



**WATFORD
BOROUGH
COUNCIL**

Equality Impact Analysis

Title of policy, function or service	Housing Nominations Policy
Lead officer	Justine Hoy, Associate Director – Housing & Wellbeing
Person completing the EIA	Catriona Wojcik, Housing Resettlement Manager & Trish Reed, Housing Consultant
Type of policy, function or service:	Existing (reviewed) <input checked="" type="checkbox"/> New/Proposed <input type="checkbox"/>
Version & Date	Version 5 25 th April 2025

1. Background

Local authorities are required by law to adopt and publish an Allocations Scheme - in Watford we call it a Nominations Policy – which sets out the priorities for the allocation of social housing accommodation and the procedures to be followed in accordance with Part 6 of the Housing Act 1996, as amended by the Homelessness Act 2002, the Localism Act 2011 and most recently the Homelessness Reduction Act 2017.

The policy covers who is eligible to apply for social housing and how priority for social housing is determined. It also sets out the procedures for nominating Housing Register applicants for social homes let within Watford.

Watford has a Nominations Policy, rather than an Allocations Policy, because all social housing available in the borough is owned by housing associations (also known as private registered providers) so we nominate Housing Register applicants to their vacant homes. The rules for joining the Housing Register, determining priority, and nominating applicants are the same as they would be for an Allocations Policy.

Watford's current Nominations Policy has been in place since August 2015. It was updated in March 2018 to ensure reasonable preference was given to homelessness applicants to whom the council had a Prevention or a Relief Duty under the Homelessness Reduction Act 2017.

A consultation was held in 2019 on several changes however these were never approved or implemented due to the pandemic. Since then further changes have been proposed to reflect current housing circumstances. This equality impact analysis covers all the proposed changes.

2. Focus of the Equality Impact Analysis

This EIA, therefore, considers the potential equality related impacts, both positive and negative of the Housing Nominations Policy on the people in the groups or with the characteristics protected in the Equalities Act 2010.

These are:

1. Age
2. Disability
3. Gender Reassignment
4. Pregnancy and maternity
5. Race
6. Religion or belief
7. Sex (gender)
8. Sexual Orientation
9. Marriage and Civil Partnership.

In addition to the Equality Act 2010, the council must have due regard to its corporate-parenting duties under s.1 Children & Social Work Act 2017 and Part 3 Children Act 1989. These require us to secure safe, suitable and stable accommodation for care-leavers and to promote their welfare and life-chances.

3. Engagement and consultation

The Nominations Policy is subject to a formal consultation for a period of nine weeks from Tuesday 6th May 2025 until Tuesday 8th July. This will consist of:

- A Press release
- An online survey on a specially designed digitally accessible consultation webpage on the council's website
- Meetings with stakeholders and representatives from our housing provider partners
- Direct communication with households affected who are already on the Housing Register
- Focus groups with young people and people living in supported housing who will be impacted by the proposed changes

On completion of the consultation the results will be analysed, including full consideration of any equality impacts raised and the policy will be amended accordingly. This summary of responses will be available to elected Members prior to approval at Cabinet in September with any equality impacts highlighted.

4. What we know about the Watford population

During 2023/24 a significant amount of research was undertaken into what we knew about the Watford population with data from the Housing Register as at 31/03/2023 and lettings to housing associations during 2022-23 to see where there were differences in need using the 2021 Census data.

There are a number of important caveats to be borne in mind in relation to this comparator exercise. Mostly importantly, the Housing Register comprises applicants affected by several factors which impact their access to it, namely that they:

- Are eligible to apply
- Have the requisite length of residence in Watford.
- Have not been excluded from the Housing Register due to unacceptable behaviour
- Have a housing need.

As a result it was not possible to say Housing Register applicants are representative of Watford's population. It does indicate that those who have applied and been accepted are in housing need that cannot be assisted through normal market means. Differences in the protected characteristics between Housing Register applicants and the general population can be helpful in understanding housing need amongst different household groups.

The following is a summary of the findings:

Population

The table below summarises the differences between Watford's general population in terms of age and Housing Register applicants. This shows that in the age groups from 20 – 50 years, Housing Register applicants are more highly represented than they are in Watford's census population.

