

London Social and Affordable Homes Programme 2026-36

EQUALITY IMPACT ASSESSMENT

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1. Introduction

- 1.1. This document is the Greater London Authority's (GLA) Equality Impact Assessment (EqIA) of the London Social and Affordable Homes Programme (LSAHP) 2026-36. It forms part of the GLA's work to comply with the Public Sector Equality Duty in respect of that programme, by assessing the equality impacts of the proposed policies, and funding conditions, of the LSAHP 2026-36. The Public Sector Equality Duty, as set out in the Equality Act 2010 (the Equality Act), requires the Mayor and GLA to 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 and
 - foster good relations between persons who share a protected characteristic and persons who do not share it.
- 1.2. This EqIA will also be used to help the Mayor continue to monitor and review the impacts of the GLA's funding conditions, and policy decisions, regarding delivery of the LSAHP 2026-36 as it is implemented. This includes making any adjustments to the programme over the course of its delivery.
- 1.3. The characteristics protected by the Equality Act 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. This EqIA also considers the impact of the LSAHP 2026-36 on people with low incomes. Although this is not a protected characteristic under the Equality Act, the socio-economic inequality it reflects is important to the Mayor as part of his efforts to address wider issues of inequality. It's important to consider that discrimination, or the potential for discrimination, can be compounded for people who share multiple protected characteristics.
- 1.4. The LSAHP 2026-36 includes some policies and funding conditions set by the Ministry of Housing, Communities and Local Government (MHCLG); and some London requirements that are distinct from the England-wide programme. This GLA EqIA provides a high-level assessment of the main equality impacts of the tenure mix of the England-wide SAHP framework in London (but does not assess the impact of any other aspects of the SAHP 2026-36 policies and funding conditions set by MHCLG). This approach recognises that the impact of the SAHP in London may be different from the rest of England – particularly in regard to housing tenures, given the capital's distinct housing needs. This EqIA assesses the potential impact of the GLA's funding conditions on the LSAHP 2026-36 on people with different protected characteristics, or combinations of protected characteristics. It also identifies ways to mitigate any potential discrimination through policy choices. This EqIA has been used to inform

development of the LSAHP 2026-36. It will continue to support decision-making during the programme.

1.5. The structure of this EqlA is as follows:

- evidence about housing need and affordability for Londoners with shared protected characteristics (section two)
- evidence on workforce diversity in the built environment sector (section three)
- equality impacts of the overall tenure mix of the SAHP 2026-36 in London (section four)
- equality impacts of GLA funding conditions (section five)
- conclusions (section six).

2. Evidence about housing need and affordability in London

2.1. This section sets out a wide range of evidence about the protected characteristics of Londoners in housing need; and Londoners who struggle to afford a home that meets their needs. There is no single indicator or metric of housing need or housing affordability. As such, evidence on housing need outlined in this section includes data on homelessness; temporary accommodation; overcrowding; and accessibility. These factors all reflect proxy indicators of housing need. Evidence on housing affordability outlined in this section covers Londoners' financial and employment circumstances, such as income; poverty; housing costs; and employment. Considering these different indicators together builds a picture of which groups of Londoners with shared protected characteristics are disproportionately in need of the affordable housing (including homes that will be funded through the LSAHP 2026-36).

2.2. Housing need is more acute in London compared with other parts of England, in particular for social rented homes. Evidence suggests that 76 per cent of affordable housing need in London is for social rent, compared with 19 per cent for the Midlands, and 42 per cent for the wider South of England.¹ There are more households in temporary accommodation in London than in the rest of England combined.² Housing is also unaffordable for Londoners who are in less acute need. Private renters in London spend an average of 46 per cent of their income on rent, compared to 30 per cent in the rest of England.³ London is the

¹ Savills' 'Beyond a one size fits all housing policy' 2024 is available [here](#)

² GLA analysis of MHCLG homelessness live tables, 2024-2025

³ English Housing Survey 2023-2024: experiences of the 'housing crisis' is available [here](#)

only region of England where house purchases are unaffordable (more than five times income) to people across the whole income spectrum.^{4,5}

Housing affordability: Poverty in London

2.3. There are a range of ways to measure poverty. The leading definition is relative low income; this is defined as having an income below 60 per cent of median net household income.⁶ Poverty is both a symptom and a cause of those struggling with the cost of housing. Before housing costs are accounted for, 1.4m Londoners live in poverty – this is around 15 per cent of Londoners. However, after accounting for housing costs, 2.4m Londoners live in poverty – this equates to 26 per cent of Londoners.⁷

2.4. Some Londoners who share protected characteristics are more likely to experience poverty (after housing costs). The Households Below Average Income report shows that:⁸

- Young Londoners (under 24) are more likely to be in poverty than other Londoners (32 per cent versus 22 per cent).
- Women are more likely to be in poverty than men (28 per cent versus 24 per cent).
- Disabled people are more likely to be in poverty than non-disabled people (30 per cent versus 25 per cent). People living in a household where someone is disabled are also more likely to be in poverty than those living in a household where no-one is disabled (31 per cent versus 24 per cent).
- People from Black, Asian and minority ethnic backgrounds are more likely to be in poverty than White Londoners.⁹ Eighteen per cent of White Londoners are in poverty, compared with 38 per cent of Asian Londoners; 36 per cent of Black Londoners; 28 per cent of Mixed ethnicity Londoners; and 43 per cent of Londoners from an Other ethnic group.

Londoners with more than one of the above protected characteristics may be even more likely to experience poverty.

2.5. LGBTQ+ Londoners are more socioeconomically polarised than other Londoners. This is because, across this group, the likelihoods of being financially comfortable, and of living in poverty, are both greater than for other Londoners.¹⁰

⁴ ONS' Housing Purchase Affordability, UK: 2024 is available [here](#)

⁵ As set out in Section 1, MHCLG's EqIA for the entire SAHP 2026-36 framework assesses the expected equality implications for the programme on an England-wide scale.

⁶ Joseph Rowntree Foundation, [UK Poverty 2025: The essential guide to understanding poverty in the UK](#), 29 January 2025

⁷ GLA analysis of Households Below Average Income, 2021-24

⁸ GLA analysis of Households Below Average Income, 2021-24

⁹ The Households Below Average Income report classifies individual ethnicities according to the ethnic group of the household reference person (usually the highest earner in the household). This means that information about households of multiple ethnicities is lost.

