

Brocade

Building Safety Compliance Platform

Residential PEEPs: What Building Managers Need to Do Before April 2026

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What are residential PEEPs?

Residential Personal Emergency Evacuation Plans (PEEPs) are a new legal requirement under the Fire Safety (Residential Evacuation Plans) (England) Regulations 2025. They require the Responsible Person (RP) for certain residential buildings to identify residents who may have difficulty evacuating in an emergency and to put practical plans in place to help them.

The regulations introduce the concept of a person-centred fire risk assessment (PCFRA) -- an individual assessment of a resident's specific needs and circumstances that feeds into a tailored evacuation plan. This is not a one-size-fits-all exercise. Each PCFRA considers the individual resident: their mobility, any sensory or cognitive impairments, the layout of their flat, and the building's evacuation routes.

PEEPs sit alongside your existing fire risk assessment obligations under the Regulatory Reform (Fire Safety) Order 2005. They do not replace your general fire risk assessment -- they add a person-centred layer for residents who need additional support.

Disclaimer: This guide covers general obligations under the Fire Safety (Residential Evacuation Plans) (England) Regulations 2025. It is not legal advice. Consult your building's fire risk assessor or a qualified fire safety professional for advice tailored to your specific building and residents.

Who needs to comply?

The regulations apply to the Responsible Person for buildings that meet specific criteria. In most cases, the Responsible Person is the building manager, managing agent, or the person who controls the common parts of the building.

Building scope

Your building is in scope if it meets all of the following:

- Located in England
- Contains two or more domestic premises (residential units)
- Meets one of the following height or evacuation criteria:

Criterion	Threshold
Height	At least 18 metres or at least 7 storeys
Simultaneous evacuation	At least 11 metres in height and uses a simultaneous evacuation strategy

If your building is a higher-risk building (HRB) under the Building Safety Act 2022 -- that is, 18 metres / 7 storeys with 2 or more residential units -- it is almost certainly in scope for PEEPs.

Buildings below 18 metres that use a simultaneous evacuation strategy (where all residents evacuate at once when the alarm sounds, rather than a "stay put" approach) are also captured if they are 11 metres or more.

Who is the Responsible Person?

The Responsible Person (RP) is defined in the Fire Safety Order 2005. For residential buildings, this is typically:

- The freeholder or management company that controls the common parts
- A managing agent appointed to manage the building
- An RTM (Right to Manage) company that has taken over management

If you are the person responsible for fire safety in the common parts of a qualifying building, these regulations apply to you.

The Responsible Person for PEEPs is defined under the Fire Safety Order, not the Building Safety Act. In some buildings, the Responsible Person and the Principal Accountable Person (PAP) may be different entities. If you are the PAP under the BSA, check whether you are also the RP under the Fire Safety Order. For more on the Building Safety Act obligations, see our Building Safety Act Compliance Checklist.

The April 2026 deadline

PEEPs enforcement begins. The Fire Safety (Residential Evacuation Plans) (England) Regulations 2025 come into force. Fire and Rescue Authorities can begin enforcement action against Responsible Persons who have not met their obligations.

This is not a "soft launch" with a grace period. From 6 April 2026, your duties under these regulations are legally enforceable. Fire and Rescue Authorities (FRAs) have the power to inspect and take enforcement action from day one.

If you are reading this before the deadline: You have time to get this right. Work through the implementation steps below methodically. The process is straightforward for most buildings -- the key is starting early enough to give residents time to respond.

If you are reading this after the deadline: You should implement these steps as quickly as possible. Begin with Step 1 (identifying relevant residents) and work through the process. Being late but demonstrating active progress is better than doing nothing. Document your actions and timeline in case of an FRA inspection.

Step-by-step implementation

The regulations create a clear sequence of duties. Here is what you need to do, in order.

Step 1: Identify relevant residents

Your first duty is to take reasonable steps to identify residents who may need assistance evacuating the building in an emergency. The regulations call these "relevant residents."

A relevant resident is someone whose primary residence is in your building and who has a compromised evacuation ability. This includes residents with:

- Physical impairments -- mobility difficulties, wheelchair users, residents who cannot use stairs
- Cognitive impairments -- dementia, learning disabilities, conditions affecting decision-making in emergencies
- Sensory impairments -- visual or hearing impairments that may affect their ability to respond to alarms or navigate escape routes
- Temporary conditions -- residents recovering from surgery, pregnancy-related mobility issues, temporary injuries

You are not expected to conduct medical assessments. "Reasonable steps" means making genuine efforts to find out -- writing to residents, asking during routine interactions, and providing a clear way for residents to

self-identify. What matters is that you have a documented, repeatable process.