Age Group (years) Census/Housing Register	Census proportion %	Housing Register proportion %	Commentary
15-19 / 16-20	5.5	5	Proportions are very similar in both cohorts
20-29 / 21-30	12.5%	17%	This age group is more prevalent amongst Housing Register applicants than it is in the general population - 4.5% more
30-39 / 31-40	17.4%	31%	This age group is 13.6% higher in the Housing Register than the general population
40-49 / 41-50	15.4%	22%	This age group is 6.6% higher in the Housing Register than in the general population
50-59 / 51-60	12.4%	12%	This age group is similarly represented in both Census and Housing Register cohorts.
60-69 / 61-70	8.1%	9%	This age group is similarly represented in both Census and Housing Register cohorts.
70-79 / 71-80	5.6%	2%	The Housing Register cohort is less prevalent than in the census by 3.6%
80 + / 81+	3.5%	2%	The Housing Register cohort is less prevalent than in the census by 1.5%

Sex (gender)

The Census did not allow for any option other than female or male and shows that females are marginally more prevalent than males in Watford.

Sex	2021 Census Data	Housing Register ¹ applicants as at 31/03/2023	Lettings ² to Housing Register applicants during 2022-23
FEMALE	50.8%	62%	62%
MALE	49.2%	38%	38%

¹ X:\Watford\05_Place_Shaping\02_Housing\Housing Strategy\Housing Strategy Projects\Housing & Other Data\Housing Waiting List\Housing Register as at dates\HR Data as at 31Mar23 - Equalities v2.xls – HR & Gender tab

² X:\Watford\05_Place_Shaping\02_Housing\Housing Strategy\Housing Strategy Projects\Housing & Other Data\Lettings\Lettings 2022-23\BI Lettings Report - 2022-23v2.xlsx, Tables - Gender tab

Comparing Housing Register applicants to 2021 Census data, the number of female headed Housing Register applicants is considerably higher than they are represented in the census population by some 12%. By contrast male Housing Register applicants are 11.2% under-represented compared with the census population.

In terms of Housing Register applicants, the sex breakdown is very different with female applicants far outweighing male applicants by almost 2:1. In terms of explaining the disparity between male and female Housing Register applicants versus census data and within the Housing Register the reasons include:

- Our homelessness data³ shows a significant number of single female parents approach the council as threatened with homelessness or homeless and are therefore eligible to join the Housing Register
- where couples apply, homeless or not, the female partner may be the lead Housing Register applicant.

There may be other reasons, such as the impact of the benefit cap and other welfare reforms implemented since 2010, access to reasonably paid work for single female parents, with affordable housing and childcare, let alone recent increases in the cost of living and so on. Further research is needed to fully understand what is happening here.

The 2022-23 data for lettings of housing association homes to Housing Register applicants shows the same proportions as for Housing Register applicants, showing there is no bias towards either sex in lettings activity.

Gender reassignment

From the census data Watford had the highest number of citizens in Hertfordshire whose gender identity was different from that registered at birth. There is however no equivalent historic data available for Housing Register applicants and lettings of housing association homes for us to make a comparison.

However, the Government introduced the monitoring of gender reassignment data in 2022. We now monitor this on all new applications and will be able to monitor the figures going forward.

Disability

The 2021 census shows that levels of disability in Watford are amongst the lowest in Hertfordshire. The total of day-to-day activities limited a lot and limited a little is 12.6%. The next lowest in Hertfordshire is St Albans at 13%. The highest is Stevenage at 17.2%. Hertfordshire as a whole is 14.4%, East of England is 16.6% and England is 17.3%.

Turning now to Housing Register data: again this is difficult to compare with the census as the question asked of applicants is whether they consider they have a disability, and if so, what is it. The proportion of Housing Register applicants who consider they have an impairment or disability is 23% which is almost double that of the 2021 Census population.

³ Available separately if required

Where a household contains someone with an impairment or disability, this often has an impact on household income which can lead to the household being less likely to be able to afford to rent or buy a home on the open market. Hence a home with a social landlord charging sub-market rents, accessed via the Housing Register, is seen as a viable option and is likely to be the main reason why there is high incidence of disability within Housing Register applicants compared with the general population. Disability can also be a contributing reason to why the household needs to move so it is accepted that the proportion on the housing register will be higher than in the general population.

Race

The following tables compare race/ethnic groups in Watford as at the 2011 census and the 2021 census. The first table has Census defined race/ethnic groups, whilst the second table summarises the data by broad ethnic categories.

