

Awaab's Law and Residential PEEPs

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Lest We Forget: 14th June 2017

Residents with Disabilities.

- 37 disabled people lived in Grenfell Tower.

Personal Emergency Evacuation Plans (PEEPs).

- None had PEEPs in place.

RBKC/TMO

- Prior to the fire aware 17 of the disabled residents who died were disabled and likely to be evacuation impaired.
- Non-disabled residents stayed to help disabled residents increasing injuries and fatalities.



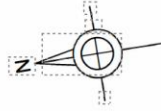
Evacuation Compliance in Housing

Government estimates that evacuation-impaired residents in multi-storey residential buildings account for:

- **28.3%** of residents in social housing.
- **16.4%** of residents in private housing.

FRA Means of Escape for Disabled People (since 2007) Legal Overview:

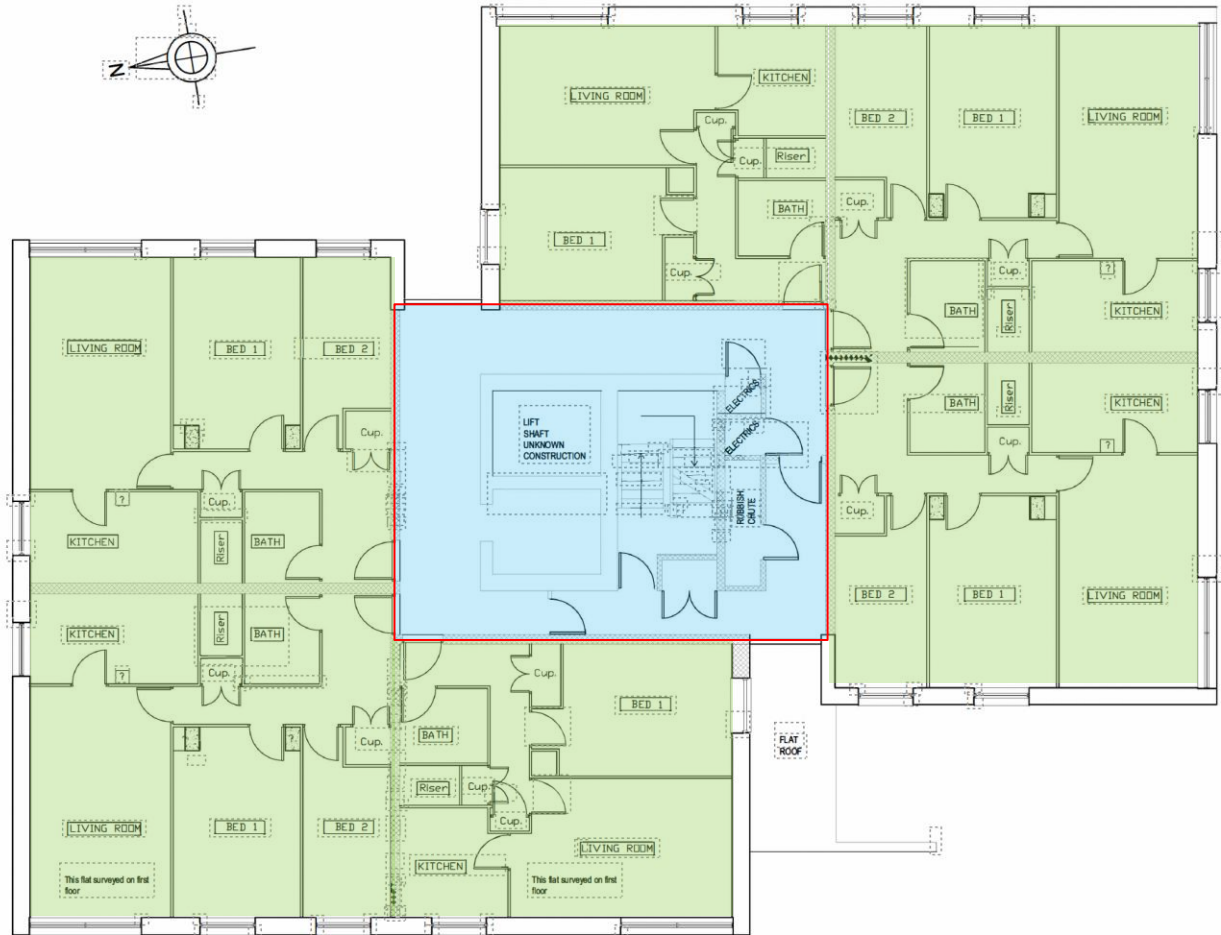
- Disabled people must be included in evacuation planning.
- Responsible persons must provide effective evacuation arrangements.
- Plans must not rely on Fire & Rescue Service intervention.



