

# **Key Worker Living Rent homes: Equality Impact Assessment**

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# 1. Introduction

- 1.1. This document is the Equality Impact Assessment (EqIA) for Key Worker Living Rent (KWLR) homes. These are a form of intermediate-rent homes proposed by the Mayor of London. He publicly consulted on these proposals in late 2024 and early 2025; they are available at <https://www.london.gov.uk/key-worker-living-rent-homes>.
- 1.2. The Mayor has developed plans for KWLR homes to meet his promise to deliver new Rent Control Homes. These have rents capped and linked to key workers' incomes. He intends KWLR homes to provide working people across London with quality, affordable and stable homes.
- 1.3. This document accompanies a report on the public consultation, and a Housing and Planning Practice Note that confirms the Mayor's plans for KWLR homes. The Mayor and his team have assessed equalities impacts as they've developed and revised proposals. The conclusions set out in this document relate to the Mayor's plans, including changes and additions made in light of consultation responses and other factors that have arisen since he published his initial proposals.
- 1.4. This EqIA helps the GLA to meet the Public Sector Equality Duty in developing and finalising plans for KWLR homes. As part of the Public Sector Equality Duty, as set out in the Equality Act 2010, the Mayor and GLA must have due regard to the need to:
  - eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act
  - advance equality of opportunity between persons who share a protected characteristic and persons who do not share it
  - foster good relations between persons who share a protected characteristic and persons who do not share it.
- 1.5. This EqIA assesses the potential impact of the Mayor's proposals and final plans for KWLR homes on people with different protected characteristics, or combinations of protected characteristics, and identifies ways to mitigate any potential impacts at odds with the Public Sector Equality Duty. For clarity, the characteristics protected by the Equality Act 2010 are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality, ethnic or national origin), religion or belief, sex and sexual orientation.
- 1.6. This EqIA also considers the impact of the Mayor's proposals and final plans on people with low incomes. Although this is not a legally protected characteristic, the

socio-economic inequality it reflects is important to the Mayor, as part of his efforts to address wider issues of inequality.

1.7. Plans for KWLR homes relate to multiple existing GLA policy frameworks, identified below, that have previously had their equalities implications assessed as part of the GLA's decision-making. This does not reduce the requirements of this EqIA; but it offers assurance that equality and inclusion considerations are embedded in the wider context surrounding KWLR homes. These frameworks include the following:

- The London Affordable Homes Programme (AHP) 2021-26. The EqIA for the AHP 2021-2026 can be viewed here: [Homes for Londoners: Affordable Homes Programme 2021-2026: Equality Impact Assessment](#).
- The 2021 London Plan. The impact assessment, which included equalities, for the London Plan can be viewed here: [London Plan: Integrated Impact Assessment \(2017\)](#).
- The Mayor's Equality, Diversity and Inclusion Strategy (2018), which sets out the Mayor's equality objectives. It can be viewed here: [Mayor's Equality, Diversity and Inclusion Strategy \(2018\)](#).

1.8. The structure of this EqIA is as follows:

- Key Worker Living Rent homes: what are the intended impacts? (Section 2)
- What do we know about the demographics of potential KWLR renters? (Section 3)
- What potential equalities impacts were raised via public consultation? (Section 4)
- What are the potential equalities impacts of KWLR homes, and any justifications for or mitigations against negative impacts, for Londoners with different protected characteristics, and combinations of characteristics? (Section 5)
- Baseline data (Appendix).

## 2. Key Worker Living Rent homes: what are the intended impacts?

- 2.1. The Mayor's proposals for KWLR homes form part of his overarching commitment to build more affordable homes. With this, he is aiming to tackle London's housing crisis and make London a fairer city.
- 2.2. Affordable housing includes a mix of social rented homes and intermediate housing. Planning policy in London – in particular, the London Plan – further defines these tenures and sets the Mayor's expectations about how these are delivered. This includes ensuring that at least 30 per cent of affordable homes are social rent, for Londoners on the lowest incomes. Developing intermediate housing is not an alternative to building social rented homes. Social rented homes are the form of affordable housing for which there is greatest need in London. The Mayor remains committed to delivering these homes.
- 2.3. Intermediate housing is for Londoners on ordinary incomes, below income thresholds for which the London Plan provides, who are very unlikely to access social housing (being lower priority for this limited resource), but who struggle to afford a home that meets their needs on the open market. It includes homes for sale and for rent.
- 2.4. The Mayor wants to develop a new type of intermediate rented housing, KWLR, to meet the needs of Londoners and, in particular London's key workers – many of whom are struggling to pay private rents. The Mayor proposed that KWLR homes provide security of tenure. Rent levels will be directly linked to key workers' average household incomes, to help with affordability.
- 2.5. The Mayor's plans for KWLR homes will build on the Mayor's existing policy on intermediate homes. This encourages boroughs and housing providers to prioritise key workers for these homes. Insofar as the Mayor's plans rely on this policy, his plans do not propose any change in how intermediate housing is allocated. However, the explicit intention that KWLR homes benefit key workers may encourage boroughs and providers to start prioritising key workers for intermediate housing, including KWLR homes. Draft London Plan guidance on affordable housing – which sets out an expectation previously outlined in Practice Notes – may also have this effect.
- 2.6. Providing intermediate homes for key workers is intended to help address the challenges of recruitment and retention in key sectors delivering essential services for Londoners. It also seeks to recognise the critical role that key workers play in our city. This means that KWLR homes may also benefit a much wider range of

Londoners who use these essential services – particularly those who rely on them most.

- 2.7. Currently, the Mayor's preferred intermediate tenures are shared ownership and London Living Rent (LLR). Unlike these, KWLR homes don't require a deposit, or saving for one. This means they could meet the needs of a different group of Londoners – key workers who cannot or do not want to own their own home. This includes those who do not have savings for a deposit, or might struggle to save towards one while renting an LLR home. The GLA's investment partners (IPs)<sup>1</sup> have noted that the requirement to let LLR homes to tenants who are able and inclined to save towards a deposit rules out many applicants.
- 2.8. Most KWLR homes will be newly built homes. This will bring further benefits in terms of homes being, on average, of a higher quality than older homes. New homes are likelier to be more energy efficient (and cheaper to heat) and accessible. They may also be more spacious and better designed. All of these qualities benefit health and wellbeing.
- 2.9. The Mayor wants KWLR homes to be more attractive to key workers and their employers – but also to the investors, developers and providers needed to build them. The Mayor's approach to setting and increasing rents and service charges is intended to enable investors, developers and providers to predict future income with confidence.

## Final proposals

- 2.10. The Mayor's plans for KWLR homes reflect consultation feedback (including on equalities impacts), and other factors that have arisen since he published his initial proposals. The following decisions will potentially impact Londoners with protected characteristics or on low incomes:
  - strengthening provisions for KWLR homes for sharers, as well as single-person households
  - capping rents at 80 per cent of average market rents in a borough, rather than 70 per cent, to support viability – in particular, for one-bedroom homes
  - linking rent increases to CPI plus 1 per cent, rather than increases in key workers' incomes

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<sup>1</sup> These are the councils and housing associations that the GLA funds to develop affordable housing.

- setting a rent and service-charge benchmark for four-bedroom homes that is higher than the benchmark for three-bedroom homes and exceeds 40 per cent of key workers' average net household income.

2.11. Section 5 of this EqIA considers the potential impacts of these decisions, and amendments to the Mayor's initial proposals, on Londoners with protected characteristics or on low incomes.

### 3. Demographics of potential KWLR tenants (baseline data)

3.1. The data available on the protected characteristics and incomes of Londoners who might need, or who secure, KWLR homes is detailed in the Appendix. The EqIA has used this data to assess the equalities impacts of the Mayor's plans for KWLR homes.

3.2. The key findings from the analysis of data set out in the Appendix are as follows:

- Some Londoners are more likely than others to be in different types of housing need. In particular, Black and Asian households, and younger families, are more likely to be in overcrowded homes; and LGBTQ+ young people and households headed by women are more likely to be homeless. More generally, low-income households are more likely to be in housing need.
- Households securing intermediate housing (either an intermediate rental tenancy or a shared ownership home) are, on average, younger and much less likely to be disabled than all working Londoners. Their lower rates of disability will be due, in part, to their younger age profile. Households securing intermediate housing also have lower incomes than all working Londoners; and their households are much less likely to include children. People moving into intermediate homes are more likely to be female than working Londoners overall.
- Households starting an intermediate rental tenancy are more likely to be Black/Black British or Mixed ethnicity, and less likely to be White, compared with all working Londoners. By comparison, households buying a shared ownership home are more likely to be White, and less likely to be Asian/Asian British or from an Other ethnic group.

- Key workers are, on average, older; more likely to be female; slightly more likely to be disabled; and more likely to be from a Black, Asian or minority ethnic background than working Londoners overall.

3.3. It's important to note that, where Londoners have multiple protected characteristics, the patterns and experiences highlighted above are likely to be compounded. For example, a young Black/Black British household may be more likely to be overcrowded, by virtue of household members' ethnicity and their age.

## 4. Potential equalities impacts raised in public consultation responses

4.1. This EqIA considers the baseline data outlined in the previous section and the Appendix. But it also considers comments made by respondents to the public consultation, about the potential equalities impacts of the Mayor's proposals for KWLR homes. The public consultation included the following question:

Please share any intelligence or insights you have on the possible impacts of the Mayor's initial proposals on Rent Control Homes, including different options set out in this document, on Londoners – and, in particular, London key workers who are eligible for intermediate housing – with different protected characteristics and combinations of those characteristics.