The most significant change shown is in the White English/Welsh/Scottish/Northern Irish/British population which has decreased by almost 16% since 2011. The ethnic group which has risen the most is White Other at nearly 5%, with the Asian British Indian group having the next highest increase at 4.2% and Any Other Group increasing by 2.2% since 2011. Most other ethnic groups have also risen over the 10 year period.

Race/ethnicity ⁴	WATFORD 2011	WATFORD 2021	%increase/ decrease	Up/down 2021 compared with 2011
White:				
English/Welsh/Scottish/Northern Irish/British	61.90%	46.00%	-15.90%	Down
White Irish	2.30%	2.10%	-0.20%	Down
White: Gypsy or Irish Traveller	0.10%	0.10%	0.00%	Same
White: Roma	Not a category in 2011	0.30%	0.30%	N/A
White: Other White	7.70%	12.60%	4.90%	Up
Mixed or Multiple ethnic groups: White and Black Caribbean	1.10%	1.30%	0.20%	Up
Mixed or Multiple ethnic groups: White and Black African	0.50%	0.70%	0.20%	Up
Mixed or Multiple ethnic groups: White and Asian	1.00%	1.40%	0.40%	Up
Mixed or Multiple ethnic groups: Other Mixed or Multiple ethnic groups	0.80%	1.40%	0.60%	Up
Asian/Asian British/ Asian Welsh: Indian	5.50%	9.70%	4.20%	Up
Asian/Asian British/Asian Welsh: Pakistani	6.70%	8.00%	1.30%	Up

⁴ X:\Watford\05_Place_Shaping\02_Housing\Housing Strategy\Housing Strategy Projects\Housing & Other Data\Census data\2021 Race.xlsx

Race/ethnicity ⁴	WATFORD 2011	WATFORD 2021	%increase/ decrease	Up/down 2021 compared with 2011
Asian/Asian British/Asian Welsh: Bangladeshi	0.40%	0.50%	0.10%	Up
Asian/Asian British/Asian Welsh: Chinese	0.90%	1.00%	0.10%	Up
Asian/Asian British/Asian Welsh: Other Asian	4.40%	5.30%	0.90%	Up
Black, Black British, Black Welsh, Caribbean or African: African	3.50%	3.90%	0.40%	Up
Black, Black British, Black Welsh, Caribbean or African: Caribbean	1.70%	1.70%	0.00%	Same
Black, Black British, Black Welsh, Caribbean or African: Other Black	0.60%	0.80%	0.20%	Up
Other ethnic group: Arab	0.30%	0.70%	0.40%	Up
Other ethnic group: Any other ethnic group	0.60%	2.80%	2.20%	Up

Census data compared with Housing Register and social housing lettings

The next section compares the above data with race/ethnicity data for applicants on the Housing Register and those achieving lettings with housing associations (WBC does not own any social housing homes).

Race/ethnic group	No. of Housing Register applicants	Broken down by % representation on the Housing Register	Broken down by % representation in 2022-23 Lettings	2021 census %
Asian	183	18.7%	20%	24.5%
Black	159	16.2%	14%	6.4%
Mixed	53	5.4%	5%	4.8%
Other	23	2.3%	3%	3.5%
White	495	50.5%	52%	61.1%
Prefer not to say	68	6.9%	6%	Not known
Grand Total	981	100.0%	100%	100.0%

Key points to note from the data are that:

- Asian and White households are both under-represented in terms of their presence on the Housing Register and in lettings compared with Census data. White households, who make up 61.1% of Watford's general population, represent 50.5% of those on the Housing Register, which is 10% lower than the general population and in terms of lettings they achieve 52% of lettings, slightly higher than their proportion on the Housing Register. Asian households comprise 24.5% of Watford's population but on the Housing Register their proportion is less at 18.7% and their access to lettings is at 20%. For both Asian and White and households, the

proportion of lettings achieved is slightly higher than their presence on the Housing Register.

- Black households are significantly over-represented on the Housing Register (16.2%), almost 10% higher than their presence in Watford's general population, and over-represented in lettings (14%), some 7.6% higher compared with their presence in the 2021 census (6.4%). Compared with the White and Asian households, Black household the proportion of lettings achieved is around 2% less than their presence on the Housing Register. However, this difference in percentage represents a small number of applicants.
- The representation of Mixed and Other ethnic households is very similar across Census, Housing Register, and lettings data.

The data shows there may be a significant housing need within the Black communities of Watford and more research is needed to understand why this is and why their levels of lettings are less than their presence on the Housing Register.

