage with the Toolkit and will look to include further examples from RPs as new practices are developed and embedded at the local level. Details on the RP Toolkit are provided further on in this guidance.

1.5 The Residential PEEPs process includes a suite of measures:

- a) The RP identifying relevant residents: those for whom the specified building is their only or principal residence, and whose ability to evacuate without assistance in the event of a fire is compromised as a result of their impairment or condition;
- b) A person-centred fire risk assessment – typically centred on a conversation between the RP and the resident – to understand their particular risks and identify how their fire safety and evacuation can be enhanced;
- c) An emergency evacuation statement setting out what the resident should do in the event of a fire (if agreed between the RP and the resident);
- d) Information for the Fire and Rescue Authority on the location and indicative level of assistance needed by residents who have engaged with the Residential PEEPs

process, to inform Fire and Rescue Services' operational response in an emergency where necessary, and in the rare case that they need to support these residents' evacuation (where the resident has explicitly consented to the sharing of that information) and also where the Fire and Rescue Authority initiate the evacuation of the building; and

e) An ongoing cycle of review.

1.6 The Regulations came into force on 6 April 2026, and enact the Residential PEEPs proposals put forward in the Government response to the EEIS+ Consultation published on 2 December 2024. The Regulations supplement the duties imposed by the Fire Safety Order (as amended) and the Fire Safety (England) Regulations 2022, and aim to support the fire safety of relevant residents in residential buildings in scope. The Regulations also mandate 'building emergency evacuation plans' (i.e. an evacuation plan for the entire building).

1.7 This Guide provides an explanation of the RP's legal responsibilities under the Regulations, advises on how the RP can meet these responsibilities, and outlines considerations the RP will wish to be mindful of, and the role of residents and local Fire and Rescue Authorities regarding these Regulations.

1.8 The Regulations apply to premises in England, and therefore this guidance is relevant to any RP with duties in respect of such premises, regardless of where the RP is based.

## **2. The scope of the Regulations**

2.1 The Regulations apply to:

- a) all buildings in England that are high-rise residential buildings, that is, buildings containing two or more sets of domestic premises ('multi-residential') that are at least 18 metres above ground level or have at least seven storeys), and

- b) all multi-residential buildings more than 11 metres in height above ground level (typically a building height of five storeys or more) that have simultaneous evacuation strategies in place.<sup>3</sup>

### **3. Relevant Residents**

3.1 A 'relevant resident', for the purpose of these Regulations, is someone for whom their domestic premises in the building is their only or principal residence, and who would have difficulty evacuating a building without assistance in the event of a fire. This may be due to a physical mobility or a cognitive condition. For example, a person who habitually needs a wheelchair, a blind person, a person who is unable to go down several flights of steps or has other mobility difficulties, or a person who due to a cognitive condition may have difficulties understanding what to do in the event of a fire (for example, a learning disability or cognitive condition such as dementia).

3.2 The RP must use reasonable endeavours to identify relevant residents. It will be for the RP to determine a reasonable approach to identify and engage with relevant residents, which they may choose to do through their fire risk assessment process or by other means.

3.3 In terms of determining whether a person's domestic premises is their only or principal residence, the RP will need to consider cases on an individual basis. Where the RP has reason to believe ambiguous cases may arise frequently, it is recommended that they set a clear policy to guide their approach to cases as they arise (taking into account the specific facts of each case). Considerations such a policy may address include:

---

<sup>3</sup>. A 'simultaneous evacuation strategy' means a strategy for evacuation whereby the responsible person has determined that all persons in the building should leave immediately in the event of a fire. In a residential building, this typically is an interim change from a 'stay put' strategy due to ongoing remediation requirements, though simultaneous evacuation can be a permanent or temporary evacuation strategy as decided by the fire risk assessment.

- a) The length of time that the person is expected to stay. For example, someone staying in a flat for an indeterminate period may be treated differently from someone where it is known when they will leave. If someone splits their time between two flats, it is likely that the RP would want to consider the flat where the person stays the greater number of nights in a given time period (e.g. per month) as being that person's principal residence;
- b) The extent to which the person's expected length of stay or duration of impairment is shorter than the time the RP would typically need to carry out a person-centred fire risk assessment and put any mitigations in place;
- c) How subletting residents should be treated. For example, as the RP would not have a contractual relationship with a subletting tenant, they may decide on a policy that any cost issues arising from application of Residential PEEPs to a subletting tenant are for the leaseholder to resolve with the subtenant. While this is for RPs to consider on a case by case basis, it is very likely to be reasonable for the building owner/manager to determine that all costs, including administrative costs, arising from Residential PEEPs for a resident who occupies a sublet flat should fall on the leaseholder.

