



Status of PEEPs in Higher Risk Residential Blocks

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Lest We Forget: 14th June 2017

37 disabled residents lived in Grenfell Tower.

None had Personal Emergency Evacuation Plans (PEEPs) in place.

RBKC/TMO fully aware that 17 of the residents who died were disabled and were unable to evacuate without assistance¹.

¹ Source: [GTI Phase 2 Report Volume 6 Part 9](#)



Grenfell Tower Inquiry Recommendation

Recommendation 33.22(e):

"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)."

Lord Greenhalgh, Building Safety Minister, stated:

“On practicality, how can you evacuate a mobility-impaired person from a tall building before the professionals from the fire and rescue service arrive?”

“On proportionality, how much is it reasonable to spend to do this at the same time as we seek to protect residents and taxpayers from excessive costs?”

“On safety, how can you ensure that an evacuation of mobility-impaired people is carried out in a way that does not hinder others in evacuating or the fire service in fighting the fire.”

16.1 million people with a long-term, substantial impairment

24% of the UK population

| | | | |
|---------------------|---------------|-------------------------|--------------------|
| Respiratory Disease | 12 million | Mobility Issues | 11 million |
| Mental Health | 11 million/yr | Arthritis or similar | 10 million |
| Deaf/hard hearing | 11 million | Neurodiverse | 10.3 million |
| Diabetes | 3.9 million | Dyslexia | 6.3 million |
| Living with Cancer | 3 million | Osteoporosis | 3 million |
| Heart Disease | 2.3 million | Sight loss | 2.5/3 million |
| Stroke Survivors | 1.3 million | Morbidly Obese | 1.4 million |
| Dementia | 920,000 | Wheelchair Users | 1.2 million |
| Epilepsy | 600,000 | Hip/knee ops /yr | 160,000 |
| Parkinson's Disease | 145,000 | Spinal Injury | 50,000 |

Emergency Evacuation Information Sharing Plus (EEIS+) Consultation

Conclusion 3

“There is no evidence that RPs have been able to broadly implement workplace-type PEEPs that are practical, proportionate or safe, in a way that allows a person to evacuate a building unassisted in a residential setting.”

Practical and Safe

Royal Borough of Kensington & Chelsea Council (RBKC)

- Every resident who requires a PEEP offered one
- Annual letters sent to 5,734 general needs homes
- Residents encouraged to self-identify
- Family members, care staff and willing neighbours act as buddies

Practical and Safe

Lambeth Council

- Developed 2,529 PEEPS since 2017
- Up to date for those with short term conditions such as lower limb injuries, late-stage pregnancies as well as those with long term vulnerabilities and with oxygen.

Practical and Safe: Public Sector

Southwark Council

East Suffolk Council

Flintshire County Council

Thanet Council

Stevenage Borough Council

LB Hammersmith & Fulham

Croydon Council

Brent Council

Westminster City Council

Bromsgrove District Council

Stevenage Borough Council

LB Waltham & Forest

Portsmouth City Council

Brent Council

Rotherham Metropolitan Borough
Council

Norfolk County Council

Southampton City Council

Lancaster City Council

Practical and Safe: Housing Associations

One Housing

The Riverside Group

Sovereign Network Group

Metropolitan Thames Valley

Origan Housing

Southlake Housing

Sutton Housing Partnership

Gateway Housing Association

Islington & Shoreditch Housing

Westward Housing

Alpha Housing Services Ltd

Red Kite Community Housing

Tower Hamlets Community Housing

Shepherds Bush Housing
Association

Platform Housing Group

Gateway Housing Association

Solihull Community Housing

Conclusion 5

“The scope of Residential PEEPs will go beyond that of the consultation. Regulations will mandate Residential PEEPs for all high-rise residential buildings and for residential buildings between 11 metres and 18 metres with simultaneous evacuation strategies in place.”

Conclusion 5

“...The consultation Impact Assessment shows the potential for high costs if the mandated requirement was extended beyond high-rise buildings, and costs would significantly increase if all 1.7 million multi-occupied residential buildings covered under the Fire Safety Order were in scope. At this stage, the additional costs are considered to be disproportionate.”

Proportionate: The Cost of a Life

PEEPs Consultation Impact Assessment 8th June 2021²

| | |
|--|---------|
| Gross hourly wage of an RP | £20.68 |
| NFCC estimate of time to develop a PEEPs | 2 hours |
| Total cost to develop a PEEP | £41.36 |

² Source: [Personal Emergency Evacuation Plans Consultation Impact Assessment, The Home Office, 8th June 2021](#)

Proportionate: The Cost of a Life

Applying the costs to RBKC/TMO for PEEPs for the 37 disabled residents of Grenfell Tower:

| | |
|--------------------------------------|--------|
| Total direct costs to develop a PEEP | £1,530 |
| Service charge cost per month/flat | £12.75 |

