



LONDON FIRE BRIGADE

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Request:

Please can you provide a copy of your full response to the Government's EEIS+ Consultation 2022, including the detailed answers to all the 18 questions.

Response:

Please find attached copy of the LFB Emergency Evacuation and Information Sharing consultation response dated 12 August 2022.

Personal data has been removed from the attached document under [section 40 of the FOIA – Personal Information](#).

We have dealt with your request under the Freedom of Information Act 2000. For more information about this process please see the guidance we publish about making a request [on our website](#).

12 August 2022

Emergency Evacuation and Information Sharing

Home Office

Introduction

London Fire Brigade is London's fire and rescue service – one of the largest firefighting and rescue organisations in the world and we are here to make London a safer city. Decisions are made either by the London Fire Commissioner (the statutory fire and rescue authority for Greater London), the Mayor of London or the Deputy Mayor for Fire and Resilience. A Fire, Resilience and Emergency Planning Committee of the London Assembly holds the Commissioner, Mayor and Deputy Mayor to account.

Executive Summary

London Fire Brigade (LFB) welcomes the Government carrying out additional consultation on this subject. We are committed to working closely with national and local government, disability groups, Grenfell communities and high-rise communities and other stakeholders to help deliver on the intention of the recommendations of the Grenfell Tower Inquiry on personal emergency evacuation plans (PEEPs) and reach a solution that is workable and maintains the safety of our communities and firefighters.

Discussions that LFB has had with representatives from disability groups, Grenfell Communities and those living in high rise buildings, have helped to inform our own response to the consultation and we would welcome further dialogue with Government and on how this can be incorporated into their future proposals.

London is particularly impacted by this consultation due to the high number of high-rise buildings in the capital, and London have a broad range of community groups representing residents with disabilities and those living in high rise buildings that may not have participated in the consultation process to date.

Scope of the consultation

LFB is concerned that the scope of the consultation is too narrow when considering disabilities that may impact on an individual's ability to evacuate. While mobility impairment raises clear challenges, there are many other disabilities (or intersecting protected characteristics) that may affect a person's ability to evacuate and these should be given equal consideration. Additionally, to this, while mobility impairment is more likely to lead to a person needing third party assistance to evacuate, it is likely that most PEEP users would be capable of at least beginning evacuation on their own. There are many types of interventions that could support people to move to a place of safety without third party assistance. While we would recognise that there will inevitably be some cases where it is difficult to put in place sufficient support to enable residents to evacuate from the building, this could be recognised and accommodated for in the proposals, rather than necessitating a completely different approach.

LFB recognises that cost is an important consideration for the Government in all policy making. However, we do have concerns that the consultation is overly focused on assumptions about the number of people that would require on-site personnel to support their evacuation, without exploring other options such as 'buddy' systems. Part of the cause of this is the lack of data currently held on how many disabled people there are in each building and what their needs are (which may change over time). We welcome the establishment of a working group of housing providers, disability groups and other stakeholders to assess how these options might be utilised. It is important that those who might require a PEEP have agency in the decision-making

process about their own safety, especially as they will have the best understanding of their own risk and how this can best be mitigated.

When considering which buildings are higher risk, LFB would also like to see other factors taken into consideration alongside those buildings that have a simultaneous evacuation strategy in place. For example, many specialised housing premises have 'stay put' strategies in place and under the proposals set out in the consultation would be considered lower risk. This is despite the fact that these premises often have a greater proportion of residents who are at higher risk from fire in their own accommodation, due not only to their ability to respond and escape from a fire, but also their behaviours e.g. smoking. The person-centred approach is especially appropriate for residents in specialised housing premises, and we recommend included within the proposed changes, regardless of evacuation strategy.

Equality of Evacuation

LFB supports the principle behind the proposals for Emergency Evacuation Information Sharing. It is vital that firefighters have information on those who may need support evacuating from a building when arriving at an incident. Further detail is included on this in our response. However, information sharing should not be considered a substitute for a plan in place to support residents to evacuate before the arrival of fire and rescue services (FRS).

In buildings with a simultaneous evacuation strategy in place, where there are heightened concerns about building failure and rapid fire spread, the consultation appears to promote conflicting evacuation guidance for residents that need support to evacuate, who would be expected to remain in the buildings and await FRS, and those that do not. LFB has concerns that this could lead to detrimental outcomes for those asked to remain in the building, particularly as FRS cannot guarantee the time it will take for firefighters to reach people.

As a busy metropolitan service, LFB has quick response times with the first two fire engines generally being in attendance within six and eight minutes respectively. However, in the event of a partial or full building failure (due to fire) and with the expectation that there will be multiple people with disabilities or conditions that may mean they require support for evacuation or rescue, it is likely that it will take significantly longer to implement evacuation and or rescue on such a scale. This could be exacerbated if the building does not have active or passive fire safety measure that can support or enhance life safety, such as sprinklers, while multiple staircases can aid both responders and residents by allowing for firefighting and evacuation stairs to be set up.