#### **4. Representatives**

4.1 The requirement for a Residential PEEP applies to relevant residents (adult and children) with a physical mobility issue, or another disability such as having a sight or hearing impairment, or a cognitive condition. For those under 18 years of age, the resident's 'Representative' – or an individual with parental responsibility for the resident – may engage with residential PEEPs on the resident's behalf.

4.2 A representative may also assist adults with cognitive conditions who are unable to engage with Residential PEEPs as a result of their impairment. In this case, the Representative is: the individual with a lasting or enduring power of attorney in relation to the relevant resident; or a deputy appointed in relation to the relevant resident by Court of Protection. Some relevant residents with cognitive conditions will be able to engage with Residential PEEPs.

4.3 A Representative with regards to Residential PEEPs can provide instructions on:

- a) requesting a person-centred fire risk assessment;
- b) discussing mitigating measures and any costs;
- c) agreeing an approach to evacuation;
- d) consenting to the provision of information to Fire and Rescue Authorities;
- e) Requesting a review of the Residential PEEPs process.

4.4 References to the relevant resident in this guidance should be read as referring to the resident's Representative in cases where the resident is unable to engage with Residential PEEPs, in relation to the above matters that they can provide instructions on.

## **5. Trusted persons**

5.1 Some relevant residents may be able to cognitively engage with Residential PEEPs but may choose to delegate their engagement to a trusted person (e.g. a partner, carer, son or daughter). The RP may engage with the trusted person acting on behalf of the relevant resident, provided that the relevant resident is present during any conversation or other engagement the RP has with the trusted person as part of the Residential PEEPs process. The relevant resident themselves must, however, be the person who ultimately agrees to any measures to be implemented, the emergency evacuation statement, and explicitly consent in order for their relevant information to be shared with the Fire and Rescue Authority.

5.2 Where appropriate, the RP is encouraged to work collaboratively with staff they are aware are already involved with a relevant resident. In situations where the RP is informed that a resident is supported by a care provider in their own home (including people receiving care in a supported living or extra care setting), communication should be established to avoid overlap and that support is appropriate.

## **6. Identify relevant residents:**

### *RP responsibilities*

6.1 The RP must use reasonable endeavours to identify their relevant residents.

6.2 This should include: at the point where a new resident moves in; every twelve months thereafter as an annual reminder to all residents; and when an individual makes an approach. Other opportunities to identify relevant residents may also arise through other means (see the RP Toolkit).

6.3 RPs will know how best to engage the residents in their buildings, however some residents may be less easy to contact. Examples of approaches to identifying relevant residents can be found in the RP Toolkit. Organisations such as national disability support groups may also be able to offer suggestions on engaging with certain relevant residents and contacting harder-to-reach groups. And as appropriate, RPs are encouraged to work collaboratively with staff already involved with a relevant resident.

### *The resident's consent to participate*

6.4 The decision as to whether to participate in Residential PEEPs lies with the resident. The RP should give every opportunity for residents to come forward and should explain the fire safety benefits to residents; however, a resident cannot be compelled to engage with Residential PEEPs.

### *Record keeping*

6.5 It is recommended that the RP records decisions made during the Residential PEEPs process and cases where the Residential PEEPs process comes to an end. This includes, for example, instances where a relevant resident declines to engage with Residential

PEEPs, or where an RP has undertaken reasonable endeavours to contact a resident but contact has ultimately not been made.

## **7. Person-Centred Fire Risk Assessments and Emergency Evacuation Statements:**

### *RP responsibilities*

7.1 The RP must offer a Person-Centred Fire Risk Assessment (PCFRA) to each relevant resident they identify and, where the resident agrees, ensure the PCFRA is undertaken. When the RP offers a PCFRA, the resident's acceptance of that offer should be interpreted as a request for a PCFRA, for the purposes of regulation 6(1)(b).

