

# Personal Emergency Evacuation Plans

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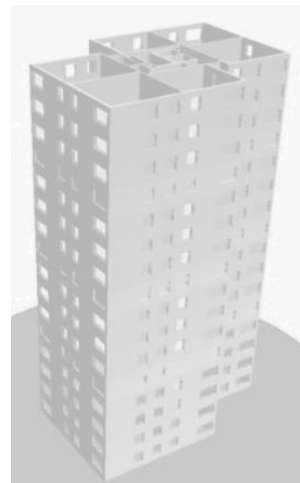
## Residential Buildings

*Practical, Proportionate & Safe?*

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Fifteen of the 37 disabled residents living in Grenfell Tower died in the fire

25% of all the children who lived in the Tower died that night

41% of the people who died in the Grenfell Tower fire were vulnerable

If we forget history, history inevitably repeats itself



## Fire Safety Order: Articles 14 & 15<sup>1</sup>

Article 14(b): 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”*

Article 15(1): Procedures for serious and imminent danger and for danger areas

*“(a) 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;*

<sup>1</sup> Source:  
Fire Safety Order: <https://www.legislation.gov.uk/uksi/2005/1541/contents/made>

## Building Safety Act 2022: Safety Case Report<sup>2</sup>

- ▶ The resident profile, approximate number of residents & whether any residents need extra assistance to evacuate in an emergency
- ▶ Where appropriate, the report should also describe how the residents' profile has been considered
- ▶ Include ability to self-evacuate, cognitive impairment

<sup>2</sup> Source:  
Safety Case Report: <https://www.hse.gov.uk/building-safety/safety-cases/report/index.htm#article> 4