Practical approach:

1. Write to all residents explaining the new PEEPs requirements and asking them to let you know if they or anyone in their household may need assistance evacuating
2. Provide a simple response form (paper and digital) with a clear return deadline
3. Follow up with residents who do not respond -- a second letter or a polite door knock
4. Record all outreach attempts and responses (tracking which residents have been offered assessments is exactly the kind of administrative burden that compliance software like Brocade is built to handle)
5. Keep a register of identified relevant residents, updated when circumstances change

Step 2: Offer person-centred fire risk assessments

For each identified relevant resident, you must offer a person-centred fire risk assessment (PCFRA). This is a one-to-one assessment that considers the individual's specific needs, the layout of their flat, and the building's evacuation routes.

A PCFRA should cover:

- The resident's specific impairments and how they affect evacuation
- The layout and location of their flat (floor level, distance from stairs and lifts)
- Available evacuation routes and any obstacles
- Equipment or aids the resident uses (wheelchair, walking frame, hearing aids)
- Whether the resident has a carer, family member, or neighbour who could assist
- What specific mitigations would help this resident evacuate safely

Critical point: participation is voluntary. You must offer the assessment, but the resident is under no obligation to accept. If a resident declines, record that you made the offer, the date, and the method. You cannot compel participation.

If a resident declines, you still need to consider them in your general emergency evacuation planning for the building. You just will not have the detailed person-centred assessment to work from.

Who should conduct the PCFRA? The regulations do not specify a particular qualification. However, using a competent fire risk assessor who understands evacuation planning for people with disabilities will produce better outcomes. If your building's fire risk assessor has relevant experience, they are a good starting point.

Step 3: Create emergency evacuation statements

You must prepare emergency evacuation statements for the common areas of your building. These are distinct from the individual PCFRAs -- they cover the building as a whole and describe how people with different types of impairments would be evacuated through the common parts.

Emergency evacuation statements should include:

- The building's evacuation strategy (stay put, simultaneous, phased)
- Evacuation routes through common areas, with notes on accessibility
- Location of refuges or protected lobbies where residents can wait for assistance
- How the fire service will be notified that residents need assistance
- Any evacuation equipment available (evacuation chairs, refuge intercoms)
- Communication methods for residents with sensory impairments

These statements must be kept up to date and available for inspection by the Fire and Rescue Authority.

Step 4: Implement reasonable and proportionate mitigations

Based on the PCFRAs and your emergency evacuation statements, you must put in place reasonable and proportionate mitigations to improve evacuation safety for relevant residents.

"Reasonable and proportionate" is a key phrase. You are not required to make unlimited physical alterations to the building. The mitigations should be proportionate to the risk and the needs identified.

Examples of mitigations include:

Mitigation	When appropriate
Evacuation chair at stairwell	Residents with mobility impairments on upper floors
Vibrating pillow alarm / visual alarm beacon	Residents with hearing impairments
Refuge intercom system	Buildings with designated refuge areas
Buddy system with consenting neighbours	Where a trusted neighbour is available and willing
Priority notification to fire service	When specific residents are known to need assistance
Clear signage and tactile indicators	Residents with visual impairments
Regular evacuation drills including relevant residents	All buildings

The cost of mitigations may be recoverable through your service charge, depending on your building's lease terms. Check your lease provisions and consult with your managing agent or solicitor before incurring significant expenditure.

Step 5: Share information with the Fire and Rescue Authority

You must share relevant information about your PEEPs arrangements with the local Fire and Rescue Authority (FRA). This helps firefighters prepare for incidents at your building and understand which residents may need assistance.

Consent is required. You must obtain explicit consent from the relevant resident before sharing their personal information with the FRA. If a resident does not consent, you cannot share their individual details -- but you should still share anonymised or aggregated information (for example, "there are three residents on floors 8-12 who may need evacuation assistance").

Information to share with the FRA:

- Number and general location of relevant residents (anonymised if no consent)
- Types of assistance likely to be needed
- Evacuation equipment available in the building
- Emergency evacuation statements
- Individual PCFRA details (with explicit consent only)

Keep a record of what information you have shared, when, and which consents you hold.

