

# London Gypsy and Traveller Accommodation Needs Assessment Equality Impact Assessment (November 2025)

## 1. Introduction

- 1.1. The Public Sector Equality Duty (PSED) set out at section 149 of the Equality Act 2010 requires the GLA, 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
  2. advance equality of opportunity between people who share a protected characteristic and those who do not
  3. foster good relations between people who share a protected characteristic and those who do not.
- 1.2. Having due regard to the need to **advance equality of opportunity** between persons who share a relevant protected characteristic and persons who do not share it involves 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.
- 1.3. Having due regard to the need to **foster good relations** between persons who share a relevant protected characteristic and persons who do not share it involves having due regard in particular, to the need to:
  - (a) tackle prejudice
  - (b) promote understanding.
- 1.4. This Equality Impact Assessment (EqIA) was undertaken in relation to the London-wide Gypsy and Traveller Accommodation Needs Assessment (GTANA). It sought to ensure that the project was being conducted in line with the PSED to which the GLA is subject. This included identifying any potential negative impacts on those with protected characteristics, so that these could be mitigated. As such, an EqIA was prepared at the outset of the project, but has

been regularly reviewed as the project progressed, as part of an iterative process that both informs and is informed by the GTANA.

## 2. Project outline and key issues

- 2.1. London Plan 2021 Policy H14 on Gypsy and Traveller Accommodation states that boroughs should plan to meet the identified need for permanent Gypsy and Traveller pitches and must include 10-year pitch targets in their Development Plan Documents. Accordingly, the Mayor will initiate and lead a London-wide GTANA; and will work to support boroughs in finding ways to make provision for Gypsy and Traveller accommodation.
- 2.2. In response, the aim of the London GTANA 2025 is to determine the current and future accommodation needs of English/Romany Gypsies, Irish Travellers, Travelling Showpeople, New Travellers and Eastern European Roma, in terms of sites, yards, transit provision, and bricks and mortar homes across London between 2022-23 and 2031-32. (The term 'Gypsy, Roma, Traveller, and Travelling Showpeople' (GRTTS) is used in this document as an umbrella term to cover these groups.) The work involved new fieldwork, and used relevant existing sources of data.
- 2.3. The findings of the 2025 GTANA will provide boroughs with up-to-date information on accommodation need. This will help them frame commitments in their Local Plans to meet the accommodation needs of the GRTTS communities. This is in relation to both London Plan Policy H14, and statutory obligations on local authorities as per section 124 of the Housing and Planning Act 2016. The findings will also inform work towards a future London Plan.
- 2.4. The GTANA was overseen by a Steering Group, which included representatives from GRTTS communities. They were recompensed for their participation (which involved, for example, giving feedback on draft material and attending meetings). Fieldwork was carried out primarily by interviewers from GRTTS backgrounds.
- 2.5. Extensive previous research, such as that undertaken by the Equality and Human Rights Commission (EHRC) (2009,<sup>1</sup> 2019<sup>2</sup>), has highlighted the multiple inequalities experienced by Gypsies and Travellers. Importantly, Gypsies and Travellers are a racial group as defined in section 9 of the Equality Act 2010. Their shared culture of travelling and other aspects of GRTTS culture might also be considered beliefs (section 10). They are therefore protected from direct discrimination (section 13), indirect discrimination (section 15) and harassment (section 26) by the Act.
- 2.6. Members of GRTTS communities will have multiple identities, including those with other protected characteristics – such as women; those who identify as LGBTQI+; and older or disabled people. The GTANA was specified and carried

---

<sup>1</sup> EHRC, [Inequalities experienced by Gypsy and Traveller Communities: A review](#), 2009

<sup>2</sup> EHRC, [Gypsy and Traveller sites: the revised planning definition's impact on assessing accommodation needs](#), September 2019

out in ways that acknowledge these multiple identities. Please see the section below regarding 'equality impacts, mitigating actions and justification' regarding how the GTANA acknowledged the needs of those with specific characteristics.

- 2.7. Also, the GTANA needed to overcome barriers – such as GRTTS communities' distrust of statutory bodies; scepticism that the GTANA will lead to new accommodation; and cultural issues, e.g., GRTTS communities may be less likely to access information online than the overall population, and some members may have limited literacy. In relation to digital exclusion, research has shown that among the Gypsy and Irish Traveller community, one in five have never used the internet.<sup>3</sup> This compares to around a tenth of the British population who have not used the internet.<sup>4</sup> The research also found that only 38 per cent of Gypsies and Travellers have a household internet connection, compared to 86 per cent of the general population.<sup>5</sup>
- 2.8. A lack of suitable accommodation – for reasons including overcrowding, pitches in poor condition, and low availability – means that around 85 per cent of GRTTS households in London have been forced to live in housing or on roadside encampments.<sup>6</sup> The lack of access to secure accommodation and suitable living environments has far-reaching implications for their physical and mental health, welfare, education, employment and access to wider opportunities. For those on unauthorised encampments, accommodation is insecure, and facilities are lacking. The lack of suitable, secure accommodation underpins and compounds many of the inequalities that Gypsy and Traveller communities experience.

### 3. Public Sector Equality Duty aims and impacts

- 3.1. It is evident from the research cited above (EHRC 2009, 2019) that members of GRTTS communities have experienced discrimination, harassment and victimisation from statutory authorities. This made it particularly important to ensure that the PSED aims (see paragraph 1.1) were met in conducting the GTANA.
- 3.2. It was incumbent on this project to engage with GRTTS communities in ways that recognise and respect their ethnic identity, beliefs, needs and traditions.
- 3.3. The GTANA is enabling, in that it determines accommodation needs. As such, it will not necessarily lead to increased provision. This means that it is difficult to predict the GTANA's impacts.
- 3.4. However, the GTANA will enable local authorities to accurately plan to meet their obligations to provide accommodation under the terms of London Plan

---

<sup>3</sup> Friends, Families and Travellers, [Digital Exclusion in Gypsy and Traveller communities in the United Kingdom](#), 2018

<sup>4</sup> Equalities and Human Rights Commission, [Is Britain Fairer?](#), p.174, 2018

<sup>5</sup> Friends, Families and Travellers, [Digital Exclusion in Gypsy and Traveller communities in the United Kingdom](#), 2018

<sup>6</sup> London Gypsies and Travellers, cited in: GLA, [Gypsy and Traveller Accommodation Topic Paper](#), 2017

Policy H14 and section 124 of the Housing and Planning Act 2016. As noted by the Planning Inspectorate in the Report of the Examination in Public of the London Plan 2019, the GTANA should 'provide greater clarity and so advance opportunities for further site provision'.<sup>7</sup> This will increase the likelihood of GRTTS communities accessing decent accommodation. Meeting their accommodation needs will lead to less overcrowding and fewer unauthorised encampments.