In analysing consultation responses, officers also noted answers to other questions where they related to equalities.

4.2. The question at 4.1, above, received 19 responses from a range of respondents. Local authorities were over-represented among these. The key themes from responses were as follows:

- **Low-income households:** Several respondents raised concerns about whether KWLR homes would be affordable to key workers on low incomes. Some mentioned specific types of low-income household – such as single-person or single-parent households. Some suggested that social housing would be more appropriate for some key workers, and were concerned that building KWLR homes would detract from building social rent homes. The Mayor's planning and funding policy safeguard against this.
- **Women:** Respondents commented that women were both more likely to struggle to afford housing costs, and over-represented in some key worker

occupations (such as nursing and teaching). On this basis, they considered KWLR homes likely to benefit women. They also noted that rents linked to average incomes don't account for the gender pay gap (where women have lower incomes on average). Respondents also commented that family-sized homes must be affordable to the families of single parents, the majority of whom are women.

- **Black, Asian and minority ethnic Londoners:** Respondents' points about Black, Asian and minority ethnic Londoners resembled those made about women. Both groups are more likely to struggle to afford housing costs; and are over-represented in some key worker occupations (such as the NHS workforce). They suggested Black, Asian and minority ethnic Londoners are, therefore, likely to benefit from KWLR homes.
- **Accessible homes for disabled Londoners:** Respondents emphasised that KWLR homes need to include accessible homes for disabled Londoners; and suggested that grant funding should cover the additional cost of accessible homes. They also commented that intermediate rented homes have lower accessibility requirements than social rented homes.
- **Young people and children:** Respondents commented that young people struggle to secure housing they can afford, and so KWLR homes would likely benefit them. Regarding children, respondents commented on the need for family-sized homes to be affordable to single-parent families. They also expressed some concerns that dual-earner families may have incomes that make them ineligible for intermediate rented homes, but still struggle to afford shared ownership or market homes.

4.3. Further points about equalities impacts were raised in response to other questions in the consultation. Attendees at meetings that GLA officers attended as part of the consultation also offered some insights on equalities impacts. The most frequently recurring points were as follows:

- **KWLR homes need to be accessible to key workers on a range of incomes.** The point respondents made most often was that many key workers have low incomes (below the averages used to calculate benchmark rents), and so might struggle to afford the benchmark rents. Participants in consultation meetings raised concerns that healthcare professionals with lower incomes may struggle to access KWLR homes. Some respondents made the point that a couple, where both earn average key worker salaries, may be ineligible for KWLR homes due to earning above the income threshold, but may still struggle to afford a home on the open market.

- **KWLR homes need to include larger homes (with three or four bedrooms) for families.** In respect of this point, respondents expressed concerns about two groups of families. They highlighted that the rent and service charges for larger homes may be unaffordable to single parents. They also observed that dual-earner families may earn more than the income threshold, but still struggle to afford a home for their family on the open market.
- **Migrant workers need to access KWLR homes.** Several respondents with a connection to the NHS were concerned about housing for migrant workers – particularly those the NHS has recruited internationally. These workers don't have access to social rented homes, and often struggle to secure accommodation in the private rented sector (PRS). Some migrant workers are looking for short-term accommodation when they arrive, while others are looking for a long-term home with family.
- **Non-key workers need intermediate homes too.** Some respondents raised the point that intermediate homes should be allocated purely based on need. They were concerned that non-key workers on low incomes wouldn't be able to access KWLR homes. (However, prioritising key workers for intermediate homes is in line with the Mayor's existing policy that boroughs should prioritise key workers for intermediate housing.)
- **Women need safe homes.** Respondents made the point that KWLR homes need to be safe for female key workers, especially shift workers. They suggested this meant building the homes in busy areas with good public transport connections, including at night.
- **Women need affordable homes:** Participants in consultation meetings were concerned that healthcare professionals with lower incomes, who are more likely to be women, may struggle to afford KWLR rents. They also made the point that high housing costs across the housing market may contribute to women remaining in relationships that they would otherwise leave.
- **Being a sharer can have social and mental health benefits for some Londoners,** including young people. Respondents also noted that sharing can allow people with low incomes to save for a deposit.

## 5. What are the likely impacts of the proposals from an equalities perspective?

- 5.1. This section outlines the potential equalities impacts of the Mayor's plans for KWLR, which form part of his commitment to building more affordable homes. It identifies and considers the potential positive and negative impacts on Londoners with each protected characteristic (and on those with low incomes). This takes into account the baseline data and consultation responses set out above and in the Appendix. The quality and availability of data on each characteristic affects how well the potential equalities impacts can be identified and assessed. For each characteristic, there are two tables showing potential impacts. The first shows the potential impacts of the proposals on which the Mayor consulted. The second shows the impacts of decisions on, and amendments to, the Mayor's proposals reflected in his final plans.
- 5.2. It is important to note that the Mayor's plans for KWLR homes rely on his existing policy of strongly encouraging boroughs and housing providers to prioritise key workers for intermediate homes of all forms. As a result, his plans may only affect who secures intermediate homes, including KWLR homes, insofar as it highlights and promotes that policy.
- 5.3. Some key potential positive impacts of the Mayor's plans for KWLR homes are:
  - increasing delivery of affordable, secure and good-quality housing for Londoners who are in housing need
  - improving access to intermediate housing for some Londoners by removing the requirement for a mortgage deposit (either having one or saving towards one)
  - providing housing that is affordable in the long term, with rent levels linked to incomes and controlled increases
  - making fuller provision for sharers than in other forms of preferred intermediate housing, which may have a positive impact for some Londoners with lower incomes
  - improved recruitment and retention of key workers, as a result of KWLR delivering more affordable housing for London's key workers, may have a positive impact on delivery of public services. This would benefit all Londoners; and may especially benefit some groups of Londoners who rely

heavily on health, social care and education services. This is likely to include disabled people, older people and households with children.

5.4. Some key potential negative impacts are as follows:

- Prioritising key workers for intermediate housing may make it harder to secure for other Londoners who need it (and who are unlikely to secure social housing). (However, the Mayor already recommends that boroughs and housing providers prioritise key workers for intermediate homes.)
- In a scenario where KWLR erodes delivery of, or replaces, LLR, intermediate renters would no longer be able to choose a tenure where they can purchase a share of the home that they are renting.

5.5. It's also important to note that, just as the experiences of Londoners with particular protected characteristics can be compounded for those with multiple characteristics (see paragraph 3.3), so the positive and negative impacts of plans for KWLR homes may be magnified.

### Potential impacts by protected characteristic

**Table 1.a: Potential impacts of initial proposals by age**

Potential positive impacts
Younger people are more likely to struggle to afford housing costs, because they have lower incomes, on average. A housing tenure with rents linked to key workers' incomes could make housing costs more affordable for young people. An overall increase in delivery of affordable homes may benefit them too.
KWLR would remove the expectation of buying (compared with LLR). This could benefit younger people, who may struggle to save for a deposit because they have lower incomes on average.
People moving into intermediate housing (starting intermediate rent tenancies and buying shared ownership homes) are likely to be younger – so a new type of intermediate rent may be more likely to serve younger people.
Households that include children (especially young children) and older people may benefit, in particular, from the energy efficiency of new homes. The particular benefit stems from young children and older people being especially vulnerable to the adverse impacts of cold homes on health.

Households that include children, especially children in school, may benefit, in particular, from the stability that KWLR homes will provide. Even with the greater security that the Renters' Rights Act will confer on private renters, tenants of KWLR homes may be less likely to need to move (which can disrupt children's education) than if they were living in the PRS, where rents are higher and rent increases less regulated.

Some households with children may struggle to afford a home that meets their needs on the open market, due to their household size increasing through having children. An overall increase in delivery of affordable homes may benefit them.

Children and younger people are more likely to be in education. KWLR aims to improve public services by supporting recruitment and retention of key workers. This may benefit children and younger people.

Key workers are older than London workers on average, so KWLR may benefit older people who need intermediate housing.

KWLR would remove the expectation of buying (compared with LLR). This may benefit older people, who may be less likely to be able to secure a mortgage.

Older people are more likely to use public services, such as health and social care. KWLR aims to improve public services by supporting recruitment and retention of key workers. This may benefit older people.

