

Equality Impact Assessment (EqIA) for London Plan Guidance

1 Overview

London Plan Guidance name: Development Viability LPG

Stage: Consultation

Date of EqIA assessment: Last updated 27 April 2023

Please provide a brief outline of the guidance:

The London Plan Guidance (LPG) explains what development viability is, when a viability assessment should be undertaken and how it is appraised. The LPG provides guidance on the viability assessment process, the principles for undertaking viability assessment, viability assessment information including viability appraisal inputs, and viability review mechanisms. The purpose of the LPG is to promote a standardised and transparent approach to viability assessments for applications for build for sale, build to rent, estate redevelopment, student accommodation, specialist older persons housing and purpose-built shared living which follow the Viability Tested Route set out in Policy H5 Part F of the London Plan. The objective of the LPG is to ensure that affordable housing, affordable student accommodation, and financial contributions towards affordable housing are maximised for schemes that are assessed under the Viability Tested Route.

Who is the guidance aimed at?

Planning authorities developing policies relating to affordable housing and planning obligations and determining planning applications for residential development.
Development industry applicants seeking to bring forward development that is required to provide affordable housing.

What are the key issues to be aware of?

The guidance, which has an underlying aim to ensure consistency around viability appraisal and ultimately drive up affordable housing delivery, is intrinsically linked to draft Affordable Housing LPG. It is recommended that the two separate EqIAs for these documents be read in conjunction with one another.

Which of the Public Sector Equality Duty (PSED) aims¹, considered in turn, are relevant to the guidance and the impacts identified?

1. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by or under the Equality Act 2010 (the Act).

¹ Please see Appendix C for legal context / background information.

No

2. Advance equality of opportunity between people who share a protected characteristic and those who do not.

Yes

3. Foster good relations between people who share a protected characteristic and those who do not.

No

2 Assessment

List aspects of the guidance that might impact those with protected characteristics or other identified group(s)²

Guidance key aspects, chapter headings, theme etc	Group(s) that could be impacted
Viability assessment process	Positive: Groups which benefit from affordable housing, in particular households with low and middle incomes who cannot access market housing, including people with disabilities, older people, children and ethnic groups.
Principles for undertaking viability assessments	Positive: Groups which benefit from affordable housing, in particular households with low and middle incomes who cannot access market housing, including people with disabilities, older people, children and ethnic groups.
Viability assessment information, inputs and sense-checking	Positive: Groups which benefit from affordable housing, in particular households with low and middle incomes who cannot access market housing, including people with disabilities, older people, children and ethnic groups.

² Including those that share one of the nine protected characteristics in the Equality Act 2010 (please see Appendix C for definitions), and other groups that are likely to be affected by equalities issues, such as people on low incomes, carers, refugees and asylum seekers, looked after children, care leavers, UK Armed Forces Veterans, homeless people and rough-sleepers and ex-offenders / people with experience of the criminal justice system.

Guidance key aspects, chapter headings, theme etc	Group(s) that could be impacted
Transparency of viability Information	Positive: Groups which benefit from affordable housing, in particular households with low and middle incomes who cannot access market housing, including people with disabilities, older people, children and ethnic groups.
Viability Review mechanisms	Positive: Groups which benefit from affordable housing, in particular households with low and middle incomes who cannot access market housing, including people with disabilities, older people, children and ethnic groups.

It should be noted that the general policy requirement and principles are already required through the London Plan. This London Plan Guidance is providing further detail on how the policies should be implemented, and therefore further amplifying the effects.

2.1 Equality impacts, mitigating actions and justification

This section sets out the positive and negative impacts of the implementation of this guidance for specified groups (including those that share a protected characteristic).

Evidence (including engagement)³ is cited, where possible, for impacts. For negative impacts, mitigating actions to minimise or eliminate negative impacts are identified, along with any action plan. If negative impacts cannot be mitigated, an [objective justification](#) is provided. For positive impacts, considerations is given to how these could be maximised.

The impacts are scored as follows:

- Strong positive
- Positive
- Neutral
- Negative
- Strong negative
- Mixed (both positive and negative impacts identified) or uncertain

Further explanation of the PSED aims and definitions of protected characteristics can be found in Appendix C.

³ See Appendix A and B

Age (consider particularly children, under-21s and over-65s)

Potential positive impacts and scores

Increasing affordable housing, particularly low-cost rented housing, will have a positive impact for children and young people as it will provide good quality affordable housing set within mixed tenure residential developments for households that are not able to access housing on the open market. The LPG will also provide access to amenities such as accessible openspace and playspace. (Strong positive)

Children will benefit from the availability of affordable family housing. This will help reduce disadvantage and foster a culture of equality through greater accessibility to housing and services in more inclusive communities and help reduce the number of children living in poverty. (Strong positive)

The provision of Intermediate housing will also have a positive impact for young and older people in middle income households who cannot access market housing. Shared Ownership purchasers are more likely to be young people aged between 25 and 34 compared with London's overall population. This LPG will help facilitate the delivery of intermediate housing, alongside other affordable options, which in turn is likely to benefit young adults in particular. (Strong positive)

Affordable student accommodation will have a positive for young people who face being disadvantaged by high student housing costs which can form a significant barrier to accessing higher education. (Positive)

Affordable housing (and specialist affordable housing such as extra care) will have a positive impact for those aged over 65 as it would provide good quality accessible and affordable accommodation. (Positive)

Older people would benefit from higher design and accessibility standards that are applied (through other London Plan policy and guidance) in new affordable housing as well as the provision of specialist affordable homes. New homes are more accessible than older stock, easier to maintain and cheaper to heat in winter. (Positive)

Potential negative impacts, mitigations or objective justification and scores

Older people are less likely to benefit from investment in affordable housing aimed at encouraging home ownership, and Shared Ownership purchasers are less likely to include households headed by someone over 55, when compared to the target market. However, as benefits will arise from higher provision of intermediate and low-cost rent homes, and significant benefits are to be gained for intermediate home ownership products by other age groups, no mitigations are suggested. (Neutral)

Relevant PSED aim(s)⁴

- 1
- 3

⁴ See Appendix C for the PSED aims

Disability (consider different types of physical, learning or mental disabilities)

Potential positive impacts and scores

Disabled people are more likely to be on a low income and therefore affordable housing, particularly low-cost rented housing, will have a positive impact for disabled people as it will provide good quality accessible and affordable accommodation.