- 3.5. By identifying the accommodation needs of GRTTS, the GTANA supports public bodies in fulfilling their obligations under the PSED. It helps local authorities eliminate discrimination; promote equality of opportunity; and foster good relations between different community groups. In this way, it helps to align policy decisions with statutory equality requirements.
- 3.6. The Mayor's support for delivering GRTTS accommodation via other interventions – notably by providing funding via the Affordable Homes Programme – will help London boroughs meet these obligations.<sup>8</sup>
- 3.7. Importantly, the London GTANA provides figures based on both the national Planning Policy for Traveller Sites (PPTS) definition<sup>9</sup> of Gypsy and Traveller households, and the definition used by the [draft London Plan \(and Minor Suggested Changes\)](#), 2018 (referred to hereafter as the draft London Plan 2018). The GTANA initially set out to assess the needs of households that meet the draft London Plan 'cultural' definition, proposed prior to the London Plan 2021 and the PPTS definition separately. Following the publication of PPTS 2024 containing which contains a revised definition, this is no longer necessary. This is because there is considered to be no difference, for practical purposes, between the two definitions. The inclusion of "all other persons with a cultural tradition of nomadism or of living in a caravan" within the revised PPTS definition (absent from previous iterations) represents an inclusive approach that aligns broadly with the definition in the draft London Plan, proposed by the Mayor before the London Plan 2021 was adopted. The GTANA also assesses the accommodation needs of the Roma community; these were last assessed, at borough level, in the 2008 London GTANA.

---

<sup>7</sup> The Planning Inspectorate, [Report of the Examination in Public of the London Plan 2019](#), October 2019

<sup>8</sup> GLA, [Homes for Londoners: Affordable Homes Programme 2021-2026](#)

<sup>9</sup> MHCLG, [Planning policy for Traveller sites](#), 12 December 2024

## 4. Assessment

The table below shows aspects of the project that might affect those with protected characteristics, and particular groups that have been identified.

**Table 1: Summary assessment of GTANA**

<b>Key aspects</b>	<b>Particular groups that could be affected</b>
Fieldwork	Positive: older people; children; people with disabilities or health needs; people undergoing gender reassignment; people with childcare commitments or other caring responsibilities; ethnic minorities; people with cultural or religious beliefs; people who identify as LGBTQI+; and people on low incomes.
Findings	As above.
Policy recommendations	Not applicable

### Detailed equality impacts, mitigating actions and justification (where applicable)

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

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

Impacts are scored as follows:

- strong positive
- positive
- neutral
- negative
- strong negative
- mixed (both positive and negative impacts identified) or uncertain.

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

The Gypsy and Irish Traveller population in London has a significantly younger age profile compared to the city's average, with 30 per cent aged 15 or under, compared to 19 per cent across London. In contrast, only 12 per cent of the Roma population are in this age group. Older people are underrepresented in both groups, at just 6 per cent of Gypsies and Travellers and only 2 per cent of Roma aged 65 or over, compared to 12 per cent citywide.

## Potential positive impacts and scores

According to the 2021 Census, 28 per cent of all Household Reference Persons (HRPs) in London had dependent children. By comparison, 42 per cent of Gypsy and Traveller HRPs, and 23 per cent of Roma HRPs, had dependent children. This contrasts with the findings from the GTANA survey, where 79 per cent of Gypsies and Travellers on sites; 86 per cent of Travelling Showpeople; 43 per cent of Gypsies and Travellers living in bricks and mortar homes; and 50 per cent of Roma respondents reported having dependent children. A higher proportion of families with dependent children can highlight the demand for larger or family-oriented accommodation. Local authorities may be prompted to prioritise family-friendly housing solutions, ensuring that the specific needs of these households (such as space for children and proximity to schools and services) are addressed (positive).

Children and young people residing on roadside encampments are potentially more likely to receive stable homes to ensure that they can attend school, enjoy a decent standard of living and reach their potential (positive). However, as stated above, the GTANA will not necessarily lead to additional accommodation provision.

Older people may be more likely to be provided with suitable accommodation, which will help mitigate health issues (positive).

## Potential neutral impacts and scores

Different age groups may engage with the GTANA in different ways: e.g., younger people are more likely to access information about the GTANA using online methods, whilst older people may prefer more traditional methods such as leaflets or 'word of mouth'.

## Potential negative impacts, mitigations or objective justification and scores

For those living in bricks and mortar (for whom surveys were online), the GTANA may have failed to engage members of the GRTTS communities from older age groups, to determine their accommodation needs. This is because these groups are less likely to complete surveys online. Over 65s accounted for 12 per cent of Gypsy and Traveller and 20 per cent of Roma respondents to the 2021 Census. By comparison 3 per cent of London GTANA Gypsy and Traveller survey respondents living in bricks and mortar homes, and 2 per cent of Roma respondents were in this age group. This suggests that the GTANA surveys may indeed have failed to engage older people. This effect may have been compounded because older people, particularly those with health needs, are more likely to live in bricks and mortar homes (negative).

Although people may access the internet via their phones, the GTANA online surveys were not designed to be accessed in this way. Therefore, people needed access to a computer to complete the online surveys. This may have been a barrier for those who are less likely to be online (including, generally, older people, people with disabilities and people on low incomes) (negative).

Households with children may live in bricks and mortar homes to make it easier for children to attend school. They may therefore have been harder to reach with fieldwork (negative).

Although surveys for members of the GRTTS communities living in bricks and mortar homes were online, they were also conducted by members of community groups both face-to-face and by telephone. This was to maximise survey response rates with all households/age groups. 'Drop-in' sessions where members of GRTTS communities received help completing surveys were also undertaken (positive).

GRTTS community groups – including London Gypsies and Travellers (LGT), the London Traveller League, Southwark Travellers' Action Group, Roma Support Group (RSG), and Roma Organisation for Training and Advice (ROTA) – were committed to promoting the GTANA and encouraging responses to the online surveys. RRR Consultancy (RRR) agreed a range of promotional activities to be undertaken by the GRTTS community groups (some of which RRR paid community groups for undertaking) (neutral).

This included providing information about the GTANA using different media including written (such as a leaflet) and online information about the GTANA surveys (see: LGT, [Have your needs heard!](#), 19 October 2022); social media, including posts on [LGT's Facebook page](#); and 'drop-in' sessions where members of GRTTS communities received help completing surveys. LGT produced a video explaining the aims and objectives of the GTANA and encouraged participation (positive).

