

B. EQUALITY IMPACT ASSESSMENT

1. Describe and explain the impact of the proposal on people with protected characteristics as described in the Equality Act 2010.

The Bill will introduce a new building safety regime covering the occupation and ongoing management of multi-occupied residential buildings in Wales.

The Equality Act 2010 protects people against discrimination based on protected characteristics. People are protected from discrimination in the workplace, when they use businesses and other organisations that provide services and when they have contact with public bodies.

By improving regulation, the Bill is intended to improve safety for people in or about the building including residents and visitors. The greatest impact will be for residents of buildings in scope of the proposed new regime. The reforms are intended to improve the safety of all residents, and therefore residents with any protected characteristics. The greatest benefit will be experienced by those most at risk from building safety incidents. However, there will be costs for residents and those least able to pay will feel the greatest impact of those. Further information on costs can be found in the Regulatory Impact Assessment. There will also be impacts for duty holders under the regime.

To support the implementation of our reforms, the Welsh Government has consulted on a white paper¹ and engaged a wide range of stakeholders including leaseholders and tenants, groups representing people with particular protected characteristics, housing associations, local authorities, fire and rescue authorities and the housing industry.

The Welsh Government also commissioned research including:

- unpublished research with minority ethnic leaseholders and disabled leaseholders²;
- research among residents of all types and from all tenure groups, living in buildings defined as in scope of the new building safety regime³; and,
- an evidence review on human influences in dwelling fires, specifically in multi-occupied buildings⁴.

¹ [Safer buildings in Wales | GOV.WALES](#)

² Although this work was small scale (12 participants), the findings are also reflected in the conclusions of the residents research work, conducted by IFF

³ [Fire safety in multi-occupied buildings: residents research](#)

⁴ [Influences on Resident's Fire Safety Behaviours: An Evidence Review](#)

The results of this research, data on households in Wales and findings from stakeholder consultation are discussed below.

Census 2021 data presented in Table 1 shows that of the 1,347,100 households in Wales, 168,400 (13%) lived in flats, maisonettes or apartments.

Table 1: Households in Wales by dwelling type, 2021 [Note 1]

	A caravan or other mobile or temporary structure	Flat, maisonette or apartment	Whole house or bungalow: Detached	Whole house or bungalow: Semi- detached	Whole house or bungalow: Terraced	All dwellings
All households	4,400	168,400	384,400	431,900	358,000	1,347,100

Source: Census 2021 [Create a custom dataset - Office for National Statistics](#)

[Note 1] Figures rounded to the nearest 100.

Census 2021 data presented in Table 2 shows that far fewer households live in Houses of Multiple Occupation⁵ (HMOs), 7100 (0.5%). Table 2 also shows that the majority (65%) of HMOs are terraced.

Table 2: HMOs by size and accommodation type, 2021

	Small HMOs		Large HMOs		All HMOs	
	Number	%	Number	%	Number	%
Detached	285	6%	100	4%	385	5%
Semi-detached	496	11%	292	11%	788	11%
Terraced (including end-terrace)	2,702	61%	1,956	72%	4,658	65%
Part of a converted or shared house (including bedsits)	473	11%	240	9%	713	10%
In a purpose-built block of flats or tenement	307	7%	75	3%	382	5%
Part of another converted building (e.g. former school, church or warehouse)	24	1%	13	0%	37	1%
In a commercial building (e.g. in an office)	128	3%	26	1%	154	2%

⁵ A dwelling where unrelated tenants rent their home from a private landlord is an HMO, if both of the following apply: (i) at least three unrelated individuals live there, forming more than one household and (ii) toilet, bathroom or kitchen facilities are shared with other tenants. A small HMO is shared by 3 or 4 unrelated tenants. A large HMO is shared by 5 or more unrelated tenants. This definition of an HMO which is used for the Census differs to the Housing Act definition used for Welsh Government HMO official statistics.

building, hotel or over a shop)						
Total	4,415	100%	2,702	100%	7,117	100%

Source: Census 2021 analysis

The household composition of respondents to the residents' survey, presented in Table 3., are a good proxy for the household composition of adult residents of multi-occupied residential buildings more generally. The data indicates that a large proportion of residents live alone and relatively few households include children.

Table 3: Household composition of multi-occupied residential buildings, 2024

Household composition	% of respondents
Living with partner/spouse	31
Living with child(ren) younger than 16	9
Living with child(ren) older than 16	2
Living with other family member(s)	2
Living with friend(s) / flatmate(s)	4
I live on my own	55

Base: 1,562

Source: [Fire safety in multi-occupied buildings: residents research](#), 2024

Age

The Census 2021 includes data about household composition for different types of housing. Table 4. shows that:

- The proportion of households with children living in flats, maisonettes or apartments is less than half that in all dwellings. 18,500 households (11%) living in flats, maisonettes or apartments have children compared to 321,500 households (24%) with children in all dwellings.
- Households with children and 2 or more adults are less prevalent in flats, maisonettes or apartments (5%) than in all dwellings (18%). However, the same is not true of single parent households which are as prevalent in flats, maisonettes or apartments (6%) as in all dwellings (6%).
- Households with 2 adults and 3 or more children are uncommon in all dwellings (2%) but particularly in flats, maisonettes or apartments. Only 3% of all households of this type lived in flats, maisonettes or apartments.
- About a quarter of households are made up of people aged 66 or over in both flats, maisonettes or apartments (24%) and all dwellings (25%).
- The proportion of households where the only resident is aged 66 or over is higher in flats, maisonettes or apartments (20%) than in all dwellings (15%).

- Almost half (45%) of all households in flats, maisonettes or apartments are single people aged 65 or under compared to 17% of similar households in all dwellings.
- When we consider one or two adult households age 65 or under the percentages rise to 61% in flats, maisonettes or apartments and 35% in all dwellings.

Table 4: Households in Wales by numbers of adults and children living in the household and dwelling type, 2021 [Note 1]

	Flat, maisonette or apartment	All dwellings
No adults, or one adult and one or more children	9,800	74,400
One-person household: One adult aged 66 years or over	33,700	196,100
One-person household: One person aged 65 years or under	76,100	233,500
Three or more adults: No children	4,800	161,400
Three or more adults: One or more children	1,000	61,500
Two adults: Both adults aged 65 years or under: No children	25,800	231,700
Two adults: Both adults aged 66 years or over: No children	6,000	138,800
Two adults: One adult aged 65 years or under and one adult aged 66 years or over: No children	3,600	64,200
Two adults: One or two children	6,900	158,200
Two adults: Three or more children	800	27,400
All households	168,400	1,347,100

Source: Census 2021 [Create a custom dataset – Office for National Statistics](#)

[Note 1] Figures rounded to the nearest 100.

The 2017-18 Welsh Housing Condition Survey also includes data about household composition for houses/bungalows and flats. As with the Census 2021 data, Table 5. shows that the most common household types living in flats are single adults, single pensioners, and adult couples without children.

Table 5. Household type by dwelling type, 2017-18

Household type	House or bungalow (%)	Flat (%)
Pensioner couple - a couple where one or more of the adults are of State Pension age or over	17	-
Single pensioner - single adult of State Pension age or over	17	27
Couple with children - a non-pensioner couple with dependent children	15	-
Couple without children - a non-pensioner couple with no dependent children	11	7
Single adult with children - a non-pensioner single adult with dependent children	7	-
Single adult without children - a non-pensioner single adult with no dependent children	10	37
3 or more adults with children - three or more adults with dependent children	5	-
3 or more adults without children - related – three or more adults with no dependent children, who are related to each other	7	-
3 or more adults without children - not related – three or more adults with no dependent children, who are not related	4	-
Other households	5	-

Source: 2017-18 Welsh Housing Conditions Survey

‘-’ indicates fewer than 30 responses.

[Welsh Housing Conditions Survey: results viewer](#) | [GOV.WALES](#)

The age of respondents to the residents’ survey, presented in Table 6., is a good proxy for the age of adult residents of multi-occupied residential buildings more generally.

Table 6: Age of adults living in of multi-occupied residential buildings, 2024

Age	% of respondents
18-24	11
25-34	25
35-44	15
45-54	12
55-64	14
65-75	12
75+	9

Base: 1,562

Source: Fire safety in multi-occupied buildings: residents research, 2024

[Fire safety in multi-occupied buildings: residents research](#)

Census 2021 data presented in Table 7 shows that a large majority (95%) of HMOs are occupied by three or more adults without children. One person households are rare (3%) and households with children rarer still (1%).

Table 7: HMOs by size and household type, 2021

	Small HMOs		Large HMOs		All HMOs	
	Number	%	Number	%	Number	%
One person household: One adult aged 65 or under	76	2%	145	5%	221	3%
One or more children in household	82	2%	17	1%	99	1%
Three or more adults: No children	4,246	96%	2,516	93%	6,762	95%
Other	11	0%	24	1%	35	0%
Total	4,415	100%	2,702	100%	7,117	100%

Source: Census 2021 analysis

Census 2021 data presented in Table 8 shows that a large majority (81%) of the residents of HMOs are young people (aged 16-24). Children up to the age of 15 are rare (1%) as are people over the age of 60 (1%).