¹⁰ Centre for London, [How do LGBTQ+ people experience life in the capital?](#), 3 July 2020

Housing affordability: unemployment in London

2.6. Almost 5 per cent of Londoners aged 16 or over are unemployed (defined as not working and actively looking for work). Some Londoners who share protected characteristics are more likely to be unemployed, reflecting structural barriers in the labour market. This is likely to have a negative impact on their ability to afford housing that meets their needs. The ONS Annual Population Survey 2024 sets out that:¹¹

- Young Londoners are much more likely to be unemployed: this status is seen among 31 per cent of 16-19-year-olds; 16 per cent of 16-24-year-olds; and 13 per cent of 20-24-year-olds.
- Disabled Londoners are twice as likely to be unemployed as non-disabled Londoners (8 per cent versus 4 per cent).
- Londoners from some Black, Asian and minority ethnic backgrounds are more likely to be unemployed. Nine per cent of Pakistani and Bangladeshi Londoners are unemployed; 7 per cent of Black Londoners; 10 per cent of Mixed ethnicity Londoners; and 9 per cent of Londoners from an Other ethnic background.
- Compared to all Londoners, unemployment is more likely among Londoners from Muslim backgrounds (9 per cent are unemployed); Hindu backgrounds (6 per cent); or any Other religious background (7 per cent).

Housing affordability: Economic inactivity in London

2.7. Londoners who are economically inactive are not working, and not actively looking for work. Common reasons are: being a student; caring for children or family; or being unable to work due to ill health. Across London, 21 per cent of working-age people are economically inactive. Some Londoners who share protected characteristics are more likely to be economically inactive, reflecting structural barriers in the labour market. This is likely to have a negative impact on their ability to afford housing that meets their needs. The ONS Annual Population Survey 2024 sets out the following findings:¹²

- Disabled Londoners are twice as likely to be economically inactive as non-disabled Londoners (37 per cent versus 16 per cent).
- Londoners from some Black, Asian and minority ethnic backgrounds are more likely to be economically inactive than working-age Londoners overall. This group includes Black Londoners (26 per cent); Pakistani/Bangladeshi Londoners (33 per cent); Londoners from a Mixed ethnic background (27 per cent); and Londoners from any Other ethnic background (26 per cent).

¹¹ GLA analysis of ONS Annual Population Survey, 2024

¹² GLA analysis of ONS Annual Population Survey, 2024

- Compared to all Londoners, economic inactivity is more likely among Muslim Londoners (34 per cent economically inactive); Jewish Londoners (24 per cent); and Christian Londoners (22 per cent).
- Women are more likely to be economically inactive than men (25 per cent versus 16 per cent).

Housing affordability: Housing tenure

2.8. The uneven distribution of Londoners with different shared protected characteristics across tenures has wide-ranging impacts. Tenures vary hugely in terms of affordability, security, quality and accessibility. Private renting is insecure, with high monthly rents; social housing is more affordable and very secure, but in short supply; and home-owning in London is secure, but difficult to access in terms of needing a large deposit. Overall, around half (53 per cent) of Londoners are owner-occupiers; 29 per cent rent privately; and 18 per cent live in a social rented home. Some of the differences in tenure patterns for Londoners with different shared protected characteristics are set out below:¹³

- Younger Londoners are more likely to live in the private rented sector (PRS), and less likely to own their own home than older Londoners: 46 per cent of those aged 16-34 live in the PRS, compared with 5 per cent of people aged over 65.
- Disabled Londoners are more likely to live in social housing than non-disabled Londoners (31 versus 15 per cent); and less likely to live in the PRS (19 versus 31 per cent).
- Londoners from some Black, Asian and minority ethnic backgrounds are more likely to live in the PRS (47 per cent of Londoners from an Other ethnic group; 38 per cent of Asian Londoners; and 35 per cent of Londoners from a mixed ethnic background).^{14,15} Overall 29 per cent of Londoners live in the PRS.
- Black Londoners and Londoners from an Other ethnic group are least likely to own their own home (27 per cent), compared with 53 per cent of Londoners overall.
- Londoners from most Black, Asian and minority ethnic backgrounds are more likely to live in a social rented home than among all Londoners (45 per cent of Black Londoners; 25 per cent of Londoners from an Other ethnic background; and 22 per cent of Londoners with a mixed ethnicity). Overall 18 per cent of Londoners live in a social rented home.

¹³ GLA analysis of Households Below Average Income, 2021-24

¹⁴ The ethnic groups were Asian, Black, White, Mixed ethnic groups or Other ethnic groups.

¹⁵ The Households Below Average Income report classifies individual ethnicities according to the ethnic group of the HRP (usually the highest earner in the household) which means that information about households of multiple ethnicities is lost.

Housing affordability: Housing costs in London

2.9. On average (median), Londoners spend 28 per cent of their income on housing costs. This varies significantly by tenure. Londoners living in the PRS spend a median average of 34 per cent of their income on housing costs, compared with 28 per cent for Londoners living in social rented homes and 18 per cent for owner-occupiers. The differences in how much income is spent on housing costs among Londoners with shared protected characteristics. These differences partly reflect different distribution across housing tenures; and partly reflect their different incomes. The English Housing Survey data sets out the following:¹⁶

- Women spend a higher median proportion of their income on housing costs (28 per cent) than men (25 per cent).
- Disabled people spend a higher median proportion of their income on housing costs (29 per cent) than non-disabled people (25 per cent).
- Londoners from Black, Asian and minority ethnic backgrounds spend a higher median proportion of their income on housing costs than White Londoners (32 per cent for Mixed ethnicity Londoners; 30 per cent for Londoners from an Other ethnic background; 29 per cent for Black Londoners; 27 per cent for Asian Londoners; 26 per cent for White Londoners).
- Older Londoners spend a higher median proportion of their income on housing costs than younger Londoners: spend is 31 per cent for Londoners aged 65 and over; and 25 per cent for those aged 25-34.