Those who are disabled and unable to access market housing will be positively impacted by the provision of intermediate housing. (Positive)

Potential negative impacts, mitigations or objective justification and scores

No impacts identified.

Relevant PSED aim(s)

- 1
- 3

Gender reassignment

Potential positive impacts and scores

No impacts identified.

Potential negative impacts, mitigations or objective justification and scores

No impacts identified.

Relevant PSED aim(s)

NA

Marriage and civil partnership

Potential positive impacts and scores

No impacts identified.

Potential negative impacts, mitigations or objective justification and scores

No impacts identified.

Relevant PSED aim(s)

NA

Pregnancy and maternity

Potential positive impacts and scores

No impacts identified.

Potential negative impacts, mitigations or objective justification and scores

No impacts identified.

Relevant PSED aim(s)

NA

Race

Potential positive impacts and scores

Greater delivery of affordable homes could benefit these households. Londoners from Black, Asian and Minority Ethnic (BAME) backgrounds are more likely to live in poverty and overcrowded households, than those from a White background. The provision of low-cost rented housing will have a positive impact for those on the lowest incomes in London by providing a good standard of modern housing on secure tenancies, whilst intermediate housing will have a positive impact for those who cannot afford open market housing by providing a good standard of modern housing which is affordable on their incomes. The provision of affordable housing will also help to promote a culture of equality and reduce poverty and social exclusion through greater accessibility to housing and services in more inclusive communities. (Strong positive)

Potential negative impacts, mitigations or objective justification and scores

No impacts identified.

Relevant PSED aim(s)

- 1
- 3

Religion or belief

Potential positive impacts and scores

To the extent that households holding particular religious beliefs belong disproportionately to BAME groups, they are likely to experience similar impacts to those identified for BAME backgrounds. (Neutral)

Potential negative impacts, mitigations or objective justification and scores

No impacts identified.

Relevant PSED aim(s)

- 1
- 3

Sex

Potential positive impacts and scores

Women are more likely to be economically inactive, low paid, and/or subject to the poverty that affects single parent families and will benefit particularly from low-cost rented housing. (Positive)

Potential negative impacts, mitigations or objective justification and scores

No impacts identified.

Relevant PSED aim(s)

- 1
- 3

Sexual orientation

Potential positive impacts and scores

Those who are LGBTQ+ may experience discrimination when seeking housing. Younger LGBTQ+ people are more vulnerable to homelessness due to rejection by their families. There is a demand among older LGBTQ+ people for specialist provision care and retirement housing. LGBTQ+ people will be positively impacted by the provision of low cost rented housing, and also the provision of intermediate housing for those on middle incomes but who are unable to access market housing. (Positive)

Potential negative impacts, mitigations or objective justification and scores

No impacts identified.

Relevant PSED aim(s)

- 1
- 3

People on low incomes⁵

Potential positive impacts and scores

The provision of affordable housing will have a positive impact for those on low incomes. The provision of low cost rented housing will have a positive impact for those on the lowest incomes in London by providing a good standard of modern housing on secure tenancies, whilst intermediate housing will have a positive impact for those who cannot afford open market housing by providing a good standard of modern housing which is affordable on their incomes. (Strong positive)

The facilitation of the delivery of low cost rented housing and intermediate housing will also benefit key workers. The provision of affordable housing has the potential to assist in addressing vacancies in the key worker labour market and enabling a more equal spatial distribution of key workers across London. Protected groups, especially those on a low income, will benefit indirectly from well-staffed services and sectors which rely on the availability of key workers to deliver, such as health and other public services, for example). (Strong positive)

⁵ The socio-economic duty was introduced into legislation as Section 1 of the Act, with the aim of ensuring that public bodies had to take socio-economic disadvantage into account when making strategic decisions. However, following a change in government in 2010, the new coalition government decided not to implement the socio-economic duty. Though not a protected characteristic in the Act, the GLA recognises that socio-economic disadvantage is a significant contributor to inequality across London and therefore considers equality impacts on people on low incomes as part of its decision making.

Potential negative impacts, mitigations or objective justification and scores

No impacts identified.

Relevant PSED aim(s)

- 1
- 3

Other groups such as carers, refugees and asylum seekers, looked after children, care leavers, UK Armed Forces Veterans, homeless people and rough sleepers and ex-offenders / people with experience of the criminal justice system.

Potential positive impacts and scores

The provision of affordable housing will help to promote a culture of equality, and reduce poverty and social exclusion through greater accessibility to housing and services in more inclusive communities. Insofar as carers, refugees, care leavers, homeless and rough sleepers, and ex-offenders are all groups that are more likely to fall into low-income brackets or experience difficulties with housing costs, the guidance could have positive effects. Many of these groups will qualify for housing under the relevant Housing Authorities' allocation process and some will take priority on council housing waiting lists. Increased social (and potentially intermediate) rent in particular would therefore be beneficial. (Strong positive)

Looked after children may also benefit, as a greater mix of affordable products could help foster carers to access the homes that they need. (Neutral)

Guidance to facilitate the prioritisation of key workers for intermediate homes will benefit the armed forces - who may be more likely to need specialist or adapted affordable housing - due to (potential) increased access to housing that meets their needs. (Positive)

Potential negative impacts, mitigations or objective justification and scores

No impacts identified.

Relevant PSED aim(s)

- 1
- 3

2.2 Overview of equality impacts

Protected characteristic / group	Strongly positive impacts	Positive impacts	Neutral impacts	Negative impacts	Strong negative impacts	Mixed or uncertain impacts
Age	Yes	Yes	Yes			
Disability		Yes				

Protected characteristic / group	Strongly positive impacts	Positive impacts	Neutral impacts	Negative impacts	Strong negative impacts	Mixed or uncertain impacts
Gender reassignment						
Marriage and civil partnership						
Pregnancy and maternity						
Race	Yes					
Religion and belief			Yes			
Sex		Yes				
Sexual orientation		Yes				
People on low incomes	Yes					
Other groups	Yes	Yes	Yes			

Cumulative impacts

N/A

3 Amendments

No changes made due to overall positive impacts.

