

Equality Impact Assessment (EqIA) for London Plan Guidance

1. An outline of the guidance, who it is aimed at and any key issues to be aware of.

London Plan Guidance:	Fire Safety
Teams involved:	London Plan Team
Date of final review:	February 2022

The consultation draft Fire Safety London Plan Guidance (LPG) sets out how applicants should demonstrate compliance with London Plan Policies D12 and D5(B5), where applicable in order to show their schemes achieve the highest standards in fire safety. The draft LPG highlights the intrinsic link between the design and the evacuation strategy.

The draft LPG notes that planning officers are not experts in fire safety and therefore places the onus of demonstrating compliance with the London Plan policies on the applicant and the fire safety expert. This is to be done via template forms provided in the draft LPG which clearly set out which policy criteria are to be addressed. The template forms also make it easy for planning officers to check that information has been provided against each relevant policy criteria.

The draft LPG seeks to ensure that fire safety is considered at the earliest stage of the design of a development by a fire safety expert along with the wider design team. In this regard the draft LPG does not set specific standards but notes that it is for the applicant to justify how the design and evacuation strategy achieve the highest standard in fire safety. This would be based on existing detailed, nationally agreed standards and codes such as Approved Documents and the British Standards.

The draft LPG clarifies that the requirement to provide an evacuation lift in line with London Plan Policy D5(B5) is in addition to the Building Regulations' requirement to provide a fire fighters' lift, in relevant schemes. In this regard, it should be noted that most residential schemes are designed and built to support a 'stay put' strategy so in theory any evacuation should be limited, however the draft guidance asks the applicant to consider mitigation measures should a wider evacuation be required due to the spread of a fire or due to spontaneous self-evacuation by residents.

The draft LPG also sets out how applicants can support the golden thread of information. The golden thread concept has been outlined through draft legislation and aims to ensure the fire safety information relating to a development is updated and passed to each subsequent stage of the development and is retained during its occupation.

The draft LPG is aimed at planning authorities, fire safety professionals, designers and applicants to determine when an evacuation lift is to be provided and to ensure fire safety has been appropriately considered and addressed from the initial design stage and that this is demonstrated as part of the planning application.

Fire safety has traditionally been the remit of the Building Regulations with detailed standards and design solutions set out in Approved Documents and British Standards. Following the Grenfell Tower fire tragedy on 14 June 2017, the government commissioned the Independent Review of Building Regulations and Fire Safety led by Dame Judith Hackitt. The report highlighted the need to transform the fire and building safety regime and

recommended that 'some minimum requirements around fire safety will need to be addressed when local planning authorities are determining planning applications and will require input from those with the relevant expertise'.

The draft LPG sets out the national context for fire safety and how the London Plan policies relate to the national Gateway One Fire Statements. It notes that the London Plan seeks more detailed information than Gateway One and applies to all land uses and a lower size threshold than Gateway One. Therefore developments covered by Gateway One will have to complete a Gateway One Fire Statement and a London Plan Fire Statement, however the information required by London Plan policies D12 and D5(B5) to inform a London Plan Fire Statement can also be used to complete a Gateway One Fire Statement.

The Building Safety Bill aims to introduce Gateways 2 and 3 which will ensure the measures identified at planning application will be carried through to the Building Control and construction stages and the fire safety information of the building will be passed to the responsible person during these stages as well as when the building is occupied.

Significant changes to the fire safety regime are proposed and standards are improving rapidly. Whilst the legislation is progressing slowly, revised British Standards have been consulted on and are due to be published in the summer of 2022. The London Plan policies and this LPG on fire safety have been published prior to a robust national fire safety regime coming into force, but giving due consideration to fire safety now at planning application stage will support the implementation of the new or updated Building Regulations, British Standards, Personal Emergency Evacuation Plans and Fire Safety Orders as they come into force.

2. Which of the Public Sector Equality Duty aims are relevant to the guidance and the impacts identified?

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

1. *eliminate discrimination, harassment and victimisation and other conduct prohibited under the Act;*

It is a legal requirement for all persons to be able to evacuate a building quickly and safely, however, traditionally this has meant people not able to use the stairs relying on someone else to support their evacuation using the stairs. In addition, there has been a different approach based on the use of the building. Commercial developments tend to be designed to be evacuated and high-rise residential development are designed to support a 'stay put' approach. This has meant that there are procedures in place to evacuate people, including disabled people, from commercial development but not necessarily from residential developments.