Religion and belief

2021 Census data shows the largest religious group is Christian (44.4%) and which is also the biggest religious group in both the Housing Register data (34.4%) and Lettings data (32.5%) (see tables below). Compared with the census data, the Christian religious group is somewhat less within the Housing Register and lettings data than represented in Watford's general population by some 10% and 11.9% respectively.

The Muslim religious group comprises 20.6% of all Housing Register applicants and 24.2% of lettings to social housing which is somewhat higher than their presence in general Watford population at 13%. Citizens and applicants with no religion are at similar levels: 24.8% in the census, 26.4% in the Housing Register data and 23.9% in lettings data.

Housing Register applicants by religion	No religion	Christian	Buddhist	Hindu	Jewish	Muslim	Sikh	Other	Prefer not to say / not known	Grand Total
No.s	259	337	5	14	2	202	2	20	140	981
Proportion %	26.4%	34.4%	0.5%	1.4%	0.2%	20.6%	0.2%	2.0%	14.3%	100.0%

All lettings by religion of applicant	No religion	Christian	Hindu	Jewish	Muslim	Other	Prefer not to say / not known	Grand Total
No.s	75	102	1	2	76	12	46	314
%	23.9%	32.5%	0.3%	0.6%	24.2%	3.8%	14.6%	100.0%

Sexual orientation

The following data compares Watford 2021 census data on sexual orientation within the population with that of Hertfordshire. Most of the usual residents aged 16 and over are straight or heterosexual (88.9%), whilst the number that did not answer this question at all was 8.3%.

Area	Watford	Hertfordshire
All usual residents aged 16 years and over	80,963	959,081
Straight or Heterosexual	72,016	869,781
Gay or Lesbian	914	10,644
Bisexual	962	9,583
Pansexual	233	1,884
Asexual	48	465
Queer	12	161
All other sexual orientations	19	174
Not answered	6,759	66,389

The council collects sexual orientation data for lettings as follows:

Lettings - Sexual orientation of applicants housed	No. of applicants housed 2022-23	%
Did not respond	162	51.6%
Applicant Prefers not to say	43	13.7%
Heterosexual / Straight	108	34.4%
Other sexual orientation	1	0.3%
Grand Total	314	100.0%

The data shows that more than half of applicants did not provide information on their sexual orientation. With such a high non-response rate, there is little merit in analysing this set of data in the same way as other protected characteristics in this paper. We will review whether to make this a mandatory field on the application form.

5. How will the council ensure equality is promoted through the Nominations Policy

Under the Equality Act 2010, three areas need to be considered when analysing the equality impact of the Nominations Policy:

1. **eliminate** discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act
2. **advance** equality of opportunity between people who share a relevant protected characteristic and people who do not share it
3. **foster** good relations between people who share a relevant protected characteristic and people who do not

A. Positive impacts

Most impacts resulting from the proposed changes are positive as the policy will be more generous and allows more flexibility to respond to the pressures the council faces in terms of available housing stock. It also provides an effective move-on option for single people housed in the single homeless pathway who otherwise may not be able to move on to affordable settled accommodation when they are ready.

The council is introducing additional ways to prioritise people in housing need rather than limit it, including where homes have damp and mould and by including care leavers who are more disadvantaged than many when considering their future housing options.

Other more explanatory changes are designed to make the policy more accessible and clearer for applicants to understand, providing clear reasoning for some of the more procedural elements.

B. Negative impacts

There are a few elements that appear negative for example limiting the number of offers and removing a period where applicants can bid for properties they choose, that are required so the council can make best use of available housing stock.

These negatives will predominantly affect all protected characteristics, but this will be monitored carefully to ensure no specific group are negatively impacted.

6. Overall conclusion

Overall, the changes proposed within the new Nomination Policy are largely a relaxation of the criteria that applicants need to meet to access to the Housing Register, and this combined with the additional priority awarded for certain new circumstances results in a policy that has an overall positive impact in terms of equality considerations.

There is one change that we believe is 'neutral' in terms of positive or negative impact and that is the move from five bands to three. We believe this isn't changing the preference awarded in any way but is a mechanism to make it easier for all applicants to understand and for officers to manage the system on a day to day basis.

The council is committed to monitoring all elements of the Nominations Policy following the implementation of the new policy through annual reviews, particularly in terms of the impact the introduction of quotas will have.