4 Recommendation

Based on the assessment, this table indicates the recommended course of action to decision makers with regard to reviewing the guidance.

Description	Recommended
No major change to the guidance is required: This EqlA has not identified any potential for discrimination or negative impact, and all opportunities to advance equality have been taken.	X
Adjustments to the guidance are required to remove adverse impacts identified by the EqlA or better advance equality. [Include here how you have adapted plans to mitigate adverse impacts]	
Justify adverse impacts or missed opportunities to advance equality and continue with the guidance. [Add justification explanation. Include here: <ul style="list-style-type: none"> • reasons why adverse impacts cannot be mitigated and justification • how you have adapted plans to mitigate adverse impacts • alternative options looked at • how you have chosen the option which is least intrusive etc] 	
Stop, rethink or abandon when the EqlA shows actual or potential unlawful discrimination.	

5 Monitoring

Monitoring will take place through the London Plan Annual Monitoring Report and wider monitoring of the Mayor's other strategies, as well as part of reviewing the London Plan.

6 Appendix A: Evidence Reference and Content

6.1 Evidence

Age

London has a relatively young population. The median age of Londoners is 35, compared to a national average of 40. Londoners under the age of 25 equate to 32% of the population and 11% are aged 65 or over (ONS 2011).

Around a fifth of London's population is under 16. Over two-thirds, or 6.2 million, are working age (aged between 16 and 64), and less than one in eight are 65 or over (1.1 million). Despite being the smallest age group in London's population, the number of Londoners aged 65 or over is projected to increase by more than 90 per cent between 2019 and 2050, faster than younger age groups (Central Upper Population projection, 94 per cent increase, Central Lower Population projection, 92 per cent increase. Source: GLA Demography, 2020 [Trend Based Projections](#)).

Young people are more likely to be unemployed than adults aged between 25 and 64 ([Unemployment numbers and rates by equalities group LFS, ONS London Datastore](#)).

Younger Londoners face higher housing costs than older groups: those aged 16-29 or 30-49 spend an average of 29% of their net income on housing costs, compared to 24% for 50-64 year olds and 17% for those aged 65 or more. Resolution Foundation, [Intergenerational audit for the UK: Data dashboard, 2020](#)

Rates of overcrowding are higher in London than anywhere else in the country and households with children more likely to be overcrowded than households with no children (English Housing Survey, 2016/17 to 2018/19).

In March 2022 there were 56,640 homeless households living in temporary accommodation arranged by London boroughs, including 75,850 children (Housing in London 2022).

In London, 20% of all households with children are considered overcrowded according to the bedroom standard measure, compared to 8% in the rest of England (Housing in London 2020, GLA Housing and Land; English Housing Survey, 2016/17 to 2018/19).

People in persistent poverty – in low-income households in at least three of the last four years – are least likely to be able to participate fully in society and achieve a healthy lifestyle. Around one in six of all Londoners live in households in persistent poverty (after housing costs), including three in ten of London's children.

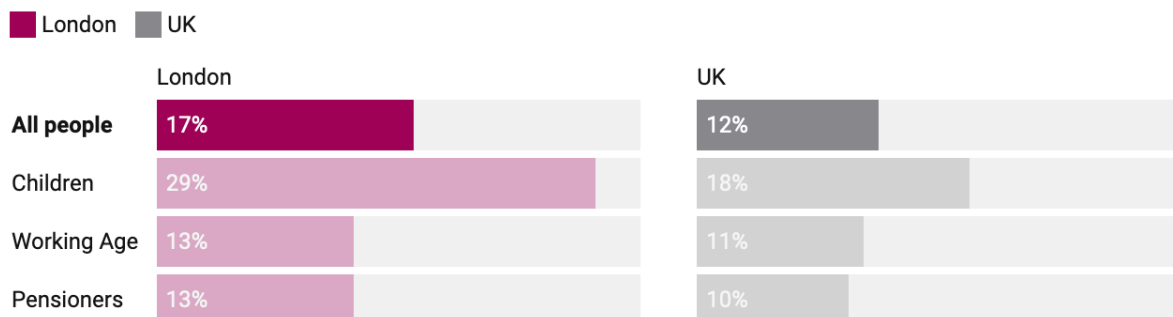
Around one in eight London pensioners are classified as in persistent poverty (AHC), according to the latest figures for the period from 2016/17 – 2019/20, having been counted as living in poverty in at least three years out of the last four. This was an increase from one in ten for 2015/16-2018/19 (<https://data.london.gov.uk/blog/poverty-in-london-2020-21>).

While a higher proportion of older Household Representative Persons aged 65 and over own rather than rent their home (65.9 per cent compared with 37.1 per cent), 27% live in

social rented housing, a higher proportion than for England as a whole (18 per cent) (Census 2011, [Census Trends in Housing Tenure](#), GLA Datastore).

Persistent Low Income

% in persistent poverty after housing costs (2016-2020)



Source: DWP Low Income Dynamics

Chart: GLA Intelligence • Source: London Datastore • [Get the data](#) • [Download image](#)

Households with dependent children comprise more than three quarters of households accepted as statutorily homeless. Female lone parents comprise half of all households accepted as statutorily homeless ([GLA EDI measures August 2020](#))

Households accepted as statutorily homeless in London by age

Age	2016/17	2017/18	2018/19
16-24	16%	16%	17%
25-44	61%	60%	54%
45-64	20%	21%	25%
65-74	2%	2%	3%
75 & Over	1%	1%	1%

Households accepted as statutorily homeless in London by family type

Family type	2016/17	2017/18	2018/19
Couple with dependent children	24%	21%	6%
Male lone parent	4%	4%	2%
Female lone parent	49%	50%	20%
Male no dependent children	10%	12%	41%
Female no dependent children	7%	8%	25%
All other household groups	6%	5%	5%

Source: [GLA EDI measures August 2020](#)

Note: 2016/17 and 2017/8 show the proportion of total households accepted as statutorily homeless while 2018/19 shows households assessed as owed a duty

Most households moving into Shared Ownership housing in London in 2017/18 were headed by a person aged between 25 and 34 (59%) or 35 and 44 (27%). By contrast, a much larger share of households in the overall London population were headed by older people (Source: MHCLG, Continuous Recording of social housing lettings and sales, 2017/18 footnote 29 Homes for Londoners: Affordable Homes Programme 2021-2026 Equality Impact Assessment).