The draft LPG sets out what information is required to demonstrate a 'suitably sized' evacuation lift will be provided and that this provision is to be in addition to the Building Regulations requirement for a firefighters' lift. This detailed guidance supplements London Plan policy D5(B5) which requires the provision of an evacuation lift, where a lift core is provided and policy D12 which requires the submission of a robust evacuation strategy.

There are currently no adopted industry standards for evacuation lifts in the residential sector and therefore the draft LPG puts the onus on the applicant to demonstrate an appropriate solution has been proposed.

This approach aims to eliminate discrimination for those that are physically and mentally disabled, have a long term illness that makes evacuation via the stairs difficult, have a short term disability so they require level access, are old, young or pregnant making evacuation by the stairs more difficult, by ensuring they can evacuate a building safely with dignity. They will no longer have to wait to be rescued but can self-evacuate via the evacuation lift or with the support of a trained evacuation lift operator for a safe and dignified evacuation.

2. *advance equality of opportunity between people who share a protected characteristic and those who do not; having due regard, in particular, to the need to*
 - a. *remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;*
 - b. *take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;*
 - c. *encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.*

This draft LPG aims to provide further detail to support London Plan policies D12 and D5(B5) to ensure developments are constructed to the highest standards of fire safety, include a complementary evacuation strategy and provide an appropriate number and appropriately sized evacuation lifts. The inclusion of evacuation lifts and supporting infrastructure, such as protected lobbies, will minimise the need for people most likely to need level exit such as those that are physically and mentally disabled, have a long term illness that makes evacuation via the stairs difficult, have a short term disability so they require level access, are old, young or pregnant to rely on others to support them during an evacuation.

In addition the guidance sets out the detailed fire safety measures required to be considered at planning application stage so that the development as constructed will contain the highest standards of fire safety and corresponding evacuation strategy, reducing the potential for a fire to start and to spread, ensuring appropriate measures are included for the fire service to access a building and tackle a fire and giving people more time to evacuate should they need to.

This approach minimises the disadvantage people with protected characteristics may experience during an emergency and provides a means for people to evacuate safely and with dignity in an emergency.

This is more likely to give people that need level access or that may be slower to evacuate an equal opportunity to evacuate and more confidence to live in, work in and visit tall buildings.

3. *foster good relations between people who share a protected characteristic and those who do not, having due regard, in particular, to the need to:*
 - a. *tackle prejudice, and*
 - b. *promote understanding*

Consider which aims are particularly relevant to the guidance.

Aims 1 and 2 are more relevant to this guidance as compared to 3, but this equality impact assessment considers aim 3 when relevant.

Assessment

List aspects of the guidance that might affect particular groups

Guidance key aspects, chapter headings, theme etc	Particular group that could be affected
Highlights intrinsic link between the design of a development and the evacuation strategy and therefore the applicant should consider fire safety measures and the evacuation strategy from the earliest design.	Positive: Age, disability, pregnancy and maternity, race or ethnicity and people on low incomes Negative: None
Introduces the golden thread concept which aims to ensure fire safety information is updated and passed to the responsible persons through the development process. This provides greater certainty that the initial design and fire safety measures will be implemented in the final development, or any changes are given due consideration and mitigated, where required	Positive: Age, disability, pregnancy and maternity, race or ethnicity and people on low incomes Negative: None
Details to consider when providing information to demonstrate compliance with London Plan policy D12A.	Positive: Age, disability, pregnancy and maternity, race or ethnicity and people on low incomes Negative: None
Details to consider when providing information to demonstrate compliance with London Plan policy D12B	Positive: Age, disability, pregnancy and maternity, race or ethnicity and people on low incomes Negative: None
Details to consider when providing information to demonstrate the proposed number and size of evacuation lifts is appropriate	Positive: Age, disability, pregnancy and maternity, race or ethnicity and people on low incomes Negative: None
Provides clarity on who should prepare a RES, PFSS and Fire Statement	Positive: Age, disability, pregnancy and maternity, race or ethnicity and people on low incomes Negative: None