Table 8 HMOs by size and resident age group, 2021

	Small HMOs		Large HMOs		All HMOs	
	Number	%	Number	%	Number	%
0-15	154	1%	35	0%	189	1%
16-20	3,606	23%	5,978	38%	9,584	30%
21-24	8,052	51%	7,877	50%	15,929	51%
25-30	1,859	12%	675	4%	2,534	8%
31-35	742	5%	317	2%	1,059	3%
36-40	380	2%	182	1%	562	2%
41-45	248	2%	129	1%	377	1%
46-50	224	1%	96	1%	320	1%
51-55	200	1%	99	1%	299	1%
56-60	172	1%	76	0%	248	1%
60+	206	1%	142	1%	348	1%
Total	15,843	100%	15,606	100%	31,449	100%

Source: Census 2021 analysis

Older People

Prevalence

Table 4. shows that about a quarter of households are made up of people aged 66 or over in both flats, maisonettes or apartments (24%) and in all dwellings (25%). Similarly, Table 6. also showed that people aged 65 and over made up 21% of respondents to the residents research survey. We may assume, therefore, that the proportion of older households in buildings in scope of the Bill is typical of the proportion of older households in all dwellings.

However, Table 4. also showed that the proportion of households where the only resident is aged 66 or over is higher in flats, maisonettes or apartments (20%) than in all dwellings (15%). Table 5. showed a similar picture of single pensioners making up a greater proportion of the residents of flats (27%) than of houses or bungalows (17%).

Therefore, it seems that although the proportion of older households is similar between flats, maisonettes or apartments and all dwellings, older residents of flats, maisonettes or apartments are more likely to live alone.

The same does not seem to be true of HMOs. We have seen that older people rarely live in HMOs and single person older households are vanishingly rare. However, since HMOs make up a small proportion of all buildings in scope of the

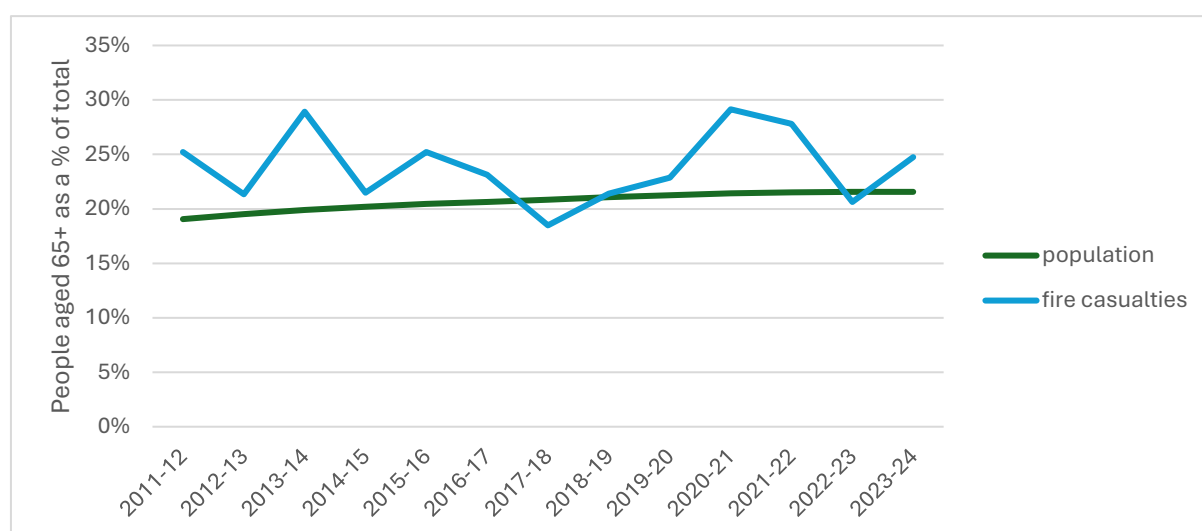
Bill, it remains true overall that older residents of in scope buildings are more likely to live alone.

Risk

Our evidence review⁶ found that older people are one of the groups who are at highest risks of home fires and injury from home fires.

Chart 1. shows that the proportion of fire casualties who are aged 65 and over tends to be higher than the proportion of people aged 65 and over in the population.

Chart 1: Relative prevalence of fire casualties in older people in Wales by year



Source: StatsWales: [Casualties by age and financial year](#) and [National level population estimates by year, age and UK country](#)

Since older people are at greater risk, by improving the safety of multi-occupied residential buildings, the Bill will be disproportionately beneficial to older residents.

Characteristics

As part of the Fire safety in multi-occupied buildings: residents research⁷, the researchers segmented residents based on their attitudes and behaviour towards fire safety and their demographic characteristics. IFF reported that 28% of residents were categorised into the 'Self-reliant' category, with residents aged 55 and over making up 49% of this group. 'Self-reliant' residents tend to have the following characteristics:

⁶ [Influences on Resident's Fire Safety Behaviours: An Evidence Review](#)

⁷ [Fire safety in multi-occupied buildings: residents research](#)

- More likely to be exposed to fire safety information and training
- Less likely to engage in risky fire safety behaviours in the home or in communal areas of their building
- Less likely to be concerned about fire safety in their home or building
- Feel they have a responsibility for fire safety in their home
- More confident in getting household out of the home in the event of a fire
- More likely to raise concerns about fire safety

Cost

Levels of poverty among working-age adults are highest at the start and towards the end of their working life, with around one in four working-age adults aged 60 or over (25%) in poverty compared to the average poverty rate in Wales and the UK of 22%⁸.

The risk of poverty for pensioners is relatively low, with around one in six pensioners (17%) living in poverty⁹. However, some groups are at particular risk¹⁰, as follows:

- 35% of private tenants and 34% of social rented sector tenants, live in poverty compared to 12% of older people who own their home outright.
- 25% of Asian/Asian British pensioners and 26% of Black/Black British pensioners are in poverty compared to 16% of White pensioners.
- 23% of single older women live in poverty compared to 20% of single older men and 13% of pensioner couples.

Therefore, although older people as a whole are not at particularly high risk of poverty, the cost of the new regime may impact some older people more significantly than the whole population. These include:

- Older people who rent their homes, privately or through the social sector.
- Older Black and Asian people.
- Older single women.

Engagement

Stakeholders, including older leaseholders, raised the following matters through various consultation events:

⁸ UK Poverty 2024, the Joseph Rowntree Foundation, [UK Poverty 2024.pdf](#)

⁹ UK Poverty 2024, the Joseph Rowntree Foundation, [UK Poverty 2024.pdf](#)

¹⁰ Age UK Poverty and financial disadvantage in later life, May 2024 [poverty-and-financial-disadvantage-in-later-life-briefing-2024.pdf](#)

- Older people are more likely to be digitally excluded. This needs to be considered when planning communication and engagement strategies
- Telephone calls remain an important means of communication for many older people.
- Safe storage of mobility scooters can be a challenge for older people.
- Older people may experience mental and physical decline as they age which results in their housing being unsuitable for their needs and leaves them vulnerable in emergency situations.
- Some older residents, who may have lived in houses and bungalows for most of their lives, are unwilling to comply with rules intended to maintain building safety. Additional engagement with older people may be needed to achieve compliance. Examples include:
 - removing self-closing door mechanisms
 - propping doors open in warm weather
 - using loft space, which should be kept free, for storage
 - failure to comply with “stay put” policies

By introducing duties on accountable persons to provide information to residents, engage residents and implement complaints processes, the Bill will help older residents to be safer and feel safer. The needs of residents will be considered when developing communications, engagement and complaints processes.

Young People

Prevalence

The age of respondents to the residents’ survey, presented in Table 5., shows that 11% of respondents were aged 18-24 years. This is similar to the percentage of 17-24 year olds in the population (11%)¹¹.

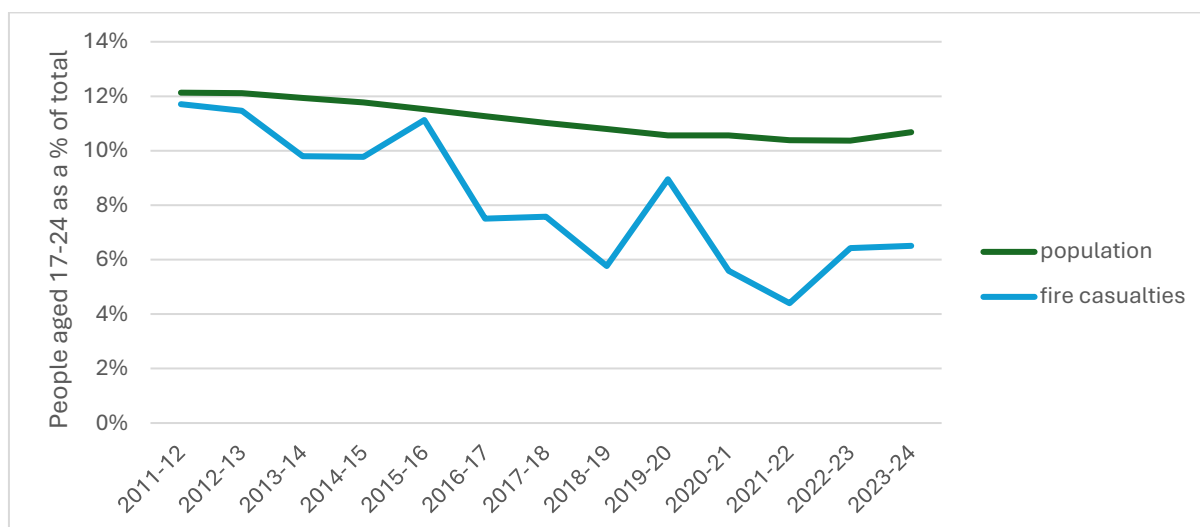
The same is not true of HMOs. Table 8., shows that young people make up a large majority of residents of HMOs.