7.2 The PCFRA must include<sup>4</sup> an assessment of:

- a) the risks relating to the relevant resident arising from their compromised ability to evacuate without assistance in the event of a fire, and
- b) any other risks to the resident as regards the building, in light of their cognitive or physical impairment.
- c) 'Risks' are those relating to safety from fire.

7.3 The PCFRA allows the resident to inform the RP what they can and cannot do with regards to the usual evacuation measures for the building (e.g. as set out in the Instructions to Residents required under the Fire Safety (England) Regulations 2022<sup>5</sup>). [The Toolkit](#) includes examples of approaches and checklists used by RPs to gather this information.

7.4 Following discussion with the resident, the RP must implement reasonable and proportionate measures to mitigate the risks identified during the PCFRA. In deciding whether a measure is reasonable and proportionate the RP will need to consider the feasibility and the impact of a proposed safety measure, taking into account factors such as the degree of risk to the relevant resident and others, the likely effectiveness of the

---

<sup>4</sup> See also paragraphs 7.8-7.9.

<sup>5</sup> Regulation 9 – Information to residents in Fire Safety (England) Regulations 2022

mitigation, its practicality, and the potential benefit to the safety of all building occupants, and cost.

7.5 Whether a measure is reasonable and proportionate may depend on who will bear the costs, i.e.:

- a) the RP
- b) the relevant resident
- c) or, where the measure benefits the majority, all the residents of the building.

7.6 For instance, in some circumstances it may be reasonable and proportionate to implement a measure on the basis that the relevant resident bears the cost, but not on the basis that the costs are to be shared by all residents or borne by the RP.

7.7 The RP must implement reasonable and proportionate measures. However, if it is reasonable and proportionate to expect the relevant resident to pay for a measure, the responsible person is not required to implement it if the resident declines to pay. If the resident agrees to pay costs but wishes to make the purchase themselves, the RP should confirm with the resident that the mitigation is appropriate. For example if the RP becomes aware of fire safety risks, such as a resident using evacuation equipment that does not meet UK safety standards, they must take proportionate steps to mitigate those risks. This may include requesting evidence of product compliance, verifying suitability for the resident's needs, and ensuring the equipment does not create new hazards in shared areas or evacuation routes.

7.8 The RP must use reasonable endeavours to agree with the relevant resident at the end of the PCFRA what they would do in the event of a fire. The PCFRA should provide all necessary information the RP and the resident need to consider this and for the resident to make their decision (see para 7.31 on the emergency evacuation statement, below).

7.9 The RP also has the responsibility under the Regulations to ensure this is written down as a clear statement, referred to as the emergency evacuation statement. The RP must also provide the relevant resident with a copy of the statement.

### Planned RP responsibilities in future legislation

7.10 Future primary legislation will be brought in as soon as possible which will require RPs, as part of the PCFRA under Residential PEEPs, to consider the fire safety risks within the relevant resident's domestic premises. This legislation will not extend other aspects of the Fire Safety Order into the domestic premises.

7.11 As this will become a legal requirement, it is recommended that RPs when conducting the PCFRA as part of Residential PEEPs include consideration of fire safety risks and mitigations within relevant residents' domestic premises, subject to the resident's agreement.

### Guidance on Person-Centred Fire Risk Assessments

7.12 The PCFRA helps identify fire safety risks to the resident, beyond the generic risks in the building's overall fire risk assessment, including barriers to evacuation, and subsequently helps identify potential suitable mitigating measures against these risks.

7.13 In offering a PCFRA, the RP should explain what the assessment includes and what personal information the relevant resident may need to share with the RP. The focus is on whether the resident faces additional, specific fire safety challenges to those faced by other residents (who would be able to follow the Instructions to Residents required under the Fire Safety (England) Regulations 2022). The assessment should also bear in mind the building's fire risk assessment, and the resident's ability to self-evacuate (i.e. to evacuate the building unaided or without assistance). The RP will need to gain a sufficient understanding to assess the risks relating to the premises in light of the resident's impairment or condition. However, there is no requirement in the regulations for the resident to share any medical records or specific information with the RP. Where information is shared, the RP must comply with data protection legislation.