2.10. An ONS survey found that 53 per cent of disabled Londoners find it difficult to afford their housing costs, compared with 44 per cent of non-disabled Londoners.¹⁷ Most Deaf and disabled Londoners who responded to a survey by Inclusion London said they struggle to afford housing costs. A third said they had to cut back on food or other essentials to afford housing costs.¹⁸

Housing need: Homelessness

2.11. There is no set definition of housing need. However, proxy evidence includes data on overcrowding, homelessness, temporary accommodation and accessibility. The impacts of the affordability and housing tenure patterns set out above create significant differences in housing need between different groups of Londoners with shared protected characteristics. When considering the evidence on homelessness set out below, it's important to consider that some groups of Londoners with shared protected characteristics are more likely to experience hidden homelessness, where they are experiencing

¹⁶ GLA analysis of English Housing Survey (2020-23)

¹⁷ GLA, [Housing in London annual report: 2024](#), November 2024

¹⁸ Inclusion London, [Barriers at Home: Housing crisis for Deaf and Disabled Londoners](#), 4 February 2025

homelessness or housing difficulties; but are not counted in official statistics. The available evidence suggests that experiencing hidden homelessness is more likely among women; young people; people from some Black, Asian and minority ethnic backgrounds; and LGBTQ+ people.¹⁹

- 2.12. In 2024-25, 70,000 London households (almost 2 per cent of all London households) were assessed as being owed a homelessness duty (prevention or relief) by a local authority.²⁰ In the same period, some groups of Londoners with shared protected characteristics were more likely to be owed a homelessness duty.²¹
- 2.13. Younger Londoners were disproportionately more likely to be owed a homelessness duty. Among London households owed a homelessness duty, 42 per cent had a lead applicant under 35. Among all London households, only 20 per cent of household reference persons (HRPs) were under 35.²²
- 2.14. According to the data, 18 per cent of households owed a homelessness duty had support needs due to physical ill health or disability; 18 per cent had a history of mental health problems; and 4 per cent had a learning disability. Households could register multiple support needs – so these groups may overlap. Among all London households, 27 per cent included someone disabled under the Equality Act definition.
- 2.15. Black Londoners, and Londoners from any Other ethnic background²³ were disproportionately more likely to be owed a homelessness duty. Of all London households owed a homelessness duty, 30 per cent were headed by a Black Londoner; and 12 per cent by a Londoner from any Other ethnic background. However, of London households overall, only 13 per cent have a Black HRP; and only 6 per cent have an HRP from any Other ethnic background.²⁴
- 2.16. Single-parent households were disproportionately more likely to be owed a homelessness relief duty (18 per cent of those owed a homelessness relief duty were single-mother households; but only 12 per cent of overall households in London are single-mother households). There are much fewer single-father households owed a homelessness relief duty, but they were also overrepresented (2 per cent of those owed a homelessness relief duty were single fathers; but only 1 per cent of overall households in London are single-father households).
- 2.17. Single-person households, particularly single men, were disproportionately more likely to be owed a homelessness relief duty. Single men accounted for 42 per cent of those owed a homelessness relief duty; but only 14 per cent of

¹⁹ ONS, ["Hidden" homelessness in the UK: evidence review](#), 29 March 2023

²⁰ GLA analysis of MHCLG homelessness live tables, 2024-25

²¹ Throughout this section on homelessness, data on Londoners owed a homelessness duty is from GLA analysis of MHCLG homelessness live tables 2024-25 (unless otherwise specified); comparator data for all Londoners is from GLA analysis of the 2021 Census.

²² In the 2021 Census, the HRP is the person who serves as a reference point, mainly based on economic activity, to characterise a whole household.

²³ Londoners from any Other ethnic background are not from a White, Black, Asian or Mixed ethnic background.

²⁴ In the 2021 Census, the HRP is the person who serves as a reference point, mainly based on economic activity, to characterise a whole household.

overall households in London are single men. Similarly, single women accounted for 22 per cent of those owed a homelessness relief duty; but only 16 per cent of overall households in London are single women.

- 2.18. According to the data, 8 per cent of lead applicants of households owed a homelessness duty have a gender identity different from their sex registered at birth; but only 1 per cent of Londoners overall have a gender identity different from their sex registered at birth. Although data relating to households and individuals is not directly comparable, this suggests that trans people may be disproportionately more likely to be owed a homelessness duty. There was a large amount of missing data on the gender-reassignment status of people owed a homelessness duty – it was only available for 20 per cent of people.
- 2.19. The MHCLG data, cited above, did not find that any sexual orientations were overrepresented or underrepresented among people owed a homelessness relief duty. However, across the UK, LGBTQ+ people are twice as likely to experience hidden homelessness, such as sofa surfing or squatting, than non-LGBTQ+ people.²⁵ The data shows that 26 per cent of LGBTQ+ young people, and 33 per cent of trans young people, are understood to have experienced hidden homelessness.
- 2.20. According to ONS analysis of homeless people living in hostels or shelters in 2021, 44 per cent were disabled, compared with 18 per cent of people across England and Wales.²⁶
- 2.21. During 2024-25, more than 13,000 Londoners were seen sleeping rough; 83 per cent of these were male. However, women are typically underrepresented in traditional rough sleeping statistics – this is due to the ways women sleep rough, which are often less visible compared to those seen among men. The 2024 Women's Rough Sleeping Census, which uses a gender-informed approach to data collection, found significantly higher levels of rough sleeping in London among women. It recorded 371 women sleeping rough during the census period, compared to 184 women recorded during the Rough Sleeping Snapshot in autumn 2024.^{27,28} The 2024 Women's Rough Sleeping Census highlighted that Black women were disproportionately affected by homelessness, making up 25 per cent of respondents.
- 2.22. Around half (47 per cent) of Londoners seen sleeping rough in 2024-25 were UK nationals. The second largest group of rough sleepers were from Europe (22 per cent), followed by those from Africa (17 per cent).²⁹
- 2.23. In 2024-25, 4 per cent of Londoners seen rough sleeping identified as White-Gypsy/Irish Traveller, White- Roma, or Gypsy/Romany/Irish Traveller. In contrast, 2021 Census data estimates that approximately 0.5 per cent of Londoners identified as Gypsy or Irish Traveller, or Roma. While a proportion of

²⁵ akt, [There's no place like home: The reality of LGBTQ+ youth homelessness](#), March 2025

²⁶ ONS, [People experiencing homelessness, England and Wales: Census 2021](#), 9 December 2023

²⁷ Solace, [Women's Rough Sleeping Census](#), 2024

²⁸ Department for Levelling Up, [Housing and Communities, Rough sleeping snapshot in England: autumn 2024](#), updated 15 July 2025

²⁹ GLA, [Combined Homelessness and Information Network \(CHAIN\) annual report: Greater London, April 2024 – March 2025](#), July 2025

London's Gypsy, Roma and Traveller communities have a preference for bricks and mortar accommodation, the provision of Gypsy and Traveller sites in London falls considerably short of demand, and much of this need is for social rented pitches.