Risk

Chart 2. shows that the proportion of fire casualties who are aged 17-24 is lower than the proportion of people aged 17-24 in the population. Since young people are not at greater risk, improving the safety of multi-occupied residential buildings will not disproportionately benefit young residents.

¹¹ [National level population estimates by year, age and UK country](#)

Chart 2: Relative prevalence of fire casualties in young people in Wales by year



Source: StatsWales: [Casualties by age and financial year](#) and [National level population estimates by year, age and UK country](#)

Cost

Levels of poverty among working-age adults are highest at the start and towards the end of their working life. Around one in four 16–24 year olds (24%) are in poverty compared to the average poverty rate in Wales and the UK of 22%¹². Therefore, the cost of the new regime may impact a slightly higher proportion of young people than the proportion of the whole population.

Engagement

Stakeholders identified the importance of considering how best to engage and communicate with young residents. For example, a workshop at the Inside Housing Conference 2022 concluded that it was important to tailor engagement with flexible online meetings, events and consultations targeted at young people. Participants at the TPAS Cymru Annual Conference 2021 discussed the importance of tailoring communication methods to young people, for example using WhatsApp and Snapchat.

By introducing duties on accountable persons to provide information to adult residents, engage adult residents and implement complaints processes, the Bill will help young adult residents to be safer and feel safer. Accountable persons will be expected to consider the needs of residents when implementing communications, engagement and complaints processes. However, since people under the age of 18 cannot own or rent property, the duties on accountable

¹² UK Poverty 2024, the Joseph Rowntree Foundation, [UK Poverty 2024.pdf](#)

persons regarding engagement do not extend to residents aged 16 and 17 years old. 16 and 17 year olds would be reliant on parents or guardians to pass on information from accountable persons and so may not benefit.

Children

Prevalence

Table 4. shows that households with children are much less likely to live in flats, maisonettes or apartments than in all dwellings. Households with 3 or more children are particularly uncommon in flats, maisonettes or apartments. However, single parent households are as prevalent in flats, maisonettes or apartments (6%) as in all dwellings (6%).

Table 7. shows that households with children are even less prevalent in HMOs (1%).

Risk

Our evidence review¹³ found that:

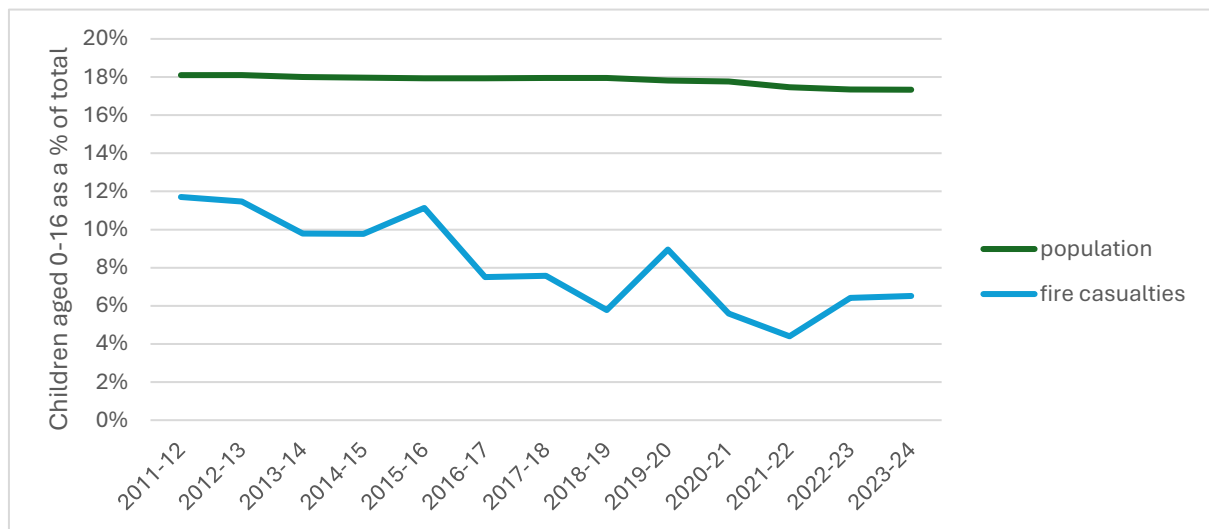
- Young children are often at higher risk of injury in fire as they lack the experience to recognise the risk posed by fire and often face difficulties being woken by smoke alarms.
- Children are less likely to be able to evacuate a fire unaided.
- There is an increased risk that children of smokers will have a greater likelihood of obtaining lighters and matches in the house in an unsafe manner.
- Households with children are more likely to practice a fire-escape plan.

However, suggestions that children are at greater risk are at odds with fire casualty data for Wales. Chart 3. shows that the proportion of fire casualties who are children is much lower than the proportion of children in the population. This suggests that while very young children might be at higher risk, children in general are not disproportionately affected compared to their representation in the population. “Playing with fire” (as it is recorded) is a very rare cause of fire and accounted for only 8 of 1500 dwelling fires in 2023/24, and not necessarily those started by children playing with matches or lighters¹⁴.

¹³ [Influences on Resident’s Fire Safety Behaviours: An Evidence Review](#)

¹⁴ [Fire and rescue incident statistics: April 2023 to March 2024 \[HTML\] | GOV.WALES](#)

Chart 3: Relative prevalence of child fire casualties in Wales by year



Source: StatsWales: [Casualties by age and financial year](#) and [National level population estimates by year, age and UK country](#)

An exception may be children living in single parent households. Those living in single parent households were one of the groups identified by the Home Office as being at greater risk of dying in a fire¹⁵.

Since single parent households are at greater risk, by improving the safety of multi-occupied residential buildings, the Bill will be disproportionately beneficial to single parent households.

Cost

Poverty rates vary for different family types. Households with children tend to have higher poverty rates because there are more people in the household relative to its potential income¹⁶. In the UK, 12% of couples without children live in poverty compared with 23% of couples with children and 42% of single parent households¹⁷. Larger families with three or more children have a higher rate of poverty (43% of children in large families were in poverty in the UK in 2021/22)¹⁸.

¹⁵ Focus on Trends in Fires and Fire-related Fatalities, Home Office 2017 [Focus on trends in fires and fire-related fatalities](#)

¹⁶ Inequalities in poverty, The Health Foundation, July 2024 [Inequalities in poverty | The Health Foundation](#)

¹⁷ Inequalities in poverty, The Health Foundation, July 2024 [Inequalities in poverty | The Health Foundation](#)

¹⁸ UK Poverty 2024, the Joseph Rowntree Foundation, [UK Poverty 2024.pdf](#)

Children living in private or social rented accommodation, those in workless households, and Black and Asian children are all also more likely to be in poverty¹⁹.

Overall, the cost of the new regime is likely to impact some children more significantly than the whole population. These include children who live in:

- Single parent households
- Larger households
- Black or Asian households
- Rented homes

Disability

Prevalence

In Wales, the Census 2021 age-standardised proportion of disabled people was around one in five (21%). This comprised of 11% who responded that their day-to-day activities were “limited a little” by their conditions or illnesses, and 10% that were “limited a lot”.

There was a higher proportion of disabled people within older age groups. Of people aged 50 years and over, 33% reported being disabled, compared to 13% of those under 50 years old (not age standardised).

Older disabled people were also more likely than younger disabled people to report that their day-to-day activities were limited a lot. Of disabled people aged 50 or over, 50% reported that their conditions or illnesses limited their day-to-day activities a lot, compared to 42% of disabled people aged under 50 (not age standardised).

Census 2021 found that around 38% of households included at least one disabled person (not age standardised).

¹⁹ Child poverty: trends and policy options, Institute of Fiscal Studies, Oct 2024, [Child poverty: trends and policy options](#) | Institute for Fiscal Studies

Table 9. shows that a higher percentage of household in flats, maisonettes or apartments include someone who is disabled (44%) than households in all dwellings (38%).

Table 9: Households in Wales by number of disabled persons and dwelling type, 2021

	Flat, maisonette or apartment		All dwellings	
	Number	Percentage	Number	Percentage
1 person disabled under the Equality Act in household	66,237	39%	396,885	29%
2 or more people disabled under the Equality Act in household	7,545	4%	113,721	8%
No people disabled under the Equality Act in household	94,662	56%	836,509	62%
All households	168,444		1,347,115	

Source: 2021 Census

[Create a custom dataset - Office for National Statistics](#)

The disability status of respondents to the residents’ survey, presented in Table 10., is a good proxy for the disability status of adult residents of multi-occupied residential buildings more generally.