The London GTANA survey determined the accommodation needs of all household members and not just the survey respondent (irrespective of age). By focusing on the entire household, the survey included the perspectives and needs of older individuals within those households, even if they were not the primary respondent. This method provides a broad and inclusive view of accommodation needs, as it considers the dynamics and requirements of all members of the household, including older adults (positive).

### Relevant PSED aim(s)

- 2b

### People with disabilities

Gypsy and Traveller households are more likely to contain members who are defined as 'disabled' under the Equality Act 2010. According to 2021 Census data, 27 per cent of all London households contain someone who is defined as disabled. The proportion of Gypsy and Traveller HRPs containing someone with a disability is higher at 43 per cent. This is consistent with 43 per cent of Gypsy and Traveller GTANA survey respondents living in bricks and mortar homes; and slightly higher than the 40 per cent living on sites who stated that the household contains an adult or child with a disability. The rate in relation to Roma HRPs in London is much lower

at 6 per cent. This compares with 22 per cent of Roma GTANA survey respondents who stated that the household contains a disabled adult or child.<sup>10</sup>

### **Potential positive impacts and scores**

The GTANA will provide local authorities and others with an understanding of GRTTS' accommodation needs. This in turn should inform future plans, and make it more likely that provision will be made to meet needs (positive).

The GTANA household surveys identified the need for adaptations and other types of support, as well as discussing health needs. The relevant borough was informed if a Gypsy and Traveller household residing on a pitch required an adaptation (the addresses of Gypsies and Travellers and the Roma community living in bricks and mortar homes were not known). This increases the likelihood of those needs being met (positive).

### **Potential neutral impacts and scores**

Contact details (telephone number and email address) of RRR were included on the online and face-to-face surveys, and GTANA information sheet. This meant potential respondents could alert RRR if they had any accessibility requirements (neutral).<sup>11</sup>

### **Potential negative impacts, mitigations or objective justification and scores**

The GTANA may have failed to capture the accommodation needs of members of the GRTTS communities with disabilities for two reasons. First, for those residing in bricks and mortar homes, surveys were online – this yielded a lower response rate compared to surveys undertaken on sites. Second, and potentially compounding the first, those with disabilities may have been less likely to have internet access. This meant that they may have been less likely to respond to the online surveys (negative).

People with learning or mental health disabilities may require support to engage with the GTANA and complete the survey. This may have meant that people with learning or mental health disabilities were under-represented by the survey results, if they were not supported to complete surveys. This was a particular risk for those living in bricks and mortar homes, for whom surveys were online (negative).

According to the 2021 Census, over a quarter (27 per cent) of respondents stated that someone in the household experiences a disability or a long-term illness. By comparison, among respondents to the GTANA survey, 40 per cent of Gypsy and Traveller households living on sites, 43 per cent of Gypsy and Traveller households

---

<sup>10</sup> Please note that the 2021 Census disability figures may not be directly comparable to the London GTANA figures.

<sup>11</sup> The information sheet given to prospective interviewees included information about the project, such as its aims and objectives, the likely length of interviews, how confidentiality and data would be maintained, and RRR's contact details.

living in bricks and mortar accommodation, and 22 per cent of Roma households contain someone with a disability.

Whilst people with disabilities are less likely to have digital access, outreach work and 'drop-in' sessions undertaken by the community groups helped respondents to complete online surveys for households in bricks and mortar and increase response rates amongst this cohort (positive).

No survey respondents contacted RRR regarding accessibility requirements. However, site interviewers helped respondents to complete surveys. Similarly, community groups helped survey respondents to complete the online surveys for Roma and Gypsies, and Travellers living in bricks and mortar homes (positive).

The informational video about the GTANA produced by LGT included closed captions for D/deaf people, and those who are hard of hearing (although it did not include British Sign Language) (positive).

### **Relevant PSED aim(s)**

- 2b

### **Gender reassignment**

Whilst a total of 41,981 people (0.46 per cent) in London stated that their gender identity was different from their sex registered at birth, there is no specific data available regarding the number of people within London's GRTTS communities who have undergone gender reassignment.<sup>12</sup>

Among respondents to the GTANA survey, six Gypsies and Travellers living in bricks and mortar accommodation, and one Roma person, identified their gender identity as 'nonbinary' or 'other'.

### **Potential positive impacts and scores**

The GTANA household surveys captured the gender identity and thus the accommodation needs of members of the GRTTS communities undergoing gender reassignment (positive).

### **Potential neutral impacts and scores**

None identified.

---

<sup>12</sup> House of Commons Library, [2021 census: What do we know about the LGBT+ population?](#), January 2023

## Potential negative impacts, mitigations or objective justification and scores

People undergoing gender reassignment may experience discrimination both within and outside GRTTS communities. Because of this, their accommodation needs may be less likely to be recognised (negative).

The GTANA may have failed to engage with members of the GRTTS communities undergoing gender reassignment, and may misgender survey respondents. This is, in part, because they are less visible within GRTTS communities. This could mean their gender identity was not reported (accurately) by household members in fieldwork (negative).

No respondents to the household surveys stated that they, or any member of their household, were undergoing gender reassignment. This could reflect survey respondents being unwilling to acknowledge that a member of the household was undergoing gender reassignment.

As well as 'male' and 'female' categories, the household surveys acknowledged 'non-binary' and 'other' gender categories (positive).

As part of their training, survey interviewers were advised as to how best to refer to people undergoing gender reassignment – e.g., use of appropriate pronouns (positive).

## Relevant PSED aim(s)

- 1.

## Marriage and civil partnership

According to the 2021 Census, 23 per cent of Gypsy and Traveller households and 38 per cent of Roma households consisted of or included couples (with or without children) who were cohabiting or married, compared to 39 per cent of all London households.<sup>13</sup>

The household surveys determined the accommodation needs of those who are likely to form households through marriage and civil partnership over the first five-year period – i.e., 2022-23 to 2026-27. It also projects population growth for 2027-28 to 2031-32 in relation to each GRTTS community – partly based on marriage and civil partnership rates from 2022-23 to 2026-27.

## Potential positive impacts and scores

The accommodation needs of members of GRTTS communities planning to marry or form a civil partnership will be recognised. As a result, local authorities will be able to plan to meet their needs (positive).

---

<sup>13</sup> This figure should be treated with caution, because 38 per cent of Gypsy and Traveller households did not answer the Census questions on household composition.

### **Potential neutral impacts and scores**

None identified.

### **Potential negative impacts, mitigations or objective justification and scores**

None identified.

### **Relevant PSED aim(s)**

- 1.

### **Pregnancy and maternity**

According to the 2021 Census, 63 per cent of Gypsy and Traveller households and 37 per cent of Roma households residing in London contained dependent children, compared with 49 per cent of all London households.

### **Potential positive impacts and scores**

Pregnant people/those with maternity needs are more likely to be provided with suitable accommodation (positive).