An increase in the supply of social rented housing would benefit many older people currently living in poor, unhealthy and expensive housing. This includes over 2 million older people currently living in non-decent homes in England ([Age UK, Submission to the MHCLG select committee inquiry: Long-term delivery of social and affordable rented housing, September 2019](#))

In terms of student affordability, the average annual rent of a room in London takes up 88 per cent of the maximum loan amount ([Unipol Accommodation Costs Survey 2021/22](#)).

Disability

Disabled people are more likely to live in the social rented sector compared with their non disabled counterparts:

- Nearly 1 in 4 (24.9%) disabled people aged 16 to 64 years in the UK rent social housing compared with fewer than 1 in 10 (7.9%) non-disabled people, [Outcomes for disabled people in the UK 2021](#), ONS.
- In London this proportion rises to nearly 1 in 3 (30%) [Table 6: Housing Situation of people aged 16 to 64 by disability status and English region](#), Disability and Housing UK 2021, ONS, APS

The proportion of disabled people living with parents has risen from 12.4% in 2013/14 to 16.4% in 2020/21. By contrast, the proportion of non-disabled people living with parents is more or less unchanged (up 1% from 18.2% in 2013/14 to 19.2% in 2020/21) ([Table 6: Housing Situation of people aged 16 to 64 by disability status and English region](#), Disability and Housing UK 2021, ONS, APS).

Deaf and disabled residents are more likely to be living in poverty: 36% of Londoners who live in families where someone is disabled are living in poverty after housing costs, compared to 26% of those in families where no-one is disabled (source: GLA analysis of Households Below Average Income data (End User dataset) quoted in EqIA AHP 2021-26))

Gender reassignment

N/A

Marriage or civil partnership

N/A

Pregnancy and maternity

N/A

Race

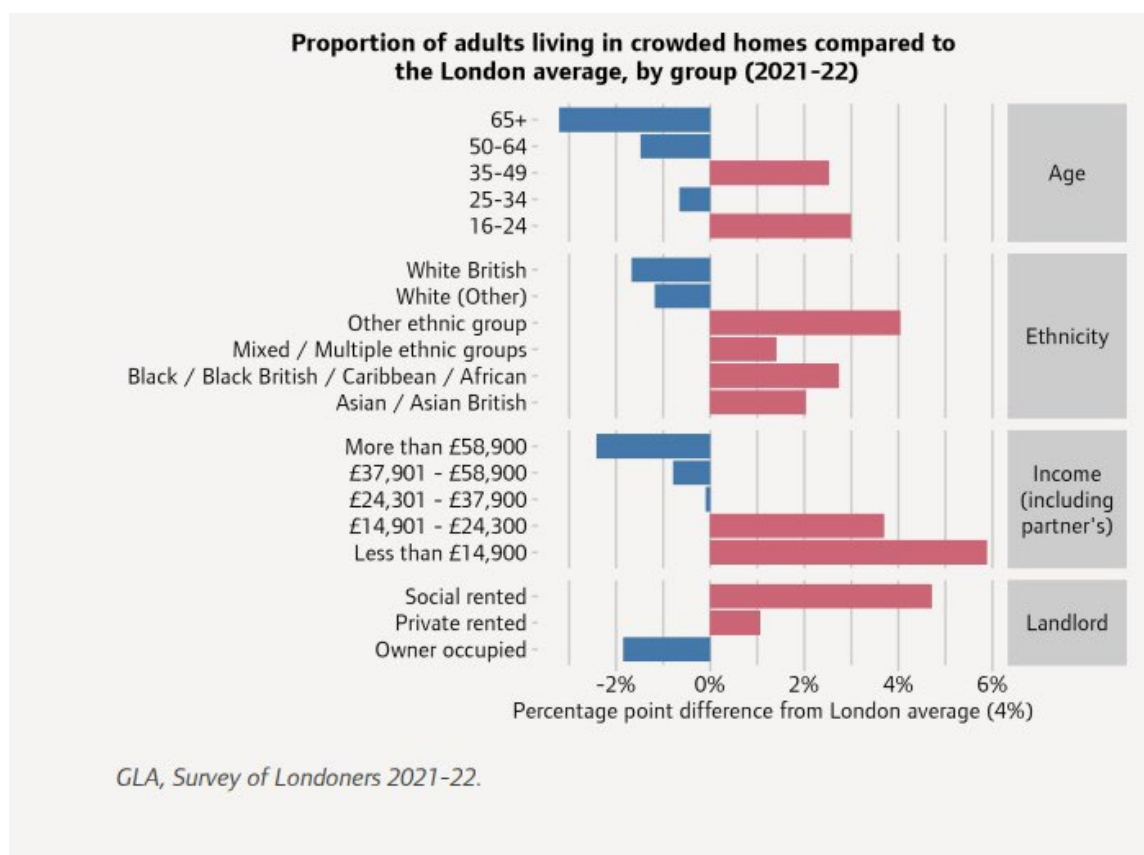
39% of BAME Londoners live in relative poverty after housing costs, compared to 21% of White Londoners (source: GLA analysis of Households Below Average Income data (End User dataset), Homes for Londoners: Affordable Homes Programme 2021-2026 Equality Impact Assessment).

Black, Asian and minority ethnic Londoners make up 40% of London's population (ONS 2011). Black, Asian and minority ethnic Londoners are more likely to be younger and on lower incomes. For instance, 44% of people on low incomes in London are also BAME (London Travel Demand Survey 2016/17).

Black, Asian and minority ethnic Londoners are more likely to live in households with an average annual income below £20,000 (33% BAME compared with 25% white).

Households with a Black or Asian household head are 80% more likely to be overcrowded than the London average, while households with a Black household head are around 150% more likely to be owed a homelessness duty. GLA, Housing in London October 2020. Overcrowding is more common in London's Bangladeshi, Black African and Pakistani households (GLA, Equality, Diversity and Inclusion Evidence Base for London 2019).

