

## **Appendix B**

# **WATFORD BOROUGH COUNCIL TEMPORARY ACCOMMODATION PLACEMENT POLICY: EQUALITY IMPACT ANALYSIS**

## **1. Introduction**

This report presents the findings of an assessment of the potential impacts of the Watford Temporary Accommodation (TA) Placement Policy. The assessment aims to ensure that the policy takes into account the needs and aspirations of a wide range of groups and does not lead to the unlawful discrimination upon any individual or group.

## **2. Report methodology**

The methodology to be used in the production of the Temporary Accommodation Placement Policy Equality Impact Assessment is based on guidance published by Watford Borough Council. In line with this guidance, this report will assess the positive and negative impact of the proposals included within the Temporary Accommodation Placement Policy in respect of the “protected characteristics” set out in the Equality Act 2010.

These are:

- Age
- Disability
- Gender reassignment
- Pregnancy and maternity
- Race
- Religion and belief
- Sex (gender)
- Sexual orientation
- Marriage and civil partnership

The assessment considers the impact of the Temporary Accommodation Placement Policy in order to:

- Identify the needs of equality groups
- Identify the positive impacts of the proposed policy
- Identify the adverse impacts of the proposed policy
- Identify proportionate and reasonable mitigation measures that need to be incorporated into the policy to reduce or eradicate significant adverse impacts.

This will be established by:

- Awareness of the relevant national, regional and local legislation and policy with regard to equality issues.
- Consultation with a wide range of individuals and groups who are stakeholders in the placement of existing and potential applicants in temporary accommodation by Watford Borough Council.

Impacts have been compiled into tables in section 6 of the report, as per Watford Borough Council’s guidelines, with impacts noted per group and classified as positive, neutral or negative. There is then a description of the reason for that classification and a description of the proposed mitigation of the impact, if necessary.

### **3. Local and National policies**

A variety of national legislation underpins the requirement and need to carry out an equality impact assessment for the proposed Watford Temporary Accommodation Placement Policy. This legislation highlights how equality is increasingly recognised as a fundamental part of the policy-making process, while also requiring organisations to adopt a more proactive approach to promoting equality of opportunity across a variety of projects including those to the built environment.

The Equality Act brings together all the existing strands of equality and discrimination legislation and provides a much clearer picture of existing law, extending it to cover some anomalies in existing discrimination law, and creating a stronger set of obligations on public bodies to promote equality. National legislation underpins Watford Borough Council's local policy which is set out in the Single Equality Scheme 2010-2013.

The primary aspiration of this policy is to create and maintain a borough in which each person has an equal entitlement and access to quality services and employment opportunities, irrespective of their race, religion or belief, disability, age, gender, gender reassignment, sexual orientation, family circumstances, marital status or financial status. The policy sets out its commitment to:

- Promote the principles and practices of equality throughout the council and the borough, as well as with appropriate multi-agency partnerships.
- Implement clear internal policies and procedures to address inequality and ensure that all employees and service users are not discriminated against on the basis of race, gender, disability, age, religion and belief, gender reassignment or sexual orientation.
- Challenge when unfair discrimination and harassment is seen.
- Promote good relations between people of different races.
- Promote equality of opportunity for disabled people, and between men and women.
- Promote equality of opportunity for people of all ages, sexual orientation, religions or belief.
- Undertake effective and meaningful consultation and encourage active community participation and involvement in decisions.
- Ensure that recruitment procedures provide equality of access for all staff and local communities.
- Assess, monitor and evaluate the implementation of access for all policies through Equality Impact Assessments, making appropriate adjustments where necessary.

Consultation and this Equalities Impact Assessment are required stages of the process to ensure Watford Borough Council meets its duties under The Equality Act 2010.

### **4. Background and Description**

The Council has a duty to provide suitable temporary accommodation (TA) Under Part VII Housing Act 1996 to households who are eligible, homeless and have a priority need until a decision has been reached on their application as to what duty if any is owed.

If the council decides that it owes a 'full housing duty', an applicant will continue to be provided with TA until they find their own accommodation or are offered permanent housing (either social housing; or from November 2012, a local authority's homelessness duty can be discharged through the use of a suitable private rented property).