### **Potential neutral impacts and scores**

None identified.

### **Potential negative impacts, mitigations or objective justification and scores**

People with childcare responsibilities (for babies) may not have been available at certain times of the day, which could have had implications for capturing their needs in fieldwork (negative).

Survey interviews took place at different times of the day to ensure that the accommodation needs of members of GRTTS communities with childcare responsibilities were determined (positive).

The usual hours for undertaking surveys were 9am to 6pm, Monday to Saturday. However, 'out of hours' interviews were undertaken at the request of the survey respondents (positive).

Up to two repeat visits (three visits in total) were undertaken with households who had yet to complete the face-to-face survey (positive).

### **Relevant PSED aim(s)**

- 2b

## **Race or ethnicity (consider refugees, asylum seekers, migrants, Gypsies and Travellers)**

The 2021 Census recorded 45,097 people in London as 'White: Gypsy or Irish Traveller' or 'Roma'. Travelling Showpeople were recognised under the ethnic category 'White: Showman/Showwoman'. However, there is no data available for this ethnic group (possibly due to the risk of being able to identify households given the small Travelling Showpeople population). Also, the Equality Act 2010 does not specifically recognise Travelling Showpeople as a protected group.

### **Potential positive impacts and scores**

The GTANA will enable local authorities to accurately plan to meet their obligations to provide accommodation as London Plan Policy H14, national planning policy and section 124 of the Housing and Planning Act 2016 require. This will increase the likelihood of GRT communities accessing decent, culturally appropriate accommodation. Meeting these groups' accommodation needs will lead to less overcrowding and fewer unauthorised encampments (positive).

Survey responses from GRTTS households and stakeholders show both a need for, and support of, transit and permanent pitches across London (positive). The GTANA assesses (i.e., quantifies) the need for pitches, yards, and bricks and mortar accommodation by borough, sub-region and London-wide; and transit provision London-wide (positive). The GTANA findings should help inform plans for future provision of transit sites and negotiated stopping places, which are prerequisites in supporting and facilitating a traditional, nomadic way of life (positive).

The accommodation needs of the Roma community have not always been assessed by previous GTANAs. By robustly identifying the needs of those with a racial/ethnic element to their GRTTS identify, including Roma, and Gypsy and Traveller households living on sites and in bricks and mortar, the GTANA will enable local authorities and others to be able to plan to meet their accommodation needs (strong positive).

The GTANA determined the accommodation needs of Roma households in all London boroughs, even in boroughs where new fieldwork was not taking place on sites (positive).

The GTANA suggests that boroughs consider implementing a 'negotiated stopping' policy as a balanced and humane approach to managing roadside camps (positive).

### **Potential neutral impacts and scores**

None identified.

### **Potential negative impacts, mitigations or objective justification and scores**

It is possible that some households may be less likely to respond to survey interviewers from a different ethnic background (negative).

Members of the GRTTS communities who reside in bricks and mortar may be less likely to be surveyed. This is particularly true for the Roma community, as they predominantly reside in bricks-and-mortar accommodation. This would mean that their needs may be less fully captured (negative).

Members of the Roma community may be less likely to complete the survey (and thus to have their accommodation needs captured), because they are less likely to have English as a first language (negative). Also, as previous GTANAs (except the 2008 London GTANA) did not assess their accommodation needs, members of the Roma community may be less familiar with GTANAs and less likely to respond to them (negative).

Fieldwork was carried out primarily by interviewers from GRTTS backgrounds (positive).

In response to lower survey-response rates from Roma in the initial phases of fieldwork (compared to the online survey for Gypsies and Travellers living in bricks and mortar), the RSG and (later) ROTA were commissioned to promote the Roma survey and increase response rates (positive).

The RSG and ROTA actively promoted the GTANA amongst members of the Roma community. They undertook outreach work and drop-in sessions, which helped members of the GRTTS communities to complete the surveys (positive).

Staff from the RSG and ROTA acted as interpreters to help members of the Roma community that lacked proficiency in English, or had literacy issues, to complete the surveys. Interviews with survey respondents were undertaken over the telephone to help maximise response rates (positive).

The Roma survey was translated by the RSG into the main languages spoken by the Roma community in London including Bulgarian, Polish, Romanian, and Slovakian (positive).

The survey interviewer training covered how they could sensitively deal with potential survey respondents being reluctant to respond to an interviewer of a different ethnicity. For example, they could arrange for an interviewer of the same ethnic identity as the household to undertake the interview. In relation to all three surveys – i.e., the face-to-face site and yard survey, and the Roma and bricks and mortar online surveys – there were no instances where the survey respondent requested an interviewer of the same ethnic identity. This is mainly because the interviewer was already of the same ethnic identity as the survey respondent; or because the interview was being undertaken by an experienced interviewer who was able to overcome such sensitivities (positive).

### **Relevant PSED aim(s)**

- 2b
- 3a
- 3b

## Religion or belief

According to the 2021 Census, 69 per cent of Gypsies and Travellers, and 68 per cent of Roma people, residing in London identify as Christians. Many Irish Travellers are practising Catholics, whilst some Gypsies and Travellers are part of a Christian Evangelical movement.<sup>14</sup>

### Potential positive impacts and scores

Robustly identifying the needs of GRTTS communities, including those with religious beliefs, may mean they are more likely to have accommodation that meets their needs; and, as such, are better able to live according to their cultural traditions (positive).

### Potential neutral impacts and scores

The fieldwork plan and interview scheduling considered the impact of religious holidays. Interviews were not scheduled to take place during religious holidays (neutral).

### Potential negative impacts, mitigations or objective justification and scores

Religion or beliefs may mean that members of the GRTTS communities were less likely to be available to be surveyed during holidays marking religious festivals, such as Christmas or Ramadan.

The survey interviewer training covered how to respond to issues around cultural beliefs and religion. This includes being briefed on the cultural norms of GRTTS communities and avoiding language that people with specific cultural or religious beliefs may find offensive (positive).

Church leaders were co-opted to help encourage members of the GRTTS communities to complete the household surveys. This included undertaking drop-in sessions at local churches (positive).

### Relevant PSED aim(s)

- 1.

## Sex

There are some differences in terms of the sex of individuals recorded by the 2021 Census by ethnic group. In relation to all persons residing in London, 51 per cent of persons recorded by the 2021 Census were female, compared to 49 per cent male. This is similar to the Gypsy and Traveller population, where 52 per cent of individuals were recorded as female, compared to 48 per cent male. However, 56 per cent of

---

<sup>14</sup> The Traveller Movement, [Romani \(Gypsy\), Roma and Irish Traveller History and Culture](#)

Roma persons recorded by the 2021 Census were male, compared to 44 per cent female.