- 7.14 If a resident has a temporary condition – a broken leg, for instance – then this may be taken into account in assessing whether it is reasonable and proportionate to provide mitigations.
- 7.15 The RP should consider the needs and capabilities of the relevant resident when carrying out the PCFRA and considering and implementing mitigating measures. For cognitively impaired residents, this consideration should be informed by the relevant resident’s ability to understand Residential PEEPs and what a PCFRA entails.
- 7.16 There is no requirement in these Regulations that a specialist is used to carry out the PCFRA, and for many RPs, the PCFRA is typically done by members of their staff. The usual process involves a conversation between the RP and the resident. RPs can find examples of PCFRAs, and the types of measures some RPs have considered reasonable and proportionate mitigations, in the [RP Toolkit](#).
- 7.17 Many RPs have well-developed PCFRA processes already in place, and in some cases these may be part of wider risk assessments and engagements with their residents. The PCFRA required by the Regulations can be incorporated within such an existing or wider assessment, so long as it includes the full assessment required by Regulation 6.
- 7.18 Where the RP is a resident management company or right to manage company then the resident directors should check with their insurance company to determine if they have any specific expectations or requirements of who should carry out this task. If necessary, they may wish to consider employing experts in fire safety matters and consider carrying out this work as part of meeting their wider fire safety responsibilities.
- 7.19 The PCFRA must consider if the relevant resident can support their own fire safety and evacuation – either alone or through the use of volunteers (such as family, friends or neighbours, or carers) where the relevant resident can source such volunteers and get their agreement to help. There is no duty on the RP to facilitate the use of volunteers, although they are able to do so if they choose to. We would be interested in hearing about new practices put in place concerning the use of volunteers, in order to

consider whether they could usefully be included in the RP Toolkit. RPs can contact the National Resilience and Fire Safety Unit with details of any such new practices at: [firesafetypolicy@communities.gov.uk](mailto:firesafetypolicy@communities.gov.uk).

7.20 The RP may also wish to seek advice from their local Fire and Rescue Authority.

7.21 The PCFRA is not intended to duplicate or repeat the building's fire risk assessment required under Article 9 of the Fire Safety Order. The PCFRA is specific to the relevant resident and considers the additional risks and needs identified relating to that resident.

7.22 Nonetheless it is possible that the PCFRA may identify the need for measures that should be considered by the building's fire risk assessment. The RP should satisfy themselves as to whether any measures identified by the PCFRA should already be provided in support of compliance with any existing provisions under the Fire Safety Order.

#### *Reasonable and proportionate measures*

7.23 The RP should implement measures in a reasonably timely manner. While the RP should discuss with the relevant resident what measures identified through their PCFRA could be implemented, it is only measures which are reasonable and proportionate, which must be implemented. An exception to the duty to implement the measures determined as reasonable and proportionate, is that, where a measure is reasonable and proportionate to take but on the basis that the relevant resident will pay for it, the measure will not be put in place if the relevant resident declines to pay.

7.24 Noting that the assessment will be context-specific, it is extremely unlikely that the following would be assessed as reasonable and proportionate:

- a) a relevant resident request for implementation of an in-flat measure that compromises compartmentation in the building (as this creates a disproportionate new risk);

- b) a relevant resident request to implement a measure in the common areas which may either have a negative impact on others who use the common areas, or may result in an excessive increase in service charges. The RP should consider carefully each request from a relevant resident of this nature on a case-by-case basis, considering both the practical impact as well as the legal rights of the other leaseholders;
- c) an RP employing paid staff with the primary purpose of supporting evacuation under Residential PEEPs (such as a Waking Watch type arrangement).
- d) The RP Toolkit provides a range of examples of measures which RPs have found to be reasonable and proportionate in their buildings.

7.25 Residential PEEPs does not override existing leaseholder rights. A proposed mitigation is unlikely to be reasonable and proportionate if it impinges on another leaseholder's rights, without that leaseholder agreeing to the mitigation. Further, where mitigation measures may well be possible, and desirable, but require lease variations, these could only be done by agreement with the leaseholder. An example might be where a potential mitigation impinged on the parking place of another leaseholder under their lease. Where such cases arise, RPs are encouraged to engage constructively with relevant leaseholders to address the issue.

7.26 RPs can find examples of PCFRAs, and the types of measures some RPs have considered reasonable and proportionate mitigations, in the RP Toolkit.