- 2.24. The GLA's needs assessment for accommodation-based support for victims/survivors of domestic abuse noted a 15 per cent increase, since 2020-21, in the number of London households owed a prevention or relief duty from homelessness, as a result of domestic abuse. Over the past three years, the London-wide increase in households seeking homelessness relief has outpaced the increase in those seeking homelessness prevention. This suggests that the needs of those requesting housing support due to domestic abuse are increasingly acute by the time they come to the attention of local authorities. Demand for housing support among victims/survivors that are sleeping rough has also risen since the COVID-19 pandemic. The GLA's needs assessment identifies areas of unmet need.³⁰

Housing need: Temporary accommodation

- 2.25. On 31 March 2025, there were 73,300 London households in temporary accommodation (including 94,700 children).³¹ This number has increased by more than 20 per cent since 2020. Households living in temporary accommodation are more likely to include children than London households overall. Of all households living in temporary accommodation, 66 per cent included children; but only 28 per cent of London households overall include children. In 2024, London Councils estimated that at least one in 50 Londoners, including one in 21 children, live in temporary accommodation.³²
- 2.26. Single-mother households were overrepresented among people in temporary accommodation in London: 35 per cent of those in temporary accommodation were single-mother households, but only 12 per cent of London households are single-mother households. There are much fewer single-father households in temporary accommodation, but they were also overrepresented (3 per cent of those in temporary accommodation were single fathers, but only 1 per cent of London households are single-father households).

Housing need: overcrowding

- 2.27. The English Housing Survey reports on overcrowding as defined by the bedroom standard. This considers the difference in the number of bedrooms needed by the household, and the number of bedrooms available to the household. Temporary household changes due to the pandemic continue to impact English Housing Survey data; and data on overcrowding is likely to be underestimated, especially in the PRS.³³ According to the English Housing

³⁰ GLA, [Domestic Abuse Safe Accommodation-Based Support for Victims/Survivors of Domestic Abuse: the needs assessment for London 2024](#), March 2025

³¹ GLA analysis of MHCLG homelessness live tables, 2024-25

³² London Councils, [London's homelessness emergency](#), 24 October 2024

³³ GLA, [Housing in London annual report: 2024](#), November 2024

Survey, 7 per cent of households in London are overcrowded overall; but this varies for Londoners with different protected characteristics:

- Households headed by Pakistani or Bangladeshi Londoners, Black Londoners or Londoners from a Mixed ethnic background are most likely to be overcrowded (26 per cent, 14 per cent and 14 per cent respectively). Households headed by White Londoners and Chinese Londoners are least likely to be overcrowded (3 per cent).
- Households including someone disabled were more likely to be overcrowded (10 per cent) than households that didn't include someone disabled (6 per cent).
- Households headed by someone aged 35-54 are most likely to be overcrowded (11 per cent). Younger and older households are less likely to be overcrowded; households headed by someone aged 65 and over are least likely to be overcrowded (1 per cent).
- Households with dependent children were more likely to be overcrowded (19 per cent) than households without dependent children (1 per cent).

Housing need: accessibility

- 2.28. In London, 17 per cent of homes have all four basic accessibility features necessary to make them 'visitable' by someone with mobility difficulties³⁴. However, less than 1 per cent are 'visitable', while also having the accessible bathrooms, kitchens and lift access that a disabled household might need.³⁵
- 2.29. In London, 11 per cent of households with at least one disabled member say they do not feel safe at home because they fear a fire might break out. This is compared to around 8 per cent of households with no disabled members.³⁶
- 2.30. One in four Deaf and/or disabled Londoners who responded to an Inclusion London survey said their home is completely inaccessible. This means that they cannot safely or easily use basic facilities such as kitchens, bathrooms and entryways.³⁷

Housing need: demographics of Londoners moving into affordable housing

- 2.31. Demographic information about the people moving into different types of affordable housing indicates the shared protected characteristics of those who

³⁴ These features are defined in the English Housing Survey as level access, a flush threshold, sufficiently wide doorways and circulation space, and a toilet at entrance level.

³⁵ GLA analysis of English Housing Survey, 2018-22

³⁶ GLA analysis of English Housing Survey, 2018-22

³⁷ Inclusion London, [Barriers at Home: Housing crisis for Deaf and Disabled Londoners](#), 4 February 2025

will likely benefit from affordable housing supplied through the LSAHP 2026-36.^{38,39}

2.32. Social rented homes are low-cost rental homes. They are allocated to low-income households, usually via their local authority housing register. The protected characteristics of households moving into general needs social rented homes differ from Londoners overall in the following ways:

- People moving into general-needs social rented homes are more likely to be younger than Londoners overall (40 per cent of households starting a new social rent tenancy had a lead tenant under 35; but only 20 per cent of Census HRPs were under 35).
- Households moving into social rented homes were more likely to have a lead tenant who is Black (33 per cent versus 13 per cent of all Census HRPs); Mixed ethnicity (8 per cent versus 4 per cent); or from an Other ethnic group (8 per cent versus 6 per cent).
- Households moving into social rented homes were less likely than Londoners overall to have a lead tenant who is White (37 per cent, versus 60 per cent overall) or Asian (14 per cent versus 17 per cent).
- The data shows that 1 per cent of people moving into social rent homes are pregnant. This can be considered a proxy for the pregnancy and maternity protected characteristic.
- Households moving into social rented homes were more likely to be headed by a woman: 63 per cent of social rent lead tenants are female, compared with 45 per cent of Census HRPs.
- Single women make up 45 per cent of households moving into general-needs social rent homes (26 per cent with children, and 19 per cent without children). Single men make up 26 per cent (24 per cent without children and 2 per cent with children).
- The data shows that 30 per cent of households moving into general-needs social rent homes include someone with a long-term health condition or illness. Although not directly comparable, the Census shows that 27 per cent of households include someone with a disability according to the Equality Act definition.
- The data also shows that 50 per cent of households moving into a general needs social rent home have a household income of less than £300 per

³⁸ 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” – this 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.

³⁹ GLA analysis of MHCLG social housing letting and sales data (CORE), various years, 2021-24

week. The average weekly household income in London is £680 per week.⁴⁰

2.33. Intermediate rented homes are let at below market rents, for people who are unlikely to secure social housing, or are struggling to cover the costs of a market rent home; and those for whom home ownership is not an affordable or desirable option. For the purposes of this EqIA, we have considered London Living Rent (LLR) an intermediate rent product, although it is a Rent to Buy product. The protected characteristics of households moving into intermediate rented homes differ from Londoners overall, in the following ways:

- Younger households are overrepresented among households starting a new intermediate rented tenancy; and older households are underrepresented. Of all households starting a new intermediate rented tenancy, 58 per cent of lead tenants are under 35, and only 5 per cent are over 55. But only 20 per cent of all Londoners are under 35, and 37 per cent are over 55.
- Of all London households, 28 per cent include children; but of all households starting a new intermediate rented tenancy, only 18 per cent include children.
- Women are slightly overrepresented among households starting a new intermediate rented tenancy: 53 per cent of people in these households are female, and 47 per cent are male. By comparison, 51 per cent of all Londoners are female and 49 per cent are male.
- Of all households starting a new intermediate rented tenancy, 3 per cent have a long-term health condition or illness; and 4 per cent include a wheelchair user. Among all Londoners, 27 per cent of households include someone disabled under the Equality Act definition. This difference will be due in part to the younger age profile of households starting a new intermediate rented tenancy, because younger people are less likely to be disabled.⁴¹
- Of all households starting a new intermediate rented tenancy, 67 per cent have a lead tenant from a Black, Asian or minority ethnic background, compared with 40 per cent of HRPs among all London households. Households with a Black lead tenant are particularly overrepresented among those starting a new intermediate rented tenancy (30 per cent of lead tenants are Black, versus only 13 per cent of HRPs among all Londoners).
- Of all lead tenants starting a new intermediate rented tenancy, 67 per cent were British; 13 per cent were from European Economic Area (EEA) countries; and 19 per cent were from any other country.

⁴⁰ ONS, [Gross disposable household income by UK constituent country and region](#), 10 September 2025

⁴¹ ONS, [Disability by age, sex and deprivation, England and Wales: Census 2021](#), 8 February 2023

2.34. Shared ownership homes are a type of intermediate housing whereby households can purchase a proportion of their home, and pay below market rent on the remaining unsold share. The protected characteristics of households moving into shared ownership homes differ from Londoners overall as follows:

- Currently, 80 per cent of households purchasing a shared ownership home had a lead buyer aged 25-44. Only 3 per cent are over 55. Among all Londoners, 40 per cent of Census HRPs are aged 25-44, and 37 per cent are over 55.
- Among all London households, 28 per cent include children; but only 6 per cent of households purchasing a shared ownership home include children.
- Of all households purchasing a shared ownership home, 50 per cent have a female lead tenant.
- Only 3 per cent of households purchasing a shared ownership home include a disabled person. Less than 1 per cent of households purchasing a shared ownership home include a wheelchair user. Among all Londoners, 27 per cent of households include someone disabled under the Equality Act definition. This difference will be due in part to the younger age profile of households purchasing a shared ownership home, because younger people are less likely to be disabled.⁴²
- The majority of households (64 per cent) purchasing a shared ownership home had a White lead buyer; 60 per cent of Census HRPs are White. Households with a lead buyer from a Black or Other ethnic background were underrepresented among those purchasing a shared ownership home. This suggests that not having a deposit may be a barrier to buyers from a Black or Other ethnic background; this is consistent with wider evidence on wealth and ethnicity.⁴³
- Census data shows that 40 per cent of households living in shared ownership homes are Christian; and 35 per cent have no religion. Other religious beliefs and combinations of beliefs make up the remainder. Among all Londoners, the same proportion of households were Christian (40 per cent), but fewer had no religion (26 per cent).

2.35. Supported and specialist housing (SSH) can include the following types of projects:

- transitional supported housing for people in crisis, or with temporary support needs
- long-term supported housing for people with enduring or lifelong support needs

⁴² ONS, [Disability by age, sex and deprivation, England and Wales: Census 2021](#), 8 February 2023

⁴³ Eleni Karagiannaki at the LSE International Inequalities Institute, [The scale and drivers of ethnic wealth gaps across the wealth distribution in the UK: evidence from Understanding Society](#), July 2023

- older people's supported housing for people aged 55 and over with support or care needs
- specialist homes designed for specific communities or needs, without support
- Gypsy and Traveller sites and pitches.

The protected characteristics of Londoners living in SSH reflect the fact that SSH is aimed at specific groups of Londoners. The protected characteristics of people moving into SSH differ from Londoners overall, in the following ways:

- Of all people moving into SSH, 59 per cent are male (49 per cent of all Londoners are male).
- Most people moving into SSH (95 per cent) are single without children; 3 per cent of people moving into SSH are single mothers with children.
- Currently, 44 per cent of people moving into SSH have a long-term health condition (or other illness); 13 per cent of all Londoners are disabled under the Equality Act definition.
- Black Londoners are over-represented among people moving into SSH: 25 per cent of people moving into SSH are Black, but only 14 per cent of Londoners are Black. Asian Londoners are under-represented among people moving into SSH: 11 per cent of people moving into SSH are Asian, but 21 per cent of Londoners are Asian.
- British people account for 77 per cent of those moving into SSH; 7 per cent are from EEA countries; and 16 per cent are from any other country.
- The data shows that 1 per cent of people moving into SSH are pregnant.
- Of all people moving into SSH, 54 per cent have an income of less than £100 per week, and 85 per cent have an income of less than £300 per week.

3. Evidence on workforce diversity in the built environment sector

- 3.1. Workforce diversity within organisations employing Londoners to deliver affordable housing is of interest to the Mayor in considering equality outcomes, given the diverse demographics of Londoners. In London's housing association

workforce, some groups of Londoners with shared protected characteristics are underrepresented:⁴⁴

- Women are underrepresented in leadership positions: 56 per cent of the workforce are female but only 43 per cent of executives are female.
- Londoners from Black, Asian and minority ethnic backgrounds are underrepresented in leadership positions: 20 per cent of the workforce is Black, but only 6 per cent of executives are Black.
- Disabled Londoners are underrepresented in all workforce groups: 21 per cent of the population are disabled, but only 9 per cent of the workforce are disabled, and only 4 per cent of executives are disabled.
- Muslims are underrepresented in the workforce; and Christians are underrepresented at board level.
- There is some evidence that LGBTQ+ people (trans and bisexual people) are underrepresented in leadership positions.

There is no workforce data available about the demographics of local authority housing teams.

