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20240301 – James Cleverly – Evacuation guidelines and research

By email only

Rt Hon. James Cleverly MP  
Secretary of State for the Home Department  
Home Office  
2 Marsham Street  
London  
SW1P 4DF

01/03/2024

Dear Home Secretary,

### **Evacuation guidelines and research**

I am writing on behalf of the Fire Brigades Union to challenge the recent Home Office publication of evacuation guidelines for fire and rescue services. The FBU believes this guidance is too little and too late. These guidelines will not reassure residents in high rise buildings. They do not help disabled and vulnerable residents. These guidelines do not explain to incident commanders how to evacuate high rise buildings. They provide little or no help for firefighters and emergency control staff seeking to keep the public safe.

### **Grenfell Tower Inquiry**

The Grenfell Tower Inquiry (GTI) published its Phase 1 report on 30 October 2019. The report made 46 recommendations, the majority aimed at the London Fire Brigade (LFB). Only one recommendation was aimed specifically at central government:

*Recommendation: 33.22a*

*That the government develop national guidelines for carrying out partial or total evacuations of high-rise residential buildings, such guidelines to include the means of protecting fire exit routes and procedures for evacuating persons who are unable to use the stairs in an emergency, or who may require assistance (such as disabled people, older people and young children).*

### **Implementing the GTI recommendation**

In December 2019, a joint Home Office and Department for Levelling Up, Housing and Communities technical steering group was established to address the GTI's recommendation. A Home Office report,

Evacuation from fire in high-rise residential buildings: a rapid evidence review, was published in November 2022. The Home Office, with the National Fire Chiefs Council (NFCC) and LFB, held a live testing exercise in May 2022, intended to inform these national guidelines. A summary of this research was also published on 5 February 2024.

The FBU participated in the technical steering group. In our experience, it met infrequently and took far too long to produce any results. It is a disgrace that more than four years after the GTI report, the Home Office can only manage a publication of nine pages in length, containing so little of real substance.

### **Home Office guidelines**

The Home Office publication, Evacuation Guidelines for Fire and Rescue Services during Fire Emergencies, (5 February 2024) contains nine guidelines to the fire and rescue service, which it states are, "intended to support operational guidance and operational practices during a full or partial evacuation from high rise residential buildings". The evacuation guidelines appear here:

<https://www.gov.uk/government/publications/evacuation-guidelines-for-fire-and-rescue-services-frs>

The guidelines mostly summarise common sense or self-evident truisms about evacuation. Firefighters and residents of blocks of flats will be shocked to learn that it has taken four years to produce the following findings, all which were already well known:

1. Evacuation times do not depend simply on building height
2. Two staircases will significantly improve evacuation times
3. Evacuation will be quicker with alert systems and door knocking
4. Evacuation lifts may help people get out quickly
5. Vulnerable residents may take longer to evacuate by themselves
6. Vulnerable residents may not have a plan to get out and may rely on other residents
7. Fire and rescue services should obtain data on vulnerable residents from landlords
8. Human behaviour may delay evacuation
9. Residents will communicate with each other during a fire.

The paucity of this guidance is plain to see. These guidelines do not tell fire and rescue services how many firefighters are needed to evacuate a high rise building. None of the guidelines mention protecting fire exit routes. None of the guidelines contain procedures for evacuating persons who are unable to use the stairs or indeed procedures for anything else.

### **Live test exercise**

The guidelines lean heavily on the Home Office publication, Strategies for evacuation of occupants from high-rise residential buildings involved in fire, (5 February 2024):

<https://www.gov.uk/government/publications/evacuation-from-high-rise-residential-buildings-involved-in-fire>

This report contains the results of a live test exercise held in May 2022. The NFCC, LFB and UCLan researchers used Hereford House in Carlton Vale, London NW6, a disused 17-storey tower block with two staircases, to run a series of evacuation simulations. The exercises took place over 10 floors of the building. The most notable were:

Test 1-1, a full evacuation using an alert system and a single staircase. This involved 80 evacuees and took 19 minutes, 14 seconds to fully evacuate.

Test 2-2, a full evacuation using door knocking but without an evacuation alert system, with a single staircase. This involved 68 evacuees and took **28 minutes, 38 seconds** to fully evacuate.

### **Vulnerable residents**

The live tests in May 2022 attempted to simulate the impact of evacuees with impairments on evacuations:

*Tests were planned to include a prescribed number of volunteers (from specific floors and flats) scripted to act as residents with mobility impairments, such as simulating walking at half speed with an elbow crutch, slow walkers, and residents using evacuation chairs (containing mannequins for safety). A small sample of volunteers (at least 10%, consistent with ONS, 2021) were identified to act with mobility impairments scripted for specific flats (consistent throughout each test).*

The report concluded:

*There was evidence for Tests 1-1, 2-2 and 3A-2 that speeds may be limited for those starting on higher floors, because the transit of evacuees with mobility impairments impacted the speed of those joining stairwells from higher floors.*

### **The Grenfell Tower fire**

The tests and guidelines do not address worst case scenarios, such as the Grenfell Tower fire, where the whole building failed, with only a single narrow stairwell, no alert system, no data on vulnerable residents, no evacuation lift, failed fire doors and other failures.