### Costs

7.27 Who pays for costs, will form part of the assessment as to whether a measure would be reasonable and proportionate. The RP should consider:

- a) **If they, the RP, can meet the costs.** Some RPs pay for certain measures themselves; Residential PEEPs will not affect this and so this will remain a potential option for some RPs.
- b) If the RP is a social housing provider, they should follow additional guidance in relation to the Residential PEEPs Social Housing Fund. In the case of social housing

providers and housing associations supported by this Fund, costs should not fall to the social housing renter.

- c) **If all residents should pay.** Costs for implementing measures, which are specific to the outcomes of the PCFRA and are not already required by other legislation, can only fall to all residents where the majority of those residents in the building at the time will benefit and where leases allow. It must also be reasonable and proportionate to take the measure on a basis where costs fall to all residents.).
- d) **If the relevant resident should pay.** This is likely to be in cases where the RP opts not to pay for the measure themselves (i.e. it is not reasonable and proportionate to take the measure on this basis), and determines that the relevant resident is the only person who will benefit from the measure. The RP should also consider if the resident may be eligible for means-tested disabled facilities grant (DFG) support, which may cover some capital costs for measures which improve access to and safe use of premises where these meet the DFG criteria.
- e) If the RP considers a mitigation would be reasonable and proportionate on the basis that the relevant resident pays the costs, the resident has the right to decline to pay and the measure would not be implemented. This means there is no possibility that, having engaged with the Residential PEEPs process, the resident is obliged to pay costs.

7.28 The RP may consider that where costs should fall, considering what is reasonable and proportionate, may differ depending on the length of stay. For example, in the case of a long-term resident, an RP may have a policy of paying certain costs themselves, or passing certain costs on to all residents; in the case of a shorter-term resident, however, the RP may have a policy of requiring the shorter-term resident to pay for any mitigating measures identified.

7.29 Residents have the right to challenge any costs they need to pay through a variable service charge, and deem unreasonable, through existing leaseholder law mechanisms, namely, through submitting an application to the First-Tier Tribunal (Property Chamber). In cases where potential mitigating measures have been identified for a subletting tenant who has undergone Residential PEEPs, and the costs do not fall to either the RP

or to the overall service charge, then the RP may reasonably request that costs are a matter for the leaseholder and tenant to discuss. For example, the leaseholder may decide to seek coverage of these costs from the tenant and, if the tenant decides not to pay, the leaseholder is not obliged to cover the costs and implement the mitigating measure.

7.30 The duties imposed by the Regulations are on the RP, however it is recognised that in the case where a resident funds a mitigation, they may choose to source it themselves. In that case, the RP is advised to confirm with the resident that they are taking steps to confirm that any kit bought is practical and safe in the circumstances. The RP has wider duties of fire and building safety, and will need to be assured that any mitigation sourced by the resident does not, for example, compromise the RP duty under the Fire Safety Order section 14(1) to ensure that emergency routes and exits are kept clear at all times.

#### Recording the emergency evacuation statement

7.31 Recording the emergency evacuation statement which is one outcome of the PCFRA can be kept in line with established practice for other resident-RP arrangements. While there is no prescribed format for the evacuation statement, apart from the fact it must be in writing, it is recommended that this is a short, clear statement of what the resident has agreed to do in the event of a fire affecting them. It should also include, for example, any arrangement the resident makes with a neighbour to provide support. The RP must provide the resident with a copy of the statement. The requirement for recording an evacuation statement is not dependent on mitigations being put in place.

#### The resident's consent to the person-centred fire risk assessment

7.32 As with the rest of the Residential PEEPs process, the resident's consent is required. The PCFRA can only be undertaken with the resident's consent; if the cost to implement a measure falls to the resident, it can only be implemented if the resident consents to pay; and an evacuation statement can only be produced if the resident agrees with the

RP on what they should do in the event of a fire. The resident may withdraw their consent to share information or participate in the PCFRA process at any time.

### Record keeping

7.33 It is recommended that the RP records the outcomes of the PCFRA. This includes their decision-making process in arriving at measures to mitigate risks and cases where an evacuation statement could not be agreed.