Potential negative impacts	Any justification or mitigation
Key workers are older than London workers on average, so KWLR may disadvantage younger people compared to other intermediate housing tenures.	<p>See paragraph 5.2.</p> <p>Young people will still be able to access all intermediate housing tenures. They are more likely to be in intermediate housing need, even if key workers are on average older. As such, they are more likely to be eligible for intermediate housing.</p>
The proportion of households moving into intermediate housing (considering those starting intermediate rent tenancies and buying shared ownership homes) that include children is much lower than the proportion of households in the PRS that include children.	<p>People may have children once they have secured intermediate housing – especially as those moving into intermediate housing tend to be younger. Census data on people living in shared ownership homes suggests this is the case. It is not possible to establish this from MHCLG's COntinuous REcording of social lettings and sales (CORE) data – this only looks at households moving into intermediate</p>

	<p>housing/starting a new intermediate rent tenancy.</p>
KWLR housing is for those with average incomes – generally working people. Older people (above working age) may be better served by social rent. Some consultation respondents were concerned that plans for KWLR homes would mean fewer social rented homes would be developed.	<p>Planning policy specifies a minimum proportion of affordable homes that should be social rented and intermediate. The AHP and SAHP prioritise delivering social rented homes. The Mayor's plans for KWLR homes will not mean that fewer social rented homes are developed.</p> <p>There is also a form of shared ownership designed for older people. Although older people may not access KWLR, younger people are more likely to be in housing need.</p>
Some families with children may be better served by social rent. Some consultation respondents were concerned that plans for KWLR homes would mean fewer social rented homes would be developed.	<p>Planning policy specifies a minimum proportion of affordable homes that should be social rented and intermediate. The AHP and SAHP prioritise delivering social rented homes. The Mayor's plans for KWLR homes will not mean that fewer social rented homes are developed.</p>
Younger people are more likely to struggle to afford housing costs, and may be better served by social rent. Some consultation respondents were concerned that plans for KWLR homes would mean fewer social rented homes would be developed.	<p>Planning policy specifies a minimum proportion of affordable homes that should be social rented and intermediate. The AHP and SAHP prioritise delivering social rented homes. The Mayor's plans for KWLR homes will not mean that fewer social rented homes are developed.</p>
There may be a negative impact on those least likely to have savings for a deposit, or access to help with a deposit from family and friends, if KWLR supersedes LLR as the Mayor's preferred intermediate rented tenure (or results in fewer LLR homes being developed). In this case, they may lose the opportunity (provided by LLR) to buy the intermediate homes they're renting (with the attendant benefits of stability and avoiding the costs of moving).	<p>If KWLR homes are a more attractive proposition to investors, developers and providers than LLR homes, then this potential negative impact may be justified by the overall positive benefit of an increase in the supply of intermediate housing.</p> <p>KWLR tenants would not be prevented from saving for a deposit and seeking to buy a home on a shared ownership basis. There is scope for boroughs and housing providers to prioritise KWLR tenants for shared ownership homes.</p>

**Table 1.b: Potential impacts of decisions on, or amendments to, initial proposals by age**

<b>Potential positive impacts</b>	
Provision for homes for sharers may make KWLR homes more affordable to young people, who have lower incomes, on average (for reasons including being at the start of their careers).	
Provision for homes for sharers may make KWLR homes something that public sector employers, such as NHS trusts, want to develop for lower-income staff. Given that key workers are older than working Londoners overall, this may benefit older people.	
<b>Potential negative impacts</b>	<b>Any justification or mitigation</b>
<p>KWLR homes may be less affordable to young people, who have lower homes on average, where:</p> <ul style="list-style-type: none"> <li>• borough-level rent and service-charge benchmarks are capped at 80 per cent of borough-level market rents, rather than the 70 per cent initially proposed</li> <li>• rent increases are linked to CPI plus 1 per cent, rather than to increases in key workers' incomes.</li> </ul>	These changes are to improve viability, which may result in more KWLR homes being built. Borough-level 20 per cent below average market rents in the borough, and most will be lower than that, with controlled rent increases.
<p>The rent and service-charge benchmark for four-bedroom homes will be higher than in the original proposals, which may make it more difficult for households that include children to afford these homes.</p>	A higher rent and service-charge benchmark for four-bedroom homes is intended to make the homes more viable. This, in turn, is intended to increase the supply of these homes. The homes will still cost much less than the market alternatives.

<p>Providers may deliver fewer three- and four-bedroom homes for families if they can deliver these homes for sharers and secure higher overall income.</p>	<p>The Mayor has designed rent benchmarks; and will assess grant allocations to avoid creating any incentive to deliver homes for sharers – rather than homes of the same size for individual households.</p> <p>Consultation responses suggested that, although some providers are keen to deliver homes for sharers, many would prefer to deliver homes for individual households.</p>
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**Table 2.a: Potential impacts of initial proposals by disability**

Potential positive impacts
<p>Disabled people are more likely to struggle to afford housing costs, because they have lower incomes, on average. A housing tenure with rents linked to key workers' incomes could make housing costs more affordable for disabled people. An overall increase in delivery of affordable homes may benefit them too.</p>
<p>KWLR would remove the requirement to have a deposit, or save for a deposit, which could benefit disabled people, insofar as they have lower incomes on average, and so may struggle to save for a deposit.</p>
<p>KWLR will provide homes that are suitable for disabled people in need of intermediate rented homes. Planning policy requires new homes to be accessible and adaptable, with 10 per cent of new homes to be built to be wheelchair accessible or adaptable. KWLR will typically be new homes, and will therefore need to meet these accessibility requirements.</p>
<p>New homes are typically better quality than older ones, with no hazards and good energy efficiency. This may have a positive impact on those with certain health conditions or disabilities.</p>
<p>Insofar as key workers are prioritised in allocating KWLR homes, this may increase the rate at which disabled Londoners benefit from the homes. This is because key workers are slightly more likely to be disabled than working Londoners overall.</p>
<p>Disabled people are more likely to use public services such as health and social care. KWLR aims to improve public services by supporting recruitment and retention of key workers. This may benefit disabled people.</p>

**Table 2.b: Potential impacts of decisions on, or amendments to, initial proposals by disability**

Potential positive impacts	
Adding provision for sharers may make KWLR homes more affordable to disabled people, who have lower incomes on average.	
Potential negative impacts	Any justification or mitigation
<p>KWLR homes may be less affordable to disabled people, who have lower incomes, on average, where:</p> <ul style="list-style-type: none"> <li>• borough-level rent and service-charge benchmarks are capped at 80 per cent of borough-level market rents, rather than the 70 per cent initially proposed</li> <li>• rent increases are linked to CPI plus 1 per cent, rather than to increases in key workers' incomes.</li> </ul>	These changes are to improve viability, which may result in more KWLR homes being built. Benchmarks for KWLR homes will still be well below market rents, with controlled rent increases.

**Table 3: Potential impacts of initial proposals by gender reassignment**

<b>Potential impacts</b>	
The lack of data available on this characteristic makes it difficult to comment on the potential impacts of the Mayor's proposals for KWLR.	
<b>Potential negative impacts</b>	<b>Any justification or mitigation</b>
Among those moving into intermediate housing (considering those starting intermediate rent tenancies and buying shared ownership homes), the proportion of disabled people overall, and wheelchair users specifically, is lower than the proportion of disabled people among all working Londoners.  This could indicate that disabled people are less able to access existing intermediate housing, potentially reflecting discrimination. And it might be that this could be replicated in KWLR homes. However, Census 2021 data shows that, although households living in shared ownership homes are less likely to include a disabled person than working Londoners' households overall, the difference is less stark than the difference apparent in CORE data on those moving into intermediate housing.	It may be that disproportionately fewer disabled people move into intermediate housing because they are more likely to have lower incomes – in part, because they are more likely to be working part-time, or in lower-paid roles – and to live in social housing.
Disabled people are more likely to struggle with housing costs, and may be better served by social rent. Some consultation respondents were concerned that plans for KWLR homes would mean fewer social rented homes would be developed.	Planning policy specifies a minimum proportion of affordable homes that should be social rented and intermediate, and the AHP and SAHP prioritise delivering social rented homes. The Mayor's plans for KWLR homes will not mean that fewer social rented homes are developed.

<p>Disabled people are more likely to experience poverty, and may be less likely to have savings for a deposit. There may be a negative impact on this group if KWLR supersedes LLR as the Mayor's preferred intermediate rented tenure (or results in fewer LLR homes being developed). In this case, they may lose the opportunity (provided by LLR) to buy the intermediate homes they're renting (with the attendant benefits of stability and avoiding the costs of moving).</p>	<p>If KWLR homes are a more attractive proposition to investors, developers and providers than LLR homes, then this potential negative impact may be justified by the overall positive benefit of an increase in the supply of intermediate homes.</p> <p>KWLR tenants would not be prevented from saving for a deposit and seeking to buy a home on a shared ownership basis. There is scope for boroughs and housing providers to prioritise KWLR tenants for shared ownership homes.</p>
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**Table 4.a: Potential impacts of initial proposals by marriage or civil partnership**

Potential positive impacts	
No impacts identified.	
Potential negative impacts	Any justification or mitigation
Households moving into intermediate housing were less likely to be married or in a civil partnership than working Londoners overall.	This might be because households including a couple often have two incomes; as such, they may not need intermediate housing.

**Table 4.b: Potential impacts of decisions on, or amendments to, initial proposals by marriage or civil partnership**

<b>Potential positive impacts</b>	
No impacts identified.	
<b>Potential negative impacts</b>	<b>Any justification or mitigation</b>
Providers may deliver fewer homes for individual households (including households that are made up of, or include, a couple who are married or in a civil partnership), if they can secure a higher income from delivering homes for sharers. These may be less suitable for people who are married or in a civil partnership.	<p>The Mayor has designed rent and service-charge benchmarks; and will assess grant applications to avoid creating any incentive to deliver homes for sharers rather than homes of the same size for individual households.</p> <p>Consultation responses suggested that, although some providers are keen to deliver homes for sharers, many would prefer to deliver homes for individual households.</p>

**Table 5.a: Potential impacts of initial proposals by pregnancy or maternity**

<b>Potential positive impacts</b>
The limited data on this characteristic makes it difficult to comment on the potential impacts of the Mayor's proposals for KWLR.
New homes are typically better quality, without hazards and good energy efficiency. This may have a particular health benefits for people who are pregnant or have recently given birth.
Some people who are pregnant or have recently given birth may struggle to afford a home that meets their needs on the open market, because they need a larger home due to the increase in their household size. An overall increase in delivery of affordable homes may benefit them.
Pregnancy/maternity typically results in a period of lower income and additional costs associated with having children. In particular, those who are pregnant or have recently given birth may struggle to afford a home that meets their needs on the open market, because their household size has increased while their income has decreased. A housing tenure with rents linked to key workers' incomes and controlled rent increases could be more affordable to people who are pregnant or have recently given birth than existing

housing options. Similarly, a tenure without the requirement to have a deposit or to save towards a deposit may be more affordable. An overall increase in delivery of affordable homes may be beneficial too.

