

# Equality Impact Assessment

<b>Title of Policy, Function or Service</b>	Local Authorities Housing Fund Local Lettings Plan
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<b>Type of policy, function or service:</b>	New/Proposed ✓
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## Introduction

### a. Purpose of the Assessment

The primary purpose of this Equality Impact Assessment (EIA) is to assess the Local Authorities Housing Fund Local Lettings Plan's (LAHF LLP) compliance with the Equality Act 2010 and other related equality legislation.

We aim to ensure that the LLP promotes equality of opportunity and does not inadvertently discriminate against any individuals or groups, particularly those with protected characteristics.

The assessment will identify, evaluate, and address any potential negative impacts the LLP may have on the promotion of equality, inclusivity, and fairness in our local housing provision.

This structured approach helps us anticipate potential issues and remedy them before they become significant concerns, thus promoting fair access to housing for all members of our community.

### b. Brief Description of the Local Lettings Plan

The LLP provides a framework for managing the allocation of sustainable homes made available through the Local Authorities Housing Fund (LAHF) for those households who fall within the following schemes: Afghan Citizen Resettlement Scheme (ACRS), Afghan Relocations and Assistance Policy (ARAP) (collectively referred to as the Afghan Schemes), Ukraine Family Scheme, the Homes for Ukraine and the Ukraine Extension Scheme (collectively referred to as Ukraine schemes).

The LLP's primary purpose is to ensure that these properties are assigned in a manner that best meets the needs of the community, with a particular focus on individuals who are homeless, at risk of homelessness, or living in unsuitable temporary accommodation, including bridging accommodation.

The LLP aims to address housing pressures, reduce costs related to emergency and temporary accommodation, and facilitate the effective resettlement and economic integration of eligible cohorts.

By partnering with Watford Community Housing (WCH), Watford Borough Council (WBC) seeks to minimise the impact on existing residents accessing social housing and provide additional properties for general needs use in the longer term.

The LLP is designed to enhance affordability, sustainability, and the overall quality of permanent and temporary accommodation, ultimately addressing homelessness and improving housing conditions within the Watford area.

## Objectives and Outcomes of the Local Lettings Plan

### a. Primary Objectives

By implementing the LLP, the council aims to achieve the following objectives:

- Provide affordable housing for specific cohorts, including those covered by the Afghan Citizen Resettlement Scheme, Afghan Relocations and Assistance Policy, Ukraine Family Scheme, Homes for Ukraine, and Ukraine Extension Scheme (the Schemes).

- Alleviate the pressures on local housing and homelessness systems by increasing the availability of affordable housing for those at risk of homelessness or currently residing in temporary or bridging accommodation.
- Reduce costs associated with emergency, temporary, and bridging accommodation.
- Facilitate effective resettlement and economic integration of the eligible cohorts into the community.
- Ensure the long-term sustainability and affordability of the properties provided through the LLP.

## b. Expected Outcomes

The implementation of the LLP is expected to yield several positive outcomes, including:

- Improved access to affordable housing for individuals and households who are part of the Schemes, who are homeless, at risk of homelessness, or living in unsuitable temporary or bridging accommodation.
- Enhanced stability and security for the eligible cohorts, enabling them to build new lives, find employment, and integrate into the community.
- Alleviation of housing pressures resulting from humanitarian schemes and increased demand due to the termination of sponsorship/family placements/bridging accommodation arrangements.
- Reduction in costs related to emergency, temporary, and bridging accommodation, leading to more efficient use of resources.
- Expansion of the availability of affordable housing, including larger family-sized homes, which will better cater to the needs of the community.
- Improved sustainability of the properties provided through the LLP, ensuring their long-term contribution to the council's wider community housing responsibilities.
- Strengthened collaboration with partners, housing associations, and other stakeholders to maximise the impact of the Local Authorities Housing Fund.
- Regular monitoring and evaluation of the LLP's implementation to track progress, identify areas for improvement, and share lessons learned with relevant stakeholders.