Table 10: Disability status of adults living in multi-occupied residential buildings, 2024

Disability status	% of respondents
Disability, long term illness or condition	33
No disability	60

Base: 1,562

Source: [Fire safety in multi-occupied buildings: residents research](#), 2024

Table 11. shows that the percentage of disabled people living in HMOs (22%) is relatively low compared to non-disabled people (77%). This may reflect the high proportion of young residents.

Table 11: HMOs by size and whether resident is disabled under the Equality Act, 2021

	Small HMOs		Large HMOs		All HMOs	
	Number	%	Number	%	Number	%
Disabled, day-to-day activities limited a lot	588	4%	446	3%	1,034	3%
Disabled, day-to-day activities limited a little	1,798	11%	1,532	10%	3,330	11%
Disabled, day-to-day activities not limited	1,228	8%	1,291	8%	2,519	8%
Not disabled	12,013	76%	12,202	78%	24,215	77%
Information not available	216	1%	135	1%	351	1%
Total	15,843	100%	15,606	100%	31,449	100%

Source: Census 2021 analysis

Risk

IFF²⁰ reported that residents in social rented homes were more likely to state that their lack of confidence in their ability to get out of their building safely in the event of a fire was due to a member of their household being disabled or having mobility impairments due to age.

Among disabled residents²¹, 59% said they were not confident to evacuate safely because a member of their household was disabled or a household member had impaired mobility due to old age.

Our evidence review²² found strong evidence on the influence of physical and mental impairments and fire safety. The report highlighted that disabled people are at greater risk of injury from fire and described difficulties faced by disabled people. For example, disabled people may be at increased risk, particularly of injury or fatality in the event of a fire, because they may face difficulties responding to warning signals, alarms or following evacuation procedures. Visual, hearing or speech impairments may mean they do not recognise fire safety cues

²⁰ [Fire safety in multi-occupied buildings: residents research](#)

²¹ [Fire safety in multi-occupied buildings: residents research](#)

²² [Influences on Resident's Fire Safety Behaviours: An Evidence Review](#)

e.g. fire alarm, smoke, communication from others, thereby delaying their attempts to take evasive action.

Since some disabled people are at greater risk, by improving the safety of multi-occupied residential buildings, the Bill will be disproportionately beneficial to those disabled people.

Characteristics

When considering residents' attitudes and behaviours towards fire safety and demographic characteristics, IFF found that the segment with the most statistically significant number of disabled residents, compared with all residents surveyed (38% compared to 33%, respectively), was 'Concerned yet distrusting'²³.

Residents in this segment tended to have the following characteristics:

- More likely to be concerned about fire safety in their home or building
- Less likely to agree they have a responsibility for fire safety in their home
- Less confident in getting household out of the home in the event of a fire
- Less likely to raise fire safety concerns
- Less engaged with information provided about their building
- Less engaged in letters or notices about their building
- More likely to engage in some risky fire safety behaviours in the home

Cost

In 2021/22, the poverty rate for disabled people was 31%, 12 percentage points above the rate for those who were not disabled²⁴. The difference continues to be particularly stark for working-age adults; disabled working-age adults were twice as likely to live in poverty compared with those who were not disabled (36% and 17% respectively).

The poverty rate for disabled people as a whole likely masks significant variation in poverty, partly related to the type of impairment someone has²⁵. Nearly half of all people who were disabled and living in poverty had a long-term, limiting mental impairment²⁶. The poverty rate for this group was 38%, compared with 31% for people with a physical or other impairment.

²³ [Fire safety in multi-occupied buildings: residents research](#)

²⁴ UK Poverty 2024, the Joseph Rowntree Foundation, [UK Poverty 2024.pdf](#)

²⁵ Inequalities in poverty, The Health Foundation, 24 July 2024 [Inequalities in poverty | The Health Foundation](#)

²⁶ UK Poverty 2024, the Joseph Rowntree Foundation, [UK Poverty 2024.pdf](#)

Poverty rates also varied by who was disabled within the family²⁷. Poverty was especially high in families where there were both disabled adults and children (39%).

Overall, the cost of the new regime is likely to impact disabled people more significantly than the whole population. Disabled people are more likely to be negatively impacted if they:

- Live in households with both disabled adults and children.
- Have long-term, limiting mental impairments.

Engagement

While developing the Bill we have engaged groups representing people with a wide range of physical and mental impairments. While broadly supportive of our proposals, these groups stressed the importance of accessible communications that meet the needs of people with a variety of impairments.

Unpublished research with minority ethnic and disabled leaseholders found that:

- Participants tended not to be regularly receiving memorable, informative, or engaging building and fire safety communications.
- There was little to suggest that participants were receiving communications to reassure them about the measures that landlords / managing agents had put in place to protect residents, other than notifications of works to be undertaken and implications for service charges.
- Given the perceived lack of regular communication on building and fire safety with landlords / managing agents, participants did not feel that they were involved in decision-making on building and fire safety. Neither did they recall being regularly encouraged to think about and plan for fire safety.
- This meant that the subject of building and fire safety was not front-of-mind for some leaseholders on a routine basis. Personal circumstances such as dealing with a debilitating disability could also mean that a leaseholder had other priorities in their lives to consider.
- In addition to learning about fire safety equipment, some participants wanted to know more about what to do in the event of a fire in the home and safety tips, how to evacuate safely including if living on a floor above the fire, and what measures had already been taken to protect residents which should be easy to access.

Although this work was small scale (12 participants), these findings are also reflected in the conclusions of the residents research work, conducted by IFF.

By introducing duties on accountable persons to provide information to residents, engage residents and implement complaints processes, the Bill will help disabled

²⁷ UK Poverty 2024, the Joseph Rowntree Foundation, [UK Poverty 2024.pdf](#)

residents to be safer and feel safer. Accountable persons will be expected to consider the needs of residents when implementing communications, engagement and complaints processes.

Gender Reassignment

We do not foresee any differential impacts for trans people.

Pregnancy and Maternity

Prevalence

We have shown above that children are much less likely to live in flats, maisonettes or apartments than in all dwellings. But single parent households are as prevalent in flats, maisonettes or apartments (6%) as in all dwellings (6%).

Cost

We have also shown that the cost of the new regime is likely to impact single parent families more significantly than the whole population.

Most single parent families are headed by women, and women usually bear the bulk of childcare responsibilities even in couples with children²⁸.

Race

Prevalence

Table 12. shows that:

- There is a higher percentage of Black, Asian and minority ethnic households (including households which contain combinations of two or more ethnic groups, which may include White) living in flats, maisonettes or apartments (11%) than in all dwellings (6%).
- 12% of White households, 25% of Asian households and 42% of Black households live in flats, maisonettes or apartments.

²⁸ UK Poverty 2024, the Joseph Rowntree Foundation, [UK Poverty 2024.pdf](#)

Table 12: Households in Wales by ethnic group combination and dwelling type, 2021

	Flat, maisonette or apartment		All dwellings	
	Number	Percentage	Number	Percentage
Asian, Asian British or Asian Welsh ethnic groups only in household	5,459	3%	22,106	2%
Black, Black British, Black Welsh, Caribbean or African ethnic groups only in household	3,147	2%	7,444	1%
Combination of three or more ethnic groups in the household	365	0%	5,690	0%
Combination of two ethnic groups in household	4,764	3%	33,199	2%
Mixed or Multiple ethnic groups only in household	2,360	1%	6,121	0%
Other ethnic groups only in household	2,743	2%	6,488	0%
White ethnic groups only in household	149,606	89%	1,266,068	94%
All households	168,444		1,347,116	

Source: 2021 Census [Create a custom dataset - Office for National Statistics](#)

The ethnicity of respondents to the residents' survey, presented in Table 13., is a good proxy for the ethnicity of adult residents of multi-occupied residential buildings more generally.

Table 13: Ethnicity of adults living in multi-occupied residential buildings, 2024

Ethnicity	% of respondents
White British, Irish, or any other White background	83
Asian or Asian British	6
Mixed or multiple ethnic groups	4
Black, African, Caribbean or Black British	3
Another ethnic group	6

Base: 1,562

Source: [Fire safety in multi-occupied buildings: residents research](#), 2024

Table 14. HMOs by size and resident ethnic group, 2021

	Small HMOs		Large HMOs		All HMOs	
	Number	%	Number	%	Number	%
Asian, Asian British or Asian Welsh	1,539	10%	1,051	7%	2,590	8%
Black, Black British, Black Welsh, Caribbean or African	590	4%	408	3%	998	3%
Mixed or multiple ethnic groups	526	3%	525	3%	1,051	3%
White	12,657	80%	13,273	85%	25,930	82%
Other ethnic group	315	2%	214	1%	529	2%
Missing	216	1%	135	1%	351	1%
Total	15,843	100%	15,606	100%	31,449	100%

Source: Census 2021 analysis

Table 14. shows that there is a higher percentage of Black, Asian and minority ethnic residents (including households which contain combinations of two or more ethnic groups, which may include White) of HMOs (16%) than in the whole population of Wales (5%)²⁹.