Seeks a declaration of compliance and places the onus of demonstrating the fire safety of the development on the applicant and fire safety expert	Positive: Age, disability, pregnancy and maternity, race or ethnicity and people on low incomes Negative: None
---	---

Equality impacts, mitigating actions and justification (where applicable)

Group	Potential impact description	Relevant PSED aim (1, 2a, b or c, and/or 3)	Actions identified and/or justification	Assessment of equality impacts
	What positive and negative impacts have been identified (known and potential) for particular groups?			Score each impact as either: +2 Strong positive +1 Positive 0 Neutral - 1 Negative - 2 Strong negative Mixed or uncertain
Age (consider particularly children, under 21s and over 65s)	Older people are more likely to have mobility or sensory disabilities or impairments that may make it more difficult for them to evacuate or be aware of a fire. They may also suffer cognitive disability such as dementia or Alzheimers which may impair their ability to react appropriately in the event of a fire. Children will need assistance, and young children are not mobile. Both of these age groups tend to spend more time at home and therefore are more likely to be			

	<p>The provision of templates makes it easier for planners and other interested parties to confirm that fire safety information has been provided against the relevant policy criteria, enabling transparency in the planning process and enabling scrutiny by the public and fire safety experts so that the highest standard in fire safety is more likely to be achieved, most significantly benefiting older and younger people should a fire occur and evacuation be required.</p>	1, 2a, 2b		+1 Positive
Disability (consider different types of physical, learning or mental disabilities)	<p>People with mobility or sensory disabilities or impairments may find it more difficult to evacuate or be aware of a fire.</p> <p>People with cognitive disabilities or mental health issues may be less able to respond in an emergency in the way anticipated.</p> <p>Positive – The draft LPG clarifies that the provision of an evacuation lift is in addition to the provision of firefighters’ lifts that are required by the Building Regulations and sets out what an applicant should consider (including the number of people that are in wheelchairs or bedbound) when determining the number and size of evacuation lifts to provide, making it more likely adequate evacuation measures will be in place for disabled people to evacuate safely and with dignity in an emergency.</p> <p>The setting out of the fire safety details to be shown in the planning application and the</p>	1, 2a, 2b,		+1 Positive

	<p>However, given the small absolute number of incidents and limited information about what type of housing trans Londoners live in, no firm conclusions can be made as to the impacts of the guidance on this protected characteristic.</p>			
Marriage and civil partnership	<p>No positive or negative impacts for this protected characteristic have been identified.</p>			
Pregnancy and maternity	<p>Pregnant women may need assistance to evacuate from taller buildings depending on the stage of their pregnancy.</p> <p>Mothers with babies are more likely to be at home and required to aid a child or children during an evacuation.</p> <p>Positive - The draft LPG clarifies that the provision of an evacuation lift is in addition to the provision of firefighters' lifts that are required by the Building Regulations and sets out what an applicant should consider (including a concentration of young people and families) when determining the number and size of evacuation lifts to provide, making it more likely adequate evacuation measures will be in place for pregnant women and mothers to evacuate safely and with dignity in an emergency.</p> <p>The setting out of the fire safety details to be shown in the planning application and the reference to the golden thread approach means that fire safety measures are more likely to be</p>	<p>1, 2a, 2b</p>		<p>+1 Positive</p>
		<p>1, 2a, 2b</p>		<p>+1 Positive</p>

	<p>effective in the final development meaning there is less likely to be a fire, any fire is less likely to spread, there will be adequate space and facilities for the fire service to tackle a fire and should evacuation be required, appropriate measures have been included in the building, providing pregnant women and those with babies and young children more time to evacuate, if required.</p>			
<p>Race or Ethnicity (consider refugees, asylum seekers, migrants, gypsies and travellers)</p>	<p>In England, in general, a Black, Asian or minority ethnic household are more likely to live in a high-rise flat.</p> <p>In addition, in London, Black and Bangladeshi households make up the highest percentage of households living in socially rented accommodation which makes up a larger proportion of households in tall buildings.</p> <p>People for whom English is not a first language, and particularly those who have a limited understanding of English may be disadvantaged in a fire safety emergency if they do not understand signage and are less able to understand verbal instructions.</p> <p>Positive - The detail in the draft LPG highlights the need for the evacuation strategy to be considered at the early design stage and the intrinsic link with the wider design supporting the approach that the evacuation strategy should consider the needs of all people, including</p>	<p>1, 2a, 2b</p>		<p>+1 Positive</p>