## Scope of the EIA

### a. Defining the aspects to be evaluated

The scope of the Equality Impact Assessment (EIA) for the LAHF LLP encompasses the evaluation of potential impacts on equality and non-discrimination throughout the implementation of the LLP. The assessment will focus on various aspects, including but not limited to:

- The allocation and prioritisation criteria to ensure fairness and equal access to affordable housing opportunities.
- The impact of the LLP on individuals with protected characteristics, such as age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.
- The effectiveness of mitigation measures in place to address potential adverse impacts and promote equality in housing allocation.
- The monitoring and evaluation framework to assess the ongoing impact of the LLP on equality and non-discrimination.
- The transparency and accessibility of information related to the LLP, including the availability of the LLP document and the Equality Impact Assessment itself.

#### b. Linkage between the Local Lettings Plan and Equality Issues

The linkage between the LLP and equality issues arises from the potential for differential treatment, barriers, or disadvantages that individuals with protected characteristics may face in accessing and benefiting from the affordable housing provided through the LLP. The EIA will assess the allocation processes, prioritisation criteria, and management of properties to identify any potential direct or indirect discrimination and to propose mitigation measures that promote equality, fairness, and inclusivity.

By conducting the EIA, WBC aims to proactively address and mitigate any adverse impacts, safeguarding the rights of individuals with protected characteristics and promoting equal access to affordable housing opportunities within the scope of the LLP.

### Local Context

#### a. Overview of the Local Community Demographics

Watford is located in Hertfordshire, 17 miles Northwest of central London and is adjacent to the Greater London Area. The borough has an area of 2,142 hectares (8.3 square miles) and is the only non-metropolitan borough wholly within the M25. The borough is the largest urban area in Southwest Hertfordshire and has the highest population density. The population size has increased by 13.3%, from around 90,300 in 2011 to 102,300 in 2021. This is higher than the overall increase for England (6.6%), where the population grew by nearly 3.5 million to 56,489,800<sup>1</sup>.

It also has a strong concentration of services and facilities with considerable employment, retail, and leisure opportunities. Formerly a market town, the settlement has grown significantly over time with its core being Watford town centre.

Watford is strongly influenced by London, which provides good access to services and facilities and opportunities for employment. However, coinciding with these benefits are increased growth pressures on the borough that have not been encountered to such an extent in the past. These pressures are the fundamental challenges facing the borough in the years ahead. The Local Plan, in conjunction with other corporate strategies will seek to guide this new development to meet the needs of the community and achieve sustainable development.

Originally a market town known for traditional industries including printing and brewing,

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<sup>1</sup> [Watford population change, Census 2021 – ONS](#)

Watford has evolved to become an important regional centre for retail, leisure and business. The town centre provides a diverse array of services and facilities that serve the wider Southwest Hertfordshire and supports a significant amount of employment. The wider town centre area contains a mix of chain retailers and private operators, creating a varied mix of retail and restaurant provision to meet local demand. This is complemented with a healthy number of new businesses across the borough. There is also a strong in-out commuting relationship with London. Watford has good access to strategic transport routes, rail and road. WBC has ambitions to increase use of buses and cycling within the borough.

#### b. Overview of the Housing Needs in the Community

This section looks at the types of households that are currently active on Watford Borough Council's Housing Register whereby they are eligible to bid via a Choice Based Lettings System for Social Housing within the District. These applicants are identified as eligible as per Watford Borough Council's Nominations Policy.

As of the 16<sup>th</sup> July 2023, there were 1,003 households in need of housing in Watford. The following data was taken from the Housing Register and reflects the current housing burden placed on Watford Borough Council.

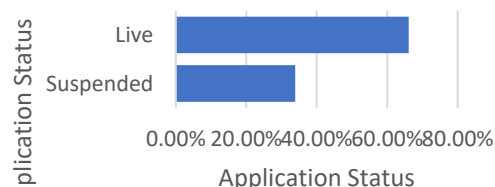
##### Application Status:

- The data below shows that 66.80% of the applications are "Live", indicating a significant proportion of individuals actively seeking housing.
- The remaining 33.20% of applications are suspended, suggesting potential challenges or temporary issues that need to be addressed to progress with these applications.