The Regulatory Reform (Fire Safety) Order 2005 (FSO) already places a duty on the Responsible Person (RP) to ensure all relevant people within a building such as those where the evacuation strategy has temporarily changed to simultaneous evacuation can evacuate to a place of safety, where necessary. In residential buildings, this duty exists regardless of the evacuation strategy. For those residents who may need assistance to evacuate, the most effective way is by the provision of a PEEP especially for those buildings with the highest risk. The sector '[Guidance to support a temporary change to a simultaneous evacuation strategy in purpose-built blocks of flats](#)' which is coordinated by NFCC, highlights the need for PEEPs to ensure that all residents can evacuate the building safely, in buildings where stay put strategies can no longer be supported. Greater clarity is needed on whether the proposals are intended to reduce the existing responsibilities of RPs under the FSO.

LFB would also welcome further work to look at the wider evidence base as to how evacuation can best be supported in all high-rise buildings. While stay put remains the safest option in the majority of high-rise buildings, this is never absolute and LFB has experienced many cases of people choosing to evacuate buildings before our arrival. It is important to recognise that people may choose to leave their building even if a 'stay put' strategy is in place. We have heard from others with expertise in evacuation management about the idea of a Plan A, Plan B and Plan C in evacuation management across the high-rise housing stock. In buildings where there are no known structural fire safety concerns, Plan A would be a 'stay put' strategy and Plan C would be rescue by the FRS. Plan B would be a strategy to evacuate residents if stay put is no longer tenable before the FRS arrive. This recognises that fact that FRS are not an emergency evacuation service and should not be relied on to provide this. A Plan B strategy would recognise that certainty about the fire safety of the built environment is not absolute. LFB has heard cases where remediation work to buildings with dangerous cladding has uncovered wider structural issues, such as missing cavity barriers that prevent fire spread. It cannot be assumed that these issues do not exist more broadly in the built environment, which makes identification of which buildings are potentially high risk a challenge.

LFB recognises that evacuation in the event of an emergency, particularly large-scale emergency evacuation, may present risks such as crush injuries or panic. This can be exacerbated where there are limited means of escape (such as a single staircase compared to multiple staircases) and strongly recommends that specific research is conducted that includes input from disability groups as well as others with expertise in evacuation management. Research areas could also include how 'buddy' or neighbourhood systems could support those with evacuation needs. We are aware of existing cases where a buddy role is already being performed informally for people who require support to evacuate a building. Consideration could also be given to whether carers could provide this support if offered the right training. Wider research could also look at how a 'Plan B' might work in reality (including how detection and alert systems could be implemented) and how concerns raised in the consultation about liability could be addressed. It also needs to explore how residents in different parts of the building could reliably receive different instructions depending on the location of the fire in the premises.

As part of this work, the development of a glossary of terms would be welcome to ensure there is consistency of understanding across all stakeholders. Understanding of different words used in the consultation appears to be varied, including what constitutes a PEEP, which can lead to confusion. Working with disability groups and other impacted communities on could help to identify where it would be useful to provide clarity on definitions being used.

Designing and building safer buildings

LFB believes that new buildings should be designed and built to be safe and fully consider the needs of those with disabilities. There should be greater reference in the consultation on the need to design buildings to be inclusive from the outset and for improvements to be made to make buildings more inclusive when major refurbishments are taking place. There has rightfully been significant focus on requiring developers to fund the fixing of past mistakes made by the industry. Equal focus should be given to getting the industry to sign up to designing and building inclusive buildings that reduce the need for PEEPs.

This could be supported by mandating life safety features and ensuring that all residents are either able to evacuate or shelter in safe locations. This would lead to greater autonomy and equality for many people with disabilities, providing the option to leave a building in an emergency in the same way as others who might be evacuating.

LFB supports the provision of multiple staircases in tall residential buildings. This increases resilience in buildings and gives firefighters and residents greater flexibility when evacuating a building as there will be more options and more space to support this. This would also bring England and Wales into line with the majority of other countries in Europe, North America and Australasia which already have height limits at which buildings can be constructed using a single staircase. We will soon be consulting on a new organisational position statement proposing a limit on the height at which buildings can continue to be built with only a single staircase. We will shortly be sharing a draft of the position statement with the Home Office and the Department for Levelling Up, Housing and Communities, which can be considered alongside our response to this consultation.

Other measures such as retrofitting sprinklers could also be considered. Sprinklers are 99% effective in extinguishing or controlling a fire, and can be retrofitted at an estimated cost of £150k in an average high-rise building, with the majority of costs being one-off. This is cheaper than some of the other more costly interim measures such as waking watches.

Question 1: Do you agree or disagree that the initial change in legislation should be focussed on the buildings with the greatest fire safety risk i.e. buildings with simultaneous evacuation strategies in place?

Neither Agree nor Disagree

If you disagree, what category of buildings do you propose should be included?

While we recognise the need for EEIS in simultaneous evacuation buildings, as reflected in the executive summary, we would advise further consideration of the scope of buildings that this applies to. LFB would support further research on the practicalities and benefits of expanding this, particularly across all higher risk buildings and buildings with high-risk occupancy.