	<p>people who do not have a good understanding of English, for example through the inclusion of clear signage, suitable for people that do not speak English or for whom English is not their first language.</p> <p>The setting out of the fire safety details (including the confirmation of using non-combustible materials on the external walls) to be shown in a planning application and the reference to the golden thread approach means that fire safety measures are more likely to be effective in the final development meaning there is less likely to be a fire, any fire is less likely to spread, there will be adequate space and facilities for the fire service to tackle a fire and should evacuation be required, appropriate measures have been included in the building, providing people for whom English is not their first language more time to evacuate and it is more likely there will be clear signs to support people to evacuate, if required. This is most likely to have the highest benefit for people that live in tall buildings.</p> <p>The LPG also seeks a rigorous assessment of the number of stair cores to be provided, which is especially beneficial for those more likely to live in tall buildings.</p>	1, 2a, 2b		+1 Positive
Religion or belief	No positive or negative impacts for this protected characteristic have been identified.			+2 Positive

Sex	<p>On average, women live longer than men and therefore a more likely to live on their own when they are older.</p> <p>In addition, women are more likely to work part time and having caring responsibilities and therefore are more likely to be affected by a fire in a domestic setting with a 'stay put' design than those who spend a greater proportion of their time at work/education.</p> <p>Positive - The setting out of the fire safety details to be shown in the planning application and the reference to the golden thread approach means that fire safety measures are more likely to be effective in the final development meaning there is less likely to be a fire, any fire is less likely to spread, there will be adequate space and facilities for the fire service to tackle a fire and should evacuation be required, appropriate measures have been included in the building, providing women in a domestic setting more time to evacuate, if required and there should be clearer signage or knowledge of the procedures to follow during a fire.</p> <p>The provision of templates makes it easier for planners and other interested parties to confirm that fire safety information has been provided against the relevant policy criteria, enabling transparency in the planning process and enabling scrutiny by the public and fire safety experts so that the highest standard in fire safety is more likely to be achieved benefiting women in</p>	1, 2a, 2b		+1 Positive
		1, 2a, 2b		+1 Positive

	a domestic setting should a fire occur and evacuation be required.			
Sexual orientation	<p>Official statistics show that there are numerous incidents of hate crimes against people because of their sexual orientation, and these may underestimate the actual extent due to under-reporting. A small proportion of overall hate crimes are incidents of criminal damage or arson against people because of their sexual orientation. It is possible that increased fire safety measures as a result of the LPG may give LGB individuals more confidence regarding their safety in new developments, should such attacks occur. However, given the small absolute number of incidents and limited information about what type of housing LGB Londoners live in, no firm conclusions can be made as to the impacts of the guidance on this protected characteristic.</p>			
People on low incomes	<p>People on low incomes are more likely to live in affordable housing and traditionally a larger percentage of tall buildings contained affordable housing. In London, a higher percentage of Black, Asian or minority ethnic households as well as those with a person with a disability have low incomes.</p> <p>However, in London this has changed over the last 10-20 years, with an increased number of tall buildings being developed as market housing.</p>			

Overview of equality impacts

Using your findings from the table above, summarise the impacts for each group in the table below using the scoring listed above.