**% distribution of  
'Application Status'**

Application Status	Application Status
Live	66.80%
Suspended	33.20%
<b>Grand Total</b>	<b>100.00%</b>

**Percentage distribution of  
'Application Status'**

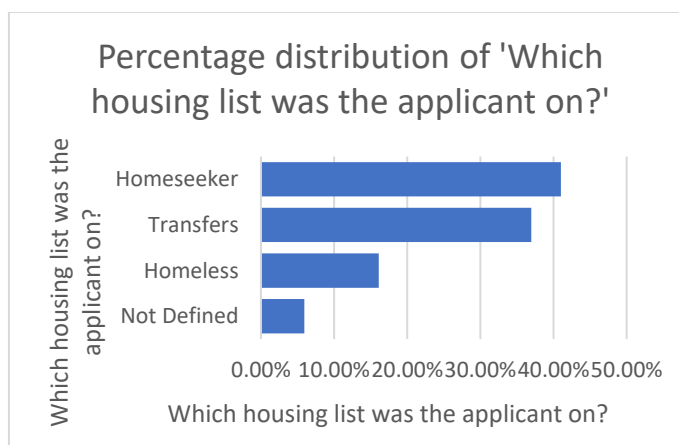


##### Housing List Types:

- The data below shows that the largest proportion of applicants, 39.88%, are on the Homeseeker list, indicating a high demand for housing among individuals actively seeking a new home.
- 37.49% of applicants are on the Transfers list, indicating a substantial number of individuals seeking a transfer from their current housing situation.
- 16.75% of applicants are on the Homeless list, highlighting the urgent need for housing assistance and support for individuals experiencing homelessness.
- 5.88% of applicants are listed as Not Defined, suggesting incomplete or unclear information about their housing list status, which may require further investigation.

**% distribution of 'Which housing list was the applicant on?'**

Housing Type List	%
Homeseeker	39.88%
Transfers	37.49%
Homeless	16.75%
Not Defined	5.88%
<b>Grand Total</b>	<b>100.00%</b>



**Housing Waiting List Bands:**

**Band A: 0.40%**

- The smallest proportion of applicants, 0.40%, falls into Band A, indicating the lowest representation among all the bands.
- Band A represents applicants with an urgent housing need, such as those with overriding medical or social/welfare need, imminent danger, necessary decant, or succeeding to a tenancy.
- This suggests a relatively low number of applicants requiring immediate emergency housing solutions.

**Band B: 4.49%**

- Approximately 4.35% of applicants fall into Band B, indicating a smaller proportion compared to Bands D, E, and C.
- Band B represents applicants with a very high housing need, including those suffering from harassment, having very high medical need, very high social/welfare need, under-occupying their current accommodation, experiencing severe overcrowding, or composite housing needs from Band C.
- This suggests a relatively lower number of applicants with very high housing needs within the dataset.

**Band C: 8.67%**

- Around 8.40% of applicants fall into Band C, indicating a smaller proportion compared to Bands D and E.
- Band C represents applicants with high housing need, including homeless households owed the main homelessness duty, those with high medical need, high social/welfare need, releasing an adapted property, those lacking two or more rooms, and other specific criteria.
- This suggests that there is a relatively lower number of applicants with high housing needs within the current dataset.

**Band D: 68.69%**



- The largest proportion of applicants, 68.77%, fall into Band D, indicating a significant number of individuals with a recognized housing need.
- Band D represents applicants with a medium-level housing need, including those with medium medical need, medium social/welfare need, and assessed as lacking one room.
- This suggests that a considerable portion of applicants require housing solutions that address their specific needs but may not require immediate emergency or priority status.

#### **Band E: 17.35%**

- Approximately 17.59% of applicants fall into Band E, indicating a relatively lower proportion compared to Band D.
- Band E represents applicants with transfers and older people seeking alternative accommodation or designated housing for older individuals.
- This suggests that there is a moderate demand for transfers and housing options specifically targeted towards older people within the applicant pool.