The Regulatory Reform (Fire Safety) Order 2005 (FSO) already places a duty on the Responsible Person (RP) to ensure all relevant people within a building can evacuate to a place of safety, where necessary. In residential buildings, this duty exists regardless of the evacuation strategy. For those residents who may need assistance to evacuate, the most effective way is by the provision of a Personal Emergency Evacuation Plan (PEEP), especially for those buildings with the highest risk, such as those with a temporary evacuation strategy. The sector '[Guidance to support a temporary change to a simultaneous evacuation strategy in purpose-built blocks of flats](#)' which is coordinated by NFCC, highlights the need for PEEPS to ensure that all residents can evacuate the building safely, in buildings where stay put strategies can no longer be supported. London Fire Brigade (LFB) therefore believes that a change in legislation could be unnecessary and there could instead be improved clarification and guidance on the means of escape for disabled people from residential buildings within the existing legal framework, which would enable RPs to address this risk and fulfil their duties. This would also empower enforcing authorities to regulate emergency plans for residents more effectively.

Whilst the London Fire Brigade (LFB) supports the initial focus on buildings with the highest risk, we believe in the principle that all residents including those with disabilities, should have equality with regards to the right to evacuate a building in the event of a fire. We are concerned that looking solely at the building or its evacuation strategy can lead to a failure to consider risk holistically and consider the needs of our communities. For example, many specialised housing premises have 'stay put' strategies in place and under the current proposals would be considered lower risk. However, these premises often have a greater proportion of residents who are at higher risk from fire in their own accommodation, due not only to their ability to respond and escape from a fire, but also their behaviours. The person-centred approach is especially appropriate for residents in specialised housing premises, and LFB believe these premises would also benefit from emergency plans and evacuation information sharing. There may also be buildings in the current stock that have serious fire safety issues that are as yet unidentified e.g. compartmentation issues in a high rise block with non-flammable cladding.

LFB is pleased to see the proposals contained no height triggers and agree that height should not be a factor in emergency plans or evacuation information sharing, as the need for assistance to evacuate is the same whether a resident occupies the ground or tenth floor of a building.

Question 2: Do you agree or disagree that the toolkit, as described, would be a suitable resource to support Responsible Persons in fulfilling their duties under the Regulatory Reform (Fire Safety) Order 2005?

Strongly Disagree

A toolkit with some real-life practical examples may be of benefit to some RPs when looking to further improve the fire safety of their mobility impaired residents. However, LFB disagrees that a toolkit alone would be a suitable source to support RPs to fulfil their duties under the FSO on its own. As the requirements of the FSO are risk proportionate and bearing in mind the vast differences in the way residential buildings are designed and lived in, there needs to be clear and concise risk-based guidance for RPs and enforcement authorities alike on how to satisfy the legislation, as what solutions may work in one building may not in another. Such guidance on means of escape for disabled people already exists, though needs reviewing, that addresses PEEPS and other initiatives such as evacuation aides and lifts. Updating this guidance to include means of escape in residential buildings for all residents who may need additional support to evacuate will provide a more suitable resource for RPs, competent persons and residents.

Without appropriate guidance, conflict could arise between the RPs and residents where they disagree on where a PEEP or other measures are required, and who should pay for them. This may discourage residents in need of support to evacuate, from self-identifying if they believe costs may be imposed on them (or be added to service charges with the risk subsequent negative behaviour or discrimination), especially as people face a particularly challenging time with cost of living, which could compromise their safety in case of fire. It is also unclear how enforcing authorities could take action against an RP in such circumstances or where they have utilised the toolkit as part of their risk assessment process. Using a toolkit as opposed to government produced Article 50 guidance seems like a weakening of fire safety standards for disabled people rather than an improvement.

Question 3: Call for evidence - Are you aware of any initiatives that enhance the fire safety of mobility impaired residents, that could be considered for inclusion as case studies in the toolkit?

LFB believes in equality of evacuation and that focusing only on mobility impaired residents is discriminatory to other residents who have additional needs or other disabilities that may also require support to respond and evacuate in case of fire. As examples, people with cognitive and learning impairments may perceive the level of risk from fire differently. People with a hearing impairment may not respond to traditional means of giving warning in case of fire. People with a vision impairment may have difficulty evacuating in low lighting or may use an assistance dog. Any guidance or toolkit needs to be inclusive of these other disabilities, conditions, impairments, as well as other additional needs not relating to a specific impairment, for example people under the influence of medication.

There are several guidance document and codes of practice already published that the Government may wish to consider or reference regarding the management and evacuation of people with a wide range of additional needs and disabilities. For example, the NFCC Fire Safety in Specialised Housing guide and British Standard 9991 – Fire safety in the design, management and use of residential buildings.

If case studies are included within the proposed toolkit, we would caution that the RP needs clear instructions that they are based entirely on the unique circumstances of the premises and residents in question and that any implementation or use by the RPs must consider the circumstances and individual needs of the residents rather than making comparisons.

Question 4: Do you agree or disagree that the proposed identification process laid out above i.e. the Responsible Person asking residents to self-identify (when resident first moves in, comms to all residents on an annual basis and via residents coming forward themselves outside of those times) strikes the right balance of responsibilities between a Responsible Person and an individual resident?

Tend to Agree

If you disagree, please explain why and outline what your alternative approach would be.

