Understanding residential personal emergency evacuation plans (PEEPs) and how the law is set to change

APRIL 2025

Birketts LLP



Personal emergency evacuation plans (PEEPs) have rightly been the subject of debate since the tragedy of the Grenfell Tower fire on 14 June 2017. As many readers will already be aware, PEEPs are tailored documents designed to ensure the safety of individuals who may need assistance during an emergency evacuation. They are particularly critical in residential settings, where occupants may include elderly individuals, people with disabilities or those with specific medical needs. Unlike workplaces or public buildings, residential properties present unique challenges due to the diversity of occupants, varied building designs and differing levels of available support.

Residential PEEPs are not merely a formality; they are a life-saving tool that recognises the rights and needs of vulnerable individuals. Emergencies like fires, floods or power outages can escalate quickly, leaving those unable to evacuate independently at significant risk. PEEPs bridge this gap, ensuring housing providers, caretakers and emergency responders have a clear plan to assist occupants in distress. However, historically PEEPs have only been mandated by law in a workplace setting and the obligation to create them has not extended to domestic premises. Following the fire at Grenfell Tower, reform of the law on PEEPs was deemed so urgent that the inquiry's phase one report contained the recommendation in paragraph 33.22 that:

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 (p. 777).

As of December 2024, the UK Government has published its response to the consultation on emergency evacuation information sharing (EEIS+), which builds upon the recommendations from the Grenfell Tower Inquiry phase one. This response outlines the government's intention to introduce legislation mandating PEEPs for residents in high-rise residential buildings who are unable to self-evacuate during emergencies.

The regulations will apply to buildings over 18 meters tall and those between 11-18 meters with simultaneous evacuation strategies. The proposed legislation will require building owners and managers to implement a structured five-step process to support vulnerable residents. This includes conducting person-centred risk assessments, identifying necessary adjustments or equipment and maintaining a "residential PEEPs statement" to document evacuation procedures and digitally share evacuation information with fire and rescue services.

The government has also committed to providing funding to assist social housing providers in fulfilling these new obligations.

Further details, including draft regulations and accompanying guidance, are expected to be released in the coming weeks. These measures aim to enhance fire safety and ensure that the lessons from the Grenfell Tower tragedy are fully integrated into the UK's fire safety framework.

This legislative development represents a significant step forward in safeguarding the rights and safety of disabled and vulnerable residents. Stakeholders are encouraged to review the forthcoming guidance and prepare for compliance with the new requirements.

For housing providers, these overarching legal principles are universally applicable:

- **Equality and accessibility:** housing providers are obligated under laws such as the Equality Act 2010 to make reasonable adjustments for disabled residents. This includes ensuring they have a safe means of evacuation during emergencies. Failure to address these needs may constitute discrimination
- **Fire safety regulations:** in the UK, the Regulatory Reform (Fire Safety) Order 2005 mandates that landlords and housing providers assess fire risks and implement measures to mitigate them. This includes identifying residents who may need evacuation support and devising PEEPs accordingly
- **Building codes and standards:** residential buildings must comply with local building codes, which often specify requirements for accessible design and safety measures. For example, multi-story buildings may need evacuation lifts or refuge areas for individuals who cannot use stairs
- **Human rights considerations:** international human rights laws emphasise the right to safety and dignity. Housing providers should ensure that emergency evacuation plans uphold these principles, providing equitable support to all residents.

Key components of a residential PEEP

A well-crafted PEEP includes the following elements:

- **Resident assessment:** housing providers must engage with occupants to understand their specific needs. This may include mobility limitations, sensory impairments or reliance on medical equipment
- **Evacuation routes:** the plan should outline accessible routes, including elevators (if safe to use), ramps and refuge areas. Providers should ensure these routes are free from obstructions
- **Support measures:** clearly define the assistance required, such as physical support, the use of evacuation chairs or notification methods (eg, visual alarms for hearing-impaired residents)
- **Communication:** PEEPs must be communicated effectively to residents, staff and emergency services. Training and regular updates are crucial to ensure everyone understands their role
- **Testing and drills:** housing providers should periodically test evacuation procedures to identify and address potential shortcomings.

