



EMBASSY COURT

Person Centred Fire Risk Assessment (**PCFRA**) and Personal Emergency Evacuation Plan (**PEEP**) Policy

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1. Purpose

1.1 Statutory duties

Bluestorm Ltd.'s statutory duties to ensure that appropriate arrangements are in place for the safe means of escape from the premises for residents meeting the qualifying criteria for a Personal Emergency Evacuation Plan (**PEEP**), determined through a Person Centred Fire Risk Assessment (**PCFRA**).

1.2 To minimise the risk of fire in properties

A **PCFRA** is a thoughtful and tailored approach to understanding how an individual's unique characteristics, behaviours, and needs may influence their risk in the event of a fire. It's designed to help identify potential vulnerabilities and put in place practical, supportive measures that reduce risk and promote safety within the home. The aim is to create safer living environments by introducing additional fire safety precautions where needed, and by encouraging everyday practices that help manage risk in a way that feels natural and achievable for each resident.

Through the PCFRA process, we take time to understand how each person might detect and respond to a fire, considering factors such as mobility, sensory awareness, and cognitive ability. This deeper understanding allows us to shape more effective support and ensure that emergency services, such as East Sussex Fire and Rescue Service, have the right information to respond swiftly and appropriately.

A **PEEP** is a bespoke plan developed in collaboration with the resident. It sets out how they can safely leave the building in the event of a fire, or if evacuation isn't possible what protective measures can be put in place to safeguard them. PEEPs are introduced for individuals living in buildings between 11 and 17.9 metres tall where simultaneous evacuation policies apply, and in all residential buildings 18 metres or taller. For the purposes of the Regulations, this includes an Emergency Evacuation Statement agreed and shared with the resident. Embassy Court measures over 18 meters in height.

2. Intentions

2.1 The PCFRA and PEEP policy complies with Emergency Evacuation Information Sharing (EEIS+) which is a UK government initiative requiring building Responsible Persons to identify and share information about residents unable to self-evacuate with the Fire and Rescue Service. Following initial concerns about Personal Emergency Evacuation Plans (PEEPs), this new approach involves a resident led, person centred fire risk assessment and the creation of a secure information sharing system. Information shared is limited to details essential for evacuation and requires resident consent.

The Responsible Person will offer a PCFRA to each identified relevant resident

2.2 PCFRAs will be carried out with residents at Embassy Court following :

- Voluntary self identification
- Periodic reminders
- Requesting information upon moving into the property

2.3 PEEPs are an additional step which further considers evacuation methods.

2.4 Information gathered from PCFRAs and PEEPs will be shared with East Sussex Fire and Rescue Service.

3. Scope

3.1 Accommodation Type

General Needs - A general needs property is a type of standard, mainstream housing not specifically designated for a particular group with special requirements. This means tenants are expected to live independently, and the property does not come with specialist care or support services. Embassy Court is fitted with a communal fire alarm system which supports a simultaneous evacuation strategy. Residents will be required to evacuate upon activation of the alarm unless otherwise instructed by the Fire and Rescue Service.

3.2 Resident Profile requiring PCFRA & PEEP

- They may have an increased risk of causing a fire
- They may be less able or unable to react to an alarm or fire
- They may have a reduced ability to escape in the event of a fire
- They may need additional fire safety measures to prevent and mitigate the impact of fire

4. Background

4.1 What are the Government doing?

The Fire Safety (Residential Evacuation Plans) (England) Regulations 2025 aim to improve the fire safety and evacuation of residents in specified residential buildings in England who would have difficulties evacuating a building by themselves in the event of a fire (relevant residents). This may be due to a physical mobility issue, some other disability such as having a sight or hearing impairment, or a cognitive condition. The Regulations also mandate building emergency evacuation plans in these buildings. The Responsible Person of a building in scope of the Regulations must prepare a separate building emergency evacuation plan, share this plan with their local Fire and Rescue Authority and place a copy of the plan in the Secure Information Box.

4.2 Why are the Government doing this?

The Grenfell Tower Phase 1 Inquiry Report made two recommendations (33.22(e) and (f)) concerning Personal Emergency Evacuation Plans (PEEPs) and one recommendation (33.22(c)) concerning evacuation plans which were to be actioned through legislation.