Traditional gender roles are typically more pronounced in GRTTS communities.

### **Potential positive impacts and scores**

Survey interviews took place at different times of day to ensure that the accommodation needs of members of the GRTTS communities who may not be present and/or available on sites during the day/at certain times are determined. This approach accounted for individuals who might be absent from sites during typical working hours due to employment or other commitments. By adopting this flexible methodology, the study aimed to capture a more comprehensive understanding of the accommodation needs of all community members, ensuring that voices from a wide range of circumstances were represented (positive).

More than one person frequently contributed to the site surveys, meaning that responses from both sexes were more likely to be captured (positive).

### **Potential neutral impacts and scores**

The usual hours for undertaking surveys were 9am to 6pm, Monday to Saturday. However, 'out of hours' interviews were undertaken at the request of the survey respondents (neutral).

Up to two repeat visits (three visits in total) were undertaken with households who had yet to complete the face-to-face survey (neutral).

### **Potential negative impacts, mitigations or objective justification and scores**

It is possible that either men or women may have been under-represented among respondents because women's childcare and other caring responsibilities, and men's work commitments, may mean they were not available to complete surveys when interviewers visited sites.

According to the 2021 Census, 58 per cent of Gypsy and Traveller respondents identified as female and 42 per cent as male. In comparison, 75 per cent of Gypsy and Traveller GTANA online survey respondents identified as female and 21 per cent as male. (4 per cent identified as non-binary, preferred not to say, or responded 'other'.)

According to the 2021 Census, 34 per cent of Roma survey respondents identified as female and 66 per cent as male. In comparison, 40 per cent of Roma GTANA survey respondents identified as female and 51 per cent as male (9 per cent did not state their gender). This could reflect cultural traits, as many Roma communities are traditionally patriarchal, with men often taking on the role of head of the household. This can lead to men being more likely to handle interactions with external organisations, including survey participation.

Due to a lack of evidence regarding household incomes, the GTANA did not determine accommodation needs based on affordability. This most likely impacts

GRTTS households with lower incomes, including lone-parent families (which are more likely to be headed by women) (negative).<sup>15</sup> The household surveys did, however, ask questions about the type of accommodation respondents would prefer in future, including tenure, which provides some indication of affordability (positive).

Promoting RRR's telephone number helped increase interview response rates, as respondents could liaise with RRR to arrange a convenient time for interviews to take place. RRR's telephone number was included in the letter to sites, on the online survey and in email communications (positive).

The RSG and ROTA carried out telephone interviews, to support people to respond to the online surveys for Roma, and for Gypsies and Travellers living in bricks and mortar. They offered to do this at times that suited people with caring responsibilities and people in paid work, ensuring that they were able to complete the surveys (positive).

### **Relevant PSED aim(s)**

- 1.

### **Sexual orientation**

According to 2021 Census data one per cent of Gypsy and Traveller, and Roma households consisted of same-sex cohabiting couples.

Given the sensitivity of the topic (and that information on sexual orientation was not required to determine accommodation need), none of the surveys included questions regarding sexual orientation. This means that surveys elicited no data regarding the sexual orientation of members of the GRTTS communities.

### **Potential positive impacts and scores**

The GTANA will provide local authorities and others with an understanding of GRTTS' accommodation needs. This in turn should inform future plans and make it more likely that provision will be made to meet needs, including for those who identify as LGBTQI (positive).

### **Potential neutral impacts and scores**

None identified.

### **Potential negative impacts, mitigations or objective justification and scores**

Similar to people undergoing gender reassignment, it is likely that LGBTQI+ members of the GRTTS communities may be less 'visible' compared to other

---

<sup>15</sup> The majority of lone-parent households in the UK are headed by women. According to the latest data from the Office for National Statistics (ONS) in 2023, approximately 86 per cent of the 453,939 lone-parent families in London are headed by women, while about 14 per cent are headed by men. This significant gender disparity highlights the prevalence of female-headed lone parent households in the UK (ONS, 'Families and households in the UK 2023' May 2024).

members. They may experience discrimination both within and outside GRTTS communities. This means that individuals who identify as LGBTQI+ may be under-represented by results from the surveys. Consequently, the ways in which LGBTQI+ members of the GRTTS communities may want or need to form households may be misrepresented by 'heads of household' who do not recognise or accept their sexual orientation (negative).

The consultants liaised with representatives of the GRTTS LGBTQI+ organisations, such as Traveller Pride (see: [Traveller Pride](#)), to help determine how members of the GRTTS community who identify as LGBTQI+ can best be engaged (positive).

This included survey interviewers not making assumptions regarding the sexuality or family structure of interviewees, and being aware that LGBTQI+ members of the GRTTS communities were more likely to be 'hidden' in order to avoid discrimination. This issue was covered by the training undertaken by the survey interviewers (positive).

This meant that the fieldwork was conducted in a way that was non-judgemental and sensitive to the needs of individuals who identify as LGBTQI+, but who may not feel able to identify as such, or may not be recognised as such by their families (positive).

### Relevant PSED aim(s)

- 1.

### People on low incomes

The GTANA survey did not ask about household income directly,<sup>16</sup> but it identified the accommodation needs of households with different income levels. These needs are likely to be influenced by affordability issues. For instance, a household might live in overcrowded conditions because they cannot afford a larger home. However, the GTANA did not distinguish between needs arising from affordability and other factors.

Another factor determined by low incomes is homelessness. Homelessness among the GRTTS communities in London is a pressing and complex issue. GRTTS individuals face disproportionately high rates of homelessness, exacerbated by barriers unique to their communities. DLUHC statutory homelessness statistics record that 210 households, where the ethnicity of the main applicant was given as Gypsy or Irish Traveller, were owed a homelessness prevention or relief duty by London local authorities in 2022-23.<sup>17</sup> In Westminster, it is estimated that Roma individuals make up approximately 20-25 per cent of the rough sleeping population, highlighting severe housing challenges faced by this community in the capital.<sup>18</sup>

---

<sup>16</sup> This is because response rates to surveys among GRTTS communities tend to be lower if the surveys ask about income.

<sup>17</sup> DLUHC, [Statutory homelessness: detailed local authority-level tables: April 2023 to March 2024, England](#), October 2024

<sup>18</sup> World Habitat, [Evaluating new approaches to Roma rough sleeping in Westminster](#), June 2023

## Potential positive impacts and scores

The household surveys asked questions regarding the type of accommodation respondents would prefer in future, including tenure, which provides some indication of affordability (positive).

The GTANA assesses the current and future accommodation needs of GRTTS communities, including those who are homeless or living on roadside encampments. By providing a detailed understanding of the scale and nature of accommodation needs within these communities, it equips local authorities and others to better plan for and address these needs, potentially reducing instances of homelessness.