²⁹ Stats Wales [Ethnicity by year and ethnic group](#)

Risk

Our evidence review³⁰ found that of the data available specific to the UK there were significant gaps in the evidence relating to individuals from a Black, Asian, and minority ethnic background or an individual's socioeconomic/ sociodemographic status. While there was clear variation in the extent that overcrowding affects Black, Asian and minority ethnic groups, evidence suggested that ethnic minority groups in the UK are disproportionately affected by housing overcrowding, across all housing tenures, and are also disproportionately more likely to be affected by socio-economic disadvantage.

Thus, Black, Asian and minority ethnic groups may be at higher risk of building safety incidents as a result of poor housing. But the effect that race has on fire risk seems to be as a proxy for deprivation or poor housing quality.

The Home Office reported that overcrowding of dwellings can result in a fire risk and those living in households with five or more members are more likely to experience a fire than those in smaller households³¹.

In their report on the experiences of housing in Wales of people from ethnic minority communities³², Tai Pawb and the Ethnic Minorities and Youth Support Team Wales (EYST) also found evidence of overcrowding. Although the report was about housing in general rather than buildings in scope of the Bill. We have seen that larger households are uncommon in flats, maisonettes or apartments, Table 4.

Characteristics

When considering residents' attitudes and behaviours towards fire safety and demographic characteristics, IFF found the segment with the most statistically significant number of residents from an ethnic minority background (36% of the segment vs 19% of all residents), was 'Content and trusting'³³. Residents in this segment tended to have the following characteristics:

- More confident in getting household out of the home in the event of a fire
- Less likely to be concerned about fire safety in their home or building
- More likely to engage with information about their building
- Less likely to engage in risky fire safety behaviours in the home with the exception of cooking with a chip-pan
- Less likely to keep fire doors closed in communal areas of building

³⁰ [Influences on Resident's Fire Safety Behaviours: An Evidence Review](#)

³¹ Focus on Trends in Fires and Fire-related fatalities, Home Office 2017 [Focus on trends in fires and fire-related fatalities](#)

³² [Report: the housing experiences in Wales of people from ethnic minority communities - Tai Pawb](#)

³³ [Fire safety in multi-occupied buildings: residents research](#)

Cost

Poverty rates are very high for some minority ethnic groups³⁴. In particular, between 2019/20 and 2021/22, around half of people in Pakistani (51%) and Bangladeshi (53%) households lived in poverty, with even higher poverty levels for children in those households (61% and 62% respectively). Around four in ten people in households headed by someone from an Asian background other than Indian, Pakistani, Bangladeshi or Chinese (39%) or households from Black African backgrounds (42%) were in poverty, with around half of children in these households in poverty. All these groups were much more likely than people in households headed by someone of white ethnicity (19%) to be in poverty (25% of children in households headed by someone of white ethnicity were in poverty).

For migrants, the nature of migration can be an additional detrimental factor³⁵: for example, whether migration was through channels that make employment harder, such as asylum, and how recently people arrived in the UK.

Overall, the cost of the new regime is likely to impact Black, Asian and minority ethnic people more significantly than the whole population.

Engagement

Another issue identified by Tai Pawb, responses to our white paper, unpublished research with minority ethnic leaseholders, and our engagement with stakeholders was poor communication and engagement between landlords, leaseholders and tenants.

Racism was another matter identified in Tai Pawb's report. Participants recalled instances of racism both directly from their landlords and through letting agents/agencies. These tenants spoke of having faced condescending attitudes and an 'accept this or leave the property' approach when expressing concerns about various aspects of the property. Unequal treatment was observed in the maintenance of rented properties. White neighbours using the same agency were perceived as having received prompt attention for repairs, while ethnic minority tenants with similar issues were overlooked, further exacerbating the disparities in treatment.

Respondents to Tai Pawb's survey rated the condition of their property as follows:

- 48% well-maintained
- 48% in need of repairs
- 4% unsafe

Participants in the survey expressed frustration at the lack of sympathy or support for tenants, feeling that the focus and understanding were predominantly directed towards the landlords' perspectives. These experiences underscored the need for

³⁴ UK Poverty 2024, the Joseph Rowntree Foundation, [UK Poverty 2024.pdf](#)

³⁵ Inequalities in poverty, The Health Foundation, July 2024, [Inequalities in poverty | The Health Foundation](#)

more compassionate and equitable treatment, recognising and addressing the mental health impacts caused by these housing-related challenges.

Some participants reported a lack of awareness of tenants' rights. The Bevan Foundation has also reported that migrants' knowledge about their rights can be limited³⁶.

Participants in the survey suggest the following ways of addressing the issues they had reported, to help address housing inequality:

- Better support and sign-posting
- Improved tenant awareness on maintenance and the complaints process
- Documentation checks and application process for migrants
- Increasing the supply of housing/more affordable rent
- Person-centred approach

By introducing duties on accountable persons to provide information to residents, engage residents and implement a two stage complaints processes, the Bill will help Black, Asian and minority ethnic residents to be safer and feel safer.

Accountable persons will be expected to consider the needs of residents when implementing communications, engagement and complaints processes. The two stage complaints process will enable residents to complain to the building safety authority if the accountable person does not take appropriate action to resolve a complaint or if the resident fears the consequences of complaining to the appropriate person.

Religion, Belief and Non-belief

We do not foresee any differential impacts as a result of religion, belief or non-belief.

Sex/Gender

Prevalence

The gender of the respondents to the residents' survey, presented in Table 15., is a good proxy for the gender of adult residents of multi-occupied residential buildings more generally.

³⁶ [Shared-Ground-report.pdf](#) Shared Ground: Integrating Migrants in Wales, Sefydliad Bevan Foundation

Table 15: Sex/Gender of adults living in multi-occupied residential buildings, 2024

Gender	% of respondents
Female	46
Male	49
Different from sex registered at birth	1

Base: 1,562

Source: [Fire safety in multi-occupied buildings: residents research](#), 2024

Cost

In the UK, it is not uniformly the case that all women are worse off than men. However, given the continued relevance of gender to involvement in paid and unpaid work, and caring responsibilities, across the life course, gender matters for understanding poverty³⁷. The cost of the new regime is likely to impact women more significantly than the whole population.

Sexual Orientation

We do not foresee any differential impacts as a result of sexual orientation.

Marriage and civil partnership

Prevalence

Table 4. shows that single person households are much more prevalent in flats, maisonettes or apartments (65% of households) than in all dwellings (31% of households). Therefore, the new regime is likely to impact single people more significantly than the whole population.

Cost

Housing costs for a couple can be similar to those of single people, but their income can be double³⁸. Therefore, the cost of the new regime is likely to impact single people more significantly than the whole population.

³⁷ [Which men and women are poor? Gender, poverty and social exclusion \(Four\) - Poverty and Social Exclusion in the UK Vol 1](#)

³⁸ [Inequalities in poverty](#), The Health Foundation, July 2024, [Inequalities in poverty | The Health Foundation](#)

Low income households

Prevalence

Data from the Census 2021 show that, of those households living flats, maisonettes or apartments, 23% (39,348) have employment deprivation, compared to 14% (185,416) of all households in Wales³⁹.

Data from the Welsh Housing Conditions Survey 2017-18 show that, 37% of households living in flats are in material deprivation, compared to 17% of households living in houses/bungalows⁴⁰.

³⁹ 2021 Census [Create a custom dataset](#) - Office for National Statistics

⁴⁰ Welsh Housing Conditions Survey [Welsh Housing Conditions Survey: results viewer](#) | GOV.WALES

Table 16. shows that unemployment is low in people living in flats although economic inactivity is relatively high compared to people living in houses/bungalows.

Table 16: Employment status of household reference person by dwelling type, 2017-18

Dwelling type	In employment (%)	Unemployed (%)	Economically inactive (%)
House or bungalow	49	2	49
Flat	34	-	61

Source: Welsh Housing Conditions Survey

[Welsh Housing Conditions Survey: results viewer | GOV.WALES](#)

Table 17. shows that the percentage of households living in flats where no members are working is high (33%) compared to households living in houses/bungalows (13%).

Table 17: Household members working by dwelling type, 2017-18

Dwelling type	All working (%)	Some working (%)	None working(%)	No one aged 16-19 (not in FT education) nor aged 19-64 in household (%)
House or bungalow	36	20	13	31
Flat	29	-	33	32

Source: Welsh Housing Conditions Survey

[Welsh Housing Conditions Survey: results viewer | GOV.WALES](#)

The employment status of respondents to the residents' survey, presented in Table 18., is a good proxy for the employment status of adult residents of multi-occupied residential buildings more generally.

