

PCFRA'S – FREQUENTLY ASKED QUESTIONS



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CAN A PEEP BE IN PLACE WITHOUT A PCFRA?

Yes, if a resident refuses a PCFRA, you may still keep evacuation arrangements / a PEEP-type document in place. But you must be able to show that:

- A PCFRA was formally offered
- The resident explicitly declined
- The existing arrangements are based only on information the resident has already chosen to provide
- You do not present the document as PCFRA-based

The law recognises resident consent and autonomy — but it also expects the Responsible Person to evidence that they followed the correct process.

WHY THIS SITUATION EXISTS

Under the Fire Safety (Residential Evacuation Plans) (England) Regulations 2025, the legal duty on the Responsible Person is to:

Offer a Person-Centred Fire Risk Assessment to relevant residents - not to force one to happen.

Government guidance is explicit that:

- Participation is voluntary
- Residents may refuse to engage
- Refusals must be recorded, not overridden service

The duty is to offer, not to complete at all costs.

WHAT ENFORCEMENT BODIES LOOK FOR

- Evidence of a process
- Respect for resident choice
- Reasonable steps based on known information

They do not expect Responsible Persons to override consent or abandon known risks.

“Where a resident has previously requested evacuation support but refuses a Person-Centred Fire Risk Assessment, we record the refusal and retain appropriate evacuation arrangements based solely on information the resident has chosen to provide. The PCFRA has been offered in accordance with the Fire Safety (Residential Evacuation Plans) (England) Regulations 2025, and participation remains voluntary.”



WHO HAS TO PAY FOR THE PCFRA?

The Responsible Person must pay for the PCFRA. This is usually the landlord, freeholder, housing association, managing agent, or care/support provider—not the resident

Under the Fire Safety (Residential Evacuation Plans) (England) Regulations 2025, in force from 6 April 2026, Responsible Persons must:

- Identify residents who may have difficulty evacuating
- Offer and carry out a Person-Centred Fire Risk Assessment where accepted
- Prepare an emergency evacuation statement
- Keep records and review them regularly

These duties sit alongside existing obligations under the Regulatory Reform (Fire Safety) Order 2005. Because the duty is legal and sits with the Responsible Person, the cost cannot be passed to the resident simply for compliance

4Site- <https://4siteconsulting.co.uk/> are able to offer this service at a cost of £170.00 + vat per PCFRA.

CAN THE RESIDENT EVER BE CHARGED DIRECTLY?

- The assessment itself: generally no
- Recommended adaptations or equipment (e.g. specialist alarms, building works): this depends on tenure, service-charge rules, funding arrangements, or social-care support - but not the PCFRA process itself

Government guidance stresses that PCFRAs must be reasonable and proportionate, and funded as part of overall fire-safety compliance.

WHO SHOULD CONDUCT THE PCFRA?

The PCFRA should be carried out by a competent person appointed by the Responsible Person. The Responsible Person retains legal accountability, even if the task is delegated.

A competent fire-safety professional

Often used where:

- The building is complex (e.g. high-rise, supported housing)
- The resident's evacuation risks are high
- Independent evidence may be needed for regulators



The assessor must have:

- Fire-risk assessment competence plus
- An understanding of evacuation capability and person-centred risk

This is common practice and explicitly supported by guidance.

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WHO SHOULD NOT CONDUCT THE PCFRA ON THEIR OWN?

- The resident (they participate, consent, and provide information, but do not carry responsibility)
- Untrained staff without fire-safety and evacuation knowledge
- Anyone without sufficient understanding of the building's evacuation strategy

PCFRAs are not informal conversations - they are part of a regulated fire-safety process.

WHO IS INVOLVED IN UNDERTAKING A PCFRA & WHAT SUPPORTING DOCUMENT IS NEEDED?

A PCFRA is a structured, resident-focused assessment that evaluates whether an individual can safely evacuate a residential building in the event of a fire, taking account of both the person and the building's fire strategy. It does not replace the building Fire Risk Assessment; it complements it.

Undertaking a PCFRA involves five core stages.

1. Identifying and engaging the resident

The Responsible Person must:

- Identify relevant residents who may have difficulty self-evacuating (e.g. due to mobility, sensory, cognitive or health conditions)
- Offer a PCFRA
- Obtain the resident's consent to take part

The resident may also nominate a representative or trusted person to support them during the process.