	Age	Disability	Gender reassignment	Marriage and civil partnership	Pregnancy and maternity	Race	Religion and belief	Sex	Sexual Orientation	People on low incomes
Guidance 1	+1	+2	Neutral	Neutral	+1	+1	Neutral	Neutral	Neutral	+1

Amendments to the guidance

Change	Reason for change
What changes have you made to the guidance as a result of this EqIA?	Why have these changes been made?
Highlight the need for an evacuation strategy at the beginning of the LPG and link it more closely with the initial design of the development	So that the evacuation strategy, including the provision of evacuation lifts and stairwells is intrinsic to the design of the development which will ensure that the final building can accommodate the measures required.
Noting evacuation lifts may be used by those lying in a bed	So people that are bed bound can be safely evacuated from a development with dignity
Noting any concentration of occupants that may find it difficult to evacuate such as older people, younger people, families, people that do not speak English in addition to those with physical or cognitive disabilities	So that evacuation strategies not only specifically consider those with physical or cognitive disabilities that may require an evacuation lift but other groups that could still evacuate via the stairs, but at a slower pace such as older people, younger people, families, people that do not speak English

Recommendation

Based your assessment, please indicate which course of action you are recommending to decision makers.

Outcome Number	Description	Mark with an X (more than one box can apply)
Outcome One	No major change to the guidance is required This EqIA has not identified any potential for discrimination or negative impact, and all opportunities to advance equality have been taken.	X (all mitigations already included in the guidance)
Outcome Two	Adjustments to the guidance are required to remove barriers identified by the EqIA or better advance equality.	
Outcome Three	Justify and continue with the guidance despite having identified some potential for negative impacts or missed opportunities to advance equality.	
Outcome Four	Stop, rethink or abandon when the EqIA shows actual or potential unlawful discrimination	

Monitoring

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

Appendix A: Evidence Reference and Content

London Plan IIA (including EqIA) and Addendums

Evidence

Between 1966 and 1992, the total number of fire deaths in London fluctuated from 125 to just under 200 deaths a year. From 1993 to 2020, the number of deaths has fluctuated between 29 (in 2014) and 103 in 2017 (including the 72 fatalities at the Grenfell Tower fire). (Fire Facts. Fatal Fires in Greater London LFB 2020)

In 2020, in London 59% of dwelling fires started in flats, whereas 50% of the population live in flats. Overall fires in flats were down by 10 percent in 2020 compared to the five previous years; however, there were 25 more fires in flats within buildings of 10 or more storeys.

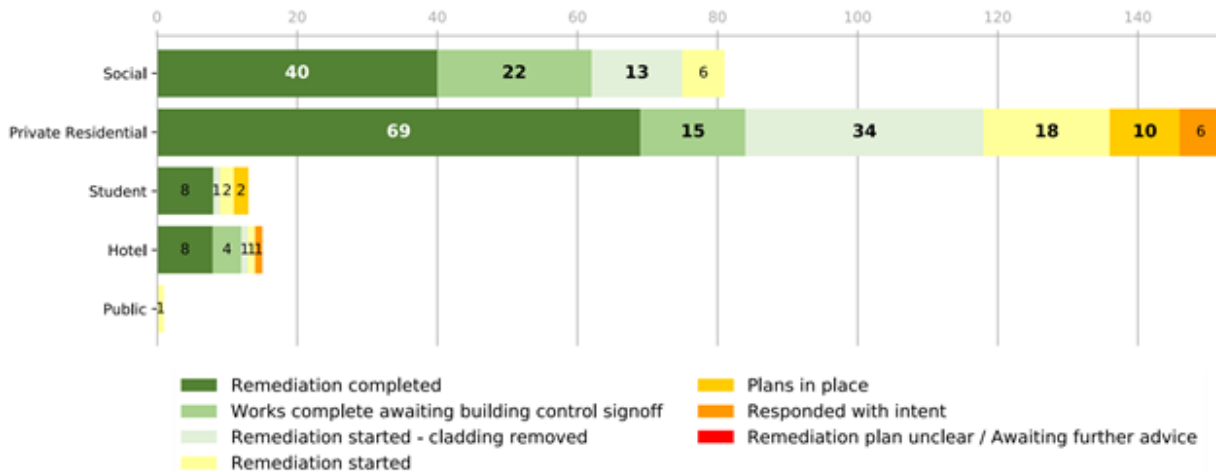
Despite smoking materials causing just 11 percent of dwelling fires, they caused over 34 percent of dwelling fire fatalities. Fires started by matches and candles are also disproportionately fatal accounting for seven percent of fires, yet, on average, resulting in 15 percent of fatal dwelling fires. This is often because candles are left alight when people fall asleep.