Awaab's Law



RPEEPs



Awaab's Law: Legislative Framework

Primary legislation (legal foundation), Awaab's Law sits within:

- Social Housing (Regulation) Act 2023.

Secondary legislation (Awaab's Law itself):

The operational rules come from:

- Hazards in Social Housing (Prescribed Requirements) (England) Regulations 2025.

Aligned to the Housing Health & Safety Rating System (HHSRS).

Fire and electrical hazards are two of 29 HHSRS.

Awaab's Law: Scope and Phased Expansion

Applies to **all** social housing tenancies in England – **houses and flats**.

Assessments must now be person-centred.

Introduces prioritisation of hazards:

- Emergency hazards (immediate risk to life or serious harm).
- Significant hazards (serious risks requiring prompt intervention).

First phase focuses on emergency hazards, where they pose an emergency risk to health.

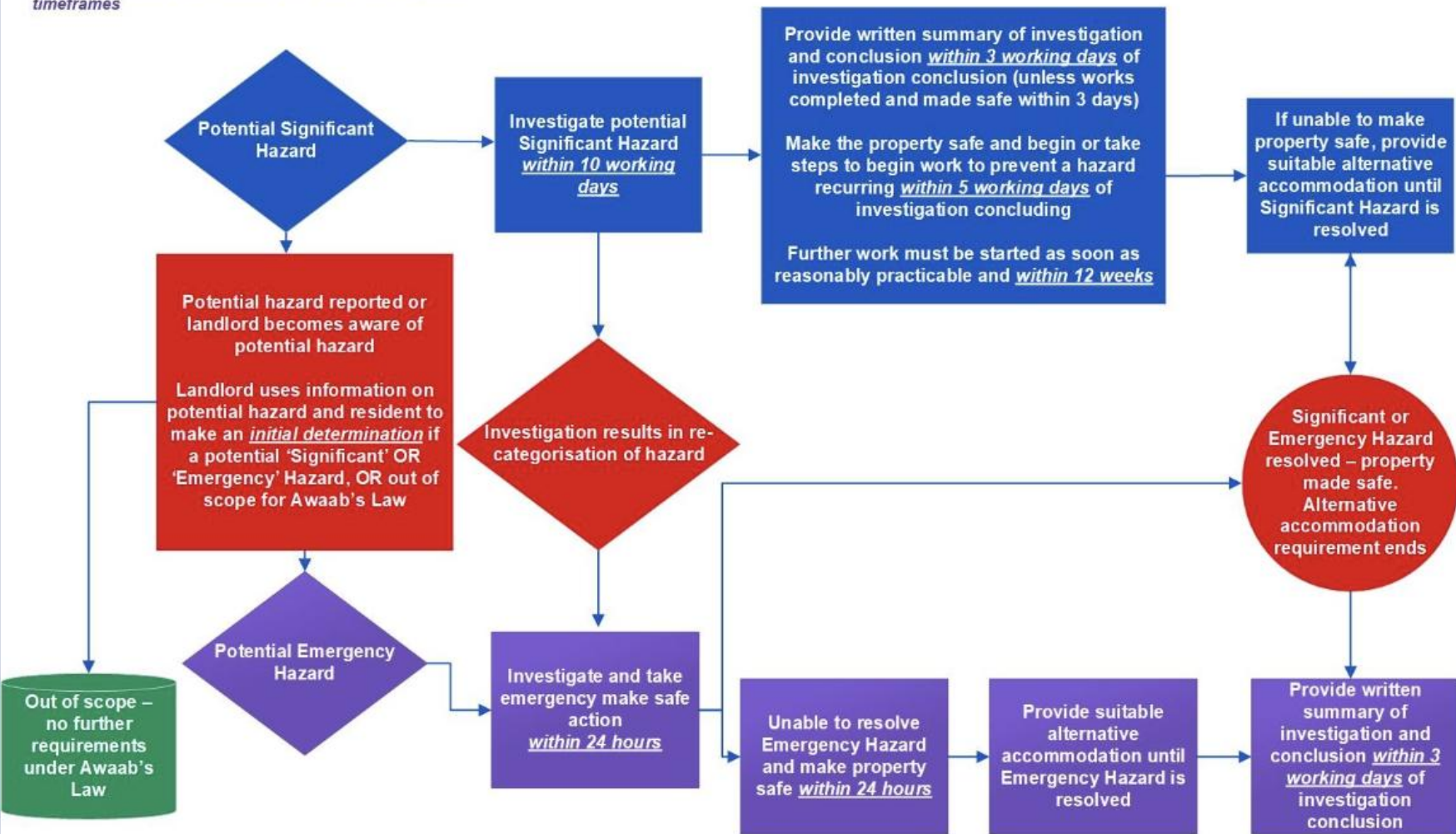
Oct 26 extends to all significant hazards.