LFB agrees that the self-identification approach outlined in the proposal is an effective starting point for both residents and RPs. However, this proposal may still discourage some residents where concerns about costs dissuades them from coming forward to the RP. The self-identification proposals also do not address residents who are unaware they may need support or do not understand the process (for example people with learning disabilities or some older people and children etc.).

Therefore, it is important that any process recognises the important role that family members and/or carers or other authorities may have in the safeguarding of residents who may need assistance to evacuate. It is highlighted in the [NFCC 'Fire Safety in Specialised Housing' guidance](#), that those who normally engage with residents, on a routine basis, such as sheltered housing scheme managers, enable residents who need a person-centred fire risk assessment to be identified. Consideration should be given to such resources being able to identify on behalf of residents to the RP, where that resident has agreed.

LFB has concerns over the proposed frequency of review. An annual review presents challenges regarding keeping information up to date and capturing any changes to residents' circumstances. As part of any operational response, the information needs to be accurate and reflect, so far as is reasonably practicable, the current building occupancy at any time. A set review period would not address any changes in the status of resident's needs, especially where the information only relates to temporary conditions such as sports injuries.

Question 5: Do you have any additional comments on the proposed identification process as laid out in step 2 above? If yes, please give as much detail as possible.

LFB is concerned that these proposals contradict the new requirement to provide information to residents in [the Fire Safety \(England\) Regulations 2022](#). These regulations apply to all residential buildings, not just those with a temporary simultaneous evacuation strategy and are set to make it a requirement for RPs to provide residents with instructions on what they must do once a fire has occurred. The ability of a resident to evacuate in case of fire does not change with the evacuation strategy. Whilst the proposals have deemed it disproportionate to apply the proposals to all residential buildings, they instead seek to create different levels of safety dependent upon a building's evacuation strategy. LFB are unclear how the RP can provide instructions to all residents about the actions to take in case of fire, if they only need to cooperate with residents in buildings with a temporary simultaneous evacuation strategy.

Where a self-identification process is utilised, it needs to be accessible to and understood by all residents. The proposed communications methods of e-mail, newsletters or site visits may prove inaccessible to residents who need assistance or who would benefit from a person-centred approach. London's communities are among the most diverse in the country, and not being able to translate a newsletter or have access to equipment to receive e-mail for example, should not be a barrier to having a personalised emergency plan formulated where needed.

Regarding the proposed frequency of the self-identification process, LFB have concerns how this information can be kept up to date, if only reviewed on an annual basis. This will not be sufficient to capture temporary conditions or impairments such as pregnancy or injury. It may also not capture a sudden change in a resident's circumstance. As this information informs the assessment of risk and is shared with fire and rescue services, it is imperative that it is kept up to date and should be reviewed as and when it is needed.

Question 6: Do you agree or disagree that this approach is a viable way to identify fire safety risks, including barriers to evacuation?

Tend to Agree

If you agree, whilst viable, are there still issues to consider in implementing this approach? Please give details.

LFB has long advocated the benefits of a person-centred approach, particularly in specialised housing premises, as an essential tool that considers the individual characteristics, behaviours and capabilities of residents that may be at a higher risk from fire in their own accommodation. We have developed our own guidance and person-centred fire risk assessment (PCFRA) checklist to assist responsible persons and others to consider what actions and/or control measures may need to be taken to reduce fire risks to a reasonable level. As such, we agree that the use of a PCFRA is a viable way to identify fire safety risks, including barriers to evacuation. However, we believe the use of PCFRA should not be limited to only those buildings with a simultaneous evacuation strategy or to mobility impaired residents. Any resident who has self-identified as being at increased fire risk, regardless of disability, impairment, tenure or evacuation strategy, should have access to a PCFRA and potential measures to mitigate fire risks in their home or to support their evacuation in case of fire.

Whilst LFB agrees PCFRAs are a practical way to identify fire risks, it is important to acknowledge these will only be to the individual resident within their own accommodation. Therefore, the PCFRA results should be considered alongside the premises fire risk assessment with consideration also given to building wide protection measures on top of any in-flat prevention measures. These measures such as the installation of sprinklers, refuge areas and evacuation lifts, are highlighted in all applicable fire safety guidance (for example [Fire Safety Risk Assessment: Sleeping Accommodation](#) and the [NFCC Fire Safety in Specialised Housing](#)), as appropriate measures to safeguard disabled residents but enhance the safety of the premises for all residents. This will require adequate cooperation and coordination between those undertaking the respective risk assessments, especially where the barriers to evacuation exist from the buildings design, layout, and facilities. Residential buildings are designed to specific standards relating to means of escape, which have changed over time. Therefore, careful consideration is required as part of a holistic risk assessment process to ensure any changes to facilitate adaptations or improvements in access and egress for residents who may need support to evacuate as a result of a PCFRA, do not negatively impact other safety provisions or firefighter access.

Question 7: Do you agree or disagree that this approach is an adequate way to identify suitable measures to mitigate against fire safety risks, including barriers to evacuation?

Tend to Agree

If you agree, whilst adequate, are there still issues to consider in implementing this approach? Please give details.