Another common cause of fires in the home are those caused by electrical supplies and wiring (11 percent). However, in recent years, there have been no fatalities that were caused by fires starting this way. (Fire Facts. Fires in Greater London LFB 2020)

In London, nearly a quarter of non-residential property fires in recent years started in out-buildings, such as private garages and sheds. Around one fifth of the fires happened in commercial retail buildings and places providing food or drink. However, over a third of the fire injuries happened in places providing food or drink (at 31 per cent). Retail buildings accounted for 16 per cent and private sheds/garages for 18 per cent of injuries. (Fire Facts. Fires in Greater London LFB 2020).

In 2018, in London there were 19 arson hate crimes (MOPAC 2019).

In London 81 buildings over 18m in use for social rent housing, 152 private residential, 13 student accommodation and 15 hotels have been identified as having Aluminium Composite Material (ACM) like that on Grenfell Tower. The figure below shows where these buildings are in the remediation process.



Source: Building Safety Programme Monthly Data Release, data as at 31 October 2021

However, there are further buildings over 18m that include other flammable cladding and many more buildings under 18m that have it too.

The Government has funded the remediation of ACM cladding and is in the process of funding the remediation of non-ACM cladding. However, this process has left many home owners with large bills not only for remediation of the cladding, but for other fire safety measures that were not included in developments, as well as interim waking watch patrols.

In addition, property owners in buildings over 11m require surveys to ensure their cladding is not combustible and mortgages are not available for properties over 11m with combustible cladding.

Age

- London has a relatively young population. The median age of Londoners is 35, compared to a national average of 40. 32% of Londoners are under the age of 25 and 11% are aged 65 or over (ONS 2011)
- Older Londoners (aged 65 or over) are more likely to be women (London Travel Demand Survey 2016/17)
- The GLA projected that, in 2019, over a fifth of London's population were under 16 (1.9 million). Over two-thirds, or 6.2 million, were working age (aged between 16 and 64), and less than one in eight were 65 or over (1.1 million). Despite being the smallest age group in London's population, the number of Londoners aged 65 or over is projected to increase by 86 per cent between 2019 and 2050, faster than younger age groups (GLA City Intelligence Unit 2018). London has a higher proportion of working age population than the national average.
- It is unusual for young children to die in fires. In the three years before the Grenfell Tower fire, there were no deaths of people aged 0 to 15. Most of the people who die in fires are usually over 65. In the three years before the Grenfell Tower fire, 56 per cent of those that died were age 65 or over. This is disproportionately high when compared to the age demographic of London where around only 12 per cent of Londoners are aged 65 and over (Fire Facts Fatal Fires in Greater London. LFB, 2020)
- 17 of the 67 (a quarter of) children living in Grenfell Tower died in the fire that killed 72 people in total (Disability Rights UK 2021)
- Nearly half of the fires in other residential buildings occurred in accommodation providing care for elderly people. However, there are very few fire deaths in other

residential buildings, averaging at one each year, but roughly half of all injuries (in other residential buildings) took place in properties that were used to provide care for the elderly. (Fire Facts Fires in Greater London. LFB, 2020)

Disability

- Between 2015 and 2017, 16% of working age Londoners aged 16 to 64 were disabled (ONS 2017). This is slightly less than the national average for Great Britain of 20%, reflecting London's younger population.
- There are 1.3 million disabled adults in London, defined according to the Equality Act 2010 as having a physical or mental impairment that has a 'substantial' and 'long-term' negative effect on their ability to do normal daily activities (ONS 2019).
- 14% of Londoners consider themselves to have a disability that effects their day-to-day activities 'a lot' or 'a little' (ONS 2011).
- Disability is closely related to age: 13% of the working age population are disabled versus 28% of people aged 65 or over (ONS 2019).
- 56% of disabled Londoners are women, compared with 50% of non-disabled Londoners
- Disabled people are also more likely to be on a low income (61% of disabled people are also on low income). 34% per cent of disabled Londoners have a household income of less than £10,000 compared with 10% of non-disabled Londoners (London Travel Demand Survey 2016/17)
- 55% of disabled Londoners state that their disability affects their mobility, 22% have a serious long-term illness and 10% have a mental health condition.
- According to GP records, approximately 2% of London's population, or approximately 175,000 people, have a learning disability (Public Health England in GLA 2019).
- In England, households with someone who had a long-term illness or disability were more likely to live in low-rise flats in blocks of three storeys or less (15%), and less likely to live in flats in a block of either four to five (3%) or six to nine storeys (less than 1%), compared with other households (14%, 4% and 1% respectively). There was, however, no difference in the likelihood of living in a house or high-rise flats in blocks of 10 or more storeys between either type of household (English Housing Survey 2017-18 MHCLG 2019)
- Households with a wheelchair user were generally no more or less likely to live in low or high-rise flats, than households with no wheelchair user (English Housing Survey 2017-18 MHCLG 2019)
- Fifteen of the 37 (41%) of Disabled residents living in Grenfell Tower died in the fire that killed 72 people in total (Disability Rights UK 2021)
- 11% of hate crime against disabled people consisted of criminal damage or arson