Emergency Hazards: Fire and Electrical

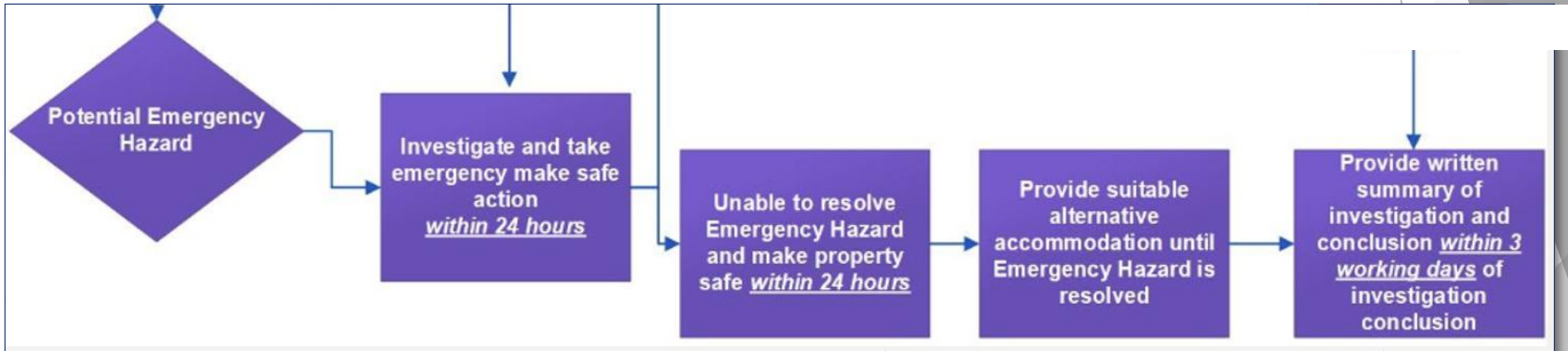
Emergency hazards that pose **an imminent and serious risk** to resident's health or safety **requiring immediate landlord action**:

- Residents cannot hear alarms or evacuate without FRS assistance.
- Compromised/missing fire doors may allow smoke spread.
- Use of emollient creams or unsafe storage of incontinent pads.
- Electrical risks, including unsafe charging of mobility scooters, creating significant fire and electrical hazards.

Diagram 1: Awaab's Law Process Flow
 NB: Does not include renewed and further investigation timeframes



Emergency Hazards: includes fire and electrical hazards



RSH: Training Expectations

Training must be continuous, role-based, competency-driven, and evidenced.

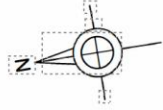
Area	Requirement
Legal duty	Suitable and sufficient, ongoing, role-based training aligned to risk. Awaab's Law implies a requirement for competent and adequately trained staff.
Quality & alignment	Recognised or accredited training linked to PEEPs and PcFRAs. Providers must ensure staff can identify hazards and meet statutory response times.
Competency & delivery	Focus on ability, not attendance. Effective compliance depends on suitable training, procedures, and evidence management.
Regulatory expectation (RSH)	Evidence of structured, role-based programmes and demonstrable staff competency.

Awaab's Law: Penalties for Non-compliance

Regulator of Social Housing downgrades result in:

- Damage to reputation and confidence.
- Increased borrowing costs and funding difficulties.
- Regulatory intervention.
- Operational and strategic impact.
- Governance and leadership consequences.