3.2. Women, people from Black, Asian and minority ethnic backgrounds, and young people are all underrepresented in the built environment sector workforce:

- Women are underrepresented in the built environment sector workforce; across the UK, 25 per cent of this workforce is female.⁴⁵ In the British engineering and construction industry workforce, only 17 per cent of workers are female.⁴⁶
- People from Black, Asian and minority ethnic backgrounds are also underrepresented in the built environment sector. Across the UK, 15 per cent of the workforce is from a Black, Asian or minority ethnic background, compared with 20 per cent of the working-age population.⁴⁷ In London, only 21 per cent of construction jobs are held by people from Black, Asian and minority ethnic backgrounds (compared to 33 per cent across all other industries).⁴⁸
- Young people are also underrepresented in the built environment sector. Across the UK, 7 per cent of the workforce is under 25, compared with 13 per cent of the working-age population.⁴⁹ In the engineering and construction industry in Britain, 17 per cent of the workforce is under 30, compared with 22 per cent of the British population.⁵⁰ The construction

⁴⁴ National Housing Federation, [How diverse is the housing association workforce in London?](#), September 2023

⁴⁵ Supply Chain Sustainability School, [2024 Diversity Survey](#), 2 April 2025

⁴⁶ ECITB, [2024 Workforce Census: Overview of the Engineering Construction Industry](#), January 2025

⁴⁷ Supply Chain Sustainability School, [2024 Diversity Survey](#), 2 April 2025

⁴⁸ GLA Economics, [Local Skills Improvement Plan: Evidence Base](#), May 2023

⁴⁹ Supply Chain Sustainability School, [2024 Diversity Survey](#), 2 April 2025

⁵⁰ ECITB, [2024 Workforce Census: Overview of the Engineering Construction Industry](#), January 2025

sector in London is ageing: 29 per cent of the workforce in 2021 was over 50, compared to 23 per cent in 2010.⁵¹

4. Equality impacts of the overall tenure mix of the SAHP 2026-36 in London

Affordable housing tenure mix

- 4.1. The LSAHP 2026-36 is expected to be a majority social rent programme, with more than 60 per cent of homes being at social rent, aligning with the government's expectations for the national (both London and outside-of-London) programmes. Though discussions with MHCLG are ongoing to agree the final funding conditions, it is anticipated that the rest of the homes will be for intermediate rent, LLR and shared ownership. It is also anticipated that the programme will also fund SSH, which can be delivered via a range of affordable housing tenures. The programme will enable vital delivery of social and affordable homes across London positively impacting Londoners with shared protected characteristics who are more likely to be in different types of housing need. However, it is unlikely to be sufficient to meet the needs of every Londoner in housing need. This will be particularly the case for those in need of specialist and supported housing who are, by definition, more likely to have housing needs unmet by the housing system.
- 4.2. Social rent is the lowest-cost rental tenure – and the one for which there is greatest need in London. A majority social rent programme will benefit Londoners who struggle to afford a home that meets their needs, and other Londoners in housing need. As set out in section two, this group includes Londoners with low incomes; Londoners from Black, Asian and ethnic minority backgrounds; disabled Londoners; young Londoners; families with children (particularly single parents); women; and LGBTQ+ people. Although the low rents and security of tenure offered by social housing will help to support Londoners moving into social rented homes out of poverty, the evidence also shows that many people living in social rented homes still live in poverty. Providing new social rented homes will have a significant positive impact on the lives of many Londoners. However, funding social housing, and making housing more affordable, will not completely resolve this inequality.
- 4.3. A majority social rent programme is also likely to have a positive impact on groups of Londoners with shared protected characteristics, who are more likely to move into social rented homes. People moving into social rented homes are

⁵¹ GLA Economics, [Local Skills Improvement Plan: Evidence Base](#), May 2023

more likely, compared to Londoners overall, to be younger; from some Black, Asian or minority ethnic backgrounds; female; single parents; or disabled. These groups of Londoners are also less likely to be able to afford a home that meets their needs on the open market.

4.4. The LSAHP 2026-36 will, subject to agreeing the final conditions of the programme, also fund intermediate housing for people on average incomes at below market rents, via intermediate rent, LLR and shared ownership. Subject to final negotiation with government, the Mayor will be inviting bids for Key Worker Living Rent homes and other intermediate rents. Londoners moving into intermediate housing are more likely to be younger, and less likely to be disabled or have children, than Londoners overall. Londoners moving into an intermediate rented home are more likely to be from a Black, Asian or minority ethnic background, compared with Londoners overall. This demographic data suggests the following:

- Funding intermediate housing will have a positive impact on some groups who cannot afford a home that meet their needs, such as younger Londoners, and Londoners from Black, Asian or minority ethnic backgrounds.
- Disabled Londoners and families with children are underrepresented in this tenure; and are also more likely to struggle to afford a home that meet their needs. Disabled Londoners and families with children may therefore be less positively impacted by funding intermediate homes. However, intermediate housing will still have a positive impact on the disabled Londoners and families with children who do move into an intermediate home.
- The delivery split between intermediate rent and shared ownership may have an impact on the ethnicity of Londoners who benefit from intermediate housing. Londoners from some Black, Asian or minority ethnic backgrounds, who are more likely to struggle to afford a home that meets their needs, are more likely to move into an intermediate rented home, and less likely to buy a shared ownership home. Therefore, Londoners from some Black, Asian or minority ethnic backgrounds may be more likely to benefit from intermediate rented homes rather than shared ownership homes.

4.5. The LSAHP 2026-36 funds SSH. SSH provides homes for many groups of Londoners whose needs are often not met by the private market. SSH is designed to provide housing for targeted client groups, including older people; disabled people; Gypsies and Travellers; and homeless people and those at risk of homelessness (including victims/survivors of violence against women and girls). Some of these groups of Londoners are likely to share protected characteristics. Demographic data shows that Londoners moving into SSH are more likely to be male, disabled; Black; or have a low income. Londoners with these characteristics are more likely to be in some types of housing need, or unable to afford a home that meets their needs.

4.6. Mixed-tenure schemes enabled by the LSAHP 2026-36 will also deliver market housing, which will have wider supply and affordability benefits. While new

social housing is the most direct way to benefit low-income households, building new market homes can also make all types of housing more affordable; and can produce other indirect benefits for low-income households.⁵²

- 4.7. Overall, the LSAHP 2026-36 is likely to have a significant positive impact for Londoners, including those with protected characteristics. As a majority social rent programme, it will deliver new, low-cost social rent homes to thousands of Londoners who are in the most pressing housing need. It will also deliver secure, affordable housing to many Londoners on average incomes via intermediate housing, including supporting Londoners into home ownership via shared ownership. SSH will provide homes for many Londoners in need of additional support or specialist housing. In addition, the wider benefits of an overall increase in housing delivery will have a positive impact on many Londoners.
- 4.8. Housing funded by the LSAHP 2026-36 will be expected to include accessible housing for disabled Londoners, as required by the current London Plan 2021 (although we note that development of a London Plan is currently under way, with a draft new London Plan expected in 2026 and an intent to adopt the final Plan in 2027). Disabled Londoners are disproportionately more likely to move into social rented homes and SSH.