### Summary of the person-centred fire risk assessment process and resultant emergency evacuation statement

7.34 The steps regarding the PCFRA process and resultant emergency evacuation statement, set out in Regulations 6-8 and noted above, are in practice likely to revolve around a single conversation or meeting: the RP will approach the relevant resident, the conversation will identify their specific risks and potential mitigations, and therefore what the resident should best do in the event of a fire. The RP can discuss with the resident and explain to them their assessment of which mitigations are reasonable and proportionate to take forward, and where costs for these would fall.

7.35 Examples of the PCFRA process are given in the RP Toolkit.

## **8. Reviewing Residential PEEPs and emergency evacuation statements:**

### RP responsibilities

8.1 The RP must review elements of the Residential PEEPs process (including the PCFRA, mitigating measures and emergency evacuation statement):

- a) no later than 12 months after the emergency evacuation statement is first recorded, or, where no statement is agreed, the PCFRA is carried out, and before the end of every period of 12 months thereafter;

- b) if there is reason to believe the PCFRA or emergency evacuation statement requires amending or updating; for example, if there are major changes to the building which the RP believes would have an impact. (In this case, the 12 month next review requirement would commence from the date of this review).
- c) at the reasonable request of a relevant resident; for example, if their condition had changed. (The 12 month next review requirement would again commence from the date of this review).

The RP should also review the Residential PEEPs process, where tested, following any planned fire drills or emergency incidents to ensure the process worked as expected and to review where improvements could be made. This is particularly important if mitigation measures did not function as expected.

8.2 The RP should encourage residents to come forward if their mobility or other impairment substantially changes and they wish to revisit the Residential PEEP process.

## **9. Sharing information with the local Fire and Rescue Authority:**

### *RP responsibilities*

9.1 The RP must share the following prescribed information on all relevant residents with their local Fire and Rescue Authority, subject to the explicit agreement of each relevant resident to this information being shared:

- a) the resident's flat number;
- b) the resident's floor number;
- c) basic information regarding the degree of assistance that the resident may require to evacuate the building – examples of approaches are included in the RP Toolkit;
- d) Whether the resident has an emergency evacuation statement.

9.2 The sharing of this information applies to all relevant residents who engage in the Residential PEEPs process, including those who have identified measures to support their evacuation. This is because a relevant resident's arrangements may not be

successful on the day (if, for example, the relevant resident's arrangement is to evacuate the building with the support of a volunteer such as a neighbour, but that neighbour is unavailable to provide support that day); therefore, the local Fire and Rescue Authority should be made aware of the flat where the relevant resident lives.

9.3 Fire and Rescue Services often have a short amount of time to mount an operational response on arrival at an incident. The RP must make available to the local Fire and Rescue Authority a limited but accessible and useful set of information, as listed above, on relevant residents; this should be concise enough to be understood by the FRS in an emergency situation and inform the operational response to a fire emergency, including their evacuation or rescue of relevant residents where needed. In addition, RPs are encouraged to ensure that any resident who has taken part in the RPEEPs process is clearly informed of the importance of communicating this information to fire control if they make an emergency call.

#### Personal information

9.4 The prescribed information identifies the relevant resident's flat in the building and includes basic information on the degree of assistance the resident may require to evacuate the building, and whether they have an emergency evacuation statement. The RP should only record the minimal and necessary information to share with the local Fire and Rescue Authority, and must comply with overarching data protection legislative requirements<sup>6</sup>. The RP Toolkit gives examples of approaches taken by RPs to sharing information.

9.5 The RP should explain the potential benefits of sharing concise information with the Fire and Rescue Services (such as useful operational information to support evacuation). The resident should also be made aware of the potential risks involved in sharing information (such as potential unauthorised access to data).

---

<sup>6</sup> ICO Guidance for organisations is available at [For organisations | ICO](#)

### The resident's consent

9.6 Sharing of information collected for the purposes of these Regulations can only be done with the explicit informed consent of the resident.

9.7 The RP should explain to the resident that refusing to give consent does not mean the local Fire and Rescue Service would not evacuate or rescue them if needed; it means that the local Fire and Rescue Service will not have information signposting them to the resident's specific flat location or the level of assistance the resident may require to leave the building.

9.8 The resident is free to withdraw their consent to sharing information with the local Fire and Rescue Authority.

9.9 Some RPs may identify residents they consider relevant through other engagements not connected with Residential PEEPs. Sharing of information with the local Fire and Rescue Authority to meet the purposes of these Regulations can only be done with the resident's explicit consent and must comply with data protection requirements.