Challenges in implementing residential PEEPs

Despite their importance, housing providers may encounter challenges when implementing PEEPs:

- **Resource constraints:** smaller housing providers may struggle to allocate funds for training, equipment and retrofitting buildings
- **Resident engagement:** some residents may be reluctant to disclose their needs or participate in planning discussions. Building trust and fostering open communication are essential
- **Building limitations:** older properties may lack modern accessibility features, necessitating creative solutions and, in some cases, significant investment.

Best practices for housing providers

One of the most significant lessons to be learned from the Grenfell tragedy was that some of the most pivotal and influential decisions that ultimately contributed to the vulnerability of the building could have been avoided if the communications and trust between the tenant management organisation and the residents had not irretrievably broken down. The spirit of the new legislation that has emerged following the fire encourages communication between the parties and there is now a duty in law to actively engage with residents on matters pertaining to their safety.

To overcome the challenges faced in implementing the new regime, housing providers should adopt the following strategies:

- **Collaborate with experts:** engage fire safety consultants, accessibility specialists and disability advocates to create effective PEEPs
- **Leverage technology:** use digital tools to maintain and update PEEPs, track resident needs and streamline communication during emergencies
- **Foster community resilience:** encourage residents to support one another and participate in safety initiatives. This can create a sense of shared responsibility and strengthen evacuation procedures
- **Accessible housing success stories:** showcase examples of housing providers who have successfully implemented PEEPs, such as retrofitting buildings with evacuation lifts and training staff to assist residents.

Looking ahead: Evolving legal and ethical standards

The evolving legal landscape since the fire at Grenfell Tower and Dame Judith Hackitt's subsequent report has understandably left many housing providers struggling to know what to prioritise, in what was already an environment plagued by budget constraints and endless workloads. If you are struggling with how to keep up with changing requirements, there are resources available to assist.

As society becomes more inclusive, legal and ethical standards surrounding PEEPs are likely to evolve. Housing providers must stay informed about changes in legislation and best practices. Proactively addressing these issues not only ensures compliance but demonstrates a commitment to residents' wellbeing.

It may help to look to environments that have already implemented successful PEEP schemes.

Many residential care homes, for example, have effectively implemented PEEPs by tailoring evacuation plans to the specific needs of residents with varying levels of dependency. For instance, they assess whether residents require mobility aids, staff assistance or specialised equipment like evacuation chairs. These plans are regularly updated to reflect changes in residents' conditions.

Corporate environment organisations such as Compass Group UK and Ireland have developed comprehensive PEEP frameworks for employees with disabilities. These include detailed evacuation routes, assigned assistance personnel and training for staff to ensure smooth execution during emergencies.

Similarly, in an educational setting, universities like the University of Manchester have implemented PEEPs for students and staff requiring assistance. They use questionnaires to identify individual needs, provide clear evacuation instructions and ensure that appropriate support is available during emergencies.

Whilst the changes may feel daunting, housing providers have a unique opportunity to safeguard lives, uphold dignity and foster inclusive communities. By prioritising PEEPs, they can transform residential spaces into safe havens, ensuring every resident has a fair chance in emergencies.

For support in implementing any of the tools above or to find out more on this topic or any health and safety matter, please contact Francesca Reason or any member of the regulatory corporate defence team at Birketts LLP.

Fast, practical guidance on everything to do with housing

HQN provides high-quality advice, tailored support and training to housing associations, councils, ALMOs and other housing providers.

Find out more about HQN and our network membership by visiting hqnetwork.co.uk or call us on +44 (0)1904 557150.

Rockingham House, St Maurice's Road, York, YO31 7JA
Tel: +44 (0)1904 557150 Email: hqn@hqnetwork.co.uk Visit: hqnetwork.co.uk

HQN Limited Registered in England Reg No. 3087930