2. Understanding the building fire strategy

Before considering the individual, the assessor must understand:

- The building's evacuation strategy (e.g. stay-put, progressive horizontal evacuation, simultaneous evacuation)
- Escape routes, travel distances and refuges (if any)

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- Fire detection and alarm arrangements
- Staffing or management arrangements relevant to evacuation

This ensures the PCFRA is based on how the building is designed to operate in a fire, not on assumptions.

3. Assessing the individual's evacuation capability

The PCFRA then considers the specific person, including:

Ability to perceive and respond

- Can the resident hear alarms?
- Can they understand and act on instructions?
- Are there cognitive, mental-health or sensory barriers?

Ability to physically evacuate

- Mobility, speed, stamina
- Use of aids (wheelchair, walking frame)
- Need for assistance (and whether that assistance is reasonably available)

Behavioural and risk factors

- Smoking or vaping risks
- Use of oxygen or medical equipment
- Hoarding or clutter
- Previous incidents or near misses

This stage is person-centred and proportionate, not generic.

4. Identifying reasonable and proportionate measures

Where risks are identified, the assessor considers practical measures that could reduce risk, such as:

- Changes to alarms (e.g. visual, vibrating, linked devices)
- In-flat fire-safety measures
- Enhanced management or response arrangements
- Information, guidance or support for the resident

Importantly, the guidance stresses that measures must be:

- Reasonable
- Proportionate
- Consistent with the building strategy

PCFRAs do not automatically require physical building alterations.

5. Recording, reviewing and sharing information

The findings of the PCFRA must be:

- Clearly recorded
- Kept under review
- Updated if the resident's circumstances or the building change

Certain information must be shared with the Fire and Rescue Service where required, in line with data-protection rules and resident consent.



WHAT SUPPORTING DOCUMENT IS REQUIRED?

The mandatory supporting document produced following a PCFRA is the:

Emergency Evacuation Statement (EES)

This is a written statement that sets out:

- Whether the resident can self-evacuate
- Any agreed evacuation arrangements
- Any supporting measures identified
- Key information that the Responsible Person and Fire and Rescue Service may need in an emergency

The EES is not a Personal Emergency Evacuation Plan (PEEP).

It does not assign staff to physically evacuate residents or require round-the-clock intervention plans.

What the EES must do

The guidance requires the EES to:

- Be clear, factual and proportionate
- Reflect the findings of the PCFRA
- Be made available to the resident
- Be kept up to date

It forms the formal output of the PCFRA process and is central to compliance with the Residential PEEPs regulations.

Key point to remember:

PCFRA = the assessment process

EES = the required supporting record

You cannot have a compliant EES without a PCFRA, and a PCFRA is not complete until an EES is produced.

ONCE A PCFRA HAS BEEN UNDERTAKEN, WHAT HAPPENS NEXT?

Once a Person-Centred Fire Risk Assessment (PCFRA) has been completed, there is a clear sequence of actions that must follow. The PCFRA is not the end point - it triggers recording, implementation, communication, and review duties for the Responsible Person (RP).

1. Produce the Emergency Evacuation Statement (EES)

What happens

- The findings of the PCFRA must be formally captured in an Emergency Evacuation Statement (EES).
- The EES summarises:
 - Whether the resident can self-evacuate
 - Any evacuation-related risks identified
 - Any agreed reasonable and proportionate measures
 - Key information relevant in an emergency

The PCFRA is not complete until this document exists.



2. Share the EES with the resident

What happens

- The resident must be:
- Given access to their EES
- Supported to understand what it says
- If the resident has a representative or trusted person, the RP may share the EES with them with consent

This step reinforces that the process is person-centred and transparent, not something done “about” the resident without them.

3. Implement any reasonable and proportionate measures

What happens

Where the PCFRA identifies additional measures, the Responsible Person must:

- Decide which measures will be implemented
- Ensure they are reasonable, proportionate, and consistent with the building’s fire strategy
- Put them in place within a sensible timescale

Examples may include:

- Enhanced alarm arrangements
- Adjustments to management or information arrangements
- Low-level in-flat fire-safety measures

There is no automatic requirement for physical alterations or staffing changes—each measure must be justified by risk.

4. Record keeping and audit trail

What happens

The RP must keep:

- A record of the PCFRA
- The completed EES
- Confirmation of resident consent
- Notes of any actions taken (or not taken) and why

These records form part of the RP’s **fire-safety evidence pack** and may be requested by enforcing authorities.

5. Information sharing with Fire and Rescue Service (where required)

Where appropriate, the RP must:

- Share relevant evacuation information from the EES with the local **Fire and Rescue Service**
- Ensure information sharing complies with data-protection requirements and consent provisions

Fire and Rescue Services may also request further information from the RP in future.