During pregnancy/maternity, people are more likely to use public services, especially healthcare. KWLR aims to improve public services by supporting recruitment and retention of key workers. This may benefit people who are pregnant or have recently given birth.

Among households moving into intermediate housing (considering those starting intermediate rent tenancies and buying shared ownership homes), the proportion of households that include children (as a proxy for pregnancy/maternity) is much lower than among households living in the PRS.	Some households will have children once they have secured intermediate housing – especially as those moving into intermediate housing tend to be younger. Census data on people living in shared ownership homes suggests this is the case. It is not possible to establish this from CORE data, which only looks at households moving into intermediate housing/starting a new intermediate rent tenancy.
People who have children may be better served by social rent. Some consultation respondents were concerned that plans for KWLR homes would mean fewer social rented homes would be developed.	Planning policy specifies a minimum proportion of affordable homes that should be social rented and intermediate. The AHP and SAHP prioritise delivering social rented homes. KWLR homes will not mean that fewer social rented homes are developed.

**Table 5.b: Potential impacts of decisions on, or amendments to, initial proposals by pregnancy or maternity**

<b>Potential positive impacts</b>	
No impacts identified.	
<b>Potential negative impacts</b>	<b>Any justification or mitigation</b>
<p>KWLR homes may be less affordable to people who are pregnant or have recently given birth, who have lower homes on average, where:</p> <ul style="list-style-type: none"> <li>• borough-level rent and service-charge benchmarks are capped at 80 per cent of borough-level market rents, rather than the 70 per cent initially proposed</li> <li>• rent increases are linked to CPI plus 1 per cent, rather than to increases in key workers' incomes.</li> </ul>	<p>These changes are to improve viability, which may result in more KWLR homes being built. Borough-level benchmarks for KWLR homes will still be at least 20 per cent below borough-level market rents, and most will be lower than that with controlled rent increases.</p>
<p>Four-bedroom homes will be less affordable than in the original proposals. This is most likely to impact households that include children, since they are most likely to need larger homes.</p>	<p>A higher rent and service-charge benchmark for four-bedroom homes is intended to make the homes more viable, which is intended to increase the supply of these homes. The homes will still cost much less than the market alternatives.</p>
<p>Introducing homes for sharers may reduce the supply of single household homes, which may be more suitable for people who are pregnant or have recently given birth.</p>	<p>The Mayor has designed rent benchmarks and will allocate grant for homes for sharers to avoid creating an incentive to develop larger homes for sharers, rather than equivalently sized homes for individual households.</p> <p>Consultation responses suggested that, although some providers are keen to deliver homes for sharers, many would prefer to deliver homes for individual households.</p>

**Table 6.a: Potential impacts of initial proposals by race – including colour, nationality, ethnic or national origin**

<b>Potential positive impacts</b>	
Those from ethnic backgrounds in greater need of affordable housing may benefit from a tenure in which rents are linked to key workers' incomes. An overall increase in delivery of affordable homes may benefit Londoners from these backgrounds too.	
Londoners from some Black, Asian and minority ethnic backgrounds are more likely to be in key worker occupations, so they may be more likely to benefit from KWLR homes.	
Londoners from some Black, Asian and minority ethnic backgrounds are less likely to move into shared ownership homes than White Londoners; but are more likely to start an intermediate rented tenancy than White Londoners. This suggests that having a deposit may be a barrier to some Black, Asian and minority ethnic groups accessing intermediate housing. KWLR removes the need for having a deposit or saving for one, so may benefit Londoners from some Black, Asian and minority ethnic backgrounds.	
Migrant key workers, who may not intend to remain in the UK in the long term or to purchase a home, may benefit from an affordable tenure that does not involve or lead to home ownership.	
<b>Potential negative impacts</b>	<b>Any justification or mitigation</b>
Londoners from some Black, Asian and minority ethnic backgrounds may be better served by social housing. Some consultation respondents were concerned that plans for KWLR homes would mean fewer social rented homes would be developed.	Planning policy specifies a minimum proportion of affordable homes that should be social rented and intermediate. The AHP and SAHP prioritise delivering social rented homes. The Mayor's plans for KWLR homes will not mean that fewer social rented homes are developed.

<p>Londoners from some Black, Asian and minority ethnic backgrounds may be less likely to have savings for a deposit, or access to help with a deposit from family and friends. There may be a negative impact on this group if KWLR supersedes LLR as the Mayor's preferred intermediate rented tenure (or results in fewer LLR homes being developed). In this case, they may lose the opportunity (provided by LLR) to buy the intermediate homes they're renting (with the attendant benefits of stability and avoiding the costs of moving).</p>	<p>If KWLR homes are a more attractive proposition to investors, developers and providers than LLR homes, then this potential negative impact may be justified by the overall positive benefit of an increase in the supply of intermediate housing.</p> <p>KWLR tenants would not be prevented from saving for a deposit and seeking to buy a home on a shared ownership basis. There is scope for boroughs and housing providers to prioritise KWLR tenants for shared ownership homes.</p>
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**Table 6.b: Potential impacts of decisions on, or amendments to, initial proposals by race – including colour, nationality, ethnic or national origin**

Potential positive impacts	
<p>Provision for sharers may make KWLR homes more affordable to Londoners from some Black, Asian and minority ethnic backgrounds, who have lower incomes on average.</p> <p>Provision for sharers may mean that public-sector employers (such as NHS trusts) are more likely to want to develop KWLR homes for lower-income staff. Given that key workers are more likely to be from some Black, Asian and minority ethnic backgrounds than working Londoners overall, this may benefit Londoners with these backgrounds.</p>	
Potential negative impacts	Any justification or mitigation
<p>KWLR homes may be less affordable to Londoners from some Black, Asian and minority ethnic backgrounds, who have lower incomes on average, where:</p> <ul style="list-style-type: none"> <li>• borough-level rent and service-charge benchmarks are capped at 80 per cent of</li> </ul>	<p>These changes are to improve viability, which may result in more KWLR homes being built. Borough-level benchmarks for KWLR homes will still be at least 20 per cent below average market rents in the borough, and most will be lower than that, with controlled rent</p>

<p>borough-level market rents, rather than the 70 per cent initially proposed</p> <ul style="list-style-type: none"> <li>rent increases are linked to CPI plus 1 per cent, rather than to increases in key workers' incomes.</li> </ul>	<p>increases.</p>
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**Table 7.a: Potential impacts of initial proposals by religion or belief**

Potential positive impacts	
Key workers are more likely to be from some religious groups (Christian, Hindu or Muslim), so these groups may benefit from a tenure targeted at key workers.	
Correspondence from Londoners suggest that some Muslims have not been able to access shared ownership homes. This is because shared owners typically need to take out a mortgage, which is not necessarily compatible with Islamic beliefs. KWLR would not present this issue.	
Potential negative impacts	Any justification or mitigation
No impacts identified.	n/a

**Table 7.b: Potential impacts of decisions on, or amendments to, initial proposals by religion or belief**

Potential positive impacts	
Provision for sharers may mean that public sector employers, such as NHS trusts, will be more likely to want to develop KWLR homes for lower-income staff. Given that key workers are more likely to be from some religious groups than working Londoners overall, this may benefit Londoners from these religious groups.	
Potential negative impacts	
No impacts identified.	n/a

**Table 8.a: Potential impacts of initial proposals by sex**

<b>Potential positive impacts</b>	
Women are more likely to be in need of affordable housing, due to earning less and being more likely to be single parents. A housing tenure with rents linked to key workers' incomes, and with controlled rent increases, could make housing costs more affordable for women, including in the longer term. An overall increase in delivery of affordable homes may benefit women too.	
Women who do not have savings for a deposit, or would struggle to save towards one, may benefit from a tenure intended to be more accessible than LLR or shared ownership.	
People moving into intermediate housing (starting intermediate rent tenancies and buying shared ownership homes) are more likely to be female, so a new type of intermediate rent may be more likely to serve women.	
Insofar as key workers are prioritised in allocating KWLR homes, this may increase the rate at which women benefit from the homes. This is because key workers are slightly more likely to be female than working Londoners overall.	
<b>Potential negative impacts</b>	<b>Any justification or mitigation</b>
Some women – in particular, single mothers – may be better served by social housing. Some consultation respondents were concerned that plans for KWLR homes would mean fewer social rented homes would be developed. Those in greatest need of affordable housing may be less likely to secure social rented housing if KWLR detracts from delivery of social rented homes.	Planning policy specifies a minimum proportion of affordable homes that should be social rented and intermediate. The AHP and SAHP prioritise delivering social rented homes. The Mayor's plans for KWLR homes will not mean that fewer social rented homes are developed.

