



**Personal Emergency Evacuation Plans
Consultation**

**Submission from the
National Pensioners Convention**

July 2021

Fire Safety Unit
Home Office
2 Marsham Street
Fry Building
London
SW1P 4DF

15 July 2021

Dear Fire Safety Unit

**NPC EVIDENCE FOR THE CONSULTATION
Personal Emergency Evacuation Plans**

Introduction

The National Pensioners' Convention (NPC) is Britain's biggest independent organisation of older people, representing around one thousand local, regional, and national pensioner groups with a total of 1.5 million members. The NPC is run by and for pensioners and campaigns for improvements to the income, health and welfare of both today's and tomorrow's pensioners and this response is based on the views and experiences of our members.

We wish to submit views to the Fire Safety Unit for the consultation for the Personal Emergency Evacuation Plans consultation. Our response has been compiled by our Housing Party as well as our Information Officer and will concentrate on the experiences and concerns of our members who are, by definition, in the older age range.

Please give the following details:

a) The name of the organisation you are representing

National Pensioners Convention

b) Your role

Information Officer

c) Your responsibilities in the organisation

Research. Information & briefings production. Administration.

c) If you are responding on a behalf of a residents' group, please indicate how many people the organisation represents?

n/a

e) How many people does the organisation employ?

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Our response to your proposals.

Your Foreword

We propose.

We note the recommendations of the report of the House of Commons Housing, Communities and Local Government Committee of 29 April 2021 over unsafe buildings. When they recommended the Government establishes a comprehensive Building Safety Fund to cover the costs of all remediation works and to move away from the current height-based approach irrespective of tenure including the provisions of these funds for social housing providers.

We agree with these recommendations and urge the Government to adopt them. It was not the owners of these properties who were to blame for these unsafe buildings.

It was wrong in the first place for these materials to have been included by the architects and construction companies. It was politicians who together with construction companies who were involved in the watering down of the health and safety and fire regulations that had created the Grenfell fire.

They allowed for the continuation of so many unsafe construction materials to be used, there huge cuts towards the safety inspections carried out by the health and safety executive and by the fire authorities enable a higher risk of fires to happen.

Executive Summary

Reference you comment:

The Act received Royal Assent in May 2021 and will be commenced in the coming months.

We propose.

This statement is too vague, and the Act must allow for an extended period of consultation. The Act should then commence by 31 September 2021. It should be noted it is now over 4 years since the Grenfell tragedy”.

Proposal 1:

We propose require the Responsible Person to prepare a PEEP for every resident in a high-rise residential building who self-identifies to them as unable to self-evacuate (subject to the resident’s voluntary self-identification) and to do so in consultation with them.

Our response:

While we agree on the need for PEEPS. We do not agree this should base on resident’s ability to be able to self-identify whether they can or cannot do so.

This task should be led by the responsible person involving the resident and, when requested a mutually agreed competent safety person. Our Fire and Rescue Services should monitor to ensure that PEEPs are being properly carried out. PEEPS must apply to all residents irrespective of their circumstances.

Responsible Person has got to be articulate, have integrity and be impartial to cost of preparing PEEPs for those who need it. Training when requested must be made available to residents so they are able to understand how they are affected by PEEPS.

Proposal 2:

We propose to provide a PEEP template (Annex A) to assist the Responsible Person and the residents in completing the PEEP, and to support consistency at a national level.

Our response:

We agree with this proposal. Good idea. Difficult to achieve.

Proposal 3:

We propose to require the Responsible Person to complete and keep up to date information about residents in their building who would have difficulty self-evacuating in the event of a fire (and who have voluntarily self-identified as such), and to place it in an information box on the premises to assist effective evacuation during a rescue by the Fire and Rescue Service.

Our response:

Good idea but Page 8 1st para last line of your paper states 'We do not propose that for a PEEP to be effective that reliance is placed upon the intervention of the Fire and Rescue Service'. You cannot have it both ways! Each individual resident must be supplied with a copy of the PEEP evaluation.

The responsible person will organise and offer each resident a regular dry run exercise of how a PEEP should work and make any necessary adjustments those involve feel is required will be made.

Proposal 4:


We propose, to assist the Responsible Person and support consistency at a national level, to provide a template to capture the key information to be provided in the information box (Annex B)

Our response:

While we agree with your proposal. Further consideration needs to be given as to: Secure placement of the information box? How access to it will be controlled? How will the Responsible Person liaise with Fire and Rescue Service to keep this information up to date?

Question 5:

To what extent do you agree with proposal: We propose to require the Responsible Person to prepare a for every resident who self-identifies to them as unable to self-evacuate (subject to the resident’s voluntary self-identification) and to do so in consultation with them?

Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Do not know
					

Question 6: If you wish, please explain your position (250 words).


Our response:

Our argument is that it is the “responsible persons” duty to ensure every single resident of a high-rise block has available to them a PEEPS. Not just those who identify for this need.

While we agree on the need for to have Responsible Persons. This will be inadequate if The July 2020 consultation on the Fire Safety Order proposed changes to the Order to require competence of assessors is properly included. We also believe it correct to have competent assessors involved in the establishment of PEEPs.

While many PEEPs could be generic, there will be some however who due to personal circumstances: old age, young age, less physical ability, disability, and ill health who would need different PEEPs that require the involvement of specialist safety advice.

Question 7: To what extent do you agree with proposal to provide a PEEP template to assist the Responsible Person and the residents in completing the PEEP, and to support consistency at a national level?