## Potential neutral impacts and scores

None identified.

## Potential negative impacts, mitigations or objective justification and scores

Evidence suggests that households on low incomes may be less likely to have internet access. Research (2024) indicates that only 51 per cent of households earning between £6,000 and £10,000 had home internet access, compared with 99 per cent of households with an income of over £40,001.<sup>19</sup> As such, lower-income households may have been less likely to complete the online surveys (negative).

It may be that not determining accommodation needs based on affordability will most impact GRTTS households likely to have lower incomes. These include, for example, lone-parent families; families with a disabled member; and households living in the social and private rented sectors (negative).<sup>20</sup>

Promotional work undertaken by community groups, including leaflets and 'word of mouth', was used to increase awareness of the online surveys for those with limited digital access, among whom households with low incomes may be over-represented. 'Drop-in' sessions were also held to help these respondents complete surveys (positive).

## Relevant PSED aim(s)

- 2b

---

<sup>19</sup> University of Cambridge, [Pay the wi-fi or feed the children: Coronavirus has intensified the UK's digital divide](#)

<sup>20</sup> ONS, 'Poverty in the UK: Statistics', May 2024

## Overview of equality impacts

This table summarises the scoring of the impacts for each group identified in the previous section.

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

The GTANA's primary positive impact is its ability to provide local authorities with a comprehensive understanding of the accommodation needs of GRTTS. This detailed assessment equips decision-makers with the evidence needed to plan for and seek to address the accommodation needs of these communities, advancing equality of opportunity.

## 5. Amendments to the project

No further changes made due to overall positive impacts.

Set out below are changes made to the project as a result of earlier iterations of this EqIA, and why they have been made.

Community groups advised on how best to engage with members of the GRTTS communities who identify as LGBTQI+. This included survey interviewers not making assumptions regarding sexual orientation (although the surveys did not ask questions about sexual orientation) or family structure of interviewees, and being aware that LGBTQI+ members of the GRTTS community are more likely to be 'hidden' in order to avoid discrimination. This informed the survey interviewer training.

This was intended to maximise survey responses from individuals who identify as LGBTQI+, in order to robustly determine their accommodation needs.

There was insufficient local authority data and evidence to quantify the need for transit pitches, as had initially been intended as part of the GTANA project brief. This was discussed with the GTANA Steering Group, who considered that in the absence of quantitative evidence, new transit provision may be less likely to be forthcoming, and needs would remain unmet. Following this, RRR agreed to explore alternative methods to quantify transit need. Drawing on analyses of DLUHC/MHCLG Caravan Count and GTANA survey data, the GTANA sets out the need for transit pitches in London.

The accommodation needs of GRTTS households residing in bricks and mortar homes (who are disproportionately likely to include older and/or disabled people, and households with children as well as Roma) were determined using an online survey. Households residing in bricks and mortar homes in all London boroughs were surveyed, including in boroughs where new site fieldwork did not take place. This was to ensure that the accommodation needs of households residing in bricks and mortar were determined (not all previously undertaken GTANAs considered the accommodation needs of this cohort).

Promotional work by GRTTS community groups – including leaflets and 'word of mouth' on sites – was used to increase awareness of the online surveys for those with limited digital access. 'Drop-in' sessions helped respondents (particularly those less likely to be online) complete surveys and maximise response rates to the online surveys. Whilst disabled people and older people were less likely to have digital access, outreach work and 'drop-in' sessions by the community groups to help respondents complete surveys helped increase response rates amongst this cohort.

The Roma survey was translated by the RSG into the main languages spoken by the Roma community in London – including Bulgarian, Polish, Romanian and Slovakian. The interviews took place over the telephone, to help increase response rates. Additional resources were applied to maximise the response rates.

The RSG (and, in the latter stages of the fieldwork, ROTA) were commissioned to promote the GTANA, and encourage responses to the online surveys. RRR agreed a range of promotional activities to be undertaken by the GRTTS community groups (the groups were paid for some of these activities).

**Reason for change:** to ensure fieldwork covers Roma communities, who have often not been covered by borough-level GTANAs; and to increase response rates to the Roma survey, after it became apparent that response rates were lower in the early stages of fieldwork.

It was part of the GLA's original specification that the London GTANA should reflect accommodation needs arising from Gypsy and Traveller households residing in bricks and mortar homes with a need to live on pitches.

One factor initially used to determine accommodation needs arising from Gypsy and Traveller households living in bricks and mortar homes was 'psychological aversion'. Whilst not a medical condition, the term 'psychological aversion' is accepted as part of accommodation assessments in encapsulating a range of factors that demonstrate an aversion to residing in bricks and mortar homes.

However, the Steering Group and some boroughs questioned the use of psychological aversion as a factor in calculating need. Their concerns were as follows:

- It is difficult to reliably identify whether a household is experiencing psychological aversion to living in bricks and mortar homes.
- The concept of psychological aversion is problematic, because it medicalises and stigmatises a well-established cultural tradition of living in caravans.
- Respondents to the survey of households living in bricks and mortar homes were not aware that their responses to the questions would be used to ascribe psychological aversion.

After careful consideration, RRR, the GLA and the London GTANA Steering Group agreed that it would be more appropriate to determine accommodation needs deriving from a 'cultural preference' to live on pitches, rather than a 'psychological aversion' to living in bricks and mortar housing. One reason is that it avoids the stigma associated with 'psychological aversion'.

It can be considered that the cultural preference to reside on a pitch, taken together with a need to move home, gives rise to a need for culturally appropriate accommodation that enables Gypsies and Travellers to continue to live according to their traditional way of life.

Given the above, the GTANA methodology was reviewed. The assessment remains based on need using household survey responses. Cultural preference is determined using responses to different questions in the household survey from those used to determine need arising from 'psychological aversion'. Households were identified as having a cultural preference for living on a pitch, if they gave the responses specified below to all of the following questions:

A6. Why do you live in a house/flat rather than a caravan? (response categories: 'due to a lack of sites', 'no choice' or both) (82 per cent). This question is important as it determines the proportion of households who prefer to reside on a site but are unable to do so.

E6. 'Do you need to move to a different home within the next 5 years?' (response category: 'yes') (32 per cent). This question is central to determining households' need to move within the first five-year period covered by the GTANA.

E8. What type of accommodation would you most prefer to move to? (response categories: 'Council/social rented site', 'Private site owned by self', or 'Private rented site' (24 per cent). Responses to this question are central to determining the proportion of households who would prefer to live on a site.

The assessment estimated that 19 per cent of Gypsy and Traveller households residing in bricks and mortar homes display a cultural preference for residing on pitches on a London-wide basis.

