



Anne Clarke AM
Chair of the Fire, Resilience and Emergency Planning Committee

(by email)

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Open Consultation: Emergency Evacuation Information Sharing (EEIS)+

I am writing as Chair of the London Assembly Fire, Resilience and Emergency Planning Committee. Please accept this letter as the Committee's response to the EEIS consultation.

The Government has undertaken two consultations in response to the following recommendations made in the Grenfell Tower Inquiry Phase One report in paragraph 33.22:

- 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.

The first consultation, setting out then Government thinking and asking for views, ran from 8 June 2021 and closed on 19 July 2021. The evidence from that first consultation led to the development of the Government's current proposal for an alternative package of initiatives that supports the fire safety of residents whose ability to self-evacuate may be compromised. The Government response to the first consultation concluded that:

“a large majority of respondents support the proposal to require the Responsible Person (RP) to prepare a PEEP for every resident who self-identifies to them as unable to self-evacuate and do so in consultation with the residents backed the requirement for PEEPs.”¹

However, when asked to elaborate individuals and organisations identified: *“significant concerns over the proportionality, the practicality, and the fire safety case for PEEPs in all high-rise residential buildings.”²*

It is these concerns that have prompted the second consultation on an alternative proposal - EEIS - with information sharing based on a Person-Centred Fire Risk Assessment (PCFRA) which would apply only to residential blocks with a simultaneous evacuation strategy. This would require the RP to ask residents to self-identify if they feel they would need assistance to evacuate and offer them a PCFRA. The RP would then liaise with their local fire and rescue service to have a fire safety home visit done and then review PCFRA if it was agreed the resident would still require assistance to evacuate.

The Committee discussed the Grenfell Tower Inquiry recommendation for PEEPs at our meeting in May this year with the London Fire Commissioner (LFC), Andy Roe. This session pre-dated the Government’s consultation on EEIS. Andy Roe said then:

“We are [setting up a forum with disabled leaseholders] around personal emergency evacuation plans (PEEPs), which is going to be a very difficult area of analysis and I expect to bring it back to this Committee. We will do the hard miles by sitting with disabled residents in London and listening to what they need and want.”³

The London Fire Brigade (LFB) is doing this engagement as part of its work on developing a Community Risk Management Plan and to inform its response to this consultation. We recommend the Government considers this evidence as this will provide the view of those directly impacted by the proposals for EEIS.

The Committee heard previously from the LFC in its meeting held on 22 February about the Grenfell Tower Inquiry recommendations for PEEPs to be available to the Brigade for vulnerable residents of high rise residential buildings. He acknowledged that there would be practical difficulties in implementing the recommendation due to the scale of high-rise residential buildings in London. However, he told the Committee:

“I know that when we turn up at a fire in a medium-rise or high-rise block, I need my firefighters to have the information immediately to hand on where disabled and vulnerable residents live so that we can plan, in a moment of crisis, for how we will best prioritise them. That is slightly different from a specific evacuation plan, but that has to exist as a baseline.”⁴

He went on to say:

¹ Gov.uk, [Government response to PEEPs consultation](#), 13 June 2022

² *ibid*

³ [London Assembly Fire, Resilience and Emergency Planning Committee Transcript](#), pgs 18, 25 May 2022

⁴ [London Assembly Fire, Resilience and Emergency Planning Committee Transcript](#), page 21, 22 February 2022

“For the very most vulnerable – and ... I spoke on this to the Inquiry, it is in the public realm - what LFB and NFCC (National Fire Chiefs Council) believe is that for the most vulnerable in the highest risk blocks - for example, the 1,000 blocks in London that still have a simultaneous evacuation policy in place - they should have a PEEP in the highest risk buildings, alongside information on all vulnerable residents generally encoded inside a premises’ information block on all residential high-rises.”

The Committee backs the LFC’s call for this information to be accessible by firefighters on attending a fire. Providing this within the premises’ information box seems the most practical means of ensuring LFB access as this already must contain key information on the building for firefighters when they arrive at an incident. However, if the Government can develop an alternative electronic system for delivering the information this would be acceptable. However, there should not be a time delay waiting for an electronic solution to be developed. It is now over five years since the Grenfell Tower fire and yet these two recommendations remain outstanding despite the knowledge that 41 per cent of Grenfell Tower residents living with disabilities died in the fire.

The Committee considers it essential that disabled and other vulnerable residents of multi-storey buildings have confidence that information on their needs will be readily accessible to the fire and rescue services in the event of fire breaking out. In addition, the Committee believes it is important that it is recognised that the needs of disabled people are highly individual, and may or may not be specifically linked to their disability (for example, a language barrier), and can change over time. Therefore, there should be scope for ongoing communication and consultation between disabled people and fire & rescue services, and, where appropriate or necessary, third parties, such as interpreters or carers.

The Committee has concerns about your proposal that RPs would offer PCFRAs to residents (who self-identify) only in buildings with simultaneous evacuation strategies. Our concerns are twofold:

1. This would mean fire and rescue services would only have very limited information on residents with disabilities living in multi-storey buildings. If a fire occurred in any multi-storey building other than one with known fire safety failings, this information would not exist. Firefighters arriving on scene would have no more information available to them than at Grenfell Tower. This seems a high risk strategy that is wholly dependent on a fire not being able to spread in buildings that have not been identified – by the RP - as needing a simultaneous evacuation strategy. In your response to the initial consultation you state that residents strongly opposed including imposing a simultaneous evacuation strategy and that 70 per cent of responses supported information on evacuation being provided for all buildings over 11 metres in height. It is unclear to the Committee why you are proposing to limit EEIS to only the known highest risk buildings.
2. The offer of a PCFRA by the RP would initiate a fire home safety visit by the fire brigade. The Committee is concerned that linking this to a home fire safety visit would in effect transfer responsibility from building ROs to the LFB. This is not acceptable. The LFB is stretching its resources to deliver a significant Transformation Programme to deliver on the recommendations from the GTI Phase One report and the HMICFRS report. The Brigade has been criticised by the London Assembly for drawing down on its reserves to meet the gap in its budget arising from this significant amount of work. Any Government proposal that would result in additional work falling to the Brigade would need to be fully funded by central Government.

The consultation also includes a call for evidence for examples of practical, proportionate and safe PEEPs and other fire safety initiatives being undertaken in residential settings that meet these criteria. The Committee has no contribution to make to this call for evidence as we consider this is best addressed by LFB and others with direct operational responsibilities and experience to draw on.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Anne Clarke', is positioned above a light blue horizontal line.

Anne Clarke AM

Chair of the Fire, Resilience and Emergency Planning Committee