The recommendations on PEEPs were that: ‘the owner and manager of every high-rise residential building be required by law to prepare personal emergency evacuation plans (PEEPs) for all residents whose ability to self-evacuate may be compromised (such as persons with reduced mobility or cognition)’; and that ‘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’.

The recommendation on evacuation plans was that ‘the owner and manager of every high-rise residential building be required by law to draw up and keep under regular review evacuation plans, copies of which are to be provided in electronic and paper form to their local fire and rescue service and placed in an information box on the premises’.

5. Identifying residents who require a PCFRA and/or PEEP

5.1 Building Type

In line with Emergency Evacuation Information Sharing guidance (EEIS), residents living in buildings taller than 11 metres with a simultaneous evacuation and any building taller than 18 metres are eligible for a PCFRA and subsequent PEEP to be carried out if they notify the responsible person that they meet the characteristic requirements.

5.2 Eligible Residents

These are residents who are less able to self-evacuate in the case of a fire.

The following are examples of attributes that eligible residents may have:

5.2.1 Unaware of alarm or emergency or unable to react, including:

- Mental health issues - e.g. anxiety, depression, PTSD
- Cognitive issues or decision-making difficulties - e.g. dementia, learning difficulties
- Alcohol dependency or misuse of drugs - e.g. debilitating prescription drugs, likely to be less conscious of the signs of fire
- Sensory impairments - e.g. hard of hearing, sight loss

5.2.2 Have a reduced ability to escape, including:

- Have restricted mobility, are frail or have a history of falls
- Have a temporary impairment or are pregnant
- Are blind or have impaired vision
- Lacks the capacity to understand what to do in the event of a fire
- Are hoarding, or there are cluttered or blocked escape routes
- Are bed or chairbound including residents with bariatric needs
- Would be unable to unlock front door to escape

5.2.3 Have an increased chance of causing a fire, including:

- Smoking – signs of unsafe smoking or vaping materials e.g. smoking in bed, cigarette burns on furniture or carpet
- Use of emollient creams that are petroleum or paraffin based - e.g. Epimax and E45 cream and other creams for eczema, psoriasis, pressure sores and ulcers
- Air pressure mattress or oxygen cylinders are used - e.g. some hospital beds, breathing apparatus
- Unsafe use of portable heaters - e.g. placed too close to materials that could catch fire
- Unsafe cooking practices e.g. cooking left unattended, use of deep fat fryers and accumulated fat or grease
- Overloaded electrical sockets/adaptors or extension leads
- Faulty or damaged wiring - e.g. visible fraying, exposed wires, sparking when plugging in devices, buzzing sounds from outlets and visible corrosion on the wire or terminals
- Use of electric blankets
- Previous fires or near misses - e.g. burn or scorch marks on furniture, walls or floor
- E-bikes stored and/or charged within the property - e.g. are they charged in a safe way, not at night or in the escape route. This also includes e-scooters and mobility scooters.
- Unsafe candle, wax burner or tea light use - e.g. candles left unattended or near curtains

5.3 Identification of Eligible Residents

5.3.1 Residents self-identifying

Under the Fire Safety (England) Regulations 2022, Landlords are obliged to write to all residents living in buildings taller than 18m at a minimum frequency of every 12 months and include within this:

- How to report a Fire
- The Fire Evacuation Strategy for the Building and what that means for residents
- Make reasonable endeavours to identify residents with disabilities.
- Requests are made for any disabilities to be made known to the Landlord (listing disability categories) and any concerns for evacuating the building upon demand for any household members are made known to the Landlord.

5.3.2 Other methods of identifying eligible residents

Residents requiring PCFRAs and/or PEEPs can also be identified by other officers or operatives visiting residents' homes.

5.4 Timescales

5.4.1 Residents will be assessed by a representative of the Responsible Person (usually through the managing agent Harper Stone Properties) within 5 working days of their request.

5.4.2 The Responsible Person (usually through the managing agent Harper Stone Properties) will share the information from new or amended PEEPs and PCFRAs within 3 working days of the completion of the assessment.