Positive Impact	Protected characteristics	Ways to ensure the positive impact
Easing the local connection requirement from 5 out of the last 6 years living in Watford to 5 out of the last 7 years and changing local residence requirement for single applicants in the Single Homeless Pathway (SHP) and Care Leavers.	Age Sex Race	This change is likely to benefit applicants from the Single Homeless Pathway who are White, male, in the age range of 36-54, and an increased number may have a disability, but the latter is from a low base. The low numbers involved will have little impact on other applicants on the Housing Register. Care leavers will be positively impacted.
Enabling applicants threatened with homelessness who accept an offer of a private rented home to remain on the Housing Register and bid on the CBL system for three years.	Age Sex	The number of households this affects is small and from the scarce data available it is not possible to come to any equality impact conclusions, however we believe this will have a positive impact.
Adding two new local reasonable preferences: a) Applicants ready to move on from accommodation and support in Watford's Single Homeless Pathway (SHP) and other supported schemes funded by Hertfordshire County Council (HCC). b) Applicants currently occupying Housing First (HP) properties.	Age Sex Race	This change is likely to benefit applicants from the Single Homeless Pathway who are White, male, in the age range of 36-54, and an increased number may have a disability, but the latter is from a low base. The low numbers involved will have little impact on other applicants on the Housing Register.
Additional priority to deal with damp and mouldy properties	All	This is a new area of concern for the council's Nominations Policy so is a positive move for all applicants and will be closely monitored to understand any links between protected characteristics and damp and mould issues.

Positive Impact	Protected characteristics	Ways to ensure the positive impact
Moving certain homeless households in temporary accommodation from Band B to Band A after a period of 12 months.	All	Important context for this is the lack of larger sized, affordable, social or private rented homes locally which means larger households tend to remain in TA for longer than 12 months.
Explaining why the council sometimes overlooks applicants' bids, in some limited circumstances. This benefits people to ensure the properties they are offered are suitable for their needs	All Disability	We sense check and monitor that we are not discriminating. We will use this element of the policy to overlook if properties are not suitable medically/due to disability or for sensitive lettings. We will, however, make sure we do not overlook based on physical disability for properties if the properties can be adapted (e.g. properties may be wheelchair adaptable if not adapted already).
Explaining the criteria for suspending applications. Less than a handful of applicants are suspended from the Housing Register because of anti-social behaviour.	All	Ensuring positive impact will occur through monitoring by protected characteristics to see if there is any impact for particular groups and changes in policy or practice made if needed.
Changing the bedroom entitlement to align with that for local housing allowance and allocating a bedroom for adult dependants aged 19 or over	Age Disability	This is positive for families with disabled adult children and to enable families to remain living together for longer.

Positive Impact	Protected characteristics	Ways to ensure the positive impact
Introducing a new Emergency and Exceptions Panel	All	The panel allows us to show that we are not discriminating and acknowledge exceptional circumstances across all protected characteristics. Monitoring of decisions will be undertaken annually to include protected characteristics. Terms of reference for the group will be developed and published during the implementation phase.

Summary of potential negative impacts and ways in which they can be removed or mitigated

Negative Impact	Protected characteristics	Ways to mitigate the negative impact
Reducing the number of offers to non-homeless Housing Register applicants from three to two, and limit care leavers and those in the Single Homeless Pathway to one offer only of accommodation.	All	The small number of households this affects will offer less choice by restricting the number of offers. This is required to address the housing crisis and will be monitored to ensure any negative impacts don't adversely impact any particular groups. Properties will always be assessed for suitability prior to being considered an appropriate offer.
Removing two months free bidding for homeless households and care leavers makes the process fairer and more automated although it takes away the perceived element of choice. NB: free bidding is where applicants bid for the property they choose. Automated bidding is where the system makes an automated bid on their behalf.	Sex Race Age	The groups most likely to benefit from this proposal are those that need studios, one or two bedroom homes, as they are in more plentiful supply. Any property offered would however have to be suitable with free bidding or automated bidding.
Letting available homes by quotas as well as bands with quotas	All	This new system will relate only to applicant type (Homeseeker/Homeless/Transfer) and will be

Negative Impact	Protected characteristics	Ways to mitigate the negative impact
		reviewed annually to enable flexibility to meet local housing need. Any negative impacts will be reviewed during the annual review of the quota system.

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This EIA has been approved by:

Lee Pound Date 9/5/25

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