Low-income Londoners, those living in social housing and from Bangladeshi and Black African backgrounds were among those most likely to say they are living in crowded homes (Housing in London 2022).



BAME households are more likely to be accepted as statutorily homeless or as owed a duty than households from White backgrounds ([GLA EDI measures August 2020](#)):

Households accepted as statutorily homeless in London by ethnicity

Ethnicity	2016/17	2017/18	2018/19
White	32%	31%	31%
Black or Black British	32%	30%	31%
Asian or Asian British	15%	16%	12%
Mixed	5%	5%	5%
Other ethnic origin	8%	7%	9%
Ethnic Group not Stated	8%	12%	11%

Note: 2016/17 and 2017/8 show the proportion of total households accepted as statutorily homeless while 2018/19 shows households assessed as owed a duty

Religion or belief

To the extent that Londoners holding particular religious beliefs belong disproportionately to BAME groups (Census 2021), they are likely to experience similar impacts to those identified for BAME backgrounds above.

Sex

Female-headed lone parent households comprise nearly half of all households accepted as statutory homelessness while male households with no dependent children comprise 41 per cent of households assessed as owed a duty [GLA EDI measures August 2020](#)):

Households accepted as statutorily homeless in London by family type

Family type	2016/17	2017/18	2018/19
Couple with dependent children	24%	21%	6%
Male lone parent	4%	4%	2%
Female lone parent	49%	50%	20%
Male no dependent children	10%	12%	41%
Female no dependent children	7%	8%	25%
All other household groups	6%	5%	5%

Note: 2016/17 and 2017/8 show the proportion of total households accepted as statutorily homeless while 2018/19 shows households assessed as owed a duty

Sexual orientation

The [Census 2021](#) found that 92.5% of respondents aged 16 or over answered the question on sexual orientation, while the remaining 7.5% chose not to. 89.4% of respondents identified as straight or heterosexual. Around 1.5 million people (3.2%) identified as gay, lesbian, bisexual, or another sexual orientation (LGB+). 1.5% of respondents identified as gay or lesbian (around 748,000) while 1.3% (628,000) identified as bisexual. A further 0.3% (165,000) people identified with a different sexual orientation. The most common 'other' orientations given in the write-in box were: pansexual (112,000 people), asexual (28,000 people), and queer (15,000 people).

Around 94.0% of respondents aged 16 or over answered the question on gender identity. 93.5% of respondents said their gender identity and their sex registered at birth were the same. Around 262,000 people (0.5%) said their gender identity and sex registered at birth were different. Not all of those 262,000 people identified explicitly as transgender. Around 48,000 people (0.1%) gave their identity as 'trans man' and another 48,000 (0.1%) gave their identity as 'trans woman'. 118,000 (0.2%) did not provide a write-in response. A further 30,000 identified as non-binary and 18,000 wrote in a different gender identity.

The [census](#) was conducted in March 2021, while Covid-19 restrictions were in place, and this might also have affected the geographical distribution of respondents. For example, [London's population may have been lower than usual at that time](#).⁶

⁶ [What to expect from the first Census results for London – London Datastore](#)

LGBT young people are more likely to find themselves homeless than their non-LGBT peers, comprising up to 24% of the youth homeless population in the UK (Albert Kennedy Trust, LGBT Youth Homelessness: UK national scoping, April 2015).

The report [Building Safe Choices 2020: Our voices: LGBT+ later life housing demand in London](#) identifies an unmet demand among older LGBTQ+ people for specialist provision, care and retirement housing (Tonic, June, 2020)

People on low incomes

The proportion of Londoners saying they were ‘financially struggling’ increased from 12% in January 2022 to 17% in January 2023. Londoners living in social rented accommodation and with a gross household income of less than £20,000 continue to be most likely to be ‘financially struggling’. Over half of Londoners (54%) in January 2023 said they struggled to pay for food and essential items, up from 39% in January 2022. (GLA, 2023).⁷

A quarter of Londoners (25%) in 2021-22 did not have at least £1,500 in savings. This is a significant reduction from 33% in 2018-19. Black Londoners were the ethnic group most likely not to have savings of at least £1,500 (GLA, 2022).⁸

The [Trust for London London’s Poverty Profile 2022](#) report showed that during the COVID-19 pandemic, more Londoners, both in and out of work, have needed benefits to make ends meet. The fall in incomes and recent increases in the cost of living are expected to worsen living standards for many. In this context, the mental well-being of Londoners has been significantly eroded.

Despite higher incomes, more expensive housing means that the 2019/20 (pre-pandemic) poverty rate in London almost doubles when housing costs are taken into account (from 16% to 27%), making London the region with the highest poverty rate in the UK. Poverty rates are even higher in Inner London (30%), where they are 5 percentage points above many parts of the North of England (Trust for London, 2022).

For some groups, the rate was even higher; the poverty rate amongst non-White households in London was 39%, and for single parents it was 53%. Poverty rates also varied significantly across London’s boroughs (Trust for London, 2022).

Unemployment rates still remain above pre-pandemic levels (Trust for London, 2022)..

People living in deprived areas and those from Black and Minority Ethnic backgrounds have been more negatively affected by the health impacts of COVID-19 (Trust for London, 2022).

Structural inequalities in the labour market particularly affect people from BAME communities, women, those with disabilities or anyone who has experienced

⁷ [GLA poll results \(airdrive-secure.s3-eu-west-1.amazonaws.com\)](#)

⁸ [Survey of Londoners 2021 - 2022 \(airdrive-secure.s3-eu-west-1.amazonaws.com\)](#)

discrimination based upon preconceived notions of what makes a good employee (GLA, 2022).⁹

Young people, disabled people, Pakistani and Bangladeshi people, and Muslims have consistently lower employment and higher unemployment rates and are more likely to be in insecure employment than other groups (Equality and Human Rights Commission (EHRC), 2018). Women are also less likely than men to be in employment (EHRC, 2018). Asian women have a low employment rate (Cribb et al., 2017). Lone parents in particular in London have low employment rates compared to the rest of the UK.¹⁰

One in 10 working-age Londoners in work were in insecure employment (GLA, 2022). Black / Black British / Caribbean / African Londoners are over-represented in insecure employment (16%) (GLA, 2022).¹¹

In 2016/17, those with low median earnings were Muslim, Bangladeshi and Pakistani employees, women and disabled people (D'Arcy, 2017; EHRC, 2018). Black African and Bangladeshi Londoners are consistently among the lowest paid (GLA, 2021). Disabled people that find work are paid less on average than their non-disabled colleagues, with a difference in the median pay of around 17 per cent in London.¹²

In 2016/17, Black people, women and disabled people were more likely to be in low-pay occupations.¹³ Bangladeshi, Black people, women and disabled people were less likely to work in high-pay occupations (EHRC, 2018).