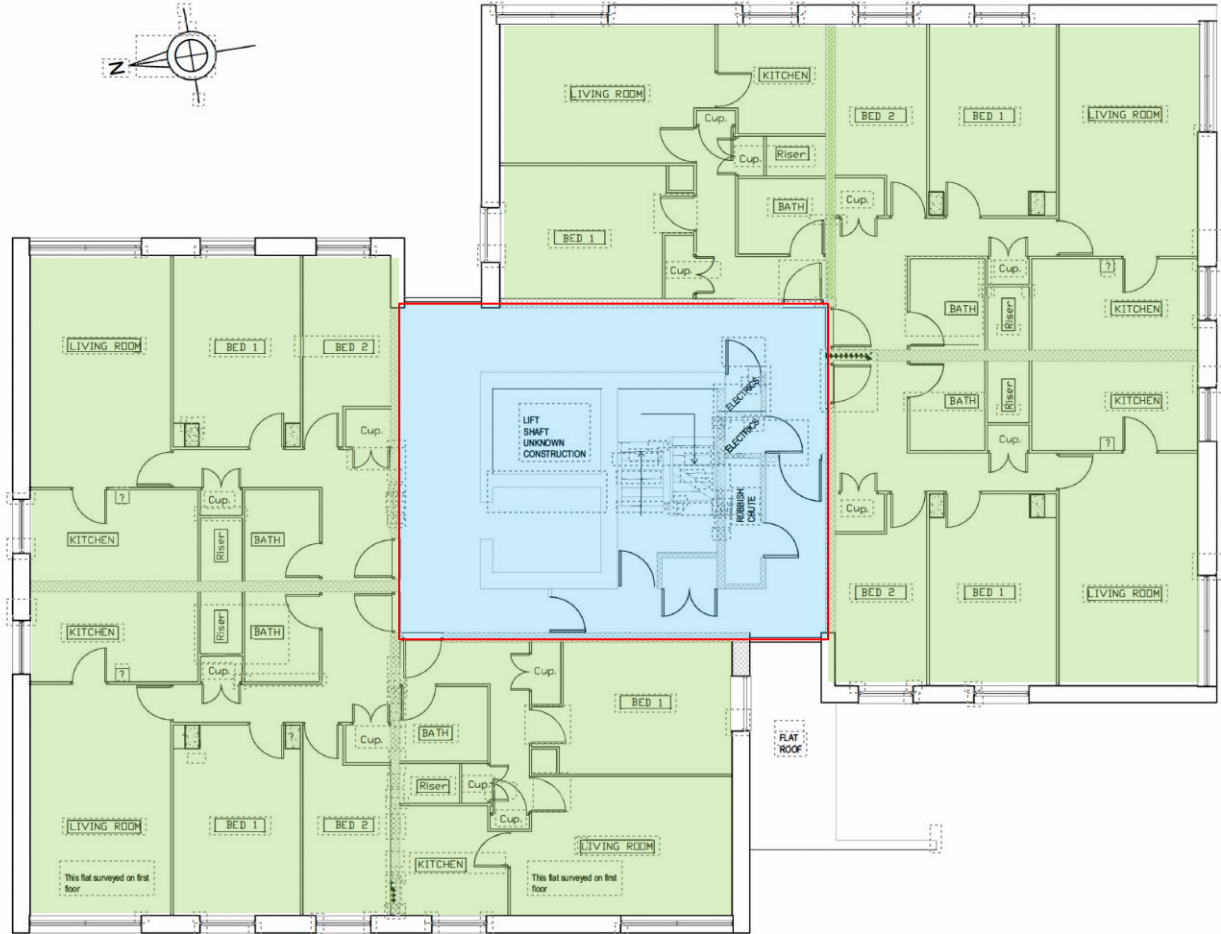
Coroner's Court: referrals to police and Prevention of Future Deaths Reports required.



Awaab's Law



RPEEPs



Residential PEEPs: Legislative Framework

Primary framework:

- Regulatory Reform (Fire Safety) Order 2005 (FSO).

Secondary legislation – must operate within the powers of the parent Act (FSO).

- Fire Safety (Residential PEEPs) (England) Regulations 2025
 - ❖ Provides detailed rules to implement primary law.
 - ❖ Because RPEEPs are made under the Fire Safety Order:
 - They apply only to common parts of residential buildings .
 - Do not extend into individual flats.

RPEEPS: Legal Hierarchy & Conflicts

Level	Legislation	Role	Conflict with RPEEPS
Primary	Fire Safety Order 2005	Core fire safety duties (broad "relevant persons")	RPEEPS use narrower "relevant residents" (main residence only) → gaps in coverage
Primary	Equality Act 2010	Requires reasonable adjustments and prohibits charging disabled persons for them	RPEEPS framework allows housing providers to charge for adjustments → potential unlawful discrimination
Primary	Data (Use and Access) Act 2025 / UK GDPR	Allows data sharing for safety without consent	RPEEPS require explicit consent → delays in information sharing
Secondary	RPEEPS Regulations 2025	Person-centred evacuation planning (PcFRAs & PEEPs) for residents in their main residence	Allows evacuation-related hazards to remain unmitigated where residents cannot or refuse to pay