Step 6: Set up an annual review cycle

PEEPs are not a one-off exercise. You must review your plans:

- At least annually as a scheduled review
- When circumstances change -- for example, when a new resident moves in, an existing resident's condition changes, or the building's evacuation routes are altered

Build the annual review into your compliance calendar. During each review:

Scheduling annual reviews is one of the recurring compliance tasks that building managers often struggle to track across multiple obligations. Tools like Brocade provide scheduled check reminders and escalation workflows to ensure nothing falls through the cracks.

Implementation checklist

Here is a summary of everything you need to do, in a format you can use to track your progress. For a printable version, download the PDF using the button in the sidebar.

Hypothetical scenarios

These are fictional examples designed to show how the regulations work in practice.

Scenario 1: Meridian Tower -- 22 storeys, 180 units

Meridian Tower is a large residential tower managed by a professional managing agent. The building uses a stay-put evacuation strategy.

Step 1: The managing agent writes to all 180 households. 142 respond. Of those, 7 residents identify as potentially needing assistance: 3 wheelchair users, 2 residents with significant mobility impairments, 1 resident with dementia, and 1 resident who is profoundly deaf. A follow-up letter is sent to the 38 non-respondents, and door knocks are attempted. 12 more respond (none identifying as relevant). 26 remain unresponsive -- this is documented.

Step 2: PCFRAs are offered to all 7 identified residents. 6 accept. 1 resident (a wheelchair user on the 4th floor) declines. The decline is recorded with the date and method of offer.

Step 3: Emergency evacuation statements are prepared for the common areas, noting that the building has protected lobbies on every other floor and an evacuation intercom system.

Step 4: Mitigations include: an evacuation chair stored at the protected lobby on each even-numbered floor, a vibrating pillow alarm unit provided to the deaf resident, and a buddy system arrangement with a consenting neighbour for the resident with dementia.

Step 5: 5 of the 6 PCFRA participants consent to information sharing with the FRA. The managing agent shares detailed plans for those 5, plus anonymised data noting "approximately 7 residents across floors 2-19 may need evacuation assistance."

Step 6: Annual review is scheduled for February each year, timed to align with the building's fire risk assessment review.

Scenario 2: Oakwood House -- 8 storeys, 24 units, RTM company

Oakwood House is managed by an RTM (Right to Manage) company run by resident directors. The building uses a stay-put strategy.

Step 1: The RTM directors know most residents personally. They combine a formal letter with informal conversations at the next residents' meeting. 2 residents are identified: an elderly resident with a walking frame on the 6th floor, and a resident recovering from hip surgery on the 3rd floor (temporary condition).

Step 2: Both residents accept the offer of a PCFRA. The assessments are conducted by the building's fire risk assessor during their next visit.

Step 3: Emergency evacuation statements note that the building has a single staircase and no refuge areas. This is flagged as a risk factor.

Step 4: The RTM company purchases an evacuation chair for the stairwell and arranges training for two volunteer residents on its use. For the resident recovering from surgery, a buddy system with a neighbour is agreed as a temporary measure, to be reviewed when the resident recovers.

Step 5: Both residents consent to FRA information sharing. The RTM company contacts the local fire station to share the information and arranges a familiarisation visit.

Step 6: The RTM company adds PEEPs review to their annual fire safety review, conducted each March.

Scenario 3: Riverside Court -- 12 storeys, 60 units, simultaneous evacuation

Riverside Court is a purpose-built block that uses a simultaneous evacuation strategy (all residents evacuate when the alarm sounds). At 12 storeys, it is above the 11-metre threshold and uses simultaneous evacuation, so it is in scope.

Step 1: 4 relevant residents are identified across the building.

Step 2: All 4 accept PCFRAs. The assessments highlight that simultaneous evacuation creates particular challenges: all residents must leave at the same time, so relevant residents cannot "wait for assistance" in the same way they might under a stay-put strategy.

Step 4: The mitigations focus on speed of evacuation: a designated assembly point with a register check, pre-arranged assistance from trained staff during evacuations, and enhanced alarm systems (visual beacons in the flats of residents with hearing impairments). The building also installs evacuation chairs at stairwell access points on every floor.

Step 5 and 6: Information is shared with the FRA. Given the simultaneous evacuation strategy, the FRA is particularly interested in the building's arrangements and requests a copy of the evacuation procedures. Annual reviews are scheduled.

Common mistakes to avoid

Waiting until April 2026 to start. The identification and assessment process takes time. You need to write to residents, wait for responses, follow up, schedule assessments, and implement mitigations. Starting in January or February gives you a realistic timeline. Starting in March is cutting it fine.

