



Wandsworth Council

Emergency Evacuation Information Sharing (EEIS) Consultation Response –

10th August 2022

Dear Home Office

Thank you for the opportunity to respond to this consultation. Please see below our response on behalf of Wandsworth Council. As a stock holding Local Authority with over 35,000 tenanted and leasehold stock, we look forward to the outcome of the consultation and embedding these measures into our housing services.

For any queries or follow up questions, please get in touch with Wandsworth's Housing and Regeneration department through michael.liu@richmondandwandsworth.gov.uk

Regards, Wandsworth Council

Question 1: Do you agree or disagree that the initial change in legislation should be focussed on the buildings with the greatest fire safety risk i.e. buildings with simultaneous evacuation strategies in place?

Strongly Agree

For buildings with 'stay put' strategies in place, we know that generally the fire safety risks are lower. In our view, this, combined with the existing Responsible Person duties under the FSO (augmented by the Fire Safety (England) Regulations 2022); the broader building safety reforms in the Building Safety Bill; and the findings laid out in the [Independent expert statement in building safety in medium and lower-rise blocks of flats](#), means that it would not be proportionate to mandate the measures laid out in steps 2 – 5 below in stay put buildings.

Question 2: Do you agree or disagree that the toolkit, as described, would be a suitable resource to support Responsible Persons in fulfilling their duties under the Regulatory Reform (Fire Safety) Order 2005?

Tend to Agree

For buildings with a stay put strategy in place, the Responsible Persons (and others) will have assessed risk under the Fire Safety Order (FSO) but will have access to a toolkit to support Responsible Persons with their thinking, as to the interventions and strategies available to them to further improve the fire safety of their mobility impaired residents.

Question 3: Call for evidence - Are you aware of any initiatives that enhance the fire safety of mobility impaired residents, that could be considered for inclusion as case studies in the toolkit?

Nothing that has not already been referenced.

Question 4: Do you agree or disagree that the proposed identification process laid out above i.e. the Responsible Person asking residents to self-identify (when resident first moves in, comms to all residents on an annual basis and via residents coming forward themselves outside of those times) strikes the right balance of responsibilities between a Responsible Person and an individual resident?

Strongly Agree

Question 5: Do you have any additional comments on the proposed identification process as laid out in step 2 above?

No, we agree that for existing residents, this would be through some form of communication (e.g. email, newsletter or a site visit) and for new residents, this would form part of their moving in / week one activities, and to encourage residents to identify themselves to their Responsible Person outside of these occasions where required.

Question 6: Do you agree or disagree that this approach is a viable way to identify fire safety risks, including barriers to evacuation?

Strongly Agree

If you agree, whilst viable, are there still issues to consider in implementing this approach? Please give details.

As advised in the consultation the Responsible Persons currently have no statutory duties to implement in-flat prevention or suppression measures. Nor do they have to pay for adjustments in the common areas. It is noted that you do not propose to change this and that resident in some cases may be required to fund this, where Disability Facilities Grants do not cover the costs. There will no doubt be cases where the resident refuses to pay and puts pressure on the landlord to do this, so expectations need to be clear.

Question 7: Do you agree or disagree that this approach is an adequate way to identify suitable measures to mitigate against fire safety risks, including barriers to evacuation

Tend to agree

If you agree, whilst adequate, are there still issues to consider in implementing this approach?

No

Question 8: Do you foresee any issues with the provision of a Person Centred Fire Risk Assessment (PCFRA) checklist (by the Responsible Person) AND the provision of a home fire safety visit from the Fire & Rescue Service?

No

Question 9: Do you agree or disagree that this approach is sufficient to allow the Fire & Rescue Service to execute an emergency evacuation, if required?

Strongly Agree. However there needs to be a consistent approach across all Fire and Rescue Services.

Question 10: What are your views on the use of the information by Fire and Rescue Services (FRSs), including to support the emergency evacuation of mobility impaired residents?

Steps 2-5 outlined above are what we are collectively terming the Emergency Evacuation Information Sharing (EEIS) proposal. We agree it is reasonable for the FRS to ask for the information contained with a PCFRA for blocks with simultaneous evacuation strategy.

Question 11: Do you have any additional comments on the EEIS proposal as laid out in Steps 2 - 5 above?

No

Question 12: Do you agree or disagree that the addition of this on-site individual adds enough value to the EEIS proposal to justify the associated costs?

Disagree – the resources required to support this is significant and disproportionate to the level of risk.

Question 13: Call for evidence – We are interested in examples of PEEPS in residential buildings, but which fully or partially avoid the concerns over safety, proportionality and practicality.

N/A

Question 14: Call for evidence – We are also interested in examples of buildings where staff have been installed on-site to support the enacting of PEEPs or other fire safety initiatives (outside of waking watch). Are you aware of any such examples?

No

Question 15: Call for evidence - Are you aware of any other initiatives for how mobility impaired residents can be made safer in their homes or be evacuated from a high-rise residential building in a way which is safe, proportionate and practical?

No

Question 16: Call for evidence - Do you have any evidence on the numbers of residents in your building(s) who are mobility impaired and would likely have difficulty self-evacuating?

We have 7 households across our two high rise waking watch blocks who have self-identified as needing help to evacuate and have a PEEP in place. We do not know how many residents we have in our general need stock who are mobility impaired.

Question 17: Do you agree or disagree that the provision of separate evacuation plan documents should be focussed on the buildings with the greatest fire safety risk i.e. buildings with simultaneous evacuation strategies in place?

Strongly Agree

Question 18: Do you have any further comments on the proportionality of applying the EEIS proposal and the requirement to create separate evacuation plan documents, only to simultaneous evacuation buildings at this time?

No