LFB agrees that a PCFRA is a viable way to identify suitable measures to prevent the ignition and development of a fire in a resident's own home. By following the current guidance in the NFCC Fire Safety in Specialised Housing or LFB's Guidance Note 93, a PCFRA should consider the propensity of the resident to contribute to the likelihood of fire or fire development, the ability to respond appropriately to fire alarm signals or signs of fire, and the ability of the resident to escape in the event of fire. The findings from this process should assist

the RP to identify suitable prevention and protection measures such as fire-retardant bedding, safer ashtrays, telecare, or personal protective water-mist systems for example.

However, the consultation states that the RP currently has "no statutory duties to implement in-flat prevention or suppression measures". This raises the question on our ability as an enforcing authority under the FSO to take any action against the findings of a PCFRA where measures are recommended to reduce fire risks for the resident, but these have not been implemented. As the RP has no duty to provide any measures identified during the PCFRA process, it is unclear how the RP can demonstrate their due diligence and could leave the PCFRA as a simple tick box exercise, with the only penalty being not carrying it out, as opposed to not taking adequate fire precautions. Not implementing measures that could reduce the risk of fire to a disabled resident, could be considered a safeguarding risk and puts additional burdens on responsible authorities.

Whilst LFB is supportive of an approach of utilising PCFRA, further consideration needs to be given to how this can be enforced and how costs of not only implementing the recommendations of a PCFRA will be funded, but also their on-going maintenance are to be funded. LFB does have concerns that the potential financial burdens of installing or maintaining any measures identified during the PCFRA process may dissuade residents from self-identifying. Whilst the consultation does have suggestions, we note that it does not address the implications where a resident is not eligible for 'disabled facilities grant' funding or the scope of the grant is not sufficient or does not cover the necessary fire safety equipment required. This may also lead to a situation where a disabled person is required to fund improvements to the common areas of buildings which will most likely benefit all residents. The Government should set out plans to ensure that any residents can self-identify without fear of financial penalties.

Question 8: Do you foresee any issues with the provision of a PCFRA checklist (by the Responsible Person) AND the provision of a home fire safety visit from the Fire & Rescue Service?

If yes, please give as much detail as possible.

Whilst LFB agrees that Home Fire Safety Visits (HFSV) carried out by our firefighters can complement a PCFRA, they should only be carried out where necessary. A PCFRA should always take precedent over a HFSV, as a suitable assessment should be sufficient to identify the fire hazards, risks, and suitable control measures. Due to the cost and resources available for HFSV, LFB prioritises high-risk residents for HFSV across all dwelling types, not just multi-occupied residential buildings, with lower risk residents instead encouraged to use our [online Home Fire Safety Checker](#) in the first instance (we are aware that NFCC have their own online [tool](#)). Consideration should be given to adopting a similar process within these proposals, whereby a HFSV by the FRS is only recommended by the RP where a PCFRA has highlighted the resident at high risk, and all other lower risk residents are where possible, directed to the online tools and guidance available. However, to achieve consistency with this approach a standardised PCFRA template and risk matrix is required, alongside suitable guidance on how to carry out the assessment in a suitable and sufficient manner.

Our data highlights that the highest proportion of higher risk residents and fatal fires are still in single private dwellings, not high-rise residential buildings. Only 2.63% of the fatal fires in London during 2021 were in flats/maisonettes (10 or more storey's). In single private dwellings this figure rises to 52.62%, with the remaining fatal fires occurring in low to mid-rise flats or houses converted to flats. As such, much of our prevention activities are targeted in housing, particularly where people are in receipt of care.

The additional burden on our resources from this proposal on top of our existing targets needs to be considered by the Government, especially as London has the highest number of buildings with a temporary simultaneous evacuation strategy in place, which currently stands at 1086 (>18m = 831, <18m + 255). Additional burdens inevitably increase costs, not only in terms of staff to undertake HFSV but the training and ongoing CPD required to ensure competence of staff to ensure the effectiveness of the visit and any recommendations made. This increase in burdens not only comes at a time of increased financial and staffing pressures, but also as the FRS face new challenges due to the impacts of climate change. We have already experienced how the pandemic effected our capacity to undertake prevention work, which decreased by 62.5% between 2019 and 2021. If the extreme temperatures witnessed in July 2022 or the flooding seen in recent years, become more frequent, FRS will need to respond with more resources, resilience and training, which could impact prevention efforts in the long-term without significant investment.

LFB also believes clarity is needed on the nature of the responsibility on FRS under these proposals and any potential liability where resource demands prevent or delay a HFSV being undertaken. Further clarity is also

required on where the accountability lies if a resident refused access to FRS to undertake a HFSV, despite an RP reporting that it is necessary.

Question 9: Do you agree or disagree that this approach is sufficient to allow the Fire & Rescue Service to execute an emergency evacuation, if required?

Strongly Disagree

If you disagree, please specify what further information should be required. If this is personal information, how do you propose it is kept secure?