**Reason for change:** to ensure that the GTANA uses an appropriate method to determine the accommodation needs of Gypsies and Travellers living in bricks and mortar homes.

## 6. Recommendation

Based on your assessment, please indicate which course of action you are recommending.

Outcome number	Description	Mark with an X (more than one box can apply)
Outcome one	No major change to the project is required  This EqIA has not identified any potential for discrimination or negative impact, and all opportunities to advance equality have been taken.	X
Outcome two	<b>Adjustments to the project are required</b> to remove barriers identified by the EqIA or better advance equality.	n/a
Outcome three	<b>Justify and continue with the project</b> despite having identified some potential for negative impacts or missed opportunities to advance equality.	n/a
Outcome four	<b>Stop, rethink or abandon</b> when the EqIA shows actual or potential unlawful discrimination	n/a

## 7. Supporting evidence

Research has explored digital exclusion among the Gypsy and Irish Traveller community, one in five of whom have never used the internet. The research also found that only 38 per cent of Gypsies and Travellers had a household internet connection, compared to 86 per cent of the general population (Friends, Families and Travellers, [Digital Exclusion in Gypsy and Traveller communities in the United Kingdom](#), 2018).

## Age

The Gypsy and Irish Traveller ethnic group has a younger age profile than the London average. According to the 2021 Census, people aged 15 or under made up just under a third (30 per cent) of London's Gypsy or Irish Traveller population. This is higher than the London average (19 per cent). In comparison, only 12 per cent of the Roma population are aged 15 or under.

Only 6 per cent of Gypsy and Traveller people are aged 65 or over, compared to the London average of 12 per cent. The proportion of Roma people aged 65 or over is lower still, at only 2 per cent. This may reflect the fact that almost two-thirds (65 per cent) of the Roma population were aged 16 to 34 when they first arrived in the UK.

Research undertaken by the EHRC (2018) shows that older people (including members of the GRTTS community) are more likely to be digitally excluded (meaning they are less likely to undertake the online surveys). Among those aged over 75 in Britain, 41 per cent were recent internet users in 2017, compared with 99 per cent of those aged 16 to 34. Although this age gap is narrowing – showing a steady increase from 38.7 per cent of over-75s in 2016 and 33 per cent in 2015 – older people still accessed the internet least of all age groups in 2017.<sup>21</sup>

## Disability and health

According to the 2021 Census, 27 per cent of all London households are deprived in the health and disability dimension. This compares with 56 per cent of Gypsy and Traveller households; and 12 per cent of Roma households. Similarly, 2021 Census HRPs living in London who identified as Gypsies or Irish Travellers were more than three times as likely to report bad or very bad health (24.1 per cent) compared with all London HRPs (6.5 per cent) (ONS 2023). The ONS suggests that, as health is related to age, younger people are more likely to report better health. Those who identified as Gypsy or Irish Traveller had a younger age profile than the England and Wales population. Therefore, poorer health of this group cannot be explained by age.

In terms of the Roma HRPs living in London, 90.9 per cent reported “Good” or “Very good” health compared with 78.9 per cent of London 2021 Census HRPs. This is likely because of the younger age profile of those who identified as Roma.

Gypsy and Traveller households are more likely to contain members who are defined as ‘disabled’ under the Equality Act 2010. According to 2021 Census data, 27 per cent of all London households contain someone with a disability, 43 per cent of Gypsy and Traveller HRPs, and 6 per cent of Roma HRPs are disabled. This compares with the London GTANA survey, which found that 40 per cent of Gypsy and Traveller households living on sites, 43 per cent of Gypsy and Traveller households living in bricks and mortar accommodation, and 22 per cent of Roma households contain someone with a disability.<sup>22</sup>

---

<sup>21</sup> Equalities and Human Rights Commission, [Is Britain Fairer?](#), p.174, 2018

<sup>22</sup> Please note that the 2021 Census disability figures are not directly comparable to the London GTANA figures, where the Census data is based on the characteristics of the HRP. The GTANA figures represent the proportion of households containing at least one person with a disability.

Compared with the general population, Gypsies and Travellers are also more likely to suffer bad health. The 2021 Census asked respondents to determine their health in terms of 'very good or good', 'fair' and 'bad or very bad'. Only 7 per cent of all London households described their health as 'bad or very bad' compared to 24 per cent of Gypsy and Traveller households. In contrast, only 3 per cent of Roma households described their health as 'bad or very bad'.

ONS research indicates that in 2017, 56 per cent of internet non-users aged 16 or over were disabled (44 per cent were not disabled). For internet non-users aged between 16 and 24, in 2017 60 per cent were disabled (40 per cent were not disabled).<sup>23</sup> Disabled people are less likely to be online and, therefore, may be less able to take part in the online surveys.

## **Gender reassignment**

According to the 2021 Census, a total of 41,981 people (0.46 per cent) in London stated that their gender identity was different from their sex registered at birth. Applying 0.46 per cent to the 2021 GRTTS population in London means that there could be 59 Gypsies and Travellers and 37 members of the Roma community in London who have undergone gender reassignment. However, there is no specific data available regarding the number of London's GRTTS members who have undergone gender reassignment.

## **Marriage or civil partnership**

According to the 2021 Census, 39 per cent of all London households consisted of couples (with or without children) who were cohabiting or married, compared to 23 per cent of Gypsy and Traveller households and 38 per cent of Roma households. A slightly higher proportion of Gypsy and Traveller households consisted of people who were married but separated (6 per cent) compared with all London households (2 per cent) and the Roma community (1 per cent).

In terms of family composition, according to the 2021 Census, Gypsy and Traveller households are more likely to consist of lone parents (33 per cent), compared with the Roma community (6 per cent) and all London households (13 per cent).

## **Pregnancy and maternity**

It is important to note that this data doesn't relate directly to pregnancy and maternity, but is the best available to give an indication of the likely relative incidence of pregnancy and maternity in GRT communities. In London, 28 per cent of all HRPs recorded by the 2021 Census had dependent children, compared with 42 per cent of Gypsy and Traveller HRPs and 23 per cent of Roma HRPs. This suggests a higher likelihood of pregnancy and maternity in Gypsy and Traveller households compared to other groups, and a lower rate among Roma households.