Table 18: Employment status of adults living in multi-occupied residential buildings, 2024

Employment status	% of respondents
Full time paid work (35 hours per week or more)	39
Part time paid work	10
Unemployed and seeking employment	4
Unemployed and not seeking employment	1
Unable to work (due to health or disability)	14
Fulltime homemaker or carer	2
Full-time student	5
Retired	20

Source: Fire safety in multi-occupied buildings: residents research, 2024

[Fire safety in multi-occupied buildings: residents research](#)

Table 19: HMOs by size and resident economic activity between 15 and 21 March 2021

	Small HMOs		Large HMOs		All HMOs	
	Number	%	Number	%	Number	%
Economically inactive- long term sick or disabled	391	2%	266	2%	657	2%
Economically inactive- looking after home/family	48	0%	15	0%	63	0%
Economically inactive- other	321	2%	134	1%	455	1%
Economically inactive- retired	62	0%	61	0%	123	0%
Economically inactive- student	7,221	46%	9,963	64%	17,184	55%
Missing	370	2%	169	1%	539	2%
Unemployed	1,269	8%	1,184	8%	2,453	8%
Working	6161	39%	3814	24%	9975	32%
Total	15,843	100%	15,606	100%	31,449	100%

Source: Census 2021 analysis

Table 19. shows that, as with flats, a relatively high proportion of residents of HMOs are economically inactive (58%), with 55% being students.

Risk

Our evidence review⁴¹ found that it has been argued that the quality of housing is closely related to deprivation and the associated risk factors surrounding the incidence of dwelling fires. Other factors associated with poor quality housing are overcrowding (increasing the risk of injury should a fire start), and poor maintenance of communal areas, escape routes, and smoke alarms.

Low-income households are less likely to have insurance to protect them from risks of building safety incidents⁴². 60% of households earning £15,000 or less per annum have no contents cover, meaning that damage to property has a greater and longer-lasting effect.

Since low-income households are at greater risk, by improving the safety of multi-occupied residential buildings, the Bill will be disproportionately beneficial to low-income households.

Cost

People in workless households face a higher risk of poverty, with more than half of working-age adults (56%) in workless households being in poverty⁴³. However, because such a high share of the population is in work, around two-thirds of working-age adults in poverty actually lived in a household where someone was in work, despite these households having a much lower poverty rate of 15%.

Low-income households with additional expenditure needs, for example because someone in their household is disabled or they live in an area with high housing costs face additional financial pressures⁴⁴.

Overall, the evidence suggests that households in buildings in scope of the Bill are more likely to experience lower rates of employment and higher rates of economic inactivity than households in general, leading to lower income. The cost of the new regime will impact low-income households more significantly than other households.

⁴¹ [Influences on Resident's Fire Safety Behaviours: An Evidence Review](#)

⁴² The hidden risks of being poor: the poverty premium in insurance, A report by the Institute and Faculty of Actuaries and Fair By Design [IFoA_Hidden_Risks_of_Being_Poor_Aug_21_v09.pdf](#)

⁴³ UK Poverty 2024, the Joseph Rowntree Foundation, [UK Poverty 2024.pdf](#)

⁴⁴ UK Poverty 2024, the Joseph Rowntree Foundation, [UK Poverty 2024.pdf](#)

Cross-cutting

People living in buildings in scope of the Bill may, of course, have more than one of the protected characteristics discussed above. Some of the most significant impacts on people with multiple protected characteristics include:

Older people who are disabled: Disability is more prevalent amongst pensioners⁴⁵. We have shown above that both older people and disabled people are at greater risk from building safety incidents, therefore, we might expect this group to benefit significantly from our proposals. However, older disabled people may also be at higher risk of being negatively impacted by the cost of the new regime.

Black, Asian and minority ethnic disabled people: Both Black, Asian and minority ethnic people and disabled people are more likely to live in flats, maisonettes or apartments. Black, Asian and minority ethnic disabled people are at greater risk of being negatively impacted by the cost of the new regime.

Single disabled people: Both single people and disabled people are more likely to live in flats, maisonettes or apartments. Single disabled people are at greater risk of being negatively impacted by the cost of the new regime. The risk may be higher still for single disabled women.

Resident Voice

An issue identified by Tai Pawb in response to our white paper, unpublished research with disabled and minority ethnic leaseholders, and our engagement with stakeholders was communication and engagement between landlords, leaseholders and tenants.

Many stakeholders commented that a one size fits all approach does not work. Rather, personalised communication that considers the needs of residents and the type of their home is key. Stakeholders identified the importance of building trust with residents to maintain the safety of their homes. Landlords need to listen to residents and co-design engagement strategies to benefit both residents and landlords.

The Bill will require accountable persons to provide a minimum level of building safety information to residents, with the detail of information provided commensurate with the complexity of the building. For category 1 buildings, there will be additional requirements on the principal accountable person to develop and deliver a Resident Engagement Strategy (RES) in consultation with residents. The RES is intended to be genuine and ongoing to involve residents in decision-making on key building safety matters which affect them. The Bill will give the Welsh Ministers powers to make regulations and guidance. Ministers intend to use these to require the principal accountable person to consider the needs of resident when consulting on the RES and when providing information on the RES.

⁴⁵ Households Below Average Income: an analysis of the UK income distribution: FYE 1995 to FYE 2023, UK Government, March 2024, [Households Below Average Income: an analysis of the UK income distribution: FYE 1995 to FYE 2023 - GOV.UK](#)

The Bill will give the Welsh Ministers powers to make regulations that require an accountable person for a category 1, 2 and 3 building to provide information to residents. The regulations may specify how the information must be given and the form in which it must be given. Ministers intend to use regulations and guidance to set out that information given to residents must be accessible and take account of residents' needs. Ministers also intend to make regulations setting out how complex and technical information should be made understandable to residents. By doing so, Ministers intend to make information as accessible as possible to residents regardless of their characteristics.

The Bill will require the principal accountable person for category 1 buildings to establish and operate a system for the investigation of relevant complaints. The Bill will also give the Welsh Ministers powers to make regulations about the complaints system for category 1 buildings, including: who may make a complaint, how a complaint may be made, the period within which, and the way in which, a complaint must be considered and dealt with. Ministers intend to make regulations and guidance to set out that the principal accountable person must consider resident demographics when informing residents how they can make a complaint and also to set out that all residents may make complaints using their preferred methods. By doing so, Ministers aim to make the complaints system for category 1 buildings accessible to all residents regardless of their characteristics.

For category 2 & 3 buildings, the Bill will give the Welsh Ministers powers to make regulations to require an accountable person to make and give effect to arrangements for the consideration of relevant complaints. As with category 1 buildings, Ministers intend to make regulations intended to make the complaints system for category 2&3 buildings accessible to all residents regardless of their characteristics.

The Bill will also require each building safety authority to establish and operate a system for the investigation of relevant complaints. The Bill will also give the Welsh Ministers powers to make regulations about the establishment and operation of these complaints systems. The Welsh Ministers intend to use their regulation making powers to allow residents to complain directly to building safety authorities in certain scenarios.

Further Impact Assessment

Further impact assessments will be carried out, as appropriate, when subordinate legislation is made under powers in the Bill. Appropriate consultation will take place in respect of any future subordinate legislation and, where appropriate, there will be opportunities for full engagement with stakeholder groups, including those with particular protected characteristics, whilst policy is being developed. It will be easier for the impacts to be envisaged by those stakeholders at that stage when specific policy considerations are being drafted.

Record of Impacts by protected characteristic:

Please complete the next section to show how this policy / decision / practice could have an impact (positive or negative) on the protected groups under the Equality Act 2010. *(Please refer to the EIA guidance document for more information.)* It is important to note any opportunities you have identified that could advance or promote equality of opportunity. This includes identifying what we can do to remove barriers and improve participation for people who are under-represented or suffer disproportionate disadvantage.

Protected characteristic or group	What are the positive or negative impacts of the proposal?	Reasons for your decision (including evidence)	How will you mitigate Impacts?
Age: Older people (65 years and above)	<p>By improving the regulation of multi-occupied residential buildings, the Bill is intended to improve safety for all residents, regardless of protected characteristics. Older residents will benefit disproportionately from improved safety.</p> <p>Some older residents will be disproportionately affected by the cost of the new regime.</p> <p>We do not foresee differential impacts for older accountable persons.</p>	<p>Older people are at greater risk of dying or being injured in a fire.</p> <p>Stakeholders identified that older people have particular requirements for communications and engagement.</p> <p>Although older people as a whole are not at particularly high risk of poverty, some older people are at higher risk of poverty. These include:</p> <ul style="list-style-type: none">• Older people who rent their homes, privately or through the social sector.• Older Black and Asian people.• Older single women.	<p>The Bill will include provisions to ensure that charges for residents are reasonable.</p> <p>Further information about costs can be found in the Regulatory Impact Assessment.</p>

<p>Age: Working age adults (24-65 years)</p>	<p>By improving the regulation of multi-occupied residential buildings, the Bill is intended to improve safety for all residents, regardless of protected characteristics. This includes working age adults.</p> <p>Working age adults will not be disproportionately impacted by the cost of the new regime.</p> <p>We might assume that accountable persons are more likely to be of working age and therefore this age group will be disproportionately impacted by the duties placed on them. However, we do not foresee that working age accountable persons would face particular challenges in discharging their duties because of their age.</p>	<p>Working age adults without children make up the largest group of residents in multi-occupied residential buildings.</p> <p>The Bill is intended to improve safety for all residents of multi-occupied residential buildings although working age adults are not at particularly high risk compared to other age groups.</p> <p>Levels of poverty among working-age adults are highest at the start and towards the end of their working life (before age 24 and after age 60)⁴⁶. Therefore, this age group is not a higher risk of poverty.</p>	<p>The Bill will include provisions to ensure that charges for residents are reasonable.</p> <p>Further information about costs can be found in the Regulatory Impact Assessment.</p>
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⁴⁶ UK Poverty 2024, the Joseph Rowntree Foundation, [UK Poverty 2024.pdf](#)