Area	Fire Safety Order 2005	RPEEPs Regulations 2025	Conflict / Tension
Scope / Relevant Persons	Protects all “relevant persons” affected by fire risk	Applies only to specified “relevant residents” and buildings	Gaps in protection and evacuation coverage
Risk Management	Requires proactive fire risk reduction	Risks may remain if residents refuse or cannot/will not pay	Unmitigated fire safety and evacuation risks
Emergency Planning	Emergency procedures required for all occupants	Consent-based PEEPs/PcFRAs	Delays and incomplete arrangements
Information Sharing	Supports sharing for life safety purposes	Requires explicit resident consent	Critical information may be delayed
Responsible Person Duties	Clear legal duty to ensure resident safety	Relies partly on resident participation and consent	Responsibility and accountability may become unclear

Area	Equality Act 2010	RPEEPs Regulations 2025	Conflict / Tension
Reasonable Adjustments	Requires reasonable adjustments for disabled residents	Measures may depend on agreement or funding	Adjustments may not be implemented consistently
Charging	Section 20(7) prohibits charging for adjustments	Evacuation costs may fall on residents	Potential unlawful charging risk
Unmitigated Risks	Providers must avoid unsafe or discriminatory conditions	Risks may remain where residents cannot or will not pay	Safety risks may remain unresolved
Service Charges	Individual adjustments may not be recoverable unless benefiting all residents	Funding measures may create leasehold/service charge issues	Difficulty funding individual measures
Provider Responsibility	Legal duty rests with landlords/providers	Relies partly on resident participation and consent	Accountability may become unclear

Area	Data (Use and Access) Act 2025	RPEEPs Regulations 2025	Conflict / Tension
Data Sharing	Allows safety-related sharing without consent where justified	Requires explicit resident consent	Delays critical information sharing
Safeguarding	Supports proactive emergency information sharing	Sharing restricted without consent	Conflict with life safety duties
Scope	Broad safeguarding and risk management purposes	Limited to evacuation planning	Restricts wider coordination
Timeliness	Encourages rapid emergency access to information	Consent process may delay sharing	Slower emergency response
Operational Impact	Supports joined-up agency working	Restricts sharing to approved parties	Hinders integrated response

New Code of Practice for SIBs

Only essential resident information should be shared.

- Resident consent is required before sharing information.
 - DUAA allows sharing without consent for emergency response and safeguarding.
- Fire services need key evacuation and assistance details:
 - Need to be alerted to an incident.
 - Need evacuation or rescue assistance.
 - Need critical evacuation equipment.
- Building plans should identify residents needing support.

Duty of Care?

Category 1 (Red)		Category 2 (Amber)	
Description	Person requiring rescue or evacuation by 3 or more people, including any additional equipment.	Description	Person requiring rescue or evacuation by 2 or less people with no additional equipment required.
Examples	<ul style="list-style-type: none"> • A bariatric person • Wheelchair user • Someone who requires a stretcher • Someone who has medical equipment with them 	Examples	<ul style="list-style-type: none"> • A person with a mobility impairment but who is not a wheelchair user • A person with a mobility impairment who walks using a mobility aid, for example sticks or a walking frame • Someone who is blind or partially sighted • Some people with a hearing impairment • Some people with a cognitive impairment
Additional Info	The additional equipment and number of people required should be recorded under the category, along with contact details of any telecare provider if the person uses such a service.		

FSO: Suitable and Sufficient Training

Area	Requirement
Legal duty	Suitable and sufficient, ongoing, role-based training aligned to risk.
Quality & alignment	Recognised or accredited training linked to PEEPs and PcFRAs.
Competency & delivery	Focus on ability, not attendance .
Regulatory expectation	Evidence of structured, role-based programmes and staff competency.

RPEEPS: Penalties for Non-compliance

- Criminal prosecution: of organisation and/or Responsible Persons under the Fire Safety Order.
- Insurance refusal of claims: where risks are known but not mitigated.
- Regulatory enforcement and legal action: for failure to protect residents.

Food for Thought:

Using Government figures, it would have put just £12.75 p/mth on to the Grenfell Tower service charges

Key Take Aways

Primary legislation always takes precedence over secondary legislation.

Awaab's Law:

- Introduces proactive, time-bound hazard enforcement.
- Focuses on hazard removal within strict timescales.

RPEEP Regulations:

- Applies only to common areas of in-scope residential buildings.
- Allows risks to be unmitigated.
- Creates legal tensions around fire safety, equality and consent duties.

Awaab's Law and Residential PEEPs for Disabled and Vulnerable Residents

24th April 2026

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