At the Grenfell Tower fire, there were almost 300 residents in the 23-storey building when the fire started at night. After 25 minutes, when the external cladding fire had reached the top of the building, there were still almost 200 people in the building and only 30 firefighters on scene. An hour after the fire began, when the stairwell was smoke-logged, 130 residents were still in the building.

It is clear that the NFCC/LFB live tests did not replicate the kind of conditions at Grenfell Tower. The simulations used far fewer evacuees over half the number of floors during daytime. Even with volunteers who were awake and knew what was happening, it took almost 29 minutes to fully evacuate.

The GTI Phase 1 report claimed that:

*2.19b. Once it was clear that the fire was out of control and that compartmentation had failed, a decision should have been taken to organise the evacuation of the tower while that remained possible. That decision could and should have been made between 01.30 and 01.50 and would be likely to have resulted in fewer fatalities.*

The live tests with the closest scenario to Grenfell Tower still took almost half an hour, with half the number of residents over half the number of floors. Therefore, the live tests directly challenge the GTI's claim that a full evacuation could have been carried out during this 20 minute period.

In May 2022, the Home Office decided to abandon the GTI's recommendations 33.22e and 33.22f relating to Personal Emergency Evacuation Plans (PEEPs) for vulnerable residents.

Disability campaigners will be disappointed to note from the latest Home Office publications that residents with mobility impairments were only considered as a risk to other evacuees during the live tests. They will also be unhappy with the 10% assumption used in the guidelines. Grenfell Tower had significantly more vulnerable residents than this and more than 40% of those who died in the fire were disabled.

The FBU and other campaigners conclude that the guidelines contain no reassurance to vulnerable residents in high rise residential buildings that they will be able to escape.

### **Stairwell protection teams**

The live test report refers to "Stairwell Protection Teams" (SPT), who were on hand to offer guidance to evacuees. It states:

*During all tests, the SPT simulated the requirement to deploy breathing apparatus. SPTs were deployed on each floor of the building, adopting the SOPs and techniques for this incident type (LFB, 2021 and LFB, 2017). SPT duties included:*

- *fitting smoke curtains*
- *supervising the entry into the staircase to minimise the spread of smoke*
- *keeping the exit routes clear of obstructions*
- *warning others if they noticed significant fire development.*

The FBU reminds the Home Secretary that Stairwell Protection Teams and breathing apparatus guidance are the subject of a major dispute within the fire and rescue service. The FBU argues that deploying firefighters above the bridgehead without their breathing apparatus is a hazardous procedure, putting firefighters and the public at greater risk and in breach of the duty of care fire employers have to their employees.

The FBU notes that smoke was not used during the simulations. This is not a realistic scenario. At Grenfell Tower, the single stairwell became smoke logged early in the fire, hampering residents from escaping and putting firefighters at risk. If these live tests were intended to replicate situations where compartmentation has broken down and a full evacuation is required, then exercises need to be realistic. The guidelines therefore provide no realistic guide to action.

### **Conclusions**

The guidelines state that:

*FRSs, and the National Fire Chief Council (NFCC), will wish to consider how to draw on these guidelines and the more detailed information to support operational guidance and local operational procedures.*

The FBU is disappointed that yet again the Home Office has invested in the NFCC, despite its repeated failures. Despite including principal managers in charge at the time of the fire (and since), the NFCC did not participate in the Grenfell Tower Inquiry. Nobody from the NFCC gave evidence on its behalf. Nobody from the NFCC was questioned about its responsibility.

The NFCC produced the flawed waking watch guidance, which many residents have complained has let landlords off the hook, while landing them with huge bills. The NFCC is responsible for promoting unsafe breathing apparatus guidance and other high rise policies that put firefighters and the public at risk. The NFCC is now given responsibility for turning these flawed and inadequate guidelines into operational guidance. Other key stakeholders, including the FBU, are routinely ignored by the NFCC. The NFCC is not a statutory advisory body, but a private company funded by central government to do ministers' bidding. This is no way to ensure fire safety.

These guidelines are supposed to represent the Home Office's considered response to the Grenfell Tower Inquiry. These guidelines add almost nothing to improve evacuation policy for high rise buildings. They look like a tick box exercise, so the Home Office can claim it has fulfilled the GTI's recommendation. The FBU is clear: these guidelines have not achieved this standard.

You will know from your time as chair of the London Fire and Emergency Planning Authority the importance of planning, preparedness, standard operating procedures and training to ensure a professional response to fire and other emergencies. The FBU urges the Home Office to think again, consult the professionals like ourselves who work in fire and rescue, and produce robust guidance that will keep people safe.

Yours sincerely,

A handwritten signature in black ink that reads "M. Wrack". The signature is written in a cursive, slightly slanted style.

Matt Wrack  
General Secretary  
Fire Brigades Union

**Letter copied to:**

Sir Martin Moore-Bick, Chair of the Grenfell Tower Inquiry  
Rt Hon Yvette Cooper MP, Shadow Home Secretary  
Andy Roe, London Fire Commissioner  
Mark Hardingham, Chair of the National Fire Chiefs Council

MW/rs