The council takes into account the circumstances of each household when allocating TA or a private rented property to ensure that it is suitable. Watford Borough Council's Placement Policy outlines the approach that will be taken in making placements into temporary accommodation. The same principles already apply to discharge into the private rented sector. This policy has been in operation informally for a number of years for TA placements and there has been a yearly increase in placements outside of the borough. 32% of TA residents are currently placed out of borough. As at 31<sup>st</sup> January 2016, 72 out of a total of 227 applicants in TA were placed out of the borough.

The Council would prefer for all placements to be made within borough boundaries. This is in line with the legislation and statutory guidance set out by the government which requires that Councils should place homeless households in their own district wherever possible. The guidance states that the circumstances of the whole family must be considered, and where a placement is made out-of-district the following will apply:

*Where it is not possible to secure accommodation within district and an authority has secured accommodation outside their district, the authority is required to take into account the distance of that accommodation from the district of the authority. Where accommodation which is otherwise suitable and affordable is available nearer to the authority's district than the accommodation which it has secured, the accommodation which it has secured is not likely to be suitable unless the authority has a justifiable reason or the applicant has specified a preference. DCLG, 2012<sup>1</sup>*

It is important to note that of those placed out of borough, most are placed in the boroughs of Dacorum, Hertsmere, Harrow, Luton and Central Bedfordshire. However, in borough placements are becoming in increasingly short supply due to rising costs and benefit restrictions and it is likely that an increased proportion of households will be placed out of borough in future.

Welfare Reform ( low levels of local housing allowance against increasing local market rent) is negatively impacting on our supply of 2 bedroom accommodation the main size required for households in TA. We have seen a decrease in the overall number of social lettings by 20% in the previous 24 months to date. TA occupation has more than doubled since March 2013 with over 200 families now occupying TA. The council needs to avoid the use of unsuitable TA that is either of the wrong type (i.e. B+B accommodation for families) or too expensive accommodation.

Given the dwindling supplies of local affordable accommodation used for TA the Council require a formalised policy to safeguard the interests of those requiring TA (or a suitable place in private rented accommodation). The Temporary Accommodation Placement Policy's aim is to prioritise the constrained supply of suitable temporary / affordable private rented in-borough housing to those that need it the most; make the council's position consistent and clear; and reduce any risk of legal challenge. Depending on their individual circumstances, households could be placed in one of two groups in line with the DCLG guide which states:

*Generally, where possible, authorities should try to secure accommodation that is as close as possible to where an applicant was previously living. Securing accommodation for an applicant in a different location can cause difficulties for some applicants.*

*Local authorities are required to take into account the significance of any disruption with specific regard to employment, caring responsibilities or education of the applicant or members of their household.*

*Where possible the authority should seek to retain established links with schools, doctors, social workers and other key services and support. Authorities should also take into account the need to minimise disruption to the education of young people, particularly at critical points in time such as leading up to taking GCSE (or their equivalent) examinations. DCLG, 2012<sup>1</sup>*

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GROUP A –Households that have an assessed need to be placed in the local area / adjacent boroughs / 90 minutes travel time on public transport). This group includes but is not limited to households with children in key stages of education e.g. sitting their GCSEs, those in settled employment, those with exceptional medical and social welfare requirements.

GROUP B – All other households. This includes those who would otherwise be in Group A but do not have an exceptional need to be in Watford or the local area.

This implies that the Council is required to carry out searches in an increasing radius, or in terms of travel time, to source accommodation. The emphasis is on securing accommodation that is suitable and affordable. In this respect, affordability applies to both to the client and to the placing council. All placements are subject to a thorough suitability assessment to determine the type and location of accommodation that should be offered. There is legislative guidance and extensive case law on this and the placement policy provides guidelines for officers to follow.

The following questions form part of the suitability assessment:-

#### Medical

1. Do you or anyone in your household have any diagnosed medical requirements which mean that you have to live close to a medical centre? I.e. Doctor surgery, hospital
2. Do you or anyone in your household have a carer that either lives with you or comes in to provide care?
3. Do you or anyone in your household provide significant amount of care to someone else, e.g. a relative you don't live with?

#### Special Needs

4. Do you have any support services that you or anyone in your household works with?
5. Are you at risk in any area/s?

#### Education

6. Do you have any children attending school?
7. What school does your child attend and what years are your children currently in?
8. Do any of your children have a Statement of Special Educational Needs?