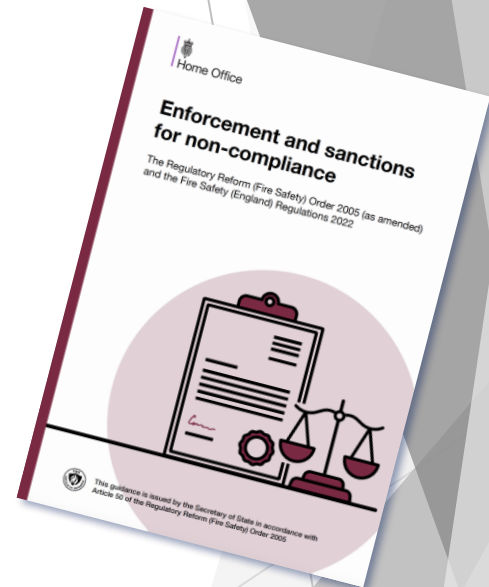
Conclusion 7

“.....We will therefore mandate RPs to undertake reasonable steps to identify vulnerable residents and take a ‘reasonable endeavours’ approach to follow through with that identification if contact is not easily established, while leaving the final decision on whether to come forward with the residents themselves..”

Fire Safety Order: Key Articles

Article 14: Emergency Routes and Exits

“in the event of danger, it must be possible for persons to evacuate the premises as quickly and as safely as possible”.



Fire Safety Order: Key Articles

Article 15: Emergency Procedures

“establish and, where necessary, give effect to appropriate procedures, including safety drills, to be followed in the event of serious and imminent danger to relevant persons;”

“nominate a sufficient number of competent persons to implement those procedures in so far as they relate to the evacuation of relevant persons from the premises”

Conclusion 8

“We will mandate the Person-Centred Fire Risk Assessment process in Regulation, while allowing RPs the flexibility to continue with existing processes as appropriate and adapted for their local circumstances and resident populations.”

PEEPs versus PcFRAs

A **PEEP** is a tailored strategy designed to provide safe evacuation procedures for individuals who may need assistance during an emergency.

A **Person-Centred Fire Risk Assessment (PCFRAs)** proactively identifies hazards and develops protective strategies to minimize risk.

Note: A PcFRA on its' own does not meet the requirements of the FSO.

Conclusion 8

*“d)implementation of reasonable and proportionate measures to support the fire safety and evacuation of the resident, noting the limitations in Conclusion 11 below - **this could include the use of family members, neighbours or other volunteers where the resident themselves can make the arrangement; and***

Conclusion 9

”The use of volunteers to support evacuation, e.g. neighbours or family, should be considered as part of the Person-Centred Fire Risk Assessment, and it would be for the resident to source and get their agreement to help.”

Conclusion 9

”A particular concern was how far a resident or RP could reasonably rely on a volunteer, and it is notable that the relatively few examples identified through the consultation calls for evidence are all resident-determined rather than involving the RP.”

Conclusion 10

”....The Fire Safety Order approach that the RP is ultimately responsible and that the decision on which measures will be implemented remains with them, excepting that in the general case a resident will make the decision whether or not to implement a measure within their flat which it has been determined is for them to pay for”

Equality Act 2010

For service providers, those exercising public functions and associations, the requirements are:

- to take reasonable steps to avoid any substantial disadvantage that a provision, criterion or practice creates for disabled people (s.20(3))
- to take reasonable steps to avoid any substantial disadvantage that a physical feature creates for disabled people, or adopt a reasonable alternative (s.20(4)), and
- **to provide an auxiliary aid where not doing so puts disabled people at a substantial disadvantage (s.20(5))**

Equality Act 2010: LGA EEIS+ Consultation Response

“We go further and say that social landlords are in law under an obligation already to consider what reasonable adjustments can be made to ensure those residents who, because of disability, cannot self-evacuate, can do so in buildings with a stay put evacuation strategy (in such buildings the advice to residents is to leave the building if the fire is in their flat or threatens them).”

“This means that they are under an anticipatory duty to consider the requirements of their disabled residents without those residents having to ask.”

“Treating disabled residents differently in buildings of different height is likely to be unsustainable in the face of legal challenge under equality law.”

Conclusion 13

*”In the event of a fire, the FRS will fight the fire, **and undertake the evacuation** and rescue of vulnerable residents. To support FRSs in carrying out these emergency evacuations, we will require, in Regulation, specific information on all vulnerable residents in in-scope buildings to be made available by RPs to their local FRS. This will be supported by Article 50 guidance.”*

NFCC PIB Code of Practice³

“Category 1 (Red):