<p>Those least likely to have savings for a deposit, or access to help with a deposit from family and friends, may lose the opportunity (provided by LLR) to save towards a deposit, if KWLR supersedes LLR as the Mayor's preferred IR tenure, or results in fewer LLR homes being developed.</p>	<p>If KWLR homes are a more attractive proposition to investors, developers and providers than LLR homes, then this potential negative impact may be justified by the overall positive benefit of an increase in the supply of intermediate housing.</p> <p>KWLR tenants would not be prevented from saving for a deposit and seeking to buy a home on a shared ownership basis. There is scope for boroughs and housing providers to prioritise KWLR tenants for shared ownership homes they develop.</p>
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**Table 8.b: Potential impacts of decisions on, or amendments to, initial proposals by sex**

Potential positive impacts	
<p>Provision for sharers may make KWLR homes more affordable for women, who have lower incomes on average.</p>	
<p>Provision for sharers may mean that public sector employers (such as NHS trusts) will be more likely to want to develop KWLR homes for lower-income staff. Given that key workers are more likely to be female than working Londoners overall, and that women are disproportionately represented in some lower-income key worker occupations such as nursing, this may benefit women.</p>	
Potential negative impacts	Any justification or mitigation
<p>KWLR homes may be less affordable to women, who have lower incomes on average, where:</p> <ul style="list-style-type: none"> <li>• borough-level rent and service-charge benchmarks are capped at 80 per cent of borough-level market rents, rather than the 70 per cent initially proposed</li> </ul>	<p>These changes are to improve viability, which may result in more KWLR homes being built. Borough-level benchmarks for KWLR homes will still be at least 20 per cent below borough-level market rents, and most will be lower than that, with controlled rent increases.</p>

<ul style="list-style-type: none"> <li>rent increases are linked to CPI plus 1 per cent, rather than to increases in key workers' incomes.</li> </ul>	
<p>Women are more likely to be single parents; as such, they are likely to be over-represented among households who need larger homes. This means they may be more adversely affected by rent benchmarks for four-bedroom homes that exceed 40 per cent of key workers' average net household income.</p>	<p>A higher rent and service-charge benchmark for four-bedroom homes is intended to make the homes more viable – which is in turn intended to increase the supply of these homes. The homes will still cost much less than the market alternatives.</p>

**Table 9.a: Potential impacts of initial proposals by sexual orientation**

<b>Potential positive impacts</b>	
The limited data on LGBTQ+ Londoners makes it difficult to comment on the potential impacts of the Mayor's proposals for KWLR.	
<b>Potential negative impacts</b>	<b>Any justification or mitigation</b>
No noted impacts	n/a

**Table 9.b: Potential impacts of decisions on, or amendments to, initial proposals by sexual orientation**

<b>Potential positive impacts</b>	
No further impacts identified.	

## Potential impacts for those with lower incomes

5.6. This section considers the potential positive and negative impacts of the Mayor's proposals for KWLR homes on households with low incomes, based on the baseline data set out in the Appendix. This group is not legally protected, but is of interest to the Mayor in addressing wider issues of inequality.

**Table 10.a: Potential impacts of initial proposals on lower-income households**

Potential positive impacts	
People with a low income are more likely to struggle to afford housing costs. A housing tenure with rents linked to key workers' incomes could make housing costs more affordable to people with a low income. An overall increase in delivery of affordable homes may benefit them too.	
Potential negative impacts	Any justification or mitigation
Londoners with low incomes may be better served by social housing. Some consultation respondents were concerned that plans for KWLR homes would mean fewer social rented homes would be developed.	Planning policy specifies a minimum proportion of affordable homes that should be social rented and intermediate. The AHP and SAHP prioritise delivering social rented homes. The Mayor's plans for KWLR homes will not mean that fewer social rented homes are developed.
There may be a negative impact on those least likely to have savings for a deposit, or access to help with a deposit from family and friends, if KWLR supersedes LLR as the Mayor's preferred intermediate rent tenure, or results in fewer LLR homes being developed. In this case, they may lose the opportunity (provided by LLR) to buy the intermediate homes they're renting (with the attendant benefits of stability and avoiding the costs of moving).	If KWLR homes are a more attractive proposition to investors, developers and providers than LLR homes, then this potential negative impact may be justified by the overall positive benefit of an increase in the supply of intermediate housing.  KWLR tenants would not be prevented from saving for a deposit and seeking to buy a home on a shared ownership basis. There is scope for boroughs and housing providers to prioritise KWLR tenants for shared ownership homes they develop.

**Table 10.b: Potential impacts of decisions on, or amendments to, initial proposals on lower-income households**

<b>Potential positive impacts</b>	
Adding provision for sharers may make KWLR homes more affordable for people with lower incomes.	
<b>Potential negative impacts</b>	<b>Any justification or mitigation</b>
<p>KWLR homes may be less affordable to people who have lower incomes, where:</p> <ul style="list-style-type: none"> <li>• borough-level rent and service-charge benchmarks are capped at 80 per cent of borough-level market rents, rather than the 70 per cent initially proposed</li> <li>• rent increases are linked to CPI plus 1 per cent, rather than to increases in key workers' incomes.</li> </ul>	<p>These changes are to improve viability, which may result in more KWLR homes being built. Benchmarks for KWLR homes will still be at least 20 per cent below market rents, and most will be lower than that, with controlled rent increases.</p>
<p>People with lower incomes will be more affected by rent benchmarks for four-bedroom homes that exceed 40 per cent of key workers' average net household income.</p>	<p>A higher rent and service-charge benchmark for four-bedroom homes is intended to make the homes more viable, which in turn is intended to increase the supply of these homes. The homes will still cost much less than the market alternatives.</p>

## 6. Key conclusions

- 6.1. Overall, our conclusion is that the potential equalities impacts of KWLR homes are a good deal more positive than negative. Where there are potential negative impacts, these are either justified or appropriately mitigated.
- 6.2. KWLR homes have the potential to provide homes for many people in need of intermediate rented homes. They can also contribute to improving key public services for all Londoners, by supporting the recruitment and retention of key workers.
- 6.3. The data presented in this EqIA suggests that Londoners with characteristics that mean they are more likely to struggle to afford housing that meets their needs (e.g., young people; women; Black, Asian and minority ethnic Londoners; disabled Londoners) may be more likely to benefit from KWLR homes than Londoners without these protected characteristics.
- 6.4. In particular, the analysis above suggests that intermediate homes for rent, without any expectation of saving for a deposit, may benefit Londoners from Black, Asian and minority ethnic backgrounds. This cohort is more likely to have secured intermediate rented homes than shared ownership homes.
- 6.5. The main potential negative impacts are justified or can be mitigated. A significant potential negative impact is on Londoners with low incomes, for whom KWLR homes may not be affordable, and who may be better served by social rented homes. This is mitigated by planning policy, which ensures that a certain proportion of affordable housing must be social rented; and by an approach to the AHP and SAHP that prioritises delivery of social rented homes.

## 7. Monitoring/updates

- 7.1. This EqIA is intended to be used as a tool to help the Mayor continue to monitor the impacts of KWLR homes as they are implemented. This includes making any adjustments to the tenure.

# Appendix: Baseline data

## Introduction

A1.1. This section sets out the available data on the protected characteristics and incomes of Londoners who might need, or who secure, KWLR homes. It draws on data sources described below.

A1.2. Ideally, we would have data about the protected characteristics of London's key workers who are eligible for, and in need of, intermediate rented housing. However, that specific data is not available.

A1.3. The GLA's 2017 Strategic Housing Market Assessment tells us how many Londoners are in need of intermediate housing. However, it doesn't tell us about the protected characteristics of these Londoners; or whether they are key workers. Nor does it differentiate between those who need (or could afford) intermediate rented housing and low-cost home ownership (i.e., intermediate housing for sale).

A1.4. There are several other data sources that can give us some demographic information about London's key workers in need of intermediate housing. These data sources, used for this assessment, are outlined below:

- **Londoners in housing need** (paragraphs A1.9 to A1.12): There is existing research from a variety of sources about the profile of Londoners who are (likely to be) in housing need, including their protected characteristics. This data doesn't necessarily tell us about people in need of intermediate housing specifically. However, we can assume that people in general housing need will share some characteristics with those in need of intermediate housing.
- **Londoners securing intermediate housing** (paragraphs A1.13 to A1.63): There is administrative data from MHCLG's CORE data, which tells us about the demographics of Londoners securing affordable homes. This includes the following:
  - **Londoners securing intermediate rented homes** (paragraphs A1.13 to A1.38): This data tells us about the demographics of people who were in need of, eligible for and secured intermediate rented housing. This data is filtered to exclude specialised and supported housing (SSH), as KWLR homes are not intended to provide SSH.

- **Londoners buying shared ownership homes** (paragraphs A1.39 to 1.63): This data tells us about the demographics of people who were in need of, eligible for and secured intermediate housing for sale – i.e., shared ownership homes.
- **Londoners living in shared ownership homes** (paragraphs A1.64 to A1.66): Census data tells us about the demographics of people living in shared ownership homes. This includes people who may have moved into shared ownership homes many years ago, and whose incomes may have since increased.<sup>2</sup>
- **Key workers** (paragraphs A1.69 to A1.76): Census data tells us about the protected characteristics of all London's key workers. It doesn't specifically tell us about key workers eligible for, and in need of, intermediate housing.

A1.5. The three data sources above do not provide a complete picture of Londoners who might need, or who secure, KWLR homes. However, they can give us some information about the likely protected characteristics of potential KWLR renters.