#### Employment

9. Are you or anyone in your household currently employed? If so, when did you start working for your current employer and where is your job mainly based?

#### Other Factors

10. Are there any other key factors that think should be considered regarding any affect the location you are placed in may have on you and your family?

## **5. Consultation Methods and Headline Findings**

The draft copy of the policy has been made available to stakeholders and service providers operating within the Watford Borough Council area. A questionnaire was then compiled which was made available for the wider public, online through the Council's website and letters with questionnaires attached were sent to 220+ housing applicants residing in temporary accommodation.

### **Headline findings**

- The responses from existing TA applicants' were based on their individual circumstances
- Recognition and acceptance that the social housing sector can no longer meet the totality of housing need of people in Watford
- Limited number of available properties in the private rented sector in the Watford area
- The need to source properties in areas outside of Watford could not be avoided
- Desire from support services to be involved in the process of placing potential applicants outside of Watford particularly the vulnerable client group
- Request for further support with quicker access and processing of housing benefit applications to avoid applicants with support needs losing offers of accommodation.

### **Comparative Analysis**

These involve a comparative analysis of the recent information obtained from the Office of National Statistics (ONS), records on Locata Housing Management System and responses received during the consultation process from the public and applicants in Watford TA

## 6. Impact Assessments

### 6.1 Watford population (ONS Data)

Watford is an extremely diverse borough. Understanding our population helps ensure the needs of local people and communities are taken into account. Outlined below are some of the key Office of National Statistics (ONS) data and information that supports our understanding of the Watford community and assessing our housing needs

Watford	Total Resident Population	Males	Females
All Ages	90,300	44,800	45,500
0-4	6,700	3,400	3,300
5-9	5,400	2,800	2,600
10-14	5,300	2,700	2,600
15-19	5,300	2,700	2,600
20-24	5,700	2,800	2,900
25-29	8,000	3,900	4,200
30-34	8,100	4,100	4,000
35-39	7,300	3,700	3,600
40-44	7,000	3,600	3,500
45-49	6,400	3,300	3,100
50-54	5,400	2,700	2,600
55-59	4,400	2,200	2,100
60-64	4,000	1,900	2,100
65-69	3,100	1,500	1,600
70-74	2,600	1,200	1,400
75-79	2,200	1,000	1,200
80-84	1,700	700	1,000
85-89	1,000	400	700
90 and over	600	100	400

Source: Office for National Statistics 2011 Census

49.6% of Watford's resident population in 2011 were male, as compared to 49.2% in 2001 and 50.4% were female, as compared to 50.8% in 2001. Further analysis of the population is below.