---

<sup>23</sup> See ONS, [Exploring the UK's digital divide](#), March 2019

## Race

The 2021 Census recorded five different ethnic groups in London relating to the GRTTS communities:<sup>24</sup>

Ethnicity	Persons (no.)	%
White: Roma	37,690	83.6%
White: Gypsy or Irish Traveller	6,892	15.3%
Other ethnic group: Gypsy/Romany	248	0.5%
White: Other Traveller	141	0.3%
Other ethnic group: Roma	126	0.3%
<b>Total</b>	<b>45,097</b>	<b>100%</b>

Research (2023) shows that of any ethnic minority group, Gypsies and Travellers were most likely (61.9 per cent) to state that they had experienced racist assault.<sup>25</sup>

## Religion or belief

According to the 2021 Census, 69 per cent of Gypsies and Travellers, and 68 per cent of Roma people (compared with 41 per cent of all people), residing in London identify as Christians. The second most common response was 'no religion,' reported by 20 per cent of Gypsies and Travellers, and by Roma people, living in London. Only 2 per cent of Gypsies and Travellers, and Roma people identify as Muslims, whilst 1 per cent of Gypsies and Travellers, and Roma people identify with an 'other' religion.

## Sex

There are some differences in terms of the sex of individuals recorded by the 2021 Census respondents by ethnic group. In relation to all persons residing in London, 51 per cent of persons recorded by the 2021 Census were female, compared to 49 per cent male. This is similar to the Gypsy and Traveller community population – of which 52 per cent were recorded as female compared to 48 per cent male. However, in relation to the Roma community, 56 per cent of persons recorded by the 2021 Census were male, compared to 44 per cent female.

Group	Female	Male
Gypsy and Traveller	52%	48%
Roma	44%	56%
All households	51%	49%

The Roma gender imbalance could be attributed to several factors, including a younger population and fewer children within the Roma community. Younger populations often

---

<sup>24</sup> [Nomis](#), 2022

<sup>25</sup> See Nissa Finney, James Nazroo, Laia Bécaries, Dharmi Kapadia and Natalie Shlomo (eds), (2023), *Racism and Ethnic Inequality in a Time of Crisis – Findings from the Evidence for Equality National Survey* p.58.

exhibit skewed gender ratios due to factors such as migration patterns, where men might migrate more frequently for work, resulting in a higher proportion of males in the community. Additionally, cultural and socio-economic factors could influence the lower number of children in Roma households, contributing to the observed demographic trends.

## Sexual orientation

According to 2021 Census data, only 1 per cent of Gypsy and Traveller, and Roma, households consisted of same-sex cohabiting couples.

Research undertaken by the University of Sussex (2021) identified a lack of visibility of LGBTQI+ Traveller identity, in both Traveller and British society. This has led to a negative impact upon intersectional identity, predominantly causing an inability to authentically participate in either community. It suggests that Traveller members of the LGBTQI+ community taking part in the research by Sussex University (nine of 50 participants) predominantly chose to hide their Traveller identities for the benefit of avoiding discrimination from within the wider LGBTQI+ community. Unfortunately, the paper doesn't state whether the interviewees resided on sites or in bricks and mortar housing.

## People on low incomes

Both Gypsy and Traveller, and Roma households, are more likely to experience deprivation compared with all London households. According to 2021 Census data, 85 per cent of Gypsy and Traveller in London, and 57 per cent of Roma households, experience some form of deprivation compared with 52 per cent of all London households.

Gypsy and Traveller households are also more likely than other ethnic groups in London to experience economic inactivity. According to 2021 Census data, 59 per cent of Gypsy and Traveller households are economically inactive. This compares with 27 per cent of all London households and only 9 per cent of Roma households. The low economic activity of Gypsy and Traveller households is likely to impact on their ability to afford accommodation.

Evidence suggests that households on low incomes may be less likely to have internet access. Research indicates that only 51 per cent of households earning between £6,000 and £10,000 had home internet access, compared with 99 per cent of households with an income of over £40,001.<sup>26</sup>

## Gaps in evidence

There is a lack of evidence regarding members of the GRTTS community who identify as LGBTQI+ or undergoing gender reassignment residing on sites. This makes it harder to identify potential impacts and identify appropriate mitigations or justifications.

---

<sup>26</sup> University of Cambridge, [Pay the wi-fi or feed the children: Coronavirus has intensified the UK's digital divide](#)

## 8. Engagement summary

### Summary of protected groups engaged

Protected groups that have engaged through the informal engagement are set out below. Please also refer to the engagement table 2 below.

#### Already engaged

At an early stage in the GTANA process, members of the GRTTS communities were involved in the specification of the GTANA and procurement of a supplier. Once the project was initiated, they were co-opted onto the Steering Group. Representative GRTTS organisations such as LGT, the RSG and ROTA were actively involved in:

- drafting surveys
- promoting the GTANA
- undertaking interviews with GRTTS households
- advising on aspects of methodology (such as whether the GTANA should adopt 'cultural preference' as a means to determine the accommodation needs of households living in bricks and mortar accommodation)
- participating in Steering Group meetings
- commenting on the draft GTANA report.

Once complete, they will play an important role in disseminating the GTANA findings.

#### Engagement record

The table below shows engagement that is relevant to the EqIA – for example with specific community groups or protected characteristic groupings, or to fill identified evidence gaps.

<b>Event details</b>	<b>Specific groups represented</b>	<b>Key findings</b>
Project specification and procuring a supplier	GRTTS communities	Members of the GRTTS communities were involved in developing the project specification and procuring a supplier.
Steering Group meetings	GRTTS communities	Members of the GRTTS communities were very much involved in advising throughout the GTANA process.
Development of household surveys	GRTTS communities	Members of the GRTTS communities were involved in helping to determine the household survey questions. Also, they assisted in the process of recruiting community interviewers.

<b>Event details</b>	<b>Specific groups represented</b>	<b>Key findings</b>
Engagement with the LGBTQI+ community	GRTTS communities and LGBTQI+ community	The consultants liaised with representatives of the GRTTS LGBTQI+ organisations, such as Traveller Pride, to help determine how best members of the GRTTS community who identify as LGBTQI+ can be engaged.
Undertaking household surveys	GRTTS communities	Members of the GRTTS communities were recruited and trained to undertake household surveys. LGT and the RSG helped to promote the survey interviewer positions using social media.
Promoting the GTANA and encouraging take-up of surveys	GRTTS communities	Members of the GRTTS communities played an important role in promoting awareness of the GTANA amongst community members. Awareness and take-up of the online surveys was promoted using a range of methods – including the RSG members promoting it at local church events, and drop-in sessions organised with a borough and community groups. This was particularly useful in encouraging Christian members of the GRTTS communities (who represent a large proportion of the GRTTS communities) to complete the online surveys.
GRTTS invited to take part in/respond to household survey	GRTTS communities	Gypsies and Travellers living on sites: 480 responses (96 per cent)  Travelling Showpeople: 80 responses (94 per cent)  Gypsies and Travellers in bricks and mortar accommodation: 500 responses (24 per cent)  Roma households: 729 responses (10 per cent)