A1.6. There are inconsistencies between the datasets – for example, whether they talk about individuals or households, and the periods covered by the data. Any specific issues with data sources or specific figures are described in the relevant section.

A1.7. There isn't data available for all the characteristics in scope. There is no data available on gender reassignment; and limited data on sexual orientation, pregnancy/maternity, marital/civil partnership status and nationality. This EqIA uses proxies in some cases. In some areas, there are gaps in the data.

A1.8. Finally, it's important to note that, where Londoners have multiple protected characteristics, the patterns and experiences highlighted below are likely to be compounded. For example, a younger LGBTQ+ person may be disadvantaged due to their age (making them more likely to struggle to afford housing costs), and discrimination related to their sexuality (making them more likely to face homelessness due to family rejection and a lack of tailored support services).<sup>3</sup>

## **Londoners in housing need**

A1.9. The demographics of Londoners who struggle to afford a home that meets their needs are well documented in various sources. One of these sources is the

<sup>2</sup> People who have staircased to 100 per cent ownership are unlikely to have identified themselves as shared owners for the purposes of the Census – meaning that this data wouldn't cover them.

<sup>3</sup> akt, LGBT Youth Homelessness Research Report 2025: There's No Place Like Home, March 2025

**Affordable Homes Programme 2021-26 Equality Impact Assessment.** Key points from this EqIA include:

- Londoners who share certain protected characteristics – specifically, Black, Asian and minority ethnic Londoners; Deaf and disabled Londoners; and younger people – are more likely to experience poverty. Poverty is both a symptom and a cause of struggling with housing costs.
- Londoners who share protected characteristics are not distributed evenly across housing tenures. For example, younger people, and Black, Asian and minority ethnic households, are less likely to be homeowners.
- Housing needs are more pronounced for people who share some protected characteristics. For example, Black and Asian households, and younger families, are more likely to be overcrowded. Households headed by a woman are more likely to be homeless; and LGBTQ+ young people are more likely to become homeless.

A1.10. Trust for London's London Poverty Profile suggests women are more likely to experience poverty than men: 28 per cent of women are in poverty, compared with 24 per cent of men.<sup>4</sup>

A1.11. The Office for National Statistics (ONS) has found evidence that younger people have lower incomes on average.<sup>5</sup> This contributes to them being more likely to experience poverty, or to struggle to cover housing costs. This is explored in the EqIA for the AHP, and discussed above.

A1.12. There is limited evidence on the housing needs of some groups, including people undergoing gender reassignment; people who are married or in a civil partnership; people who are pregnant or have recently given birth; and people with different religions or beliefs.

## **Londoners securing intermediate rented homes**

A1.13. This section uses demographic information from MHCLG's CORE data, which tells us about the demographics of households starting intermediate rental tenancies (excluding SSH). This data doesn't tell us about whether these Londoners are key workers; so, it needs to be considered alongside the data on key workers at paragraphs A1.69 to A1.76.

<sup>4</sup> Trust for London, Gender: Poverty rates by demographic characteristics in London (2019/20, 2022/23, and 2023/24), updated May 2026

<sup>5</sup> ONS, Earnings and hours worked, UK region by age group, 29 October 2024

A1.14. Providers have only been required to record intermediate rentals on CORE since 2022-23. Therefore, the dataset is relatively young and should be treated with caution. The CORE data for intermediate renters is based on around 550 responses in 2023-24, and around 900 responses in 2022-23 – although there were different numbers of responses to different questions. For example, the CORE data on household income had a lower response rate than other questions. This means the data is based on smaller samples of 254 responses for 2023-24, and 512 responses for 2022-23. The data presented in this section combines both years, unless otherwise specified.

### Age

A1.15. Intermediate renters securing a new tenancy are younger than working Londoners,<sup>6</sup> on average. More than half (56 per cent) of households moving into intermediate rent homes were led<sup>7</sup> by someone under 35; but only 38 per cent of working Londoners were under 35. This reflects the fact that young people have lower incomes and, as a result, are more likely to struggle with housing costs. Similarly, young people are less likely to be homeowners.

**Table A1: Age of Londoners securing intermediate rent tenancies, compared to all working Londoners**

Age (grouped)	Intermediate renters securing a new tenancy (CORE)	All working Londoners (Census 2021)
Under 35	58%	38%
35-44	26%	25%
45-54	10%	20%
Over 55	5%	17%

<sup>6</sup> This assessment uses all working Londoners as a comparator. This is because intermediate housing is intended for those in work; and the Mayor expects boroughs and providers to prioritise key workers for intermediate housing, including KWLR homes.

<sup>7</sup> CORE data is collected at a household level, but most demographic information is at the level of an individual. Demographic information relates to the “lead tenant”: the person in the household who does the most paid work. If several people do the same amount of paid work, the “lead tenant” is the oldest household member.

A1.16. According to the data, 16 per cent of households securing an intermediate rent tenancy included children. This breaks down as follows:

- 9 per cent of households securing an intermediate rent tenancy included one child
- 5 per cent included two children
- 2 per cent included three or more children.

These proportions are lower than among all working London households (Census 2021). Among all working Londoners, 34 per cent of households include children. This figure is slightly lower in private renting households (31 per cent with children).

### Disability

A1.17. Those starting intermediate rent tenancies are much less likely to be disabled than working Londoners overall.

A1.18. The CORE data covers two different variables relating to disability:

- 3 per cent of households included someone with a long-term physical or mental health condition. (That figure excludes 16 per cent of households overall who responded “don’t know”.)
- 4 per cent of households moving into intermediate rented homes included a wheelchair user. This suggests that the first variable about long-term health conditions may significantly underestimate the number of disabled people/households moving into intermediate rented homes.

A1.19. According to 2021 Census data, 13 per cent of working Londoners had a long-term physical or mental health condition. This includes 7 per cent who were disabled under the Equality Act’s definition.<sup>8</sup>

### Marriage/civil partnership

A1.20. The data on households moving into an intermediate rented home tells us about the composition of the household; but not their marital or civil partnership status directly.

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<sup>8</sup> A person is disabled under the Equality Act 2010, if they have a physical or mental impairment that has a ‘substantial’ and ‘long-term’ negative effect on their ability to do normal daily activities. Substantial means more than minor or trivial, and long-term means for 12 months or more.

A1.21. There are two variables that tell us about household composition:

- the number of people in the household – from this, we can infer whether the household moving into an intermediate rented home is a single-person household
- if the household moving into an intermediate rented home is a multi-person household, the relationship between the second occupant and the lead tenant.<sup>9</sup>

A1.22. Considering the two variables together shows that 61 per cent of households moving into an intermediate rented home were single-person households. When specifying the second occupant, 28 per cent named a partner (i.e., they were a couple, with or without children); 5 per cent named a child; and 7 per cent named someone else (so not a partner or a child – this could be, for example, a multi-generational family, friends or siblings). Note that respondents were not given guidance about who to select as second person in the household (e.g., those with a partner and a child were not told to choose their partner as the second person). This means there may be inconsistencies in how such scenarios were captured.

A1.23. Among working Londoners' households (Census 2021), 43 per cent include a couple who are married or in a civil partnership; and 16 per cent include a couple who are cohabiting. This means, in total, 59 per cent of working Londoners are living with a partner.

A1.24. Considering these two variables together establishes that, while 43 per cent of working households in London include a married/civilly partnered couple, no more than 39 per cent of households moving into an intermediate rented home could be married or in a civil partnership (given that 61 per cent of those households were single-person households). Therefore, households moving into an intermediate rented home were less likely to include a couple who are married or in a civil partnership, than working Londoners' households overall.

### Pregnancy and maternity

A1.25. There isn't any data that tells us which households included a child born within the last 26 weeks (and, accordingly, a parent with the "maternity" characteristic). However, there is data on pregnancies and the presence of children of any age.

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<sup>9</sup> CORE data is collected at a household level, but most demographic information is at the level of an individual (e.g., age). Demographic information relates to the "lead tenant", who is the person in the household who does the most paid work. If several people do the same amount of paid work, it's the oldest household member.

The CORE data showed that 1 per cent of households new to intermediate renting included someone pregnant.

A1.26.In terms of children of any age, households securing an intermediate rent tenancy were much less likely to include children than working Londoners' households overall. According to the data, 16 per cent of households securing an intermediate rent tenancy included children. This breaks down as follows:

- 9 per cent of households securing an intermediate rent tenancy included one child
- 5 per cent included two children
- 2 per cent included three or more children.

Among all working London households (Census 2021), 34 per cent of households include children. This figure is slightly lower among households renting privately (31 per cent with children).

A1.27.It is therefore likely that households securing an intermediate rent tenancy included a lower proportion of people with the maternity characteristic than working households across London.

#### Race – including colour, nationality, ethnic or national origin

A1.28.By comparison with all working Londoners, households where the lead tenant is Black/Black British or Mixed ethnicity are over-represented among those starting intermediate rent tenancies. Households where the lead occupant is White are under-represented. This aligns with the fact that Black households are less likely to be homeowners.

A1.29.The CORE data on ethnicity for the previous two years shows some differences, in terms of the distribution of the ethnicities, between those starting intermediate rent tenancies in each of the years. So, the table below shows the data for each year separately. The data for Asian/Asian British households and households from an Other ethnic group is particularly difficult to interpret across the two different years.