# Disabled People in the UK

Respiratory disease

11 million

Mental health

10 million

Deaf/hard hear

6.3 million

Osteoporosis

3 million

Sight loss

2.3 million

Stroke survivors

**1.2 million**

Dementia

900,000

Epilepsy

160,000

Parkinson's Disease

50,000

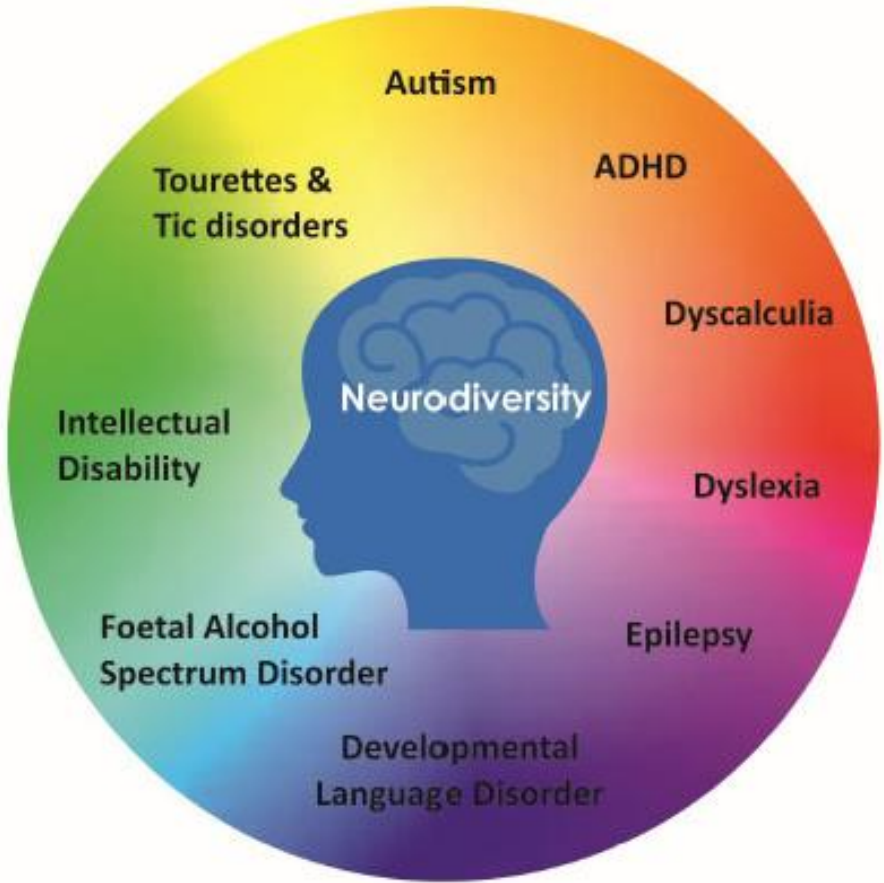
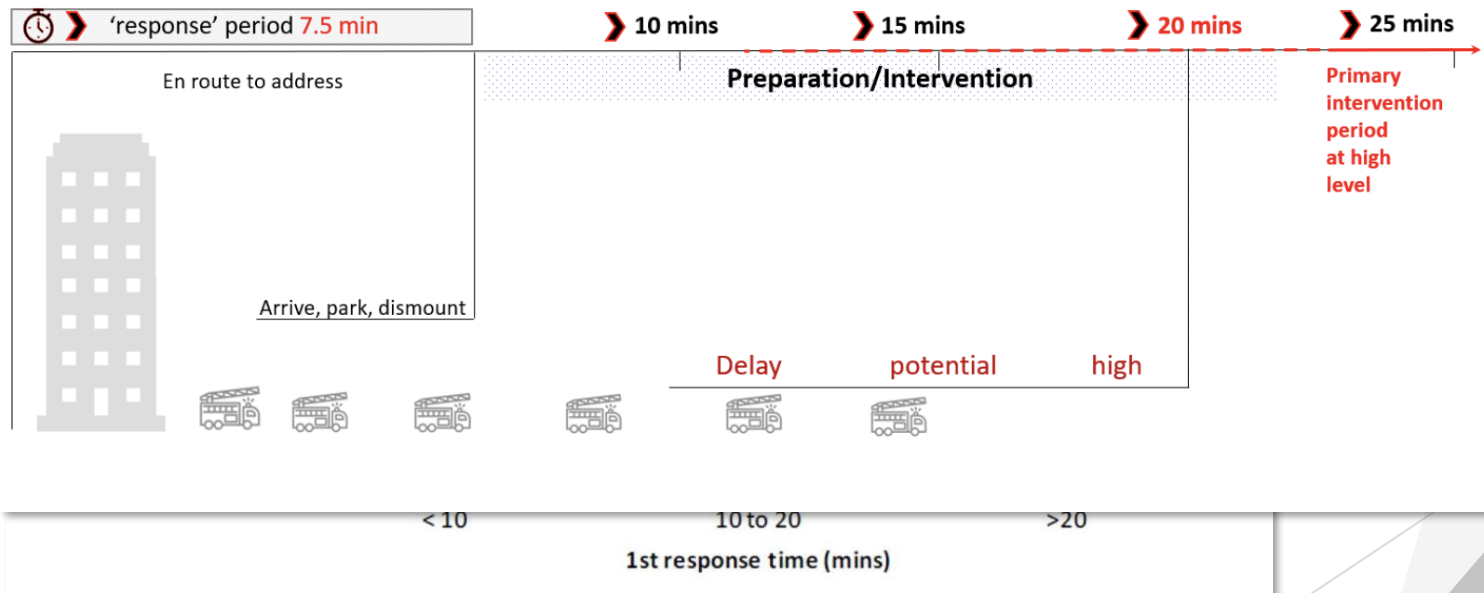


Figure 3.3<sup>21</sup>: Percent of Fatalities, Casualties (all grades) and Rescues (FCRs) that die versus percent that are rescued, against response time

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



Source:

University of Leeds & Phil Murphy: <https://www.hrrbfiresafety.com/post/fire-risks-of-purpose-built-blocks-of-flats-an-exploration-of-official-english-fire-incident-data>

# The Birkenhead Drill



## April 2022 - Lord Greenhalgh statement<sup>3</sup>

*“On practicality:*

*How can you evacuate a mobility-impaired person from a tall building before the professionals from the Fire and Rescue Service arrive?”*

<sup>3</sup> Source:

Hansard record: <https://hansard.parliament.uk/lords/2022-04-04/debates/ECEAEAD5-9736-4C75-BBB6-53764151213D/BuildingSafetyBill>