Strongly agree	Tend to agree	Neither agree nor disagree		Tend to disagree	Strongly disagree	Do not know
						

Question 8: If you wish, please explain your position (250 words).

Our response:

In general, we agree with this proposal. However, this template would not necessarily be the same for all residents as residents’ personnel circumstances may vary and have complexities involved that others do not have. To alleviate this problem sufficient space should be allowed to vary these templates to meet these differences.

Question 9: To what extent do you agree with proposal 3: We propose to require the Responsible Person to complete and keep up to date information about residents in their building who would have difficulty self-evacuating in the event of a fire (and who have voluntarily self-identified as such), and to place it in an information box on the premises to assist effective evacuation during a rescue by the Fire and Rescue Service?


Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Do not know
					

Question 10: If you wish, please explain your position (250 words)

Our response:

While we tend to agree. We reiterate It should not be for a resident to voluntary self-identify to the responsible person whether they can or cannot self-evacuate. This task should be led by the responsible person without any discrimination towards self-identity determinations. Also relying on digital inclusion should not be the only way of communicating as it is difficult for some people.

Question 11: To what extent do you agree with proposal 4: We propose, to assist the Responsible Person and support consistency at a national level, to provide a template to capture the key information to be provided in the information box?

Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Do not know
					

Question 12: If you wish, please explain your position (250 words)

Our response:

We agree with this proposal.

Question 13: Do you think other information than in Annex A should be included in the PEEP template and if so, what? (250 words)

Our response:

After the second box the wording of: “Personal circumstances of the resident” should be adding with the wording of: (if you need extra space for your comments, please include these at the back of this template and if felt necessary add additional pages. The wording in the second box 1st line: “If No, this will be provided on: (include date) should also be shown in the 2nd box 2nd line down.

Question 14: Do you think other information than in Annex B is necessary for the Fire and Rescue Service to undertake a rescue and should be included in the information box; if so, what (250 words)?

Our response:

Box l/h side next to Building should read: "Block name and address".

Second box L/H which reads: Contact details of the Responsible Persons should next to it read: Name, Address, mobile phone no, and email address.

Third box L/H side next to Number of floors (including ground and lower ground floors) should be added on R/H side with: This is number floor of numbered floors.

Eighth box L/H side down insert" Number of" before the word "Residents"

Ninth line down delete wording in the third box and replace with: "Name of residents who will require assistance".

Ninth line down delete wording in the fifth box that reads: "How many people would be required?"

Question 15: How often should the PEEP be reviewed?

Our response:

At least every week and whenever a resident indicates a change in circumstances to the Responsible Person.

Question 16: How often should the information in the information box on the premises be updated?

Our response:

At least every week and as soon as a resident indicates a change in circumstances.

Question 17: Do you have any further comments that you think would be important for policy officials to consider as part of this consultation? (400 words)

Our response:

Yes

Question 18: Do you have any comment on or data to support the impact assessment (250 words)?

Our response:

No

Our additional comments

Discrimination of older people

As an organisation that represents older people, we are concerned with the discrimination that already exists to older people. And if not recognised will affect how PEEPS are established. We are discriminated on so many levels, too long to list in this paper. Communications with us is extremely poor, with many of us suffering from being isolated. Our housing conditions are more likely to be unsuitable making it harder to evacuate than most. Because of our age we are prone to having more ill health and disabilities than others. This makes it more likely that we will need more help during an emergency. These obvious facts mean we need more support than what is indicated in your document. Ref page 13-14

We want the new requirements being set out in the Building Safety act 2021 be demonstrated in PEEPS:

We do not agree with the proposal not to involve the Fire and rescue services in establishing PEEPS. The expertise of our fire services should be used to sign off fire safety plans and PEEPS. We need to bring back a direct overlap between the owners of properties, the high level of expertise required for what is a high level of risk. Ref page 8.

Relevant fire safety legislation

We do not accept all the reasons given not to look at relevant workplace safety regulations to see how they can be used for PEEPS.

The Building Safety act 2021 and the Health and Safety at Work Act and its various provisions applies to buildings when used as workplaces providing workers protections. These workplace regulations should be looked at to see where they can be successfully applied to the residents of buildings. Especially when construction work is carried out on buildings that have tenants occupying them. Ref Page 15.

You have a ridiculous situation in which a caretaker a building worker or another type of worker are protected by health and safety law when working in these buildings when a tenant facing the same hazards are not protected. The dangers of asbestos being most common and most deadly.

Evacuation and Stay Put Strategy

We agree when the report says that “the Stay Put Strategy failed at Grenfell Tower” and further agree with the recommendation they must be based on risk assessment approach of each tower block. Ref page 17.

The definition of a high-rise residential building.

We do not agree that PEEPS should only apply to 18 metres in height or having at least seven storeys. The safe evacuation of disabled and vulnerable older people can be equally compromised whether they are on a higher or lower part of a building. Ref page 19.

Keeping a PEEP updated

There is no substitute for all residents being more involved in looking out for the safety of each other. But this should always be done with sensitivity. That is why tenants/residents' associations and older persons organisations should be encouraged on these estates. Responsible persons should carry out regular surveys and do so with the involvement of the residents and their organisations. Ref page 24.

PEEPs and personal information

We support the proposals concerned with PEEPS and personal information. Ref page 24.

Fire Surveillance

It would be a 24/7 job for a Responsible Person to monitor the building. If he/she is away Who then will do it?

Should you require any further information, please use the contact information previously supplied.

Yours sincerely

Jonathan Safir

**Jonathan Safir
Information Officer**

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