**Table A2: Ethnicity of Londoners securing intermediate rent tenancies, compared to all working Londoners**

<b>Ethnicity</b>	<b>Households securing intermediate rent tenancies in 2023-24 (2022-23 in brackets) (CORE)</b>	<b>All working Londoners (Census 2021)</b>
Asian or Asian British	25% (16%)	19%
Black or Black British	38% (26%)	12%
Mixed	7% (8%)	4%
Other ethnic group	2% (14%)	5%
White	28% (37%)	60%

A1.30. The proportion of Londoners moving into intermediate rent homes who were British was similar to the proportion of working Londoners overall. Londoners moving into intermediate rent homes who were not British were less likely to be from another European Economic Area (EEA)<sup>10</sup> or European country than working Londoners overall; and more likely to be from any other country (i.e., not British, Irish or EEA/European).

A1.31. In the CORE data, the two most recent years also show slightly different patterns. In 2023-24, 61 per cent of those moving into intermediate rent homes were British; 1 per cent were Irish; 12 per cent were from another EEA country; and 26 per cent were from any other country. In 2022-23, a higher proportion were British (72 per cent); the same proportions were Irish (1 per cent) or from another EEA country (12 per cent); and a lower proportion (15 per cent) were from any other country.

A1.32. Among all working Londoners, 71 per cent were British; 2 per cent were Irish; 19 per cent were from another EEA/European country; and 9 per cent were from any other country.

<sup>10</sup> The EEA groups together the EU Member States with three European Free Trade Association (EFTA) countries (Iceland, Liechtenstein and Norway) in a single market subject to the same rules.

Sex

A1.33. People moving into intermediate rented homes were more likely to be female, and less likely to be male, than all working Londoners. The CORE data showed that 53 per cent of people moving into intermediate rented housing were female, 47 per cent were male, and less than 1 per cent were non-binary.

A1.34. Comparing this with all working Londoners, 48 per cent were female, and 52 per cent were male. The Census only gave the options of female and male, not non-binary.

Income

A1.35. The household incomes of those securing a new intermediate rent tenancy are lower than household incomes of working London households. This is unsurprising, as intermediate housing is for people struggling to afford a home that meets their needs on the open market.

A1.36. The majority of households securing an intermediate rent tenancy (61 per cent) had a household income between £30k and £49k. A further 23 per cent had a lower household income between £20k and £29k, and 11 per cent had a higher household income of £50k and £67k. A very small number had an income under £20k (4 per cent) or over £67k (1 per cent) – i.e., the household income threshold for intermediate rent.

**Table A3: Ethnicity of Londoners securing intermediate rent tenancies, compared to all working Londoners**

Annual household income	Households securing intermediate rent tenancies (CORE)
£0-£19k	4%
£20-29k	23%
£30-49k	61%
£50-67k	11%
More than £67k	1%

A1.37. We can compare the incomes of households securing intermediate rented homes with those of all working Londoners. This is done by using household income data from the Family Resources Survey (FRS). The CORE data has been aligned to the FRS income bands (which are less granular at higher incomes) for the comparison below. The majority of working London households (66 per cent) had an income over £52,000 (the highest income band); 21 per cent had an income between £31,200 and £52,000; 8 had an income of £20,800 to £31,200; and five per cent had an income below £20,800.

Annual household income	Households securing intermediate rent tenancies (CORE)	All working Londoners (FRS, 2023/24)
Less than £20,800	5%	5%
£20,800 – £31,200	26%	8%
£31,200 – £52,000	60%	21%
More than £52,000	9%	66%

A1.38. There is no data about Londoners securing intermediate rented homes that tells us: whether they have undergone, or are preparing to undergo, gender reassignment; their religion or belief; or their sexual orientation.

### Londoners securing shared ownership homes

A1.39. This section considers the demographics of households moving into shared ownership homes. This data also comes from CORE, and is a more established dataset than the data on households moving into intermediate rented homes. It is also a larger dataset: the CORE data for households moving into shared ownership homes is based on around 2,300 responses in 2021-22, and around 1,200 responses in 2020-21 (although there were different numbers of responses to different questions). The data presented in this section combines both years, unless otherwise specified. There isn't any data available yet for 2022-23.

A1.40. As with the data on households securing an intermediate rent tenancy, this data doesn't tell us about whether these Londoners are key workers. Therefore, this needs to be considered alongside the data on key workers in paragraphs A1.69 to A1.76.

A1.41. As well as data from CORE, this section includes some data on the religious beliefs of households living in shared ownership homes, taken from the 2021 Census.

### Age

A1.42. Similarly to intermediate renters, households moving into shared ownership are likely to be younger, compared to all working Londoners. This is consistent with the purpose of shared ownership and the cohort it is intended to support.

**Table A4: Age of Londoners securing shared ownership homes, compared to all working Londoners**

Age (grouped)	New shared ownership households (CORE)	All working Londoners (Census 2021)
Under 25	4%	9%
25-34	52%	29%
35-44	31%	25%
45-54	10%	20%
Over 55	3%	17%

A1.43. Considering children, only 4 per cent of households who bought shared ownership homes included any children. Across all working households in London (Census 2021), 34 per cent include children. This figure is slightly lower in households who rent privately. (31 per cent of these include children.)

A1.44. According to 2021 Census data on all London households living in shared ownership homes, 28 per cent of households include dependent children. This is much closer to the figure for all working London households. This suggests that people moving into shared ownership homes may have children after buying their home.

### Disability

A1.45. Londoners moving into shared ownership homes are much less likely to be disabled than working Londoners overall.

A1.46. According to the CORE data, 2 per cent of new shared ownership households included a disabled person; 73 per cent did not; and 25 per cent of households responded “Don’t know”. As with households starting intermediate rent tenancies, this is much lower than the proportion of households that include someone disabled overall. According to the 2021 Census, 13 per cent of working Londoners had a long-term physical or mental health condition; this includes 7 per cent who were disabled under the Equality Act’s definition. CORE data also shows that less than 1 per cent of households moving into a shared ownership home included a wheelchair user.

A1.47. The 2021 Census data also shows that 16 per cent of all working households in shared ownership homes in London include someone disabled. This is lower than the figure for working London households overall (20 per cent). Disabled people are more likely to live in social rented homes or own their homes without a mortgage. The latter is likely linked to age: older people are more likely to be disabled, and more likely to own their home without a mortgage.<sup>11</sup>

#### Marriage/civil partnership

A1.48. Like the CORE data on intermediate renters, the data on households who bought a shared ownership home tells us about the composition of the household. However, it does not specifically tell us their marital or civil partnership status.

A1.49. There are two variables that tell us about household composition:

- the number of people in the household – from this, we can infer whether the household moving into shared ownership is a single-person household
- if the household moving into shared ownership is a multi-person household, the relationship between the second occupant and the lead occupant.

A1.50. Considering the two variables together shows that two-thirds (67 per cent) of households moving into shared ownership were single-person households. When specifying the second occupant, 25 per cent named a partner as the second occupant (i.e., they were a couple, with or without children); 1 per cent named a child, and 7 per cent named someone else (i.e., not a partner or child – this could be, for example, a multi-generational family, friends or siblings). Note that respondents were not given guidance about who to select as second person in the household (e.g., those with a partner and a child were not told to choose their partner as the second person). This means there may be inconsistencies in how they captured such scenarios.

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<sup>11</sup> ONS, Census 2021, [Household characteristics by tenure, England and Wales](#)

A1.51. As above, among working London households (Census 2021), 43 per cent were married or in a civil partnership; and 16 per cent were cohabiting with a partner. So, households moving into shared ownership homes were much less likely to include a couple than in all working households across London. Even if all 33 per cent of non-single-person households moving into shared ownership included a married/civilly partnered couple, this would be much less than the 43 per cent of all working Londoners who are married or in a civil partnership, according to the Census.

A1.52. Considering these two variables together establishes that, while 43 per cent of working London households include a married/civilly partnered couple, no more than 33 per cent of households moving into a shared ownership home could be married or in a civil partnership (given that 67 per cent of those households were single-person households). Therefore, households moving into a shared ownership home were less likely to be married or in a civil partnership than working Londoners overall.

#### Pregnancy and maternity

A1.53. There was no data about pregnancy or maternity (that is, having had a child within the last 26 weeks) for households moving into shared ownership homes.

A1.54. Data on the presence of children is the closest proxy available. It showed that only 4 per cent of households who bought shared ownership homes included children. Among all working London households (Census 2021), 34 per cent of households include children. This figure is slightly lower in households who rent privately (31 per cent with children).

A1.55. So, it is likely that households moving into shared ownership included a lower proportion of people with the maternity characteristic than working households across London.

A1.56. However, considering 2021 Census data on all London households living in shared ownership homes, 28 per cent of households include dependent children. This is much closer to the figure for all working London households. This suggests that people moving into shared ownership homes may have children after buying their home.

#### Race – including colour, nationality, ethnic or national origin

A1.57. Compared with all working Londoners, households where the lead occupant is White or Mixed were over-represented in households who bought shared ownership homes. Households where the lead occupant was Asian, Black or from an Other ethnic group were under-represented.

**Table A5: Ethnicities of Londoners securing shared ownership homes, compared to all working Londoners**

Ethnicity	New shared ownership households (CORE)	All working Londoners (Census 2021)
Asian or Asian British	13%	19%
Black or Black British	11%	12%
Mixed	6%	4%
Other ethnic group	1%	5%
White	69%	60%

### Sex

A1.58. People living in households buying shared ownership homes were slightly more likely to be female, and less likely to be male, than all working Londoners. The CORE data showed that 52 per cent of people moving into shared ownership homes were female; 48 per cent were male; and less than 1 per cent were non-binary.