LFB agrees that having information available on potential residents who may be prevented from self-evacuating, would be a valuable resource for firefighters to assist with emergency evacuation. We also agree that the need for relevant information for firefighters should not be reliant on digital infrastructure being available and support the inclusion of Secure Information Boxes (SIBs) in the proposal, until such point where an effective, consistent and reliable digital infrastructure is in place across all FRSs. However, we disagree on the level of detail proposed and that the proposals are only focused on mobility impaired residents. Supplying FRS with limited information could potentially delay or compromise any emergency evacuation or rescue attempt and may put residents with specific requirements (e.g. do not remove from specialist chair) at a greater risk of harm. Limiting the requirement to only residents with mobility issues also excludes residents with other needs who FRS may also be required to rescue.

[The FIA/NFCC Code of Practice for Premises Information Boxes](#) contains useful guidance on the type of information pertaining to people with not only mobility, but also cognitive and sensory impairment(s) that can support the FRS in emergency evacuation and rescue, as well as how to keep this information secure. LFB supports this code of practice as a benchmark guide in providing FRS with relevant information in a consistent format that has sufficient level of detail, useable in most conditions and is also secure.

LFB also supports the new requirement for Secure Information Boxes (SIBs) in high-rise buildings in the [Fire Safety \(England\) Regulations 2022](#). However, we note that the height requirement in the regulations appears to contradict the no height requirement of these proposals. The current proposals are also unclear on what action a resident or RP is to take, if the building returns to a 'stay put' strategy upon completion of any remediation works. In such circumstances it is unclear what happens to the information held by the FRS. It seems counterintuitive to delete information about the resident, which may benefit firefighters, but without a requirement for the RP to continue to review this information, it may become outdated or incorrect. Clarity is needed in this respect as an improvement in the safety of the building due to completion of remediation works, should not worsen the safety of the resident, whose needs do not change with the evacuation strategy.

Whilst we acknowledge that the consultation has taken the technological capacity of FRS into account, the Government does need to consider the cost implications for the digital solutions to receive and securely store and maintain this information. FRS are being asked to receive and store more and more information, as part of the legislative changes. While we recognise that this is a desirable shift for a variety of reasons, the investment in both time, money and resources to adapt information technology infrastructure cannot be overlooked.

However, whilst the proposals in Stage 4 are of value to FRS to ensure that appropriate information is available to enable emergency evacuations or rescues, they would still require a resident who is unable to evacuate unaided to await the arrival of the FRS to undertake an emergency evacuation. This could leave those residents in serious danger if they are unable to reach a place of relative safety should a fire spread beyond the flat of origin or start within their own flat. Where any resident is impacted by fire, they should have the appropriate means to escape to a place of relative safety or they need appropriate means to ensure any preventative or protection measures they may require are provided, to extend the available safe evacuation time to allow for intervention from the FRS. As already outlined in our response to Question 1, reliance on emergency evacuation cannot be entirely left to the FRS.

Question 10: What are your views on the use of the information by FRSs, including to support the emergency evacuation of mobility impaired residents?

In line with recommendation 33.22b of the Grenfell Tower Inquiry Phase 1 report, LFB has developed policies for partial and total evacuation of high-rise residential buildings and has completed training to support these. However, these policies relate to the emergency evacuation or mass rescue of a high-rise building and are not intended to replace the planned evacuation strategy for a high-rise building as required by the FSO.

Emergency evacuation is defined within our policy as, "the immediate and unplanned movement of people assisted by LFB personnel or other emergency responders away from actual or potential danger towards a place of relative or ultimate safety using recognised or normal means of escape". The current proposals go against what LFB regards as emergency evacuation and if implemented will require additional policy development and a further training requirement for firefighters, to ensure they are equipped to respond in these circumstances. This will undoubtedly have financial and resource implications.

LFB also has concerns over the proposed reliance on FRS to carry out emergency evacuations as standard practice. Therefore, clarity is needed as to the difference between the planned evacuation strategy for the building to comply with the requirements of the Fire Safety Order and an emergency evacuation as carried out by fire and rescue services where the incident commander has determined that the planned evacuation strategy is no longer tenable or that an evacuation is needed where residents have remained within their accommodation. Clarity is also needed with regards to the potential responsibility and liability FRS will have if issues arise during an emergency evacuation, which results in serious injury or death.

LFB believe, it is the duty of the RP to give effect to adequate procedures for all residents in case of fire. It should be clear that where evacuation of residents is required either to a place of relative safety within the building or external to the building, this should commence at the earliest possible stage and should not wait until the arrival of the FRS. In London, our average attendance time target is six minutes for the first appliance and eight minutes for the second. However, this figure does not account for additional time needed to ensure amongst other things, that there are adequate numbers of firefighters required to commence operations and implement safe systems of work, which could take upwards of 20 – 30 minutes.

As outlined in our response to Question 9, LFB is also concerned that the proposals are focused on residents with mobility impairments and do not consider residents with other impairments that may also need assistance to evacuate. Not all disabilities are mobility related or even apparent and limiting the proposals could be seen as discriminatory. LFB strongly recommends that residents with sensory, cognitive or even temporary impairments, are included as they would also benefit from the PCFRA process and from sharing relevant information about any assistance they may require with the FRS.

Question 11: Do you have any additional comments on the EEIS proposal as laid out in Steps 2 - 5 above?

If yes, please give as much detail as possible.

