



Championing better homes and communities

Home Office Emergency Evacuation Information Sharing (EELS) NFA Consultation response

Submitted online – 2 August 2022

Introduction

We responded to the initial consultation on PEEPs with our colleagues at ARCH and raised some of the practical concerns our members had in terms of implementing the proposals back then. We are pleased that the Government has listened to us and others and taken on board the very difficult practical obstacles to implementing PEEPs in social housing on the same basis as in workplaces.

Overall, we agree that the new proposals focusing initially on the buildings with the greatest fire safety risk is the right approach at this time. We welcome the proposals to develop a toolkit to support Responsible Persons fulfil their duties under the Regulatory Reform (Fire Safety) Order 2005 which we believe would help spread good practice across the country.

Answers to specific questions

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?

Strongly Agree

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 Agree

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?

We are aware that one of our members, **South Essex Homes** has installed an Annunciation System into one of their tower blocks. It is controlled by the Fire Rescue Service and has the ability for the Fire Rescue Service to communicate with residents either to ask them to leave their flats or reassure them that there is no need for concern. The system is a hybrid incorporating the benefits of Public Address system and EACIE. The system complies with:



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BS 6259 (Code of Practice for the Design, Planning, Installation, Testing and Maintenance of Sound Systems)

BS 5839 (Code of Practice for Fire Detection and Fire Alarm Systems for Buildings)

BS 8629 (Code of Practice for the design, installation, commissioning and maintenance of evacuation alert systems for use by fire and rescue services in buildings containing flats)

The system is installed in a thirteen-storey high rise block with eighty eight flats and single staircase.

- Control equipment including microphone located on the ground floor in an EACIE enclosure complying fully with BS 8629.
- In December 2021 Essex County Fire Rescue Service carried out a five pump exercise at the block and used the system to reassure residents that they were carrying out an exercise and they also used it contact residents at various floors.
- The system is 24/7 monitored in case of faults or damage to speakers.
- The system has battery backup for 24 hours on standby and 30 minutes on full duty cycle.

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?

Strongly Agree

Question 5: Do you have any additional comments on the proposed identification process as laid out in step 2 above?

Work could be done in future to identify the most successful forms of communication with residents and promote good practice nationally, for example social media posts, email or paper newsletters might work better at certain times of the year.

Question 6: Do you agree or disagree that this approach (a person centred fire risk assessment and adaptations where appropriate) is a viable way to identify fire safety risks, including barriers to evacuation?



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Tend to Agree – This approach seems reasonable but to our knowledge we do not have any members with simultaneous evacuation buildings at the moment and we have not received feedback on this issue.

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

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?

We do not see any issues with the provision of both of these services however there is a concern that some residents may not agree to measures to mitigate risks especially if costs are involved and some clarity is still needed on what authority will the landlord have on implementing them if resident does not approve them or cannot pay for them? Clarity would also be helpful on whether a responsible person would be expected to check that resident was using in-flat measures e.g. fire retardant bedding, fire safe ashtrays etc? and what if any would the consequences be if a fire breaks out and it is identified these are not used by the resident?

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

Strongly Agree – This is in line with evidence we were provided with by members for our submission to the consultation on PEEPs.

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

This seems like a sensible and practical way forward and one which has already been adopted by many of our members.

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

No



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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?

Strongly Disagree – there is not a sufficient need on most days for someone to be onsite for this purpose for blocks with a stay put policy to justify the costs and as each higher risk block should have a building safety manager and/or resident engagement officer there should always be a point of contact within the organisation for residents to contact for general enquiries and assurance and in the event of a fire there should now be very clear plans for organisations to work closely with the FRS and provide the information required.

We believe there is a stronger case for blocks with a simultaneous evacuation strategy and waking watches in place. We think it could be added to a waking watch's role but would urge government to consult further with those organisations who currently have those in place to explore the detail of such arrangements.

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.

We have not received any additional evidence or case studies on this so cannot provide anything further.

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?

No

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?

No further detail provided by members since last consultation.

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?

No detail has been provided by members.



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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?

Strongly Agree

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?

No further comments