### Digital vs hard copy format sharing of information

9.10 The prescribed information can be shared either digitally or in hard copy format in a secure information box on-site, and it is for the local Fire and Rescue Authority to determine in which format it should be provided by the RP.

9.11 The preference is for the prescribed information to be shared digitally rather than in hard copy format with the local Fire and Rescue Authority, because it is easier and quicker to update digital information rather than physical information in a secure information box. Examples of different approaches are in the RP Toolkit, including an example where a council RP has arranged for the local Fire and Rescue Service to have access to their own recording system on the day for the purposes of the emergency,

thus avoiding keeping information in a physical box, while avoiding the need for the Fire and Rescue Authority to manage information which may be updated frequently.

9.12 The RP should contact their local Fire and Rescue Authority before sharing information, to ask whether they want to access the information digitally in advance of any incident or in hard format in an on-site secure information box which they will access when they attend an incident. (RPs should first check the relevant FRS's website to see whether it specifies a preference.) If a secure information box is not installed and the local Fire and Rescue Authority opts for the information to be in a hard copy format in a secure information box, then the RP must install and maintain a secure information box for this purpose. It is expected that any local Fire and Rescue Authority currently preferring information to be shared physically via a secure information box on-site will work towards accepting digitally shared information in the future.

9.13 The sharing of information must be done in line with the provisions of the Data Protection Act 1998 and UK General Data Protection Regulation. Both the RP and the Fire and Rescue Authority need to ensure the safety of the data. RPs may want to consider "coding" the data, for instance encrypting or colour coding, so that it is not intelligible to anyone who gains unauthorised access to it. In the event that the local Fire and Rescue Authority chooses to have the information shared with them via a secure information box, the RP must ensure the box complies with Regulation 4 of the Fire Safety (England) Regulations 2022.

9.14 The Regulations amend the Fire Safety (England) Regulations 2022 to create a requirement that the secure information box must be capable of containing the documents required by the Regulations to be placed in it: i.e. the mandatory information shared with the local Fire and Rescue Authority, as well as the Building Emergency Evacuation Plan (see below).

*Fire and Rescue Authorities requesting further information from RPs*

9.15 Fire and Rescue Authorities may consider asking for further information (beyond what has been prescribed above) digitally from the RP where they consider this would help inform the operational response, including any evacuation, and where the resident consents. There is no legal requirement on the RP to digitally share any further information beyond what has been prescribed, however, if requested by their local Fire and Rescue Authority to do so, they are expected to consider the case and the potential benefit, and their own data protection obligations.

9.16 In the event of a fire, the local Fire and Rescue Service will fight the fire, and where necessary use the information provided on residents to assist their operational plan which may include the initiation of evacuation of parts or whole of the building or otherwise undertake the evacuation or rescue of relevant residents as required.

## **10. Preparing Building Emergency Evacuation Plans:**

### *RP responsibilities*

10.1 The RP of a building in scope of the Regulations must prepare a separate building emergency evacuation plan, share this plan with their local Fire and Rescue Authority and – in the event the building has a secure information box – place a copy of the plan in the box.

10.2 The RP must review the building emergency evacuation plan no later than 12 months after the plan is first prepared, and before the end of every period of 12 months thereafter; as well as when there is reason to believe the plan needs updating. If the plan is updated or amended as a result of this review, then as soon as reasonably practicable the RP must: share the amended or updated plan with the local Fire and Rescue Authority; and, in the event the building has a secure information box, place a copy of the amended/updated plan in the box.

### *Required information in the Building Emergency Evacuation Plan*

10.3 This plan must include:

- a) a copy of the instructions to residents as required under regulation 9(2)(b)(i) of the Fire Safety (England) Regulations 2022<sup>7</sup>
- b) whether there are relevant residents
- c) information on any other arrangements for evacuating the building, for example if an Evacuation Alert System has been included, as recommended for new 18m+ buildings under the guidance to the Building Regulations 2010 within 'Approved Document B'.

The Plan will need to be aligned with the Fire Risk Assessment for the property.