<p>Age: Young People (age 16-24)</p>	<p>By improving the regulation of multi-occupied residential buildings, the Bill is intended to improve safety for all residents, regardless of protected characteristics. This includes young people.</p> <p>Duties on accountable persons to engage residents only apply to adult residents and so young people aged 16 and 17 will be disadvantaged.</p> <p>The cost of the new regime may impact a slightly higher proportion of young people than the proportion of the whole population.</p> <p>Young people under the age of 18 will not be accountable persons since they are not old enough to own property. We do not foresee differential impacts for young accountable persons aged 18-24 years.</p>	<p>Stakeholders identified that young people have particular requirements for communications and engagement. Accountable persons will be required to provide a minimum level of building safety information to adult residents with the detail of information provided commensurate with the complexity of the building. However, since people under the age of 18 cannot own or rent property, accountable persons will not be required to provide information to 16 and 17 year olds.</p> <p>For category 1 buildings, there will be additional requirements on the principal accountable person to develop and deliver a Resident Engagement Strategy in consultation with residents. The Resident Engagement Strategy should be genuine and ongoing to involve residents in decision-making on key building safety matters which affect them. Again, this will not apply to 16 and 17 year olds.</p> <p>Around one in four 16–24 year olds (24%) are in poverty compared to the average poverty rate for</p>	<p>The Bill will include provisions to ensure that charges for residents are reasonable.</p> <p>Further information about costs can be found in the Regulatory Impact Assessment.</p>
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		the whole population of Wales and the UK of 22%.	
Disability (consider the social model of disability ⁴⁷ and the way in which your	By improving the regulation of multi-occupied residential buildings, the Bill is intended to improve safety for all residents,	Disabled people are more likely to live in flats, maisonettes or apartments than in all dwellings.	The Bill will include provisions to ensure that charges for residents are reasonable. Further information about costs can be found

⁴⁷ Welsh Government uses the social model of disability. We understand that disabled people are not disabled by their impairments but by barriers that they encounter in society. Ensuring that your proposal removes barriers, rather than creating them, is the best way to improve equality for disabled people. For more information, go to the intranet and search 'social model'.

proposal could inadvertently cause, or could be used to proactively remove, the barriers that disable people with different types of impairments)	<p>regardless of protected characteristics. Disabled people will benefit disproportionately from improved safety.</p> <p>The cost of the new regime is likely to impact disabled people more significantly than the whole population.</p> <p>Some disabled accountable persons may face additional challenges and costs in complying with duties put on them by the Bill. However, the responsibility of a disabled accountable person to manage the safety of the building should not be diminished as a result.</p>	<p>Disabled people are at greater risk of dying or being injured in a fire.</p> <p>Stakeholders identified that disabled people have particular requirements for communications and engagement. All accountable persons will be required to provide a minimum level of building safety information to residents with the detail of information provided commensurate with the complexity of the building. For category 1 buildings, there will be additional requirements on the principal accountable person to develop and deliver a Resident Engagement Strategy in consultation with residents. The Resident Engagement Strategy should be genuine and ongoing to involve residents in decision-making on key building safety matters which affect them.</p> <p>Disabled people are at higher risk of poverty, particularly those who:</p> <ul style="list-style-type: none"> • Live in households with both disabled adults and children. • Have long-term, limiting mental impairments. 	in the Regulatory Impact Assessment.
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Gender Reassignment (the act of transitioning and Transgender people)	<p>By improving the regulation of multi-occupied residential buildings, the Bill is intended to improve safety for all residents, regardless of protected characteristics. This includes trans people.</p> <p>The cost of the new regime is unlikely to impact trans people more significantly than the whole population.</p> <p>We do not foresee differential impacts for trans accountable persons.</p>	<p>The Bill is intended to improve safety for all residents of multi-occupied residential buildings although trans people are not at particularly high risk compared to other residents.</p> <p>We have not found evidence that trans people are at higher risk of poverty.</p>	<p>The Bill will include provisions to ensure that charges for residents are reasonable.</p> <p>Further information about costs can be found in the Regulatory Impact Assessment.</p>
Pregnancy and maternity	<p>By improving the regulation of multi-occupied residential buildings, the Bill is intended to improve safety for all residents, regardless of protected characteristics. This includes pregnant women and mothers.</p> <p>The cost of the new regime is likely to impact pregnant women and mothers who live in buildings in scope of the Bill more significantly than the whole population buildings in scope of the Bill. This is</p>	<p>Children are less prevalent in flats, maisonettes or apartments than in all dwellings. However, single parent households are as prevalent in flats, maisonettes or apartments as in all dwellings. Single parent households are at greater risk of dying or being injured in a fire.</p> <p>Having children and being a woman are factors which may increase the risk of poverty. Therefore, the cost of the new regime is likely to impact pregnant</p>	<p>The Bill will include provisions to ensure that charges for residents are reasonable.</p> <p>Further information about costs can be found in the Regulatory Impact Assessment.</p>

	<p>particularly true of single parents. However, mothers are less likely to live in flats, maisonettes or apartments than in other types of housing.</p> <p>We do not foresee differential impacts for pregnant women or mothers who are accountable persons.</p>	<p>women and mothers more significantly than the whole population. Being single is another factor that increases the risk of poverty so single mothers may be more significantly impacted.</p>	
<p>Race (include different ethnic minorities, Gypsies and Travellers and Migrants, Asylum seekers and Refugees)</p>	<p>By improving the regulation of multi-occupied residential buildings, the Bill is intended to improve safety for all residents, regardless of protected characteristics. This includes Black, Asian or minority ethnic people.</p> <p>The cost of the new regime is likely to impact Black, Asian or minority ethnic people more significantly than the whole population.</p> <p>We do not foresee differential impacts for Black, Asian or minority ethnic accountable persons.</p>	<p>Black, Asian or minority ethnic households are more likely to live in flats, maisonettes or apartments than in all dwellings.</p> <p>There is evidence that Black, Asian or minority ethnic households suffer from poor communication from landlords and difficulties when trying to complain. These households will particularly benefit from duties on accountable persons to engage residents, operate a complaint system or to arrange for consideration of resident complaints (as applicable).</p> <p>Stakeholder told us that Black, Asian and minority ethnic residents were not always aware of</p>	<p>The Welsh Ministers intend to use guidance to raise awareness amongst accountable persons that residents from ethnic minorities feel less inclined to make a complaint for fear of repercussions. Guidance will also play an important role in supporting residents and owners of residential units to understand their right to make building safety complaints to accountable persons.</p> <p>The Bill will include provisions to ensure that charges for residents are reasonable.</p> <p>Further information about costs can be found in the Regulatory Impact Assessment.</p>

		<p>their rights. The duty on accountable persons to provide information to residents will mitigate this risk.</p> <p>Black, Asian and minority ethnic people are at higher risk of poverty.</p>	
Religion, belief and non-belief	<p>By improving the regulation of multi-occupied residential buildings, the Bill is intended to improve safety for all residents, regardless of protected characteristics. This includes people of all religions and beliefs and those without belief.</p> <p>The cost of the new regime is unlikely to impact people more significantly because of their religion or beliefs.</p> <p>We do not foresee differential impacts for accountable persons because of religion, belief or non-belief.</p>	<p>The Bill is intended to improve safety for all residents of multi-occupied residential buildings although people are not at particularly high risk because of their religion or beliefs.</p> <p>We have not found evidence that people are at higher risk because of their religion or beliefs.</p>	<p>The Bill will include provisions to ensure that charges for residents are reasonable.</p> <p>Further information about costs can be found in the Regulatory Impact Assessment.</p>
Sex / Gender	<p>By improving the regulation of multi-occupied residential buildings, the Bill is intended to improve safety for all residents,</p>	<p>Similar proportions of women and men live in flats, maisonettes or apartments.</p>	<p>The Bill will include provisions to ensure that charges for residents are reasonable.</p> <p>Further information about costs can be found</p>

	<p>regardless of protected characteristics.</p> <p>Women may be disproportionately affected by the cost of the new regime.</p> <p>We do not foresee differential impacts for accountable persons because of sex or gender.</p>	<p>Women may be at higher risk of poverty than men.</p>	<p>in the Regulatory Impact Assessment.</p>
<p>Sexual orientation (Lesbian, Gay and Bisexual)</p>	<p>By improving the regulation of multi-occupied residential buildings, the Bill is intended to improve safety for all residents, regardless of protected characteristics. This includes lesbian, gay and bisexual people.</p> <p>The cost of the new regime is unlikely to impact lesbian, gay and bisexual people more significantly than the whole population.</p> <p>We do not foresee differential impacts for accountable persons because of their sexual orientation.</p>	<p>The Bill is intended to improve safety for all residents of multi-occupied residential buildings although lesbian, gay and bisexual people are not at particularly high risk compared to other residents.</p> <p>We have not found evidence that lesbian, gay and bisexual people are at higher risk of poverty.</p>	<p>The Bill will include provisions to ensure that charges for residents are reasonable.</p> <p>Further information about costs can be found in the Regulatory Impact Assessment.</p>
<p>Marriage and civil partnership</p>	<p>By improving the regulation of multi-occupied residential buildings, the Bill is</p>	<p>The residents of flats, maisonettes or</p>	<p>The Bill will include provisions to ensure that</p>