5. GLA funding conditions

- 5.1. The Mayor of London uses funding requirements in the LSAHP 2026-36 to promote policy objectives that he deems relevant to Londoners' wellbeing. These requirements might diverge from the England-wide SAHP 2026-36, as it operates outside London. The substantive London conditions in the LSAHP 2026-36 covered in this EqlA relate to building safety; space standards; equality, diversity and inclusion (EDI); and post-occupancy evaluation (POE). The expected equality impacts of these discretionary conditions are considered below.
- 5.2. Final funding conditions will be set out in the draft funding guidance for the LSAHP 2026-36, though the GLA reserves the right to amend its funding guidance for the LSAHP 2026-36, in line with evolving policy requirements.

Building safety standards

- 5.3. The national regulatory regime has been strengthened since the GLA launched its last AHP 2021-26. This has included the government establishing the Building Safety Regulator; expanding requirements to install sprinklers and

⁵² GLA Housing and Land, [Housing Research Note 10 – The affordability impacts of new housing supply: A summary of recent research](#), August 2023

second staircases; and improving the competency and regulation of fire risk assessments and local authority building control.

- 5.4. Despite these improvements, the Mayor has raised concerns that the regulations covering the external walls of buildings under 18m is insufficient – as is the testing and certification regime, which does not sufficiently control for the risk of unsafe materials being used on external walls.
- 5.5. The LSAHP 2026-36 will restrict the use of combustible materials on the external walls of buildings of all heights, including banning their use in new development. This goes further than national regulations, which only ban combustible materials in new developments over 18m, and severely restrict their use at 11-18m.
- 5.6. The LSAHP 2026-36 will also require active fire suppression systems in newly developed buildings of all heights, with the exception of single units. This goes further than national regulations, which only require sprinklers in new development over 11m. This is because of the well-evidenced benefits that these systems provide, and ongoing concerns about the effectiveness of regulations covering buildings under 11m.
- 5.7. Potential positive equality impacts are as follows:
 - These requirements will make residents' homes safer by reducing fire risks. This is a positive benefit for all residents, but will particularly affect residents who have reduced mobility or would be otherwise vulnerable in a fire. This includes, for example, some disabled people, older people, pregnant people and children.⁵³ In the Grenfell Tower fire, a disproportionate number of disabled residents and children died.⁵⁴
 - Across England, men and older people are more likely to die due to a fire than women and younger people.⁵⁵ These building safety requirements may have a positive impact on men and older people.
 - These requirements aim to make evacuation easier and safer. AFSS lessen the spread and heat of fires; reduce the toxicity and temperature of smoke; and allow more time for residents to safely evacuate, and for fire and rescue services to respond. This may have a positive impact on residents who could find it harder to evacuate in the event of a fire, including disabled people, older people, pregnant people and children.
 - The National Fire Chiefs Council suggests that the number of people unable to descend staircases will increase over time, due to demographic trends. (These trends include, for example, an ageing population, and more people choosing to receive care at home rather than in a residential care setting.) This group is likely to include older people and disabled

⁵³ National Fire Chiefs Council, [response to MHCLG consultation, "Sprinklers and other fire safety measures in high-rise blocks of flats](#), 28 November 2019

⁵⁴ Disability Rights UK, [Almost half of Grenfell fire deaths were Disabled people and children \(press release\)](#), March 2021

⁵⁵ MHCLG, [Detailed analysis of fires and response times to fires attended by fire and rescue services, England, April 2024 to March 2025](#), 14 August 2025

people. These requirements may help ensure that homes continue to meet the needs of these Londoners in future.

- Evidence from expert stakeholders suggests that many people with specific evacuation requirements (e.g. reduced mobility) choose to live on lower floors. While the national building safety standards on combustible materials and AFSS systems apply to buildings over a certain height, the GLA building safety requirements apply regardless of building height. This may have a positive impact on people with specific evacuation requirements who choose to live on lower floors, which is likely to include disabled people and older people.
- Living in an overcrowded home is a fire risk, and Londoners from some Black, Asian and minority ethnic backgrounds, families with children, and Londoners aged 35-54 are more likely to live in an overcrowded home. Therefore, these requirements may have a positive impact on these groups.
- Requiring non-combustible materials for SAHP-funded homes in London could be market-shaping for the building material supply chain, which would have a positive impact on building safety across England.

5.8. Potential negative impacts, and any justifications or mitigations, include the following:

- There is a risk that this requirement could lead to higher construction costs for projects funded through the LSAHP 2026-36, which could affect overall levels of affordable housing delivery. This could have a negative impact on groups of Londoners with shared protected characteristics who are more likely to be in housing need. However, since 2020, national requirements have restricted the use of combustible materials, and required sprinklers, in buildings over 11m. The market is accordingly being encouraged to adopt these higher standards. Additional GLA requirements only substantively impact buildings under 11m; and where they do, they are deemed to be proportionate, with minimal impacts on overall building costs.
- The LSAHP 2026-36 removes several London-specific funding restrictions, related to building safety, that were in place for the AHP 2021-26. It was deemed that these were no longer proportionate or effective in creating their intended outcomes. Where standards remain on restricting combustibles and requiring AFSS, their scope has been refined to remove instances where the impact has been deemed disproportionate. This has been determined following a careful review of the effectiveness of national regulations; and of the significant progress made nationally in establishing the Building Safety Regulator. This expands requirements to install sprinklers and second staircases; and improves competency in, and regulation of, fire risk assessments. Following this review, the GLA does not believe that a more London-specific approach is required to minimise fire risks in the new programme.

Promoting design and sustainability

5.9. The programme will not specify design or sustainability standards for new developments. Specifications will instead be determined through the planning system and relevant London Plan policies, as amended from time to time. Providers bringing forward homes through alternative routes have to meet specific standards, though exceptions can be made at the GLA's discretion. These routes include the following:

- Where projects that have not been fully scrutinised by the planning system (such as acquisitions and through permitted development routes such as office-to-residential conversions), these projects will generally be required to meet London Plan minimum floor space standards.
- For acquisitions of supported and specialist homes that are self-contained, providers will generally be required to achieve London Plan minimum standards for gross internal floor space and storage.
- Private living spaces in new-build shared accommodation projects (as part of SSH), which tend to have client groups with higher support needs, will generally be required to have a total floor space of at least 12.5 square metres per unit.

5.10. Potential positive impacts:

- The GLA's approach to design and sustainability in the new programme should ensure that homes are of an adequate size to benefit residents' physical and mental health. This could have a positive impact on people with higher health needs, such as older and disabled Londoners.
- For general needs acquisitions and permitted developments, space standards may have a positive impact on the Londoners who move into these homes. The LSAHP 2026-36 will be a majority social rent programme, so the protected characteristics of people moving into general needs acquisitions or permitted developments may reflect the protected characteristics of people who are more likely to move into social rented homes. This includes younger Londoners; disabled Londoners; and Londoners from some Black, Asian or minority ethnic backgrounds.
- SSH is designed to provide housing for groups of Londoners whose needs are often not met by the private market, and who are likely to share protected characteristics. Evidence shows that Londoners moving into SSH are disproportionately likely to be disabled; Black; or have a low income. The SSH space standards may have a positive impact on these Londoners.