Women are more likely than men to work part-time (McGuinness, 2018), particularly women with young children (EHRC, 2018).

In 2017, women were more likely than men to work on zero hours contracts (ONS, 2018c).

In 2016, Black, Asian and minority ethnic employees were far more likely to be in insecure employment than White workers. Black employees were twice as likely to be in insecure employment (TUC, 2017a).¹⁴

Homelessness disproportionately affects ethnic minorities, lone parents, young care leavers, young offenders, LGBT young people, transgender people, people with mental health conditions, women at risk of domestic abuse, ex-services personnel, and those living in material deprivation (Just Fair, 2015, Watts et al., 2015, EHRC, 2018).

Around one in six Londoners, including three in ten children, are in persistent poverty. Child poverty is most acute in wards in Tower Hamlets, Hackney and Camden.¹⁵ The

⁹ [Survey of Londoners 2021-22 - London Datastore](#)

¹⁰ [Equal Opportunities - London Datastore](#)

¹¹ [Survey of Londoners 2021 - 2022 \(airdrive-secure.s3-eu-west-1.amazonaws.com\)](#)

¹² [Labour Market - London Datastore](#)

¹³ Defined as caring, leisure and other service occupations, sales and customer service occupations, or elementary occupations, such as cleaners or kitchen and catering assistants (EHRC, 2018)

¹⁴ This study uses a definition of insecure employment that is different from the EHRC 2018 Is Britain Fairer? report.

¹⁵ [Poverty in London 2021/22 - London Datastore](#)

proportion of London's pensioners in material deprivation, at 12 per cent, is double the rate for the UK as a whole.¹⁶

One in nine pensioners in London are living in material deprivation, unable to access the necessities for today's society. One in twenty lived in a household that was in food insecurity.¹⁷

The number of individuals seen sleeping rough in London rose substantially last year, to over 10,700, continuing the long term trend. More than 60,000 homeless households were being housed by London's local authorities in temporary accommodation at the end of March 2021.¹⁸

In England, people from ethnic minorities, women and disabled people are more likely to live in overcrowded accommodation compared to White people, men and non-disabled people (EHRC, 2018). Women from ethnic minorities are particularly more likely to live in overcrowded accommodation than any other combination of sex and ethnicity (EHRC, 2018).

People from many ethnic minorities (particularly Pakistani, Bangladeshi, Black African, Black Caribbean Chinese adults and people of Mixed ethnicity), women and disabled people are more likely to live in poverty (EHRC, 2018). Over half of children in Bangladeshi, Black African, Pakistani and Other ethnicity households lived in poverty in 2015/16. (EHRC, 2018).

Bangladeshi, Pakistani, Black Caribbean and Black African adults, women and disabled people are more likely to experience severe material deprivation (EHRC, 2018). Women from Black Caribbean and Black African backgrounds were substantially more likely to experience severe material deprivation (EHRC 2018).

UK-wide reforms to social security and taxes since 2010 have had a disproportionately negative impact on the poorest in society, particularly affecting ethnic minorities, women and lone parents and disabled people (Portes and Reed, 2018). Benefit sanctions have been shown to apply inconsistently and may disproportionately impact ethnic minorities (de Vries *et al.*, 2017), men and disabled people (Baumberg Geiger, 2017).

39% of BAME Londoners live in relative poverty after housing costs, compared to 21% of White Londoners (GLA analysis of Households Below Average Income data (End User dataset), Homes for Londoners: Affordable Homes Programme 2021-2026 Equality Impact Assessment).

BAME Londoners make up 40% of London's population (ONS 2011) and are more likely to be younger and on lower incomes. For instance, 44% of people on low incomes in London are also BAME (London Travel Demand Survey 2016/17).

BAME Londoners are more likely to live in households with an average annual income below £20,000 (33% BAME compared with 25% white).

¹⁶ [Raising Living Standards – London Datastore](#)

¹⁷ [Poverty in London 2021/22 – London Datastore](#)

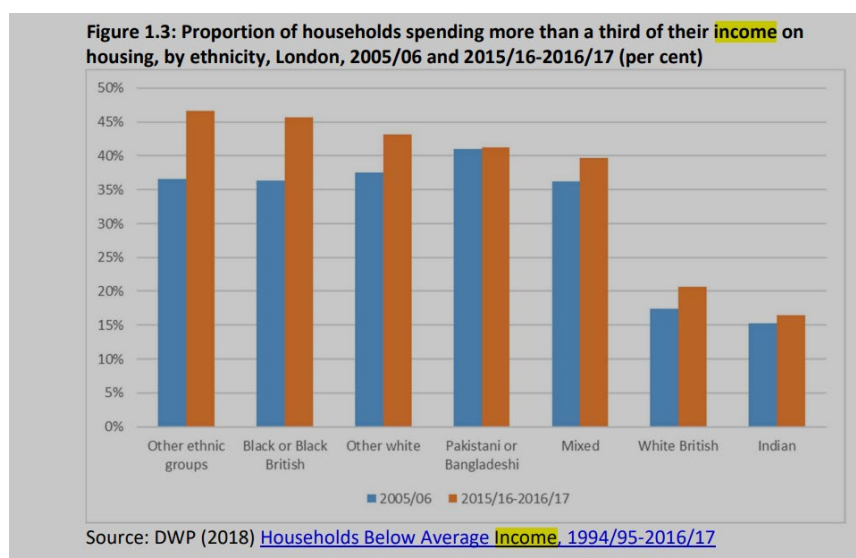
¹⁸ [Raising Living Standards – London Datastore](#)

Social renting is more prevalent among Black and Bangladeshi Londoners than other ethnicities. Private renting is relatively more widespread among non-British/white Irish Londoners, and people from the other Asian and other ethnic groups. Younger, lower-income and disabled Londoners, as well as recent migrants to London, are more likely to be renting (GLA, 2019).