6. Outcomes of Person Centred Fire Risk Assessments and Personal Emergency Evacuation Plans

6.1 Fire Safety Equipment

A PCFRA is designed to check that residents have the relevant fire prevention and detection apparatus installed in their homes.

6.1.1 PCFRAs require the assessor to identify that there is a sprinkler system in the property (if high rise), a carbon monoxide (if gas appliances are present) and check the smoke or heat alarm.

6.1.2 The PCFRA also requires the assessor to identify whether the resident would be less able to identify or react to a fire or alarm.

6.2 Personal Emergency Evacuation Plans (PEEPs) - only applicable to those living in Embassy Court.

The PEEP must be tailored to individual circumstances and agreed by the resident or a representative, assumptions about the limitations or the assistance required in an emergency should not be made.

6.2.1 It will be devised with the resident so that they have a clear understanding of what to do in the event of a fire either in their own home or elsewhere in the building.

6.2.2 If the resident must remain in their property in the event of a fire, East Sussex Fire and Rescue Service will be aware of their likely location due to information-sharing arrangements.

6.3 Information sharing with East Sussex Fire and Rescue Service

6.3.1 Information gathered through PCFRAs and PEEPs is shared with East Sussex Fire and Rescue Service. Information is shared digitally and physically through markers on the building plans in the Secure Information Box.

6.3.2 Information will be shared with East Sussex Fire and Rescue Service within 3 days of the completion of the PEEP/PCFRA.

6.4 Reasonable and Proportionate Measures

Following the completion of a Person-Centred Fire Risk Assessment (PCFRA), the Responsible Person will consider and, where appropriate, implement measures to reduce the fire safety risks identified for the resident.

In determining whether a measure should be implemented, the Responsible Person will apply a test of whether the measure is reasonable and proportionate. This assessment will take into account:

- The level of risk to the resident and other occupants
- The likely effectiveness of the proposed measure
- The practicality and feasibility of implementation
- The potential impact on other residents and shared areas
- The overall benefit to fire safety within the building
- The cost of the measure and who is expected to bear that cost

6.4.1 The Responsible Person is required to implement measures that are assessed as reasonable and proportionate. However, a measure will not be implemented where:

- It would introduce new fire safety risks or compromise the building's fire safety features (such as compartmentation or escape routes)
- It would have a disproportionate impact on other residents or significantly increase service charges
- It would require the employment of staff solely to assist evacuation as part of the Residential PEEPs process
- The measure is considered reasonable only on the basis that the resident funds it, and the resident declines to do so

6.4.2 Where appropriate, the Responsible Person may consider whether costs for a measure should be met by:

- The Responsible Person
- The relevant resident
- All residents where the measure provides a wider safety benefit and lease arrangements allow

6.4.3 Residents will not be compelled to pay for any measure, and refusal to fund a measure will not affect their participation in the Residential PEEPs process.

6.4.4 All decisions regarding reasonable and proportionate measures will be documented as part of the PCFRA record.

6.5 Use of Volunteers and Personal Support Arrangements

As part of the Person-Centred Fire Risk Assessment (PCFRA), relevant residents may identify that they are able to support their own evacuation with assistance from volunteers, such as family members, friends, neighbours, or carers.

6.5.1 The Responsible Person may record these arrangements as part of the Emergency Evacuation Statement where agreed with the resident. However, the Responsible Person:

- Does not have a duty to provide volunteers or arrange personal assistance for evacuation
- Is not responsible for ensuring that volunteers are available at the time of an emergency
- Is not required to employ staff for the purpose of supporting evacuation under the Residential PEEPs process

6.5.2 Where a resident relies on a volunteer to assist their evacuation, this arrangement remains the responsibility of the resident. The Responsible Person's role is limited to recording the agreed approach and ensuring it does not introduce additional fire safety risks to the building or other occupants.

6.6 Cost Allocation for Mitigating Measures

Following the completion of a Person-Centred Fire Risk Assessment (PCFRA), the Responsible Person will consider the cost of any measures identified to reduce fire safety risks and will determine, as part of the reasonable and proportionate assessment, where the cost should appropriately fall.

In making this determination, the Responsible Person will consider:

- The level of risk to the relevant resident and others
- The effectiveness and necessity of the proposed measure
- The practicality of implementing the measure
- The extent to which the measure benefits only the individual resident or multiple residents
- Lease and legal considerations relating to shared costs
- The duration of the resident's expected stay in the building

Costs for mitigating measures may fall to one of the following:

a) **The Responsible Person**

Where it is reasonable and proportionate for the Responsible Person to fund the measure, taking into account overall safety benefit and available resources.

b) **The Relevant Resident**

Where the measure is specific to the needs of the individual resident and it is reasonable and proportionate for the resident to meet the cost.

Residents will not be required to pay for any measure, and if a resident chooses not to fund a measure, it will not be implemented and their participation in the Residential PEEPs process will not be affected.

c) **All Residents**

Where a measure benefits the safety of multiple residents and lease arrangements permit, it may be reasonable and proportionate for the cost to be shared across all residents through service charges.

Where a cost is proposed to be shared through service charges, residents retain the right to challenge the reasonableness of such costs through established legal mechanisms.

7. Building Emergency Evacuation Plan

7.1 In accordance with the Fire Safety (Residential Evacuation Plans) (England) Regulations 2025, the Responsible Person has prepared a Building Emergency Evacuation Plan (BEEP) for this building. The purpose of this plan is to set out the arrangements for the safe evacuation of the building in the event of a fire and to support the fire safety of all residents, including those who may have difficulty evacuating without assistance.

7.2 Content of the Building Emergency Evacuation Plan

The Building Emergency Evacuation Plan includes:

- The building's evacuation strategy which is a Simultaneous Evacuation
- The number of floors and residential units in the building
- Instructions to residents on what to do in the event of a fire
- Any additional relevant evacuation arrangements

The plan is aligned with the building's Fire Risk Assessment and the Fire Safety (England) Regulations 2022.

7.3 Sharing with the Fire and Rescue Authority

A copy of the Building Emergency Evacuation Plan has been provided to the local Fire and Rescue Authority. Embassy Court has a Secure Information Box installed, a copy of the plan is also stored within the box to support emergency response arrangements.

7.4 Review of the Building Emergency Evacuation Plan

The Building Emergency Evacuation Plan will be reviewed:

- No later than 12 months after the plan is first prepared
- At least every 12 months thereafter

When there is reason to believe the plan requires updating, including:

- Significant changes to the building
- Changes to fire safety systems
- Changes to the building's evacuation strategy
- Following a fire incident, drill, or emergency where learning is identified

Where updates are made, the revised plan will be shared with the Fire and Rescue Authority and placed in the Secure Information Box as soon as reasonably practicable.

8. Storing and Sharing Information

8.1 Manual information storage

8.1.1 Physical copies of building plans are stored in all high-rise buildings in Secure Information Boxes. These will be used by the Fire Brigade in the case of an emergency. Building plans are marked with stickers indicating residents who have a PEEP or PCFRA:

Red sticker- category 1: People requiring rescue or evacuation by 3 or more fire fighters and/or additional equipment, such as a bariatric person, a wheelchair user, someone who requires a stretcher, and someone who has medical equipment with them.

Orange sticker- category 2: People requiring rescue or evacuation by 2 or fewer fire fighters with no additional equipment required, such as a person with a mobility impairment but does not require a wheelchair, someone who is blind or partially sighted, someone with a cognitive impairment.

8.1.2 The Fire Brigade and the Responsible Person (usually through the managing agent Harper Stone Properties) have keys to access the Secure Information Box (SIB). The Responsible Person (usually through the managing agent Harper Stone Properties) mark Secure Information Boxes with a sticker upon completion of a PEEP or PCFRA, this will be done within 10 working days of the completion of the assessment.

8.2 Digital information storage

8.2.1 Information about new PEEPs/PCFRAs or amendments to existing assessments will be shared with East Sussex Fire and Rescue Service within 3 working days of the completion of the assessment.