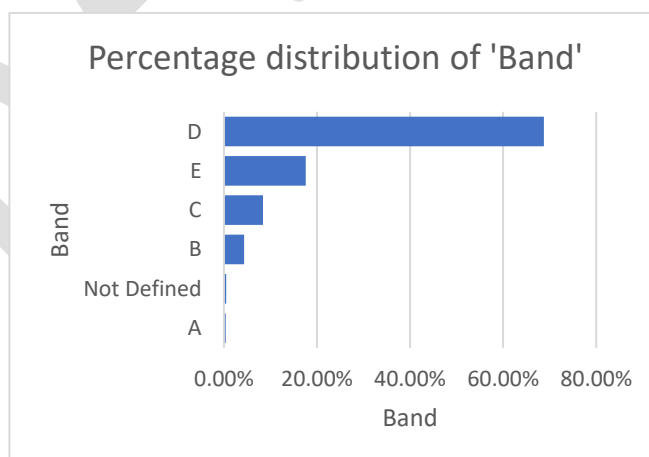
#### **Not Defined: 0.40%**

- A small percentage, 0.49%, of applicants are classified as Not Defined, indicating incomplete or unclear information about their band categorization.
- This category requires further investigation to clarify and assign appropriate banding based on the applicants' housing needs.

In summary, the data indicates that the majority of applicants fall into Band D, representing individuals with a recognized housing need. While there is a smaller proportion in Bands E, C, and B, it is important to consider the specific needs of applicants in each band to ensure suitable housing solutions are provided.

#### **% distribution of 'Band'**

Band	Count of Band
D	68.69%
E	17.35%
C	8.67%
B	4.49%
Not Defined	0.40%
A	0.40%
<b>Grand Total</b>	<b>100.00%</b>



## **Legislative Context**

The Equality Act 2010 provides the foundation for applying the principles of equality and non-discrimination to the Equality Impact Assessment (EIA) process. Under this legislation, Watford Borough Council is required to conduct EIAs to assess the potential impact of our policies, practices, and decisions on different equality groups.

The Act ensures that all individuals, regardless of their protected characteristics, are treated fairly and without discrimination. When conducting EIAs, the Equality Act 2010 mandates that all public authorities consider the potential effects of their actions on various aspects of equality, including age, disability, gender, race, religion, sexual orientation, and other protected characteristics. This includes examining both direct and indirect impacts on equality and identifying any potential barriers or adverse effects that may disproportionately affect specific groups.

By applying the Equality Act 2010 to the EIA process, public authorities can proactively address inequalities, promote equal opportunities, and make informed decisions that promote inclusivity and fairness in their policies and practices.

## Methodology

- a. Data Collection Methods
- b. Data Analysis Techniques
- c. Stakeholders Engagement

## Protected Characteristics Considered

This next section looks at the types of households with protected characteristics that are currently active on Watford Borough Council's Housing Register whereby they are eligible to bid via a Choice Based Lettings System for Social Housing within the District. These applicants are identified as eligible as per Watford Borough Council's Nominations Policy.

As of the 16<sup>th</sup> July 2023, there were 1,003 households in need of housing in Watford. The following data was taken from the Housing Register and reflects the current housing burden placed on Watford Borough Council.

### a. Age

Gender of applicant	Average of Age
Male	44
Female	40
Grand Total	41

The average age of male applicants is 44 years old.

The average age of female applicants is 40 years old.

The average age of customers, regardless of gender is 41 years old.

### b. Disability

Does the household contain anyone who has a disability	%
No	75.77%

There are only 24.23% of households who would constitute themselves as having a disability.

Yes 24.23%

Grand Total 100.00%

#### c. Gender Reassignment

**% distribution of 'Is your gender the same as the sex you were registered at birth?'**

Is your gender the same as the sex you were registered at birth?	%
No Data	52.84%
Yes	44.67%
Prefer not to say	1.69%
No	0.80%
<b>Grand Total</b>	<b>100.00%</b>

There are only 0.80% of households who have confirmed that their gender is not the same as it was at birth.

However, we do not have data for over 50% of applications.

#### d. Marriage and Civil Partnership

Watford Borough Council does not hold any information in relation to this protected characteristic.

#### e. Pregnancy and Maternity

**% distribution of 'Is this person pregnant?'**

Is this person pregnant?	%
No	58.03%
No Data	35.79%
Yes	6.18%
<b>Grand Total</b>	<b>100.00%</b>

There is only 6.18% of applicants who are pregnant. However, this is based on the figures for main applicants. There could be people who are pregnant within the household.