LFB is disappointed that the current EEIS proposals and impact assessments mainly only focus on mobility issues, when there are other known factors that may prevent a resident evacuating or where additional support, or preventative measures are needed. There are cognitive, learning and neuro-diverse conditions that could lead to those residents reacting differently during a fire emergency and yet these are not considered in the EEIS proposals or as information that may be relevant to FRS.

With the current EEIS proposals being for buildings with a simultaneous evacuation strategy in place, it should be acknowledged these are often only temporary in nature. The current proposals do not detail what is expected of RPs or residents who have self-identified where a building operating with a simultaneous evacuation policy is returned to a 'stay put' strategy, when any remediation work is completed. Clarity is needed regarding the status of any PCFRA and/or any measures or agreements put in place to assist with the evacuation of those residents. The local FRS will also need to be notified of any change in circumstance. Whilst a building having a 'stay put' strategy reinstated post remediation work is a positive step forward in the overall safety of the premises, removing the additional prevention or evacuation safeguards could be viewed as an unnecessary backwards step, as the barriers as resident may have with evacuating are not necessarily removed with a change in evacuation strategy

'Stay put' is not an evacuation strategy in the conventional sense, as those not immediately affected by a fire are not required to evacuate due to the enhanced compartmentation and fire resistance found in residential buildings. However, there are now many examples of buildings with 'stay put' strategies where fire has spread due to deficiencies in the building construction, resulting in the need for evacuation of residents. Without a means to warn residents they need to evacuate or procedures in place to evacuate all residents, this leaves them vulnerable to the effects of fire.

It appears that over time, the original intent of the 'stay put' strategy, which originated from the 1962 edition of British Standard Code of Practice CP3: Chapter IV 'Precautions Against Fire' Part 1: Fire Precautions in flats

and maisonettes over 80 ft in height' has been lost, with 'stay put' as the sole strategy for residential buildings. 'Plan b' evacuation strategies in cases of fire spread, are often not considered.

The 1962 code of practice says that, whilst high-rise residential buildings should be designed so that occupants of floors above a dwelling fire, should be able to remain safely on their own floor, if they choose to, "it may be necessary to evacuate the floor on which the fire occurs, and in some circumstances those floors which are in the immediate vicinity of the fire". This highlights that the need to evacuate some or all parts of the building was always part of the original intent behind the 'stay put' strategy and therefore should be considered as part of an overall emergency plan. Due to the high levels of compartmentation, 'stay put', if designed, constructed, maintained and managed appropriately, is still an effective strategy for residential buildings. However, this should always be supported by the ability for residents to progressively evacuate to any other part of the building, free from the effects of a fire, via the staircase or an appropriate evacuation lift, where necessary. This methodology affords residents more time to escape to a protected area or to receive advice or assistance from the FRS. This is particularly important in the context of feedback that LFB has received from communities about their intention to evacuate if there is an incident in their building regardless of the evacuation strategy, due to a lack of trust that the performance of the building can be guaranteed.

LFBs considers the best solution for residential buildings to be a 'stay put' strategy, supported by a 'plan b' evacuation plan (subject to further research and guidance), that allows residents to evacuate to a place of relative safety when they are affected by fire, or when they choose to. This combined with the EEIS for all high-risk buildings, would enhance the overall fire safety and emergency plans for all residents. However, we have concerns that the EEIS proposals could be viewed as the FRS having responsibilities regarding the evacuation of relevant people. This would contradict the Government's own guidance in the 'Fire Risk Assessment – Sleeping Accommodation' which states that everyone should be able to escape without the help of the FRS and that every emergency plan should not rely on FRS involvement for it to be effective. The FRS are not an evacuation service and suggestion of such could be seen as watering down the RP responsibilities under the FSO towards emergency plans and means of escape. It is imperative that these duties remain with the RP, so as not to impact the FRS ability to take action against those who have not implemented suitable procedures in the event of serious and imminent danger to relevant persons.

Question 12: Do you agree or disagree that the addition of this on-site individual adds enough value to the EEIS proposal to justify the associated costs?

Neither Agree nor Disagree

The provision of a suitably competent on-site individual to supply information, advice, and assistance in the event of a fire could be a valuable resource to both FRS and residents alike. However, as the proposal only extends to buildings with a temporary simultaneous evacuation strategy, there could already be individuals on-site as part of a 'waking watch' and/or evacuation management roles. In such cases, both these roles can carry out the functions described in the proposal but can add further value by facilitating effective coordinated evacuation, where trained to do so. LFB note that proposed responsibilities on sharing information and buildings plans appear to replicate duties that already exist for the RP under the Fire Safety (England) Regulations and the amendments to the FSO in the Building Safety Act 2022. As such, it is unclear whether the benefit from an on-site individual would be enough to justify the associated costs and also note concerns raised about the efficacy of some waking watch/on site staff. We believe that an RP should explore all options in order to find the most effective way of ensuring residents who need assistance to evacuate have the means to do so, whether this is by implementing appropriate preventative and protective measures, such as a PEEP, the provision of an on-site individual, or both.

Question 13: Call for evidence – We are interested in examples of PEEPS in residential buildings, but which fully or partially avoid the concerns over safety, proportionality, and practicality?