Gender reassignment

- In London in 2019, 291 hate crimes were recorded against transgender people. (MET police dashboard)
- Between 2018 and 2021, in England and Wales, on average 4% of hate crimes were recorded as criminal damage or arson against transgender people (Hate Crime England and Wales. Home office 2018, 2019, 2020, 2021)

Marriage or Civil Partnership

No evidence was found which is relevant to fire safety guidance

Pregnancy and maternity

- 49.4 per cent of lone parent households were socially rented (2011 Census release 3.2a Housing Key Facts GLA 2013)
- 63.9 per cent of all social rented properties were flats in purpose-built blocks. 14.5 per cent were terraced houses and 9.8 per cent were flats in converted houses (Housing characteristics GLA 2013)
- There were some variations between couples and lone parents with dependent children. Couples with dependent children were among the least likely household type to live in flats (10%), while around a quarter of lone parents with dependent children (26%) resided in flats. Lone parents were notably more likely to live in both low-rise (23%) and high-rise flats (3%) than couples with dependent children (9% and 1% respectively) (English Housing Survey 2017-18 MHCLG 2019)

Race

- Black, Asian and minority ethnic Londoners make up 40% of London's population (ONS 2011). Black, Asian and minority ethnic Londoners are more likely to be younger and on lower incomes. For instance, 44% of people on low incomes in London are also BAME (London Travel Demand Survey 2016/17)
- Black, Asian and minority ethnic Londoners are more likely to live in households with an average annual income below £20,000 (33% BAME compared with 25% white).
- Race remains the most commonly recorded motivation for hate crime at 82% of recorded motivations (Home Office, 2015a)
- On average, 66 per cent of those that died in fires in London were white, 34 per cent were from other minority ethnic groups, the largest per centage being Black - Caribbean. This compares with the London ethnic demographic which is around 59 per cent white and 41 per cent other ethnic origin, (Fire Facts. Fatal Fires in Greater London LFB 2020)
- 85% of the residents of Grenfell Tower who died on the night were from minority ethnic groups: 32 were from the Middle East or North Africa, nine were from East Africa, five were from West Africa, five were of Bangladeshi heritage, three were Caribbean, one was from the Philippines, one was Colombian and one was of an unknown BAME heritage. Seven people were white British or Irish (Inside Housing 2021)
- In England, in general, households with a Black, Asian or minority ethnic household reference person (HRP) were more likely to live in a high-rise flat, e.g. 3% of households with an Asian HRP and 7% with a Black HRP lived in a high-rise flat compared with 1% of households with a white HRP (English Housing Survey 2017-18 MHCLG 2019)
- In London, in 2011, the ethnicities with the highest percentage of households in socially rented accommodation are Black Other (52.0 per cent), Mixed White & Black Caribbean (50.0 per cent) and Bangladeshi (48.5 per cent) (2011 Census release 3.2a Housing Key Facts GLA 2013)
- In London, in 2011 Black Londoners headed 12.7 per cent of all London households but 25.2 per cent of socially rented households (Housing characteristics GLA 2013)
- In 2011, in London 74.3 per cent of social rented households and 72.1 per cent of private rented households were in flats (Housing characteristics GLA 2013)

