

Appendix 5

PCFRA and RPEEP Policy

**Person-Centred Fire Risk Assessments (PCFRA) and
Residential Personal Emergency Evacuation Plans (RPEEP)**

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Document Control

Governance

Table 1 – Policy information

Item	Response
Title	PCFRA and RPEEP Policy
Responsible officer	Joe Keating, Head of Assets and Building Safety Homes & Neighbourhoods
Author	David Ellison, Technical Fire Officer
Approved by	H&N SLT
Version approval date	02/04/26
Next review date	02/04/27
Review responsibility	Service Manager Building Safety
Applicable to	Kirklees Homes & Neighbourhoods staff. Kirklees Homes & Neighbourhoods tenants, leaseholders and household members.
Regulatory framework	Fire Safety (Residential Evacuation Plans) (England) Regulations 2025

Revision history

Table 2 – Revision details

Date	Version	Author	Authorised by	Revision details
02/04/26	1.0	David Ellison	H&N SLT	First publication

1 Introduction

1.1 Purposes of this policy

- 1.1.1 Kirklees Council recognises its duties under relevant fire safety and equality legislation and is committed to taking reasonable and proportionate steps to safeguard tenants and other residents living in its housing stock.
- 1.1.2 The council recognises that some tenants and other household members may have difficulties evacuating their home by themselves in the event of a fire or other emergency. This may be due to a physical mobility issue, or another disability such as having a sight or hearing impairment, or a cognitive condition.
- 1.1.3 This policy sets out the council's approach to identifying potentially vulnerable residents and implementing Person-Centred Fire Risk Assessments (PCFRAs) and Personal Emergency Evacuation Plans (PEEPs) where appropriate.

1.2 Legal context

- 1.2.1 Fire Safety (Residential Evacuation Plans) (England) Regulations 2025:
 - The Regulations were laid on 4 July 2025, will come into force on 6 April 2026, and apply in England only.
 - The Regulations apply to:
 - a) all buildings in England that are high-rise residential buildings, that is, buildings containing two or more sets of domestic premises ('multi-residential') that are at least 18 metres above ground level or have at least seven storeys), and
 - b) all multi-residential buildings more than 11 metres in height above ground level (typically a building height of five storeys or more) that have simultaneous evacuation strategies in place.
 - A "simultaneous evacuation strategy" is an evacuation strategy that applies to certain buildings deemed to be at a higher risk of fire, where the Responsible Person has determined that all residents should leave the building in the event of a fire, rather than staying put if they do not feel threatened by the fire.
- 1.2.2 Regulatory Reform (Fire Safety) Order 2005:
 - The Regulatory Reform (Fire Safety) Order 2005 was introduced in October 2006 and has been subsequently amended by the Fire Safety Act 2021 and the Building Safety Act 2022 in England.
- 1.2.3 Fire Safety Act 2021:
 - The Fire Safety Act clarifies the scope of the Fire Safety Order to make clear it applies to the structure, external walls (including cladding and balconies) and individual flat

entrance doors between domestic premises and the common parts of a multi-occupied residential building.

1.2.4 Building Safety Act 2022:

- The Fire Safety (England) Regulations 2022, made under article 24 of the Fire Safety Order, impose new duties on responsible persons with regard to the areas brought within the Fire Safety Order by the Fire Safety Act, and commencement of section one of the Fire Safety Act was therefore a necessary precursor to the laying of these regulations.

1.2.5 Equality Act 2010:

- Requires the council to “advance equality of opportunity between persons who share relevant protected characteristics and persons who do not share it.”

1.2.6 Care Act 2014:

- The Care Act 2014 is a key piece of legislation in the UK that modernizes and unifies adult social care law, establishing clear rights for individuals needing care and support.

1.2.7 Housing Act 2004:

- Introduced to protect the most vulnerable people in society and help to create a fairer and better housing market.

1.3 Definitions

1.3.1 For the purposes of this policy, the following definitions apply:

Table 3 – List of definitions used in this policy

Term	Definition
Person-Centred Fire Risk Assessment (PCFRA)	An assessment focusing on the individual resident’s specific needs, vulnerabilities, behaviours, and circumstances that may increase fire risk or impact safe evacuation.
Residential Personal Emergency Evacuation Plan (RPEEP)	A documented plan detailing how a resident who cannot independently evacuate in an emergency will be supported to reach a place of safety.
Tenant	A person that has an active tenancy agreement, living in a home owned by Kirklees Council.
Leaseholder	A person that owns a home on a lease, within a council-owned building.
Household member	Another person (other than the named tenant or leaseholder) living in a home owned by Kirklees Council.
Staff; Officer; Employee	A person that works for Kirklees Council, including temporary or agency workers and apprentices.
Homes &	Kirklees Council’s housing management service, inclusive of all