#### f. Race / Ethnicity

**% distribution of 'Ethnic origin of main applicant'**

Ethnic origin of main applicant	%
White	51.65%
Asian	18.15%
Black	15.45%
Mixed	5.68%
Prefer not to say	4.69%
Other	2.59%
No Data	1.79%

51% of households requiring housing assistance from Watford Borough Council has a white ethnic origin.

<b>Grand Total</b>	<b>100.00%</b>
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#### g. Religion or Belief

##### *% distribution of 'Religion'*

<b>Religion</b>	<b>Count of Religion</b>
Christian	33.00%
No religion	27.42%
Muslim	20.84%
Prefer not to say	8.57%
	5.58%
Other	2.09%
Hindu	1.50%
Buddhist	0.50%
Jewish	0.30%
Sikh	0.20%
<b>Grand Total</b>	<b>100.00%</b>

From the housing register data, 33.00% of the main applicants are Christian.

#### h. Sex / Gender

<b>Gender of main applicant</b>	<b>Count of Gender of applicant</b>
Female	63.31%
Male	35.69%
<b>Grand Total</b>	<b>100.00%</b>

From the housing register data, 63.31% of the main applicants are female.

#### i. Sexual Orientation

<b>Applicant's sexual orientation</b>	<b>Count of Applicant's sexual orientation</b>
No Data	653
Heterosexual / Straight	226
Prefers not to say	119
Bisexual	2
Gay / Lesbian	2
Other sexual orientation	1
<b>Grand Total</b>	<b>1003</b>

From the housing register data, 65.10% of the data is unavailable. An additional 11.86% of individuals opted not to disclose their sexual orientation.

## Assessment of Equality Impact

### a. Analysis of how the Local Lettings Plan affects individuals with protected characteristics

The utilisation of funding from the Local Authorities Housing Fund for the acquisition of additional housing stock ensures that no negative consequences will arise for individuals currently on the Housing Register, regardless of their protected characteristic.

Once the housing requirements of the Afghan and Ukrainian Schemes have been fulfilled through the LLP, the properties procured through the Local Authorities Housing Fund will be integrated into the general housing needs inventory.

This advantageous outcome implies that more properties will become accessible to all individuals on the Housing Register, thereby expanding housing opportunities for the entire community.

### b. Identification of any adverse effects or potential inequalities

None identified.

### c. Assessment of measures taken to mitigate adverse effects

None identified.

## Consultation and Engagement

### a. Summary of consultations with stakeholders

### b. Feedback from stakeholders on potential impacts

### c. Recommendations from stakeholders

## Action Plan

### a. Proposed actions to address identified inequalities or adverse effects

None identified.

### b. Timeframes and responsibilities for actions

None identified.

### c. Monitoring and evaluation measures

None identified.

## Conclusion

### a. Summary of key findings

In conclusion, the implementation of the Local Lettings Plan (LLP) by Watford Borough Council demonstrates a commitment to addressing housing needs and promoting equality within the community.

The LLP aims to provide affordable housing, alleviate housing pressures, and reduce costs associated with temporary and bridging accommodation.

Through this initiative, improved access to affordable housing, stability, and security will be achieved for eligible cohorts, fostering their resettlement and economic integration.

The expansion of affordable housing availability and strengthened collaboration with partners further contribute to the sustainability and inclusivity of the housing strategy.

The utilisation of funding from the Local Authorities Housing Fund ensures that there will be no negative impact on the Housing Register, allowing the acquired properties to be seamlessly integrated into the general housing needs inventory once the needs of the eligible cohorts have been met.

This proactive approach increases housing opportunities for the entire community, aligning with the principles of equality, fairness, and long-term housing sustainability.

Regular monitoring and evaluation of the LLP's outcomes will ensure ongoing improvements and informed decision-making for future housing initiatives.

### b. Overview of the action plan

No actions required.

### c. Recommendations for further consideration or action

No recommendations to be made.

## Appendices

a. Relevant data and analysis

b. Consultation responses and summaries

c. Additional information or references

## Approval and Sign-Off

a. EIA completion date

b. Approval by relevant authority/ies

c. Signatures and dates