Lower-income households are more likely to rent, with households in the poorest 20 per cent of households the most likely to be in social rent housing. Those in the top 20 per cent are the most likely to be owner-occupiers (Households Below Average Income, 2005/06 and 2016/17) (GLA, 2019).

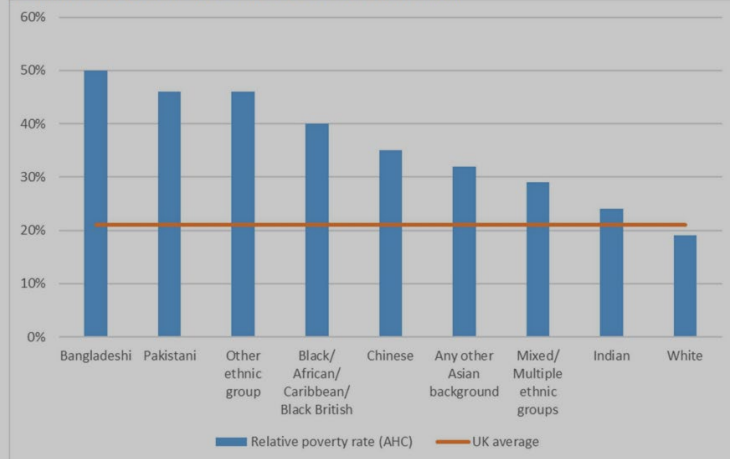
Across London, 33 per cent of households faced high housing costs (costs totalling over a third of their income) in 2016/17. This figure varies widely by tenure; 64 per cent of private renters, and 46 per cent of social renters, have high housing costs, compared to just 8 per cent of owner-occupiers (Households Below Average Income, 2005/06 and 2016/17).

60 per cent of households in the lowest income quintile have high housing costs, against less than 10 per cent of households in the top quintile (GLA, 2019).



At a UK level, BAME households have a higher than average risk of relative poverty after housing costs. The risk of poverty is particularly high for those households whose head is Pakistani, Bangladeshi, Black or in other ethnic groups. For these households the risk of poverty is 40 per cent or higher, more than double the UK average (GLA, 2019).

Figure 1.10: Per cent of all individuals living in poverty households by ethnicity, after housing costs (AHC), UK, 2013/14 to 2015/16 (per cent)



Source: DWP (2017) [Households Below Average Income: 1994/95 to 2015/16](#)

Figure 2.3 Proportion of children living in relative child poverty households (AHC), 2014/15-2016/17, by household characteristics, UK (per cent)

Household characteristics	Proportion of children living in households with less than 60 per cent of median income (after housing costs)
Disability status	
Children living in families where no-one is disabled	28%
Children living in families where someone is disabled	36%
<i>Of which:</i>	
In receipt of disability benefits	24%
Disabled but not in receipt of disability benefits	40%
Economic activity	
All adults in work	16%
At least one adult in work, but not all	42%
Workless households	75%
Household type	
Lone parent	49%
Couple with children	25%
Tenure	
Owners	14%
Social rented sector tenants	53%
All rented privately	48%

Source: DWP (2018) [Households below average income: 1994/95 to 2016/17](#). Three-year

There are many smaller groups in London's population that are at particular risk of disadvantage and social exclusion but are poorly captured by data. These include:

- Looked-after children
- Homeless households and rough sleepers
- The Gypsy and Irish traveller community
- Refugees and asylum seekers
- UK Armed Forces Veterans
- People with experience of the criminal justice system
- Children and adults with learning disabilities

(GLA, 2019)

The characteristics set out above overlap and interact with one another, producing intersectional identities that can in turn lead to distinct patterns of discrimination and disadvantage (GLA, 2019).

The next section of the evidence discusses what is known for some of these groups.

Other groups

Asylum seekers and refugees:

Asylum seekers have rapidly increased in the last few years, nationally and in London (London Councils, House of Commons Library, 2023). Accommodation provision is typically through hotel (initial) and private rental (dispersed) contracts as asylum seekers do not have access to other housing until they are granted refugee status. At this point, the rapid withdrawal of direct state support (within 28 days) can often lead to homelessness as refugees, given lack of time to find employment and linked to this, alternative accommodation (Refugee Council).

Carers:

The current cost of living crisis means that carers are facing unprecedented pressure on their finances: 25% are cutting back on essentials like food or heating and 63% are extremely worried about managing their monthly costs (Carers UK, State of Caring 2022).

In addition, caring also comes with additional costs that can have a significant impact on carers' finances and many carers suffer financial hardship. 44% of working-age adults who are caring for 35 hours or more a week are in poverty (Joseph Rowntree Foundation, UK Poverty 2022). Carer's Allowance is the main carer's benefit and is £76.75 per week (2023/24) for a minimum of 35 hours. It is the lowest benefit of its kind. In the UK, 977,506 carers were in receipt of Carer's Allowance in 2022 (X-Stat Explore (retrieved in Feb 2022)).

Being a carer also links to sex as a protected characteristic, as unpaid carers are more likely to be women (59% of unpaid carers are women (Census 2021)).

In terms of housing, a 2016 report by Carers UK found:

- 1 in 5 carers (18%) are waiting for adaptations to be made to their homes
- 10% said that their home was in poor condition, damp or disrepair, rising to 15% of carers renting privately
- 15% said there isn't enough space for someone to provide overnight care, rising to 19% of carers living in social housing
- 13% said that as a result of caring there isn't enough space to live comfortably, rising to 18% of carers living in social housing.

Veterans:

Only a small minority of the Armed Forces Community will need to access the housing services provided by the housing bodies subject to the Duty (section 4A). However, there are likely to be disproportionate numbers needing specialist adapted housing which may be particularly lacking, and some are at increased risk of homelessness due to a lack the knowledge of the civilian housing sector, welfare system and budgeting, and reluctance to seek help early (Statutory Guidance on the Armed Forces Covenant Duty, Nov 22).