	<p>intended to improve safety for all residents, regardless of protected characteristics.</p> <p>Single residents will be disproportionately impacted by the cost of the new regime.</p> <p>We do not foresee differential impacts for accountable persons because of their marital status.</p>	<p>apartments are more likely to be single.</p> <p>Housing costs for a couple can be similar to those of single people, but their income can be double. Therefore, the cost of the new regime is likely to impact single people more significantly than the whole population.</p>	<p>charges for residents are reasonable.</p> <p>Further information about costs can be found in the Regulatory Impact Assessment.</p>
Children and young people up to the age of 18	<p>By improving the regulation of multi-occupied residential buildings, the Bill is intended to improve safety for all residents, regardless of protected characteristics. This includes children and young people up to the age of 18.</p> <p>The cost of the new regime is likely to impact children who live in buildings in scope of the Bill more significantly than the whole population of buildings in scope of the Bill. However, children are less likely to live in buildings in scope of the Bill than in other types of housing.</p>	<p>Children are less prevalent in flats, maisonettes or apartments than in all dwellings. But single parent households are as prevalent in flats, maisonettes or apartments as in all dwellings. Single parent households are at greater risk of dying or being injured in a fire, although children in general are at lower risk.</p> <p>Children have a higher risk of poverty. Children are at particularly high risk of poverty if they live in:</p> <ul style="list-style-type: none"> • Single parent households • Larger households 	<p>The Bill will include provisions to ensure that charges for residents are reasonable.</p> <p>Further information about costs can be found in the Regulatory Impact Assessment.</p>

	<p>See also the Children's Rights Impact Assessment.</p>	<ul style="list-style-type: none"> • Black or Asian households • Rented homes <p>However, households with children are much less likely to live in flats, maisonettes or apartments than in all dwellings. Households with 3 or more children are particularly uncommon in flats, maisonettes or apartments.</p>	
Low-income households	<p>By improving the regulation of multi-occupied residential buildings, the Bill is intended to improve safety for all residents, including low-income households.</p> <p>The cost of the new regime is likely to impact low-income households more significantly than all households.</p>	<p>37% of households living flats are in material deprivation, compared to 17% of households living in houses/bungalows.</p>	<p>The Bill will include provisions to ensure that charges for residents are reasonable.</p> <p>Further information about costs can be found in the Regulatory Impact Assessment.</p>

Human Rights and UN Conventions

Do you think that this policy will have a positive or negative impact on people's human rights? *(Please refer to point 1.4 of the EIA Guidance for further information about Human Rights and the UN Conventions).*

Human Rights	What are the positive or negative impacts of the proposal?	Reasons for your decision (including evidence)	How will you mitigate negative Impacts?
Right to life (article 2)	Positive impact: The Bill will improve the safety of multi-occupied residential buildings	This is the purpose of the Bill.	N/A
Right to a fair trial (article 6)	Positive impact: Enforcement and sanctions resulting from the breaches of duties introduced by the Bill will comply with the right to a fair trial.	<p>Accountable persons may make an interpretation of the duties or requirements that apply to them, that is incorrect. Building safety authorities must have the power to make decisions/determinations where matters are disputed, to allow consistent application and protection for residents.</p> <p>Provisions in the Bill are believed to be justified and proportionate, and compliant with both A1P1 and Article 6 of the ECHR.</p>	<p>Certain decisions of the building safety authority will carry a right to review, and subsequently appeal, if the affected person disputes the decisions, for example decisions relating to registration information of a building.</p> <p>Enforcement activities will either have an appeal right, e.g. against compliance notices or prohibition notices, or the opportunity to present a defence, e.g. prosecutions, and where subsequent rights of appeal apply to</p>

			the decisions of the court.
Right to respect for private and family life, home and correspondence (article 8)	<p>Negative impact: The Bill will enable accountable persons and the building safety authority to enter private dwellings subject to appropriate controls.</p> <p>Negative impact: The Bill will restrict residents' behaviours in some ways.</p>	<p>On occasions, accountable persons or the building safety authority may need access to a private dwelling for building safety purposes.</p> <p>The Bill will put duties on residents regarding fire and structural safety as well as information provision requirements.</p>	<p>The Bill will introduce appropriate controls to safeguard residents' rights.</p> <p>The duties placed on residents will be limited and specific. Our approach will be to inform and educate residents about how their behaviour can help to keep themselves and other residents.</p>
The right to be free from discrimination (article 14)	Positive impact: By introducing duties on accountable persons to provide information to residents, engage residents and implement complaints processes, an aim of the Bill is that all residents receive equitable treatment	Some Black, Asian and minority ethnic residents have reported inequitable treatment from landlords. The Bill will require accountable persons to provide information to residents, consult residents of category 1 buildings on building safety decisions and to arrange for consideration of resident complaints. The two stage complaints process is intended to ensure fair	N/A

		consideration of residents' complaints will enable residents to complain to the building safety authority in certain scenarios.	
The right to peaceful enjoyment of possessions (protocol 1 article 1)	<p>Negative impact: The Bill will restrict residents' behaviour somewhat by putting duties on residents to maintain building safety within their properties and within the communal areas of buildings.</p> <p>Negative impact: The Bill will seek to control the use of in-scope buildings and put duties put on accountable persons, for example to register certain buildings and to undertake certain safety assessments.</p>	<p>Residents may expect that they have freedom to do as they wish within their own homes. However, the Bill will put duties on residents and owners of residential units regarding fire and structural safety as well as information provision requirements.</p> <p>Duties put on accountable persons by the Bill are required to improve building safety.</p>	<p>The duties placed on residents will be limited and specific. Guidance will play an important role in supporting residents and owners of residential units to understand their responsibilities under the new regime.</p> <p>Information about the duties will be made available to accountable persons.</p>

EU/EEA and Swiss Citizens' Rights

Part 2 of the EU-UK Withdrawal Agreement, along with the EEA EFTA Separation Agreement and Swiss Citizens Rights Agreement ("Citizens Rights Agreements") give EU, EEA⁴⁸ and Swiss citizens who were lawfully resident in the UK by 31 December 2020 certainty that their citizens' rights will be protected.

The Citizens Rights Agreements are implemented in domestic law by the European Union (Withdrawal Agreement) Act 2020 (EUWAA)⁴⁹

Eligible individuals falling within scope of the Citizens Rights Agreements will have broadly the same continued entitlements to work, study and access public services and benefits, in as far as these entitlements have derived from UK membership of the EU as well as its participation in the EEA Agreement and the EU-Swiss Free Movement of Persons Agreement.

Subject to certain limited exceptions⁵⁰, individuals will need to have applied for a new residence status (either pre-settled or settled status) through the EU Settlement Scheme. The deadline for making such an application expired on 30 June 2021.

Policy considerations to take into account:

- Have you considered if your policy proposal will impact EU, EEA or Swiss citizens whose rights are protected by the Citizens Rights Agreements?
- If there is the potential for any negative impact on such EU EEA or Swiss citizens, how will any such impacts be eliminated or managed if management is deemed appropriate?
- Is legal advice required?

Please consider the impacts of your policy on the areas below, indicating whether the impact is positive or negative and any action required to eliminate potential negative impact. Please note the basis for your answer, including where legal advice has been sought and please also indicate where a right is not relevant for your policy:

Residency – the right to reside and other rights related to residence: rights of exit and entry, applications for residency, restrictions of rights of entry and residence;

⁴⁸ The EEA includes the EU countries as well as Iceland, Liechtenstein and Norway.

⁴⁹ Sections 5 and 6 of EUWAA.

⁵⁰ E.g. where an individual has Irish citizenship (including dual British and Irish citizenship) or where they had indefinite leave to enter or remain in the UK)

Mutual recognition of professional qualifications –the continued recognition of professional qualifications obtained by EU/EEA/Swiss citizens in their countries (and already recognised in the UK);

Access to social security systems – these include benefits, access to education, housing and access to healthcare

Equal treatment – this covers non-discrimination, equal treatment and rights of workers;

Workers rights - Workers and self-employed persons who are covered under the Citizens Rights Agreements are guaranteed broadly the same rights as they enjoyed when the UK was a Member State. They have a right to not be discriminated against due to nationality, and the right to equal treatment with UK nationals.

(Frontier workers (those citizens who reside in one state and regularly work in another) can continue working in the UK if they did so by the 31 December 2020).

The Bill will not have a differential impact on EU, EEA or Swiss citizens whose rights are protected by the Citizens Rights Agreements.