- In London 63.9 per cent of all social rented properties were flats in purpose-built blocks and 9.8 per cent were flats in converted houses (Housing characteristics GLA 2013)

Religion or belief

- The 2011 Census shows that the representation of religion and beliefs of Londoners has changed over the past 10 years. There has been a decline in the proportion of Londoners considering themselves to be Christian (58% to 48%). There has also been an increase in the proportion who do not identify with any religion (16% to 21%)
- Religion varies considerably between ethnic groups, while 28% of white and 27% of mixed Londoners report they have no religion, only 7% of Black and 8% of Asian Londoners report this (Census 2011)
- More than half of Black (68%) and white (57%) Londoners report that they are Christian. Asian Londoners and Londoners who have selected 'other' to describe their ethnic group are most likely to be Muslims (36% of Asian Londoners and 50% of Londoners selecting 'other' ethnic group are Muslims) (Census 2011)
- In England there were similar numbers of Muslim households in the three main types of housing tenure: socially rented (36.8 per cent), occupied (30.2 per cent) and privately rented (33.0 per cent) (English Housing Survey 2017-18 MHCLG 2019)

Sex

- Of lone parents, 90% are women and suffer disproportionately from poverty (Census 2011)
- Women in London are more likely to be older (Census 2011)
- In London there was a significant difference between the rate of men and women who were economically active (74 per cent of men were economically active compared to 61% of women). Women were more likely to work part-time than men with 35 per cent of women working part-time compared to 18 per cent of men. Women with dependent children in the family were less likely to work than those without dependent children however men with dependent children were more likely to work. (Differences in Employment by Gender in London. 2015 GLA Intelligence)
- The gender gap (i.e. the difference between the economic activity rate of men and women) was largest amongst those born in the Middle East and Asia. Muslim women were the least likely to be economically active (41 per cent active) and had the largest gender gap, with women reporting an economic activity rate 28 per cent lower than men. (Differences in Employment by Gender in London. 2015 GLA Intelligence)
- On average, in London 58 per cent of people that died in a fire were male and 42 per cent female. When compared to the 50/50 London gender demographic, this suggests that men are more likely to be victims of fatal fires than women. (Fire Facts Fatal Fires in Greater London. LFB, 2020)

Sexual orientation

- Statistics on the size of the LGB population vary considerably and there is no single widely accepted measure. The 2017 GP Patient Survey found that 5.4% of Londoners identified as Lesbian, Gay, Bisexual or 'Other' compared to the national rate of 3.3%. Figures from the 2017 Annual Population Survey provide lower estimates for London and England (3.2% and 2.6% respectively).
- In London in 2019, there were 3028 recorded homophobic hate crimes. (MET police dashboard)
- Between 2018 and 2021, in England and Wales, on average 6% of hate crimes were recorded as being criminal damage or arson against sexual orientation (Hate Crime England and Wales. Home office 2018, 2019, 2020, 2021)

Gaps in Evidence

Please detail any areas identified as requiring further data or detailed analysis.

Appendix B: Engagement summary

Summary of protected groups engaged

List the protected groups that have been engaged through the informal engagement - Please refer to the engagement table 2 below.

If groups are identified in the assessment who have not been previously engaged, briefly set out how they will be targeted through the formal engagement (i.e either a specific focus group meeting or invitation to community webinar event) and timeframes.

Already engaged:
Claddag - Leaseholder Disability Action Group

Future engagement:
Grenfell United, Grenfell Next of Kin, Justice for Grenfell, London Leaseholders Cladding Action Group, Claddag - Leaseholder Disability Action Group

Engagement record

Engagement undertaken which is relevant to the EqIA for example with specific community groups, or protected characteristic groupings, or to fill identified evidence gaps.

Event details	Specific groups represented	Key findings
Discussions with fire safety experts		Understanding of Building Regulations, requirement for fire fighters' lift Understanding of standards available to guide the incorporation and design of evacuation lifts

Event details	Specific groups represented	Key findings
Presentation to Grenfell Response Steering Group	Grenfell survivor groups	Need to ensure cladding is not combustible on all buildings
PEEPs consultation	Claddag - Leaseholder Disability Action Group	Understanding of potential needs to avoid discrimination, considerations of data protection