Treating PEEPs as a paperwork exercise. The regulations require you to actually implement mitigations, not just document that you thought about them. An assessment without action is not compliance.

Pressuring residents to participate. Participation is voluntary. If a resident says no, record it and move on. Repeated pressure could be seen as harassment and will not help your compliance position.

Forgetting about temporary conditions. PEEPs are not just for residents with permanent disabilities. A resident recovering from surgery, a pregnant resident in the later stages of pregnancy, or a resident with a temporary injury may all have compromised evacuation ability. Your process should capture these.

Sharing personal data without consent. The regulations are explicit: you need the resident's consent before sharing their personal information with the FRA. Sharing without consent is both a PEEPs compliance failure and a potential data protection breach.

What happens if you don't comply?

PEEPs requirements are enforced by Fire and Rescue Authorities (FRAs) under the Regulatory Reform (Fire Safety) Order 2005. The enforcement powers available to FRAs include:

| Action | What it means |

|-----|-----|

| Informal advice | FRA officers may provide guidance during routine inspections |

| Enforcement notice | A formal notice requiring you to take specific steps by a set deadline |

| Prohibition notice | In serious cases, a notice restricting the use of the building until safety issues are resolved |

| Prosecution | For serious or persistent non-compliance, criminal proceedings can be brought |

In practice, FRAs are likely to take a proportionate approach in the early months after enforcement begins. A Responsible Person who is actively implementing PEEPs but has not yet completed every step is in a very different position from one who has done nothing.

That said, this is not an area where you want to be relying on FRA goodwill. The regulations are clear, the deadline is fixed, and the duties are specific. Get it done.

Evolving guidance: As the 6 April 2026 enforcement date approaches and passes, Fire and Rescue Authorities will develop their inspection and enforcement approaches. Detailed enforcement guidance may be published during 2026. We will update this guide as new guidance becomes available. Check your local FRA's website for any region-specific guidance.

Further reading and official sources

Primary legislation

- Fire Safety (Residential Evacuation Plans) (England) Regulations 2025 (SI 2025/797) -- the full regulation text
- Regulatory Reform (Fire Safety) Order 2005 -- the enforcement framework

GOV.UK guidance

- Residential PEEPs: guidance for Responsible Persons -- step-by-step official guidance
- Residential PEEPs: factsheet -- overview and key facts
- Criteria for being a higher-risk building -- building height and scope definitions

Related Brocade guides

- Building Safety Act Compliance Checklist -- comprehensive BSA obligations for higher-risk building managers
- Golden Thread Requirements -- how to maintain your digital building safety record (coming soon)

Criterion	Threshold
Height	At least 18 metres or at least 7 storeys
Simultaneous evacuation	At least 11 metres in height and uses a simultaneous evacuation strategy

Mitigation	When appropriate
Evacuation chair at stairwell	Residents with mobility impairments on upper floors
Vibrating pillow alarm / visual alarm beacon	Residents with hearing impairments
Refuge intercom system	Buildings with designated refuge areas
Buddy system with consenting neighbours	Where a trusted neighbour is available and willing
Priority notification to fire service	When specific residents are known to need assistance
Clear signage and tactile indicators	Residents with visual impairments
Regular evacuation drills including relevant residents	All buildings

Action	What it means
Informal advice	FRA officers may provide guidance during routine inspections
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Checklist

- Contact all residents to check whether their circumstances have changed
- Update the register of relevant residents
- Review and update individual PCFRAs
- Review emergency evacuation statements for accuracy
- Check that mitigations are still in place and functioning (e.g., evacuation chairs, alarms)
- Update information shared with the Fire and Rescue Authority
- Document the review date and any changes made

- Confirm your building is in scope (height/storey threshold, 2+ residential units, England)
- Confirm you are the Responsible Person under the Fire Safety Order
- Write to all residents explaining PEEPs requirements and asking them to self-identify
- Follow up with non-respondents (second letter, door knock)
- Create and maintain a register of relevant residents
- Offer a PCFRA to each identified relevant resident
- Record acceptances, declines, and non-responses with dates
- Conduct PCFRAs for consenting residents
- Prepare emergency evacuation statements for common areas
- Identify and implement reasonable mitigations
- Obtain explicit consent from residents for FRA information sharing
- Share relevant information with your local Fire and Rescue Authority
- Set up an annual review cycle in your compliance calendar
- Document everything -- dates, actions, decisions, consents

Ready to simplify compliance?

Brocade helps building managers of higher-risk buildings meet their Golden Thread obligations with structured, trackable compliance management.



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