Care leavers:

Poor housing options and provision for care leavers persists. It is often far from social networks and comprised of stressful environments which have knock on effects to mental health (Caring for Better Health (Care Leavers UK, 2017)).

Looked after children:

There is concern for distribution of housing options, including sufficient in-borough provision (including foster care) which is likely to have correlation with the availability of affordable housing. Statutory guidance assumes that foster carers can access the homes they need, including affordable homes, in each borough, which given the need for affordable homes across London seems unlikely to be the case (Statutory Guidance on Securing Sufficient Accommodation for Looked After Children (undated)). Further evidence is however needed.

6.2 Gaps in evidence

Religion: Impact on those who hold a particular religion or belief (including no religion or belief): Lack data on the extent to which those who hold a particular religion or belief (including no religion or belief) find it harder to gain access to suitable housing they can afford compared with other groups. This makes it difficult to identify potential impacts.

Impact on younger people: The limited availability of specific data on young adults under 21 makes it hard to identify impacts, beyond those that affect households which include children.

LGBTQ+ and Gender Reassignment: Lack of data on the extent to which those who identify as LGBTQ+, or who are undergoing gender reassignment, find it harder to gain access to suitable housing they can afford compared with other groups. This makes it difficult to reliably identify potential impacts.

Marriage and civil partnership: no data has been found that details the extent to which this characteristic correlates with gaining access to suitable housing.

Pregnancy and maternity: no data has been found that details the extent to which this characteristic correlates with gaining access to suitable housing.

7 Appendix B: Engagement summary

7.1 Summary of groups engaged and engagement record

Robust equality information is necessary to design and deliver effective and efficient policies. Where there are information gaps about people who may be affected with particular protected characteristics, focused and targeted engagement may help.

Already engaged:

None. Engagement is yet to take place on the document.

Future engagement:

It is unclear what targeted events could take place to tackle the lack of data within the EqIA for marriage and civil partnerships and pregnancy and maternity, however it is proposed that the GLA Webinar event be highlighted to Stonewall Housing and Gendered Intelligence, organisations that may have richer data on those undergoing gender reassignment and LGBTQ+ people. Such targeting will help to ensure that those undergoing gender reassignment or who identify as LGBTQ+, or their representatives, understand that this consultation is live.

Specific engagement to raise awareness of the consultation is also planned with the London Housing Panel (LHP). The panel represents a number of groups across the city who experience barriers to housing access (including for affordability reasons).

Through the EqIA process, all other protected groups have all been identified as being positively impacted. Given this and the fact that this is LPG consultation rather than an opportunity to influence policy change, no further targeted consultation is planned.

7.2 Engagement record

Event details	Specific groups represented	Key findings

8 Appendix C: Legal context

8.1 Equality Act 2010

The Equality Act 2010 replaced the pre-existing anti-discrimination laws with a single Act. The legislation covers the exercise of public functions, employment and work, goods and services, premises, associations, transport and education.

The Act prohibits victimisation and harassment, and all of the following forms of discrimination: direct; indirect; by association; by perception; or discrimination arising from disability.

The Act recognises [nine protected characteristics](#):

1. Age

A person having a particular age or being within an age group. This includes all ages, including children and young people.

2. Disability

A physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities. Certain medical conditions are automatically classed as being a disability- for example, cancer, HIV infection, multiple sclerosis.

3. Gender reassignment

A person has the protected characteristic of gender reassignment if they are proposing to undergo, are undergoing or have undergone a process (or part of a process) to reassign their sex by changing physiological or other attributes of sex ([Equality Act 2010, Section 7 \(1\)](#)).

4. Marriage and civil partnership

Marriage is a union between a man and a woman or between a same-sex couple.

Same-sex couples can also have their relationships legally recognised as 'civil partnerships'. Civil partners must not be treated less favourably than married couples (except where permitted by the Equality Act 2010).

Marriage and civil partnership are a protected characteristic for the purposes of the duty to eliminate discrimination.

5. Pregnancy or maternity

Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

6. Race

In the Equality Act, race can mean your colour, or your nationality (including your citizenship). It can also mean your ethnic or national origins, which may not be the same as your current nationality. For example, you may have Chinese national origins and be living in Britain with a British passport.

Race also covers ethnic and racial groups. This means a group of people who all share the same protected characteristic of ethnicity or race.

7. Religion or belief

Religion refers to any religion, including a lack of religion. Belief refers to any religious or philosophical belief (including ethical veganism) and includes a lack of belief (for example, Atheism).

8. Sex

A man or a woman.

9. Sexual orientation

Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.

Though not a protected group in the Equality Act 2010, the GLA recognises that socio-economic disadvantage is a significant contributor to inequality across London and therefore regards people on low incomes as an additional group against which to assess equality impacts.

8.2 Public Sector Equality Duty aims

The Public Sector Equality Duty (PSED) set out at Section 149 of the Equality Act 2010 requires public bodies, when exercising its functions, to have 'due regard' to the following:

- Aim 1. eliminate discrimination, harassment and victimisation and other conduct prohibited under the Act;
- Aim 2. advance equality of opportunity between people who share a protected characteristic and those who do not;
- Aim 3. foster good relations between people who share a protected characteristic and those who do not.

The first aim means the giving advance consideration to discrimination issues before making policy decisions. It relates particularly to scrutinising policies, practices or decisions that could result in discrimination or other prohibited conduct.¹⁹

¹⁹ [EHRC Technical Guidance](#)

Having due regard to second aim involves having due regard, in particular, to the need to:

- Aim 2(a): remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
- Aim 2(b): take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;
- Aim 2(c): encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

Having due regard to the third aim involves having due regard, in particular, to the need to:

- 3(a) tackle prejudice, and
- 3(b) promote understanding.

The three aims of the duty are known as the 'general equality duty'. They must be fulfilled before and at the time of the exercise of a public function and on a continuing basis by the GLA when exercising its functions. Each aim must be considered in turn: for example, the obligation to have due regard to advancing equality is quite separate from the obligation to have due regard to eliminating discrimination.