Term	Definition
Neighbourhoods	departments and teams.
Responsible Person, RP	The individual or organisation that is legally responsible for making sure fire safety duties are carried out in a building. As the landlord, Kirklees Council is the RP for council-owned homes.
WYFRS	West Yorkshire Fire and Rescue Service

2 Objectives and scope

2.1 Policy objectives

- 2.1.1 This policy aims to ensure that Kirklees Council meets its obligations as a landlord and building owner, to provide assurance that residents identified as needing additional fire safety support have the required PCFRA/RPEEPs in place to support them.
- 2.1.2 Kirklees Council will ensure that person-centred fire risks are assessed appropriately and that suitable risk reduction measures are implemented. Following assessment, RPEEPs will be developed where appropriate and reasonably practicable.
- 2.1.3 Kirklees Council will clarify roles and responsibilities under the legislation and promote partnership working with relevant agencies such as WYFRS.

2.2 Policy scope

- 2.2.1 The policy is relevant to all residential properties owned and managed by Homes & Neighbourhoods.
- 2.2.2 The policy applies to general needs housing, sheltered and supported housing and temporary accommodation where the council has landlord responsibilities.
- 2.2.3 Pinnacle Housing, who manage some homes on behalf of the council, are required to provide assurance that the landlord's fire safety obligations are being met. Separate arrangements are in place and maintained to ensure this.
- 2.2.4 The policy applies to all Homes & Neighbourhoods staff and contractors who have responsibility for fire safety, building safety, resident engagement and housing management of H&N properties.

3 Identification of residents requiring assessment

3.1 Identification of need

3.1.1 Residents may be directly identified as requiring a PCFRA and/or a RPEEP through the following methods:

- Self-disclosure.
- Housing officer referrals.
- Adult social care referrals.
- Safeguarding processes.
- Reports from family members or carers.
- Fire and Rescue Service referrals.
- Direct phone call.
- Social media campaign.
- Routine tenancy visits.

3.2 Possible indicators

3.2.1 Residents may also be identified as potentially requiring a PCFRA and/or RPEEP through the following indicators

- Mobility impairments.
- Sensory impairments.
- Cognitive impairment or dementia.
- Mental health conditions.
- Substance misuse.
- Hoarding behaviours.
- Use of oxygen therapy.
- Dependency on medical equipment.
- Social isolation.
- History of accidental fires.

3.3 The PCFRA process

- 3.3.1 Upon identification of the potential need for a PCFRA, a housing management officer, independent living officer or technical fire officer will determine the level of urgency and prioritise an assessment accordingly.
- 3.3.2 Within five working days of a referral, a housing management officer will contact the tenant to arrange a PCFRA. In urgent cases these should be referred direct to WYFRS for a Safe and Well visit. If there is an immediate threat to life the emergency services should be notified before leaving site.
- 3.3.3 A trained officer will undertake a home visit to:
- Assess fire hazards.
 - Assess the tenant's ability to detect fire.
 - Assess the tenant's ability to respond and evacuate.
 - Identify behavioural or environmental risks.
 - Review existing fire safety measures.
- 3.3.4 Following assessment, the tenant's risk rating will be categorised as Low, Medium or High, as set out below:
- Low Risk: The resident's mobility is not impaired, and they can physically leave the premises without assistance, or if they have some impairment but can leave with no assistance.
 - Medium Risk: The resident is neither low or high risk, but they have a mental health or cognitive condition and/or limited mobility issues. They assess themselves as being able to effectively self-evacuate, and the assessor has seen nothing to contradict this view.
 - High Risk: The resident's care and/or condition is such that they are unable to effectively self-evacuate from the building, or the immediate evacuation could prove life threatening.
- 3.3.5 A documented action plan will be developed as part of the PCFRA, which may include:
- Provision of specialist smoke detection.
 - Fire-retardant bedding.
 - Fire-resistant letterboxes.
 - Referral to Fire and Rescue Service.
 - Care package review.
 - Decluttering support.
 - Telecare or linked fire alarm system.

3.4 RPEEP content

3.4.1 In general needs housing, including in blocks of flats where a “simultaneous evacuation” strategy is in place:

- The RPEEP will focus on:
 - i. Early warning measures.
 - ii. Safe refuge within the dwelling or a place of safety within the building or an ultimate place of safety, depending on the assistance required.
- Evacuation equipment will be assessed and discussed. Any equipment required will be at the tenant’s own cost unless the mitigation/equipment benefits the entire block and safety as a whole.
- The council will not normally implement evacuation assistance requiring staff presence where none exists.
- Information will be shared with West Yorkshire Fire and Rescue Service (where lawful and appropriate).