A1.59. Compared with 2021 Census data on all working Londoners, 48 per cent were female, and 52 per cent were male. The Census only gave the options of female and male, not non-binary.

### Gender reassignment and sexual orientation

A1.60. There is no data about Londoners moving into shared ownership homes that tells us about gender reassignment status or sexual orientation.

### Income

A1.61. The household incomes of those buying shared ownership homes are more concentrated around “middle incomes”, compared with household incomes of working London households. This is unsurprising, as intermediate housing is for working households who are struggling to afford a home that meets their needs on the open market.

A1.62. Among buyers of shared ownership homes, 25 per cent had a household income of £30,000 to £49,999; 44 per cent, £50,000 to £67,000; 30 per cent, more than £67,000, and less than 1 per cent, under £30,000.

**Table A6: Household incomes of Londoners securing shared ownership homes**

Annual household income	New shared ownership households (CORE)
£0 – £19,999	0%
£20,000 – £29,999	1%
£30,000 – £49,999	25%
£50,000 – £67,000	44%
More than £67,000	30%

A1.63. As stated above, we can compare the incomes of households moving into shared ownership with those of all working Londoners, using data available from the FRS. The CORE data has been aligned to the FRS income bands (which are less granular at higher incomes), for the comparison in the table below. The majority of working London households (66 per cent) had an income over £52,000 (the highest income band); 21 per cent had an income between £31,200 and £52,000; 8 per cent had an income of £20,800 to £31,200; and 5 per cent had an income below £20,800.

**Table A7: Household incomes of Londoners securing shared ownership homes, compared to all working Londoners**

Annual household income	New shared ownership households (CORE)	All working Londoners (FRS 2023-24)
Less than £20,800	0%	5%
£20,800 – £31,200	1%	8%
£31,200 – £52,000	30%	21%
More than £52,000	69%	66%

**Londoners living in shared ownership homes**Religion or belief

A1.64. Data from the 2021 Census indicates that there may be fewer Hindus and Muslims in shared ownership homes than among all working Londoners. However, the data on shared ownership residents is at a household level, so any comparison is approximate. Some Muslims interested in shared ownership homes are unable to take out a conventional mortgage due to their religious beliefs, which could explain some of this difference. However, this may be related to ethnicity or culture rather than religion, as many Hindu and Muslim Londoners are South Asian.

A1.65. The data about religion among London households living in shared ownership homes (shown in the table below) comes from the 2021 Census.

**Table A8: Religion of Londoners living in shared ownership homes**

Religion	London households in shared ownership homes (Census 2021)
No religion only	35%
Christian religion only	40%
Buddhist religion only	1%

Hindu religion only	2%
Jewish religion only	1%
Muslim religion only	6%
Sikh religion only	1%
Same other religion only	1%
No religion and Christian only	10%
No religion and any other religion (excluding Christian)	2%
Christian and any other religion (excluding 'No religion')	2%
Any other combination of two religions (excluding Christian and 'No religion')	0%
Any combination of three or more religions in the household (including 'No religion')	1%

Note: Each of the responses above may also have people in the household who didn't answer the religion question.

A1.66. For comparison, the table below shows some 2021 Census data about the religion of all working Londoners.

**Table A9: Religion of all working Londoners**

<b>Religion</b>	<b>All working Londoners (Census 2021)</b>
No religion	32%
Christian	41%
Buddhist	1%
Hindu	5%
Jewish	2%
Muslim	10%
Sikh	2%
Other religion	1%
Not answered	7%

## Comparing households moving into intermediate rent and shared ownership homes

A1.67. Looking at the evidence set out above, there are many similarities in how households starting an intermediate rental tenancy, and households moving into a shared ownership home, compare to working Londoners. They are both, on average, younger; more likely to be female; much less likely to be disabled; much less likely to include children; and earning lower incomes.

A1.68. The most notable difference between households starting an intermediate rental tenancy and households buying a shared ownership home was in their ethnicity. Households starting an intermediate rental tenancy were more likely to be Black/Black British or Mixed, and less likely to be White, compared with all working Londoners. By comparison, households buying a shared ownership home were more likely to be White, and less likely to be Asian/Asian British or from an Other ethnic group.

## Key workers

A1.69. Another key consideration in assessing the potential equalities impacts of the Mayor's plans for KWLR homes is the demographics of London's key workers. Data from the 2021 Census can be used to compare the demographics of London's key workers with those of all working Londoners. However, the Mayor's definition of key workers uses both the sector and the occupation in which individuals work; and this data on key workers is not available at a regional level. So, it was necessary to use a close approximation of the Mayor's definition of key workers.<sup>12</sup> In this definition, key workers account for about 25 per cent of all

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<sup>12</sup> It wasn't possible to extract data, from the 2021 Census, on the protected characteristics of Londoners on the GLA's list of key workers. That list identifies occupations by both sector and occupation; data on individuals' sector and occupation is only available at a national level. To provide a proxy for this data, the GLA took the following steps:

- Extracted 2021 Census data on the protected characteristics of those living in London, working in occupations on the GLA's list of key workers.
- Analysed national data to establish the proportions of workers in both the occupations and sectors specified on the GLA's list. So, for example, the GLA's list includes biological scientists working in health and social care; and national Census data indicates that 13 per cent of biological scientists work in health and social care.
- Applied those proportions to the numbers of Londoners with particular protected characteristics in occupations on the GLA's list, to estimate the number of Londoners with particular characteristics, in those occupations in the sectors on the GLA's list. So, for example, the 2021 Census data showed that there are 640 female biological scientists in London. The GLA calculated 13 per cent of this number – i.e., 83.2. On this basis, it extrapolated that there are 83.2 female biological scientists working in health and social care in London, for the purpose of calculating the total number of those in occupations on the GLA's list who are female.

The resulting profile of Londoners in occupations on the GLA's list may have limited accuracy, in either of the following cases:

London workers. However, in the Mayor's full definition, key workers make up around one-third of all London workers.

A1.70. We don't have demographic data on key workers that includes income or current tenure, or whether key workers are in need of intermediate housing. This means that this data needs to be considered in combination with the CORE data on Londoners securing intermediate rent and shared ownership homes.

### Sex

A1.71. Key workers are much more likely to be female than all working Londoners.

**Table A10: Sex of all working Londoners, compared to key workers**

Age	All working Londoners	Key workers only
Female	48%	61%
Male	52%	39%

### Age

A1.72. Key workers are on average slightly older, compared with all working Londoners.

**Table A11: Age of all working Londoners, compared to key workers**

Age	All working Londoners	Key workers only
16 to 19 years	1%	2%
20 to 24 years	8%	8%
25 to 29 years	14%	13%
30 to 34 years	15%	13%

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- the distribution of occupations on the GLA's list across sectors on the GLA's list is different in London from the distribution nationally
- the protected characteristics of those working in an occupation, in all sectors, are different from the protected characteristics of those working in both that occupation and the sector (or sectors) specified on the GLA's list.

35 to 39 years	13%	12%
40 to 44 years	12%	11%
45 to 49 years	10%	11%
50 to 54 years	10%	11%
55 to 59 years	8%	9%
60 to 64 years	5%	6%
65 years and over	3%	4%

### Disability

A1.73. Key workers are slightly more likely to be disabled, compared with all working Londoners.

**Table A12: Disability among all working Londoners, compared to key workers**

Disability	All working Londoners	Key workers only
Disabled under the Equality Act: day-to-day activities limited a lot	1%	2%
Disabled under the Equality Act: day-to-day activities limited a little	6%	7%
Not disabled under the Equality Act: has long term physical or mental health condition but day-to-day activities are not limited	6%	7%
Not disabled under the Equality Act: no long term physical or mental health conditions	86%	85%

Race – including colour, nationality, ethnic or national origin

A1.74. In terms of ethnicity, key workers are more likely to be Asian, Black or from an Other ethnic group, compared with all working Londoners. They are less likely to be White, compared with all working Londoners.

**Table A13: Ethnicities of all working Londoners, compared to key workers**

Ethnicity	All working Londoners	Key workers only
Asian, Asian British or Asian Welsh	19%	23%
Black, Black British, Black Welsh, Caribbean or African	12%	17%
Mixed or Multiple ethnic groups	4%	4%
White	60%	51%
Other ethnic group	5%	6%

A1.75. **Religion or belief:** Key workers are less likely to have no religion than all working Londoners. This might correspond, to some extent, to the ethnicity of key workers, given that households with some religious beliefs are disproportionately from a Black, Asian and minority ethnic background.

**Table A14: Religion of all working Londoners, compared to key workers**

Religion	All working Londoners	Key workers only
No religion	32%	26%
Christian	41%	42%
Buddhist	1%	1%
Hindu	5%	6%

Jewish	2%	1%
Muslim	10%	13%
Sikh	2%	2%
Other religion	1%	1%
Not answered	7%	6%

### Sexual orientation

A1.76. Key workers were equally likely to be heterosexual or to be LGBTQ+ as non-key workers.

**Table A15: Sexual orientation of all working Londoners, compared to key workers**

Sexual orientation	All working Londoners	Key workers only
Straight or heterosexual	87%	87%
Gay or lesbian	3%	3%
Bisexual	2%	2%
All other sexual orientations	1%	1%
Not answered	9%	9%

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