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6. Review and keep the PCFRA under continual assessment

What happens

A PCFRA and EES are **living documents**, not one-off exercises.

They must be reviewed when:

- The resident's circumstances or abilities change
- The building fire strategy changes
- There is a significant incident or near miss
- As part of periodic planned reviews

Failure to review can undermine the validity of the assessment.

7. Ongoing responsibility stays with the Responsible Person

Key legal principle

Tasks can be delegated. Responsibility cannot.

Even if the PCFRA was carried out by a third party:

- The Responsible Person remains legally accountable for:
 - Accuracy
 - Implementation of outcomes
 - Review and record keeping

This is consistent across fire-safety law and Residential PEEPs guidance

DOES AN EMERGENCY EVACUATION STATEMENT REPLACE A PEEP?

Yes — in residential buildings in England, the Emergency Evacuation Statement (EES) has replaced the traditional PEEP. But it is important to be clear what it replaces and what it does not.

The position under current law (England)

Under the Fire Safety (Residential Evacuation Plans) (England) Regulations 2025, in force from 6 April 2026:

- A Person-Centred Fire Risk Assessment (PCFRA) is undertaken for a relevant resident
- The required outcome document is an Emergency Evacuation Statement (EES)
- A traditional Personal Emergency Evacuation Plan (PEEP) is not required and should not be produced for residential tenants

This is explicit in the government's Residential PEEPs Guidance for Responsible Persons and Fire and Rescue Service guidance.



WHAT REPLACE MEANS IN PRACTICE

Old approach	New approach
PEEP (workplace model)	Emergency Evacuation Statement (EES)
Often assigns staff	Does not assign staff
Assumes assistance	Records evacuation capability
Operational plan	Information & risk statement
Unsuitable for most housing	Designed specifically for residential buildings

The EES now fulfils the role that some people previously tried to use PEEPs for in residential settings - without creating unrealistic or unlawful expectations.

Why PEEPs were replaced in residential buildings

Government and fire authorities deliberately moved away from PEEPs because:

- Residential buildings usually do not have guaranteed staff presence
- PEEPs can imply a promise of rescue or physical assistance
- This created legal and moral risk, highlighted in post-Grenfell reviews
- Many Responsible Persons were being pressured into drafting plans they could not deliver

The EES avoids this by focusing on factual, proportionate information rather than operational commitments.

WHAT THE EES ACTUALLY DOES

An Emergency Evacuation Statement:

- Is produced after a PCFRA
- Records whether the resident can self-evacuate
- Summarises any agreed, realistic supporting measures
- Reflects the building's actual evacuation strategy
- Can be shared (with consent) with Fire and Rescue Services

It is the formal output of the PCFRA process and the document inspectors will expect to see.



CAN A TENANT REQUEST A PCFRA?

If you're the Responsible Person (RP)—for example, the landlord, managing agent, or building owner—for a building subject to the Fire Safety (Residential Evacuation Plans) (England) Regulations 2025, you do not need to verify a tenant's request for a PCFRA with the property owner before proceeding.

- Under the Regulations, RPs must **offer** a PCFRA to tenants who may have difficulty evacuating, and tenants may also **request** one directly. [[london-fire.gov.uk](https://www.london-fire.gov.uk)], [[gov.uk](https://www.gov.uk)]
- Once a tenant requests a PCFRA and meets the criteria as a **Relevant Resident**, the RP must **carry out the PCFRA** there is **no legal requirement** to obtain the owner's permission first. [[london-fire.gov.uk](https://www.london-fire.gov.uk)]

WHAT YOU SHOULD DO

1. Identify whether the tenant is a Relevant Resident.
2. Offer the PCFRA if they haven't already requested it.
3. If the tenant requests it and gives consent:
 - Arrange for a competent assessor to conduct the PCFRA.
 - Proceed and complete the PCFRA.
4. Produce the Emergency Evacuation Statement and implement any agreed-upon measures.

All these steps are the responsibility of the RP, not the tenant or a third party.

WHEN OWNER ENGAGEMENT MIGHT BE NEEDED

You only need to involve the owner if:

- The owner isn't the RP but owns the building or common parts.
- You need access to building documentation or tenant consent.

But **you do not need explicit permission to carry out the PCFRA**—it is your statutory obligation under the Regulations. [[gov.uk](https://www.gov.uk)], [[london-fire.gov.uk](https://www.london-fire.gov.uk)]