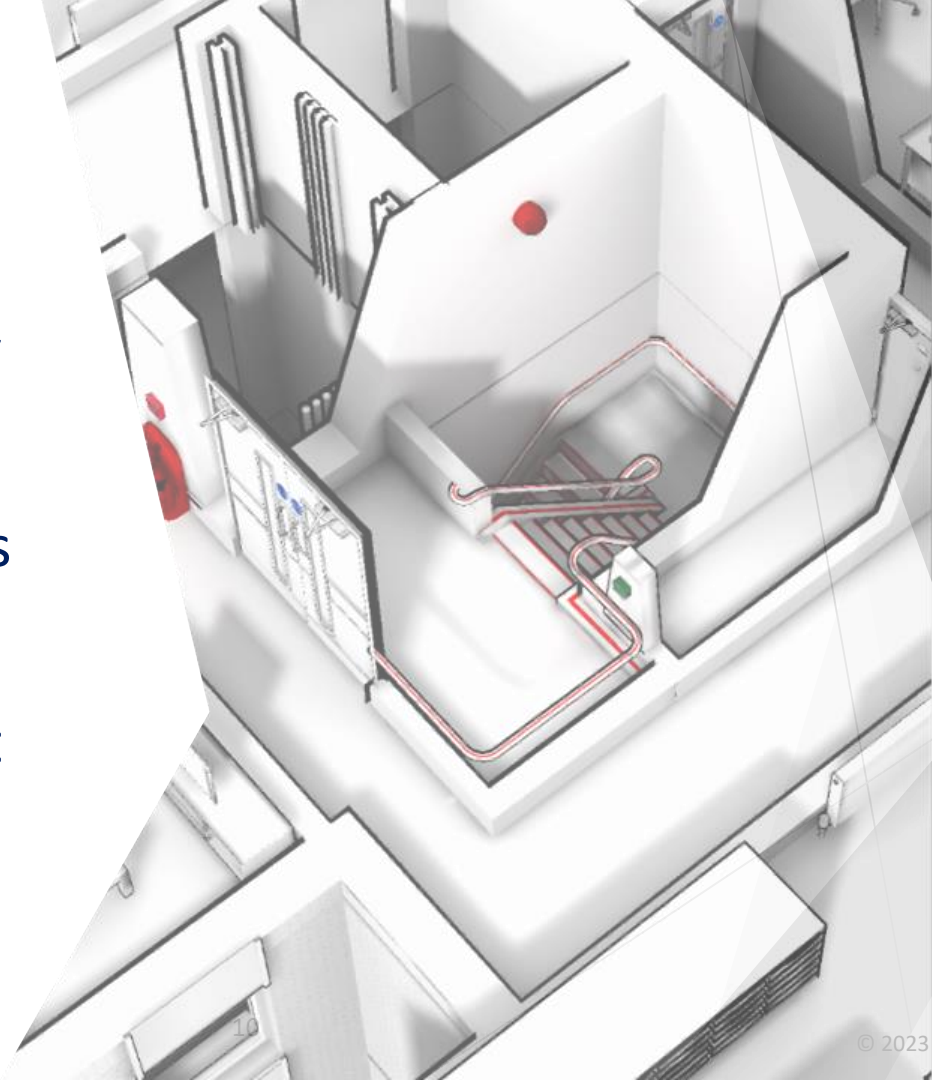
# Institution of Fire Engineers<sup>4</sup>



<sup>4</sup> Source:  
IFE Training & Development Directory: <https://www.ife.org.uk/Training-Development-Directory/160522>

## PEEPs

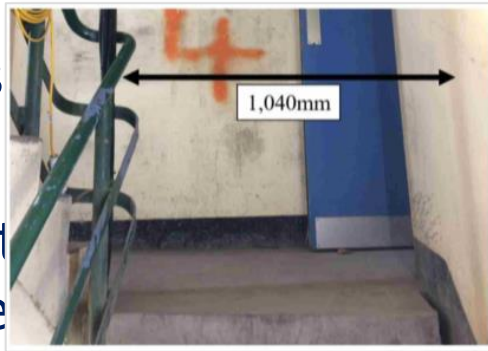
- Escape to total safety
- Risk Reduction
- Repeatable processes
- Buddies
- Physical Environment