10.4 An example of a simple building emergency evacuation plan is as follows:

*This building is under a Stay Put evacuation strategy. It has x flats across y floors. Residents have been told to do x in the event of a fire via the 'instructions to residents'. There are relevant residents in the building. See further Residential PEEPs information in the box for information on the location of flats housing relevant residents.*

10.5 The building emergency evacuation plan should also include any broader measures implemented as a result of Residential PEEPs – these are measures that are implemented as a result of Residential PEEPs but that benefit multiple residents as opposed to one individual relevant resident. Such measures might include, for instance, handrails or signage.

10.6 The building emergency evacuation plan may include further relevant information beyond the matters noted above. For example, in those cases where a building has an evacuation lift, it should set out how that is intended to be used in the event of a fire. Where RPs have developed plans or protocols for the use of evacuation lifts in their

---

<sup>7</sup> This requires the Responsible Person to provide instructions relating to the evacuation strategy for the building. The evacuation strategy is determined by the building's overall Fire Risk Assessment. - [Fire safety: Approved Document B - GOV.UK](#)

evacuation plans, or FRS have advised on these, we would be interested in hearing about these, for potential inclusion in the RP Toolkit.

10.7 The RP may combine the building emergency evacuation plan with the floor plans and/or building plan required under Regulation 6 of the Fire Safety (England) Regulations 2022.

## **11. Enforcement of Residential PEEPs**

11.1 Enforcing authorities under the Fire Safety Order, such as Fire and Rescue Authorities, have the power to enforce RPs' compliance with their duties. The local Fire and Rescue Authority could, for example, during an inspection look at the process the RP has in place to undertake Residential PEEPs. An enforcement notice (under Article 30 of the Fire Safety Order) could be served in the event of non-compliance with any provision under the Fire Safety Order, and any regulations made under it, such as these regulations. Further, while the RPEEPs process is regulated under the Fire Safety Order, for a high rise residential building the consequences of failing to put an effective process in place may give rise to a failure of an Accountable Person to perform duties under the Building Safety Act 2022, and where this is the case, residents would be able to raise concerns about the building emergency evacuation plan and Residential PEEPs process through the Residents Voice process.

11.2 There is no expectation that a local Fire and Rescue Authority or the Residents Voice process would arbitrate in any disagreement between the RP and a resident. In such cases, the matter should be referred to the appropriate dispute resolution process, such as the landlord's complaints procedure, an ombudsman service, or relevant housing authority.

## **12. RP Toolkit**

12.1 The RP Toolkit is a resource provided to support RPs on their thinking about potential interventions and strategies to support the fire safety of their relevant residents. The RP

Toolkit is accessible to all RPs, even if the RP's building falls outside the scope of the Residential PEEPs proposals.

12.2 The RP Toolkit includes examples of real-life, sustained initiatives that some RPs have already successfully put in place across their buildings, which others may wish to consider for deployment in their own buildings. The Toolkit examples derive from RPs who have differing numbers of staff, resources and finances, therefore providing a range of potentially feasible options for RPs to consider. Each case study focuses on one particular area of strength. The Toolkit also includes examples of resources that are currently being used proactively by other RPs such as person-centred fire risk assessments, risk assessment forms and common area measures such as signage. RPs using the Toolkit can therefore consider whether their own residents would benefit from the use or adaptation of such resources.

12.3 The intention going forward is to add to the Toolkit as more examples become available, so that RPs and residents can benefit from a wider range of examples as these are developed and successfully put into practice. We are also interested in including examples where RPs have successfully supported residents using volunteers to aid their evacuation, as such cases were not provided in response to the calls for evidence submitted to the 2022 EEIS+ Consultation. We will invite further contributions to the Toolkit with a view to updating it in a subsequent edition as new practices are developed and embedded at the local level.

### **13. Sharing examples of good practice**

13.1 RPs take different approaches and measures to improve the fire safety of relevant residents, as evidenced in the RP Toolkit which provides examples of measures that RPs have implemented. This is beneficial not only for new RPs entering the sector but also for current RPs, as the RP Toolkit provides them with a range of different initiatives that they can draw on in their work to improve the fire safety of their residents.

13.2 RPs developing and embedding new practices that are not encompassed within the Toolkit are encouraged to share details of these practices with the department. This will allow consideration of whether these should be included in the RP Toolkit and so shared with a wider audience of RPs. RPs can contact the Fire Safety Policy team in the department at: [firesafetypolicy@communities.gov.uk](mailto:firesafetypolicy@communities.gov.uk).