5.11. Potential negative impacts, and any justifications or mitigations, are as follows:

- A requirement for acquisitions, permitted developments and certain SSH homes to meet space standards will have viability considerations for providers bringing such homes forward. If this leads to delays in bringing forward housing, this would have a negative impact on groups of

Londoners with shared protected characteristics who are more likely to be in housing need, or are specifically in need of SSH. However, any impact is expected to be minimal, given a majority of the homes delivered through this programme will be new-build and the GLA has the ability to be flexible, in exceptional circumstances, with regards to the space standard requirement.

- These conditions represent an evolution of funding conditions imposed in the London AHP 2021-26, with some GLA funding restrictions removed in the LSAHP 2026-23. This will give providers delivering new affordable homes through the LSAHP 2026-36 more certainty, and should speed up the delivery of new affordable homes. This will benefit groups of Londoners with shared protected characteristics who are more likely to be in housing need.
- There is a risk that, by removing funding restrictions relating to design standards on new-build general needs developments funded through the programme, the quality of the homes delivered through the programme suffers. This would have a negative impact on groups of Londoners with shared protected characteristics who are more likely to be in housing need. However, the GLA believes that, for new-build homes that are subject to the full scrutiny of the planning process, the planning system is best placed to determine the most appropriate approach to embedding design and sustainability standards into new developments, rather than funding restrictions. It is considered that the risk of substantive shortfalls in the quality of homes delivered through the programme is low. Where projects will have been scrutinised less by the planning system – on acquisitions and permitted development – the GLA is retaining standards in relation to minimum space standards.

Equality diversity and inclusion

5.12. Providers delivering under the LSAHP must achieve the following five minimum EDI requirements:

- offer EDI training for all employees
- implement a zero-tolerance approach to all forms of discrimination, harassment and bullying
- broaden recruitment channels, and encourage applications from diverse and underrepresented groups
- collect and monitor workforce data to benchmark the diversity of their workforce against the local area of their organisation
- publish their gender and ethnicity pay gaps.

5.13. Potential positive impacts are as follows:

- The EDI standards aim to improve EDI outcomes within organisations in the housing and built environment sector. In London housing

associations,⁵⁶ disabled people are underrepresented. Many groups of Londoners with shared protected characteristics are underrepresented in leadership positions at London housing associations. These include women; Londoners from Black, Asian and minority ethnic backgrounds; disabled people; some LGBTQ+ Londoners; Muslims; and Christians.

- The EDI standards aim to improve the diversity of the sector's workforce, and make organisations within the sector more inclusive. This may make organisations in the built environment sector more likely to meet the needs of Londoners who are disproportionately in housing need – such as Londoners from Black, Asian and minority ethnic backgrounds; disabled Londoners; and younger Londoners. This is because a diverse workforce that represents Londoners in housing need may have a better understanding of people in housing need, leading to a more positive experience and better outcomes for clients. It may also be easier to build trust between organisations and their clients, if the workforce is representative of Londoners in housing need.

5.14. There is a small risk that these requirements could negatively impact housing delivery, due to additional costs required to meet them. This would have a negative impact on groups of Londoners with shared protected characteristics who are more likely to be in housing need. Officer experience from administering the London AHP 2021-26 suggests that the impact on delivery will be minimal. In addition, these conditions represent an evolution of funding conditions imposed in the London AHP 2021-26. As such, many providers should be familiar with these requirements; this should mitigate impacts on housing delivery.

Post-occupancy evaluation (POE)

5.15. The effectiveness of the POE requirement for providers working with the AHP 2021-26 will be reviewed. Following this, providers may be required to undertake POE reviews on a proportion of their projects completed under this programme. The POE process evaluates a building's performance through surveys and interviews.

5.16. Potential positive impacts include the following:

- POE may help the GLA meet design, sustainability and EDI objectives, by understanding the experiences of Londoners with different shared protected characteristics living in homes funded through LSAHP 2026-36.
- A small POE pilot showed some evidence of material improvements and repairs being achieved for residents (who had flagged issues as part of the POE survey process). This suggests that undertaking a POE may have a positive impact on residents who may be particularly vulnerable to the health and wellbeing impacts of issues with energy performance or disrepair. This includes, for example, older people, children and disabled people.

⁵⁶ Demographic data for the London local authority housing workforce is not available.

- POE is intended to give providers insights that can help improve design and sustainability. Wider sectoral research indicates that POE can deliver on this.^{57,58} There are early indications of design improvements based on POE evidence from the London AHP 2021-26 pilot. For example, a small number of providers used information from the POE pilot to change the layout of future schemes, and the specifications of components on future phases of existing schemes.
- Insofar as POE can deliver improvements to energy performance or disrepair issues in homes designed and built in the future, this may have a positive impact on disabled people, older people and children, who may be particularly vulnerable to the health and wellbeing impacts of these issues.

5.17. Potential negative impacts, and any justifications or mitigations, are as follows:

- POE could create a time and financial burden for providers that detracts from housing delivery. Although providers in the POE pilot were all able to implement the POE requirements, this necessitated external consultancy support for some providers. To reduce the burden on providers, the effectiveness of POE under AHP 2021-26 will be reviewed, and POE will only be implemented when there is confidence that the requirements are not too burdensome for providers.
- The POE pilot identified several practical challenges with implementing POE home visits. It was difficult to get the right staffing for home visits; and data protection protocols made it difficult for officers to make full use of data collected from home visits. As above, the POE requirements are being reviewed – POE will only be implemented when there is confidence that the requirements are not too burdensome for providers.

6. Key conclusions

- 6.1. Overall, the impacts of the funding conditions introduced by the GLA for the delivery of the LSAHP 2026-36 are considered positive for those with protected characteristics. Where there are potential negative impacts, they have been mitigated against where possible, or are considered justified. Some groups with shared protected characteristics may be more likely than others to experience positive impacts, but this is considered justified as these groups are more likely to be in housing need, and less likely to be able to afford a home that meets their needs.

⁵⁷ Quality of Life Foundation, [Review of Post-Occupancy Evaluation for Housing](#), June 2023

⁵⁸ RIBA, [Post Occupancy Evaluations: an essential tool for the built environment](#), 2020