<b>Population</b>	<p>The size of Watford's population at the time of the census in 2011 was <b>90,300</b>. This is around a 13% increase in population since the last census in 2001 when the population was 79,726.</p> <p>The current mid-year estimate (2014 revised) puts the population at <b>95,500</b>.</p> <p>Watford's numerical population growth of 1,769 persons between mid 2013 and mid 2014 was made up of the following:-</p> <ul style="list-style-type: none"> <li>• Excess births over deaths +862 persons</li> <li>• Net internal in-migration persons +318</li> <li>• Net international in-migration +590 persons</li> <li>• Other person -1</li> </ul>
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	<ul style="list-style-type: none"> <li>• <i>Total persons</i> +1,769</li> </ul> <p>This marks a major change from mid 2012 to mid 2013 population growth in which net internal in-migration was the biggest component in Watford's population growth. What it means for the borough is that its attraction for a diverse range of the population continues to be a big draw and, ultimately, adds to town's overall diversity.</p>
<b>Population density</b>	<p>The population density for Watford is around 4,300 people per square kilometre. This makes it the most densely populated district area in England and Wales being 21 sq km (8 sq mi). However, in comparison with some metropolitan boroughs, particularly those in and around the outskirts of London, the density is relatively low.</p> <p>Since 2013, Watford's popularity as a place to live has increased. All indications are that its appeal continues to extend beyond the borough and it attracts new residents because of its excellent transport links, proximity to London and high levels of employment opportunities. The town also benefits from a good range of facilities, entertainment and leisure venues and a strong social fabric – including its range of voluntary and community groups and organisations.</p>
<b>Age</b>	<p>Watford continues to have a relatively young population - particularly in comparison to the rest of Hertfordshire.</p> <p>The largest populations by age band in Watford are:</p> <ul style="list-style-type: none"> <li>• 25-29 (8,000); 30-34 (8,100); 35-39 (7,300); 40-44 (7,000)</li> <li>• the numbers in each successive age-band fall progressively until there are estimated to be 1,600 who are 85+.</li> </ul> <p>The <b>median age</b> in Watford is <b>35</b> - no change since 2001. This is the lowest median age in Hertfordshire and is the fifth lowest median age in the Eastern region (47 local authority areas in total). The median age for the UK is 39.</p> <p>Watford has the fourth highest percentage population of 0-4 year olds in the Eastern region and the sixth highest 0-14 year olds. In comparison, Watford has the third lowest percentage population of 65+ in the region.</p>
<b>Households</b>	<p>The average household size in Watford is <b>2.4</b>. This is average for the region.</p> <p><b>Number of households</b></p> <p>The ONS data, based on the census, says that there were <b>36,681</b> households in Watford at the time of the Census; as of March 31 2015 is the figure was <b>38,482</b>.</p> <p>Watford had the fourth highest percentage change in households - <b>+14.6%</b> - in the Eastern region from 2001 to 2011.</p> <p><b>Household Composition</b></p> <ul style="list-style-type: none"> <li>• <b>Most frequent household</b> = single people aged under pensionable age. <ul style="list-style-type: none"> <li>• Grown from 17.5% in 2001 to <b>21.1%</b> in 2011 (overtaken</li> </ul> </li> </ul>

	<p>married couples with children)</p> <ul style="list-style-type: none"> <li>• <b>Lone parents</b> - significant rise in the number and % of lone parents (from 4.9% in 2001 to <b>7.2%</b> in 2011)</li> <li>• <b>One person pensioner households</b> – declined in both numbers and percentage (from 12.2% 2001 to <b>10.0%</b> in 2011)</li> </ul> <p><b>Household tenure</b></p> <ul style="list-style-type: none"> <li>• <b>Privately rented housing:</b> <ul style="list-style-type: none"> <li>• increased from 3,170 homes in 2001 to 7,371 homes in 2011, from 9.8% to 20.1% of the housing stock</li> </ul> </li> <li>• <b>Homes owned outright:</b> <ul style="list-style-type: none"> <li>• decreased from 26.1% to 24.4%</li> </ul> </li> <li>• <b>Homes being purchased with a mortgage:</b> <ul style="list-style-type: none"> <li>• decreased from 46.1% to 37.2%</li> </ul> </li> <li>• <b>Social housing</b> remained static as % of the total housing stock (16.3% in both 2001 and 2011) yet it has increased in number from 5,266 in 2001 to 5,987 in 2011</li> </ul>
<b>Projections</b>	The ONS interim 2012-based sub national population projections are an indication of the future trends in population over the next 10 years. Watford's population is projected to be <b>103,000</b> by 2021
<b>Sex</b>	Watford has a balanced male / female population.
<b>Ethnicity</b>	The White British population has decreased from 2001 to 2011 and is now 62% of the Watford population. All ethnic categories except for White British and White Irish have increased over the time period, with notable percentage increase in White Other, Indian, Pakistani and Black African. Other white is the largest non-White British ethnic group in Watford (7.7%) followed by South Asian(11%) and Black African(3.5%). Recent data indicates that this trend continues.
<b>Religion</b>	54% of the Watford population identified themselves as Christian in the 2011 Census, 21% stated they had 'no religion, and just under 10% identified themselves as Muslim.

## 6.2 Housing records on Locata

This is the analysis of the records of applicants who have been placed in temporary accommodation by Watford Borough Council is below. Over 100 responses were received which



represented a mix of online responses and responses many of which were past and present TA applicants.

<b>AGE</b>																			
	<table border="1" data-bbox="632 387 1002 689"> <thead> <tr> <th>Age band</th> <th>No</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>18-25</td> <td>11</td> <td>5%</td> </tr> <tr> <td>25-40</td> <td>127</td> