

CROYDON COUNCIL HOUSING

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

The Policy outlines the London Borough of Croydon approach to delivering Person Centred Fire Risk Assessments and Personal Emergency Evacuation Plans in the Councils owned and managed properties.

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1. Purpose

1.1. *Statutory duties:*

- The Council'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 PEEP, have requested a risk assessment and live in a qualifying building.

1.2. *To minimise the risk of fire in properties:*

- A person-centred fire risk assessment (PCFRA) is a process that evaluates a person's individual characteristics, behaviours, and capabilities to identify fire risks and determine how to reduce them.
- To minimise and mitigate the risk of fire in properties by implementing additional safety measures where appropriate and managing the risk within the property through household practices.
- To assess and evaluate a resident's individual characteristics, behaviours, and capabilities in relation to the risk of fire within their property.
- To further understand residents' ability to identify fire and respond to this appropriately.
- To collect appropriate information to share with the London Fire Brigade to equip them with additional information regarding the risk of individuals and their ability to escape in the event of a fire.
- A personal emergency evacuation plan (PEEP) is a customised plan made in agreement with the resident which outlines how an individual can safely evacuate from a building in the event of a fire. If the resident is unable to evacuate, it will detail what safety measures can be implemented to mitigate the risks of and during a fire. PEEPs will be implemented in instances where relevant individuals live in buildings 11-18 m tall where simultaneous evacuation policies are in place, or any residential building 18m or taller.

1.3. *Definitions:*

- Secure Information Box (SIB) – Secure boxes outside all high rise and sheltered blocks with details of the outcomes of PEEPs and PCFRAs stored in there for use by the Fire and Building Safety Team and Fire Brigade.
- Personal Emergency Evacuation Plan (PEEP)
- Person-Centred Fire Risk Assessment (PCFRA)
- Emergency Evacuation Information Sharing (EEIS)
- Responsible Person – Croydon Officers responsible for undertaking assessment process associated with this policy.

- Relevant Residents – Set out in 6.
- Qualifying building - Buildings taller than 11 metres with a simultaneous evacuation and any building taller than 18 metres.

2. Statement of Intent

- 2.1. The PCFRA and PEEP policy complies with Emergency Evacuation Information Sharing guidance published by the Home Office, as well as the legal framework in section 4.
- 2.2. PCFRAs will be carried out with residents living in any property type if deemed reasonable and practicable by the assessor. Information will be shared with the Fire and Building Safety team and additional fire safety measures put in place where necessary.
- 2.3. PEEPs are an additional step which further considers evacuation methods and must be carried out for relevant residents living in a building with a simultaneous evacuation strategy between 11 and 18 metres and every building taller than 18 metres who self-identifies to Croydon as unable to self-evacuate (subject to the resident's voluntary self-identification) and to do so in consultation with them.
- 2.4. Information gathered from PCFRAs and PEEPs will be shared with the London Fire Brigade.

3. Scope

3.1. Accommodation Type

- General Needs – The majority of the housing stock which comprises of properties intended for general family housing and dwellings for singles and couples. There are no additional support offers.
- Specialised Accommodation – Sheltered and Extra Care
- Leasehold Properties
- Temporary Accommodation – Managed by the Council
- The Council will require third-party managing agents to conduct an annual compliance survey.

3.2. Resident profile

- 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

Please see section 6.2 for additional detail.

4. Legal Framework

4.1. This Policy will ensure compliance with the following standards and legislation and promote good practice.

Legislation:

- Housing Acts 1988, 1996, 1998 and 2004
- The Building Regulations 2010
- The Equality Act 2010
- Regulatory Reform (Fire Safety) Order 2005
- The Building Safety Act 2022
- The Building (Higher-Risk Buildings Procedures) (England) Regulations 2023
- Fire Safety Act 2021
- Fire Safety Regulations 2022
- The Care Act 2014
- London Fire Brigade – Fire Safety Guidance Note

This policy should be read in conjunction with:

- Tenancy Agreement
- Hoarding policy

5. Background

- 5.1. Under current Regulatory Reform Fire Safety Order (RRFSO) 2005 and that of the Equality Act 2010, it is a requirement of the Responsible Person to make suitable arrangements for means of escape from the premises (RRFSO2005) and 'to a provision criterion or practice of a Duty Holder in relation to a relevant matter in comparison with persons who are not disabled, to take such steps as is reasonable to have to take to avoid the disadvantage'.
- 5.2. On 2nd September 2024 the Government announced intention to implement outstanding recommendations in relation to the safety of disabled and vulnerable residents living within high-rise buildings, referring to Residential PEEPs statement. Proposals will see residents with disabilities and impairments entitled to a Person Centred-Fire Risk Assessment (PCFRA) to identify appropriate equipment and adjustments to aid their fire safety / evacuation as well as a Residential PEEPs statement that records what vulnerable residents should do in the event of a fire if living in a building with a simultaneous evacuation policy.
- 5.3. Further guidance published in December 2024 on Emergency Evacuation Information Sharing (EEIS) stipulated that PEEPs should be offered to residents living in high-rise buildings which have a simultaneous evacuation policy in place. PEEPs must be carried out with residents who self-refer to the Responsible Person.

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

6.1. 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.

Residents living in any property which does not meet these requisites for a PCFRA or PEEP to be conducted but requests a PCFRA can have one carried out in instances where the responsible person agrees that it is proportionate, practical, and safe.

6.2 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:

6.2.1. 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

6.2.2. 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
- Is hoarding, or there are cluttered or blocked escape routes
- Are bed or chairbound including residents with bariatric needs
- Internal doors are left open at night
- Would be unable to unlock front door to escape

6.2.3. 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

6.3 Tenancy or lease type

- PCFRAs and/or PEEPs will be carried out for residents living in General Needs and Sheltered accommodation in agreement with the resident.
- Those who reside in Extra Care accommodation automatically meet the criteria to have a PEEP carried out. These are updated through the annual review of their care.
- Temporary Accommodation managed by Croydon Council.
- Croydon Council will require third party managing agents to carry out annual compliance checks.
- Leaseholders living in eligible blocks managed by Croydon Council are also eligible to have a PCFRA or PEEP carried out. Leaseholders will be charged for the service and any recommended changes to the property arising from the assessment will be funded by the Leaseholder.

6.4 Identification of Eligible Residents

6.4.1 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.

6.4.2. Other methods of identifying eligible residents

- Proactive programmes for residents who do not self-refer will also be carried out. This will involve desktop reviews of disability and age demographics.
- Residents requiring PCFRAs and/or PEEPs can also be identified by other officers or operatives visiting residents' homes. This will be flagged to the tenancy team.
- Assessments will be offered to eligible residents who have new tenancies and carried out during the initial tenancy visit.

6.5 Timescales

- 6.5.1 Residents will be assessed by a Tenancy Sustainment Officer within 5 working days of their request.
- 6.5.2 The Fire and Building Safety Team will update stacking plans with the information from the completed PEEP or PCFRA within 10 working days of the completion of the assessment.
- 6.5.3 The Fire and Building Safety Team will share the information from new or amended PEEPs and PCFRAs within 7 working days of the completion of the assessment.

7. Outcomes of Person-Centred Risk Assessments and Personal Emergency Evacuation Plans

7.1 Fire Safety Equipment

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

- 7.1.2. Any fire mitigation measures or additional alert systems will be installed within 28 days of the visit from the Fire and Building Safety Team, in line with the Croydon Council Repairs Guide.
- 7.1.3. 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.
- 7.1.4. The PCFRA also requires the assessor to identify whether the resident would be less able to identify or react to a fire or alarm.
- 7.1.5. The assessor is required to contact the Fire and Building Safety team in instances where the detection system is not appropriate for the resident. For example, in instances where there is a sounding smoke alarm in a property where a deaf resident lives.
- 7.1.6. The Fire and Building Safety Team will arrange the installation of adapted fire detection equipment or fire prevention systems such as personal misting systems, where necessary.

7.2 Hoarding

- 7.2.1 If a resident is identified as hoarding according to the hoarding policy, they are referred to the tenancy sustainment team to improve the safety of the resident's home— see Hoarding policy.

7.3 Personal Emergency Evacuation Plans (PEEPs)- only applicable to those living in simultaneous evacuation blocks taller than 11m and all residential buildings over 18m

- 7.3.1. 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.
- 7.3.2. 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.
- 7.3.3. If the resident is not able to self-evacuate in the event of a fire, the fire and building safety team will assess whether additional precautions are required for the resident such as a personal misting system.
- 7.3.4. If the resident must remain in their property in the event of a fire, the LFB will be aware of their likely location due to information-sharing arrangements.

7.4 Information sharing with the London Fire Brigade

- 7.4.1 Information gathered through PCFRAs and PEEPs is shared with the London Fire Brigade. Information is shared digitally and physically through markers on the stacking plan in the SIB.

- 7.4.2 Information will be shared with the London Fire Brigade within 3 days of the completion of the PEEP/PCFRA.

8. The Review Process

- 8.1 PCFRAs and PEEPs are reviewed annually, or in any instance where the Council is made aware of or identifies a change in a resident's conditions, including living conditions and health and abilities.
- 8.2 The review dates for PEEPs are set in accordance with the reason for the PEEP. People with rapidly changing conditions will have a review date set sooner than those which mean that residents' abilities are likely to remain stable.
- 8.3 Annual reviews can be done remotely over the phone or a video call with the resident, but it is strongly recommended, that where any change in condition has taken place, a face-to-face review of the assessment take place.

9. Storing and Sharing Information

9.1 Manual information storage

- 9.1.1. Physical copies of stacking 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. Stacking 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.

- 9.1.2. The Fire Brigade and the Fire and Building Safety Team have keys to access the Secure Information Box (SIB). The Fire and Building Safety team 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.

9.2 Digital information storage

- 9.2.1 Flags are generated on residents' NEC profiles to indicate whether they have a PEEP or PCFRA. Flags are generated with a review date.

- 9.2.2 Information regarding PEEPs and PCFRAs is centrally stored to be shared with the Tenancy Team, Tenancy Sustainment Officers, Quality Officers, and Fire and Building Safety Team. It will be shared externally with the London Fire Brigade.
- 9.2.3 Information about new PEEPs/PCFRAs or amendments to existing assessments will be shared with the London Fire Brigade within 7 working days of the completion of the assessment.
- 9.2.4 Residents in Extra Care Accommodation agree to PEEPs carried out by Scheme Managers, these are also shared with the Fire and Building Safety team and the London Fire Brigade.

10. Competence

- 10.1 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.
- 10.2 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.

11. Quality Assurance

- 11.1 The Secure Information Box will be monitored by the Fire and Building Safety team every 6 months to ensure that the correct information is installed and perform quality checking.

12. Performance Reporting

- 12.1 The number of residents who are recorded as having a PEEP or PCFRA compared to the number of residents who are recorded as having a vulnerability.
- 12.2 The proportion of residents in Extra Care Accommodation who have had a PEEP/PCFRA should be maintained at 100%.
- 12.3 Proportion of qualifying staff trained to conduct PEEPs and PCFRAs will be monitored.

13. Roles and Responsibilities

13.1 Director of Housing Management and Director of Assets and Repairs

The Director of Assets and Repairs and Director of Housing Management will have joint responsibility for the implementation of the Personal Emergency Evacuation Policy and Person-Centred Fire Risk Assessment Policy.

13.2 Heads of Services

The Head of Fire Safety will develop, implement, and monitor the effective management of Person-Centred Fire Risk Assessments and ensure that information sharing is carried out appropriately.

The Head of Fire Safety will ensure the services comply with all property-related health and safety legislation and regulations and has an up-to-date knowledge of Policy at a national and local level, to inform the Council of any changes. The Person-Centred Fire Risk Assessment policy and associated procedures are embedded within the operational delivery of Fire and Building Safety and Tenancy Management, and all staff are aware of their responsibilities and are adequately trained to carry them out.

The Head of Tenancy Management will manage and monitor the completion and quality of PCFRAs and PEEPs and the resultant data input by Tenancy Sustainment Officers.

13.3 Council Staff and Contractors

Will follow the PCFRA and PEEP Policy and related Policies, the associated rules, and procedures, and have an awareness of property-related legislation and regulations to ensure the operational delivery is fair and consistently delivered across our services. Staff and contractors are aware of their roles and responsibilities and regularly carry out mandatory and personal development training offered to them.

14. Related documents

- Person Centred Fire Risk Assessment process document (question form)
- Stacking Plans
- PCFRA Process Map

15. Reasonable Adjustments

15.1 Croydon Council will make reasonable adjustments to support our residents' needs when they access our services. The term 'reasonable' refers to what we can do without compromising our resources, efficiency, or ability to practically fulfil requests. This does not include [Aids and Adaptations](#) to our properties and common parts of a building.

15.2 No resident should be at a disadvantage when accessing our services. The following statements offer a general overview to ensure that our services are adjusted to meet the needs of our residents where possible. This list is not exhaustive, and we will adapt our approach based on individual resident needs.

15.3 We aim to provide services that are accessible to all who require them. As a result of this, we will:

- Ensure our officers get to know our residents and their individual needs
- Provide a range of ways for residents to contact our officers including phone, mail, email and via [Housing Online](#)
- Provide alternative communication methods on request, such as Braille, foreign language interpreter, large print etc.
- Ensure residents are always able to select their preferred method of contact.
- Ensure our offices are fully accessible to visitors

15.1. We will continue to diversify our services to meet residents' needs where possible.

16. Equalities

16.1. The Council is committed to promoting fair and equal access to services and equal opportunities in employment, the procurement of goods and as a community leader. The Council's policies, procedures and day-to-day practices have been established to promote an environment which is free from unlawful and unfair discrimination while valuing the diversity of all people.

16.2. Discrimination on the grounds of race, nationality, ethnic origin, religion or belief, gender, marital status, sexuality, disability, and age is not acceptable: the Council will take action to ensure no person using the Council's premises or services receives less favourable treatment or is disadvantaged by requirements or conditions that cannot be justified. The Council will tackle inequality, treat all people with dignity and respect and continue to work to improve services for all service users.

16.3. The legal framework for the Council's approach is provided by the Equality Act 2010 and specifically by the Public Sector Equality Duty, under which a public authority must work consciously to eliminate discrimination, harassment, and victimisation, and to advance equality of opportunity and foster good relations between people with differing characteristics.

16.4. Further detail on the Duty, and the Council's approach to fulfilling its requirements, can be found on our website.

17. Appeals and complaints

- 17.1. Should there be a complaint from a resident concerning, any aspect of the PEEPs and PCFRA policy, this will be dealt with via the Council's Corporate Complaints Policy.

18. GDPR and Data Protection

Housing Management 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 Housing Management's Records Retention Policy.
- Secured with appropriate solutions, which protect the data against unauthorised or unlawful processing and accidental loss, destruction, or damage.

Further information about Croydon Council's commitment to the General Data Protection Regulations GDPR can be found on Croydon Council's website.

[General Data Protection Regulation \(GDPR\) guidance | Croydon Council](#)

19. Consultation

- Partners with responsibility and operational knowledge of Person Centred Fire Risk Assessments and Personal Emergency Evacuation Plans, have been consulted during the development of this policy.
- Residents have also been engaged and consulted in the development and review of the Person Centred Fire Risk Assessments and Personal Emergency Evacuation Plans Policy.
- The London Fire Brigade have been consulted regarding their requirements from the outcomes of the assessment.

20. Monitoring and Review

- 20.1 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 Council wide policies.

20.2 Arrangement for a full internal audit of our PCFRAs and PEEPs processes will be undertaken by the Council's Internal Auditors. The full scope of the audit will be agreed.

21. Document Control

22.1. This is a controlled document and should not be changed unless by authorisation of the policy owner.

Monitoring		
Approved Date:	17.04.2025	
Next Review Date:	May 2028	
Effective date:	22.05.2025	
Consultation Review		
Stakeholders review:	12.03.2025	
Legal review date:	16.05.2025	
Residents reading group:	23.03.2025	
Policy owner:	Director of Housing Management	
Ratified by:	Housing DMT on 17.04.2025	
Equality impact assessment:	The impact of this policy will be measured as it is implemented and used as part of a scheduled 1-year implementation compliance review.	
Version History		
Version Number	Summary of change	Author and Approver
1.0	New Policy	Developed and reviewed with subject matter experts in Housing and the Resident's Reading Group