Therefore, can you provide examples of existing PEEPs for residential buildings, agreed between resident and RP, that provide for evacuation from a building, that at least partially:

avoids the staffing up of buildings to enact the PEEPs;

avoids the liability issues for RPs and third parties who are enacting the PEEPs such as friends or neighbours;

avoids the safety issues in enacting them e.g. the blocking of stairwells.

If you are aware of any examples, please share them (redacted for data protection purposes if necessary) and provide as much supporting detail as possible, including the resources required to implement them and the costs involved.

While we have anecdotal information about such examples, we believe that full and appropriate research is required in this area to ensure that the evidence provided is robust (e.g. proven in use and with resident/disabled group feedback having also been considered) and relevant to being applicable in a wider context.

Question 14: Call for evidence – We are also interested in examples of buildings where staff have been installed on-site to support the enacting of PEEPs or other fire safety initiatives (outside of waking watch). Are you aware of any such examples?

Question 15: Call for evidence - Are you aware of any other initiatives for how mobility impaired residents can be made safer in their homes or be evacuated from a high-rise residential building in a way which is safe, proportionate, and practical?

If yes, please provide as much detail as possible including how the initiative works in practice, the resources required and the costs involved, and, if you are willing, a contact email address to discuss further.

LFB believes that new buildings should be designed and built to be safe and inclusive, allowing for the aging population and the desire to live independently in our own homes. Fire safety and accessibility of people's homes should be intrinsically linked to ensure they are fit for purpose for all people and that there is equality when it comes to evacuating in case of fire. Whilst new buildings can have these features designed in, the current suite of design guidance do not go far enough to address the evacuation of disabled people.

The fire detection within a flat has a significant role in providing early warning in case of fire to occupants. Where those occupants are unable to self-evacuate without support, arrangements for remotely monitoring fire alarms can be of benefit to them and FRS with regards to early attendance. This can be achieved by linking fire alarms to a social alarm ("Telecare") system, to enable residents to communicate with someone on or off-site. These systems support people to living safely and independently in their own homes. However, this is currently an unregulated area and although there are British Standards and industry guidance, the provision of Telecare is not mandatory. Many of our conclusions following fatal fires reviews find that these systems may have been of benefit and these issues have been raised with HM Coroners. As such, we believe the Government should seek to review the existing guidance and application of social alarms/'Telecare' as a cost-effective measure to improve the response to a fire emergency in an at risk resident's own home. Copies of our submissions to HM Coroners can be provided.

Question 16: Call for evidence - Do you have any evidence on the numbers of residents in your building(s) who are mobility impaired and would likely have difficulty self-evacuating?

Not applicable.

Question 17: Do you agree or disagree that the provision of separate evacuation plan documents should be focussed on the buildings with the greatest fire safety risk i.e. buildings with simultaneous evacuation strategies in place?

Tend to Disagree

If you disagree, please explain why and outline what your alternative adequate approach would be.

There already exists a duty in the FSO for RPs to establish effective arrangements to evacuate to a place of safety if needed, regardless of premises types or evacuation strategy. According to Government guidance 'Fire Safety Risk Assessment – Means of Escape for Disabled People', the RPs fire risk assessment should include "an emergency evacuation plan for all people likely to be in the premises, including disabled people, and how that plan will be implemented". As such, this proposal could be seen to contradict existing RP duties and remove the requirement for emergency plans for buildings operating a 'stay put' strategy. Whilst, throughout our response, we have agreed that higher-risk buildings should be addressed and prioritised, we strongly advocate that research is required regarding the need for evacuation plans to be provided for all residential

buildings, not just with simultaneous evacuation strategies in place. By limiting evacuation plans to buildings with simultaneous evacuation strategies in place, could result in a worsening in standards as these buildings are remediated and return to a 'stay put' strategy. In such cases, there will no longer be requirement for the RP to have evacuation plans and could leave residents and fire and rescue services with out-of-date information.

Whilst LFB agrees that 'stay put' remains the appropriate strategy for many multi-occupied residential buildings, this is only providing they have been designed, built, managed, and maintained appropriately. However, as noted in our response to question 11, 'stay put' is not an evacuation strategy and plans are needed for when full or partial evacuation of a building are also required. Since 2017, LFB has witnessed significant numbers of residents evacuating prior to the arrival of our firefighters rather than staying put. Our engagement with residents and community groups has highlighted concerns around the efficacy of a stay-put strategy being in place, without consideration to plans and measures for resident evacuation. An appropriate evacuation plan, that includes a 'plan b' of actions to take for example, when a resident is impacted by heat, fire and/or smoke, could reassure residents and regain confidence in 'stay put'. Any provision for evacuation plans, must including a requirement that they are provided by competent persons and that resident engagement is undertaken as any plan should work for them and should take a holistic view of the fire precautions and occupants within a building.

Question 18: Do you have any further comments on the proportionality of applying the EEIS proposal and the requirement to create separate evacuation plan documents, only to simultaneous evacuation buildings at this time?

Further detail on this is covered in the executive summary.

For further information, please contact: [REDACTED] at [REDACTED] [@london-fire.gov.uk](mailto:[REDACTED]@london-fire.gov.uk)