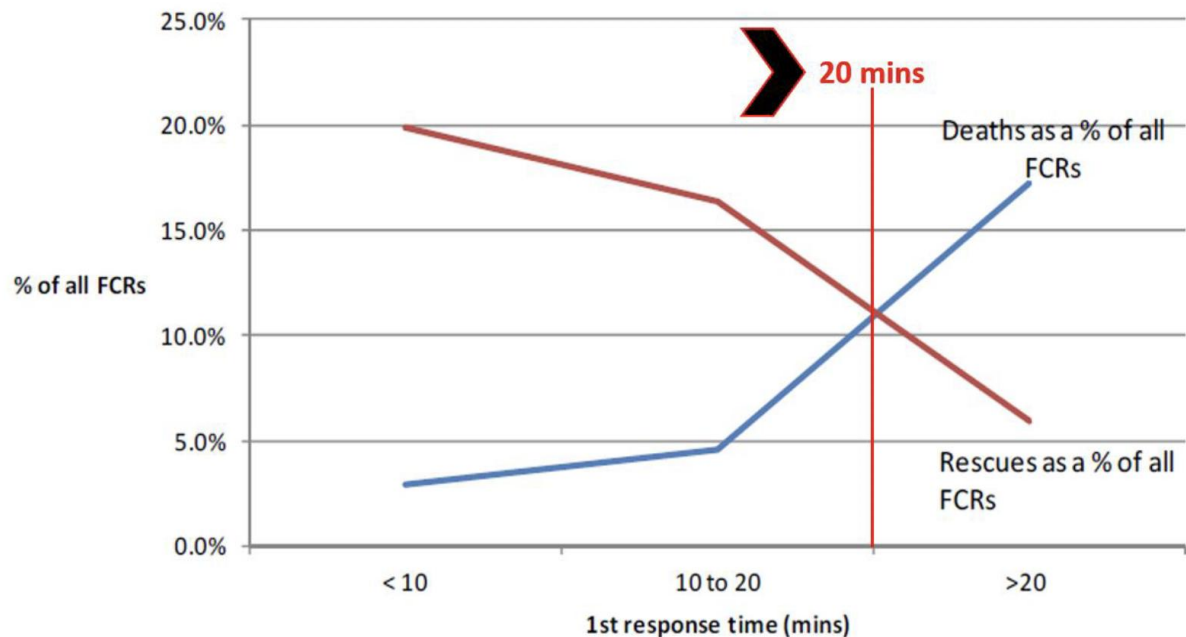
3 or more fire-fighters and/or additional equipment required for a bariatric person or a wheelchair user; someone who requires a stretcher; someone medical equipment with them.

Category 2 (Amber)

2 or less fire-fighters with no additional equipment required for a person with a mobility impairment, blind, partially sighted, hearing impairment or cognitive impairment.”

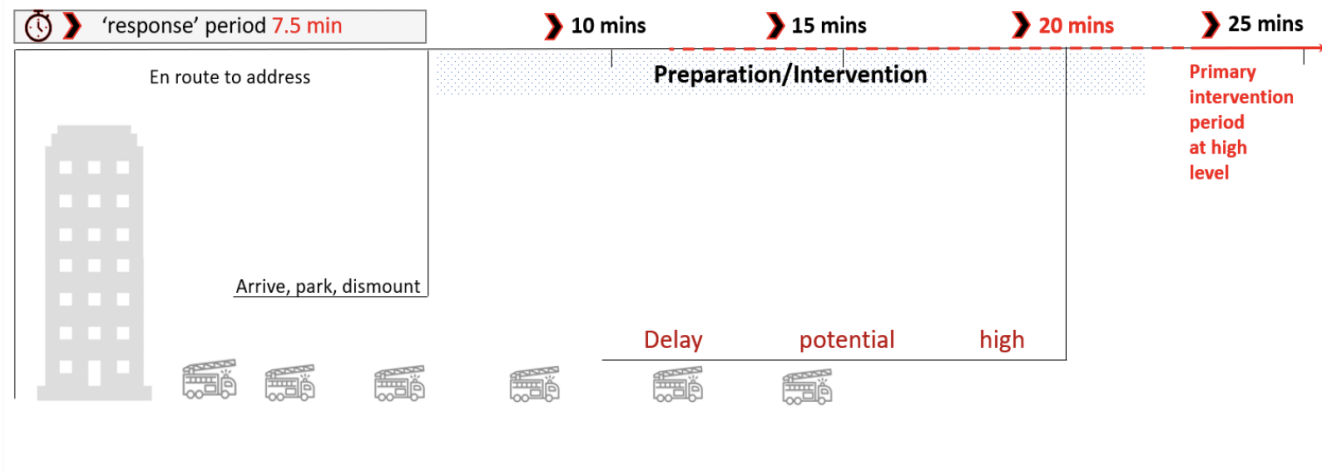
³ Source: [NFCC Premise Information Box Code of Practice Appendix A Section 1.8](#)²⁸

Figure 3.3²¹: Percent of Fatalities, Casualties (all grades) and Rescues (FCRs) that die versus percent that are rescued, against response time



The Fire Risks of Purpose-Built Blocks of Flats: An Exploration of Official Fire Incident Data in England by the University of Leeds & Phil Murphy June 2021⁴

Figure 3.5: Firefighting response and intervention timeline for fires to blocks of flats



⁴Source: [Research Document](#)

Evidence of Competency: Training⁵

Institution of Fire Engineers (IFE) Recognised

Foundation Course

Strategic Planning

Practical PEEPs

PEEPs & Neurodiversity

PEEPs & Specialised Housing



⁵ Source: [Triple A Solutions Training](#)

Grenfell Tower Testimony Week

On the final day, the survivors and families of those who died faced the defendants and said:

“You might not have been in charge at the time of the fire, but what have you done to change?”

And yet, seven years later.....

Millions of disabled residents still live in residential buildings with no means of escape even from a fire in the vicinity.

As an industry, we must do better.



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