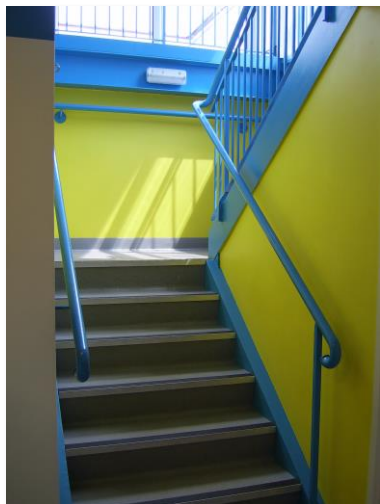
## Means of Escape: Part M<sup>5</sup>



Fire Alarms  
volume



not to a minimum



nt  
ne

nd  
as

in clear print

be yellow walls and blue

cy lighting, door pressur

pressure for closure



<sup>5</sup> Source:

Building Regulations Part M: <https://www.gov.uk/government/publications/access-to-and-use-of-buildings-approved-document-m>

## Disabled & Vulnerable Residents

- Legal compliance: Employees developing PEEPs must be trained – Article 21
- Start of Tenancy: Offset your risk in leases & gather information from forms
- Join up the dots: All employees, contractors, social workers instructed to inform the RP if any person is unlikely to be able to evacuate

## NFCC PIB Code of Practice<sup>5</sup>

### Category 1 (Red):

3 or more firefighters and/or additional equipment required for a bariatric person or a wheelchair user  
Grenfell Tower  
A fairly typical profile of 37 disabled residents

### 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  
Fire and Rescue Services would have had to plan for 74 fire-fighters just to affect the safe evacuation of all the disabled people

<sup>5</sup> Source:

NFCC Premise Information Box Code of Practice: [www.nationalfirechiefs.org.uk/write/MediaUploads/NFCC%20Guidance%20publications/Protection/PIBS\\_Guide\\_06-21\\_V2.pdf](http://www.nationalfirechiefs.org.uk/write/MediaUploads/NFCC%20Guidance%20publications/Protection/PIBS_Guide_06-21_V2.pdf)

## April 2022 - Lord Greenhalgh statement<sup>6</sup>

*“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?”*

<sup>6</sup> Source:  
Hansard record: <https://hansard.parliament.uk/lords/2022-04-04/debates/ECEAEAD5-9736-4C75-BBB6-53764151213D/BuildingSafetyBill>

## Costs Versus Liabilities

▶ Development of 1 PEEP	£56.08 <sup>7</sup>
▶ Cost of purchase of 1 tracked AED	£1,500

Apply these costs to RBKC & Grenfell Tower:

▶ Total cost for 37 disabled residents	£55,500
▶ Service charge increase for first year	£462.50
▶ Increase on service charge	£38/month

## RBKC failed to implement PEEPs - multiple legal actions

<sup>7</sup> Sources:  
Personal Emergency Evacuation Plans Consultation Impact Assessment, The Home Office dated 8<sup>th</sup> June 2021  
EIS Consultation Impact Assessment, dated 18<sup>th</sup> May 2022

## April 2022 - Lord Greenhalgh statement<sup>8</sup>

***“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.”*

<sup>8</sup> Source:  
Hansard record: <https://hansard.parliament.uk/lords/2022-04-04/debates/ECEAEAD5-9736-4C75-BBB6-53764151213D/BuildingSafetyBill>



# Practical, Proportionate & Safe



## LGA EEIS+ Consultation Response<sup>9</sup>:

*Part 3 of the Equality Act 2010 imposes an anticipatory duty on councils and housing associations.....:*

*“This duty to disabled residents applies in all blocks, not just those with simultaneous evacuation.”*

and

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

<sup>9</sup> Source:

[www.local.gov.uk/parliament/briefings-and-responses/lga-eeis-consultation-response#:~:text=The%20LGA%20believes%20the%20Emergency,the%20provision%20of%20a%20Personal](http://www.local.gov.uk/parliament/briefings-and-responses/lga-eeis-consultation-response#:~:text=The%20LGA%20believes%20the%20Emergency,the%20provision%20of%20a%20Personal)

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