8.3 Consent for Assessment and Information Sharing

Participation in a Person-Centred Fire Risk Assessment (PCFRA) and agreement to an Emergency Evacuation Statement (EES) is voluntary. Residents must provide informed consent before personal information is recorded or shared with East Sussex Fire & Rescue Service (ESFRS).

Consent will be:

- Clearly explained,
- Limited to relevant fire safety information only,
- Recorded in writing, and Capable of being withdrawn at any time.

8.4 Refusal of PCFRA or Emergency Evacuation Statement

Where a resident declines a PCFRA or does not wish to agree an Emergency Evacuation Statement:

- The offer and refusal will be recorded.
- The resident will be provided with general fire safety advice appropriate to the building's evacuation strategy.
- The resident will be informed that they may request a PCFRA at any time in the future.

Refusal of assessment or information sharing will not affect the resident's tenancy or relationship with the Responsible Person.

8.5 Withdrawal of Consent

If a resident withdraws consent for information sharing with ESFRS:

- The withdrawal will be recorded.
- No further personal information will be shared.
- Existing records will be managed in accordance with data protection legislation.

Fire safety advice and reasonable mitigating measures within the Responsible Person's control will continue to be considered.

8.6 Residents Lacking Capacity or Requiring Representation

Where a resident may lack capacity to provide informed consent, or where appropriate support is required:

- A lawful representative, advocate, or person with appropriate authority (e.g., Power of Attorney) may be involved in the assessment process.
- Decisions will be made in accordance with the principles of the Mental Capacity Act 2005.
- The resident's wishes and best interests will remain central to the process.

8.7 Ongoing Engagement

Residents who initially decline participation will be re-offered the opportunity at appropriate intervals as part of the Responsible Person's duty to use reasonable endeavours to identify and support relevant residents.

9. Competence

9.1 All staff undertaking key roles within the delivery and management of PCFRAs and PEEPs will have access to training and support applicable to their roles.

9.2 All staff who meet residents and enter their homes will be made aware of the referral mechanisms to request for a PCFRA or PEEP to be carried out.

10. Quality Assurance

10.1 The Secure Information Box will be monitored by The Responsible Person (usually through the managing agent Harper Stone Properties) every 3 months to ensure that the correct information is installed and perform quality checking.

11. Appeals and complaints

11.1 Should there be a complaint from a resident concerning, any aspect of the PEEPs and PCFRA policy, this will be dealt with via Harper Stone Properties Complaints Policy. This is available upon request from Harper Stone Properties.

12. GDPR and Data Protection

Bluestorm Ltd & Harper Stone Properties recognises the commitment to ensure that all data is:

- Processed lawfully, fairly, and in a transparent manner.
- Collected for a specific and legitimate purpose and not used for anything other than this stated purpose, or as provided for in our privacy and fair processing notices.
- Relevant and limited to whatever the requirements are for which the data is processed.
- Accurate, and where necessary, kept up to date. Any identified inaccuracies will be amended or removed without undue delay.
- Stored for as long as required, as specified within Harper Stones Privacy Notice Policy.
- Secured with appropriate solutions, which protect the data against unauthorised or unlawful processing and accidental loss, destruction, or damage.

13. Monitoring and Review

13.1 This policy will be reviewed every three years, or sooner if required by statutory, regulatory, best practice, emerging developments, or circumstances arising from reviews of other Embassy Court documents.

13.2 Review of Person-Centred Fire Risk Assessments and Emergency Evacuation Statements

In accordance with the Fire Safety (Residential Evacuation Plans) (England) Regulations 2025, each Person-Centred Fire Risk Assessment (PCFRA), associated mitigating measures, and Emergency Evacuation Statement (EES) will be reviewed at least annually from the date of completion.

A review will also be undertaken sooner where:

- The resident's personal circumstances change (e.g. mobility, health, support arrangements).
- There are changes to the building's fire safety systems or evacuation strategy.
- Following a fire incident, false alarm, or near miss.
- At the request of the resident or their representative.

Where consent has been provided for information sharing with East Sussex Fire & Rescue Service, updated information will be shared following any material change.

Records of all reviews will be securely maintained in accordance with data protection requirements.

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