3.4.2 In general needs blocks of flats designed under a “stay put” strategy:

- The RPEEP will focus on:
 - i. Early warning measures.
 - ii. Safe refuge within the dwelling or a place of safety within the building or an ultimate place of safety dependent on the assistance required. (If fire is in their own home)
- The council will not normally implement evacuation assistance requiring staff presence where none exists.
- Information will be shared with West Yorkshire Fire and Rescue Service (where lawful and appropriate).

3.4.3 In council-managed sheltered and supported housing where on-site staff are present 24/7:

- A documented PCFRA & RPEEP will be developed.
- Staff roles and responsibilities will be clearly defined.
- Regular drills and staff training will be undertaken by the care providers in line with CQC regulations.
- The need for evacuation equipment will be assessed and provided where appropriate. This may be at the resident’s own cost.

3.5 Recording information and data privacy

3.5.1 Homes and Neighbourhoods staff will record information on tenant vulnerabilities and conditions that could (i) indicate a need for a PCFRA or RPEEP, where consent is given,

or (ii) identify a risk of significant harm. Information will be recorded and shared across the relevant management systems and databases utilised within Homes & Neighbourhoods.

3.5.2 Information relating to PCFRAs and RPEEPs must only be recorded on a tenant record if:

- The tenant has willingly shared the information with us (verbally/in writing) and is told that a marker will be noted on their client record; or
- The information is pertinent for the council as a social landlord to inform decisions, assess risk and deliver fire safety services effectively; or
- A concern has been shared/observed that identifies a significant risk of harm.

3.5.3 Any vulnerability or safety markers added to a tenant's file will be reviewed at least once every 12 months to ensure information is current and accurate.

3.5.4 All completed and in-progress PCFRAs and RPEEPs will be securely stored on the council's housing management systems.

3.5.5 All information captured and recorded in connection to the delivery of PCFRAs and RPEEPs, as identified in this policy, will be used in accordance with Kirklees Council's Data Protection Policy and the functions and activities outlined in Kirklees Council's Privacy Notice for Homes and Neighbourhoods.

4 Roles and responsibilities

4.1 Council responsibilities

4.1.1 The council is responsible for ensuring it complies with all relevant regulations and guidance for the management of PCFRA and RPEEPs.

4.1.2 The council will offer a person-centred fire risk assessment (PCFRA) to each relevant resident they identify and, where the resident agrees, ensure the PCFRA is undertaken.

4.1.3 The council will ensure that all residents can easily request a PCFRA and that they receive a copy of their RPEEP where completed.

4.1.4 All appropriate staff and contractors will receive the adequate level of training to conduct a PCFRA and RPEEP.

4.2 Tenant responsibilities

4.2.1 Tenants are responsible for engaging with assessments and making H&N aware of any vulnerability that may indicate a need for a PCFRA or RPEEP.

- 4.2.2 Tenants are responsible making the council aware of any relevant changes that could affect them or anyone in their household in regard to RPEEPs.
- 4.2.3 In line with the Tenancy Agreement, tenants must allow council staff, agents or contractors access to their homes to carry out any inspection of fire safety related works.
- 4.2.4 For the PCFRA and RPEEPs process to be carried out, the resident's consent is required. If the cost to implement a measure falls to the resident, it can only be implemented if the resident consents to pay; and an evacuation statement can only be produced if the resident agrees with the RP on what they should do in the event of a fire. The resident may withdraw their consent to share information or participate in the PCFRA process at any time.

5 Monitoring and review

5.1 Monitoring and improvement

- 5.1.1 To ensure resident safety, review and monitoring of each PCFRA and RPEEP will be carried out in line with the following timescales:
- 3 monthly reviews of high-risk cases.
 - 6 monthly reviews of medium risk cases.
 - 12 monthly reviews of low-risk cases.
- 5.1.2 To ensure a high level of assurance, performance reporting shall take place to the Building Safety Assurance Board.

5.2 Policy review

- 5.2.1 The policy will be reviewed annually, or in response to relevant changes in legislation, regulation or organisational structures.
- 5.2.2 Any significant changes will be consulted on prior to implementation and relevant approvals sought.
- 5.2.3 This policy and future updates will be published on the council's website.

6 Associated policies and strategies

6.1 Homes & Neighbourhoods policies

6.1.1 The following Homes & Neighbourhoods policies and other documents are relevant:

- Homes & Neighbourhoods Fire Safety Management Policy
- Homes & Neighbourhoods Tenancy Agreement
- Homes & Neighbourhoods Vulnerable Tenant Policy
- Homes & Neighbourhoods Safety in Communal Areas Policy
- Privacy Notice for Homes and Neighbourhoods

6.2 Kirklees Council policies

6.2.1 The following wider Kirklees Council policies and strategies are relevant:

- Kirklees Council Housing Allocations Policy
- Kirklees Corporate Safeguarding Policy
- Corporate Health and Safety at Work Policy
- Corporate Health and Safety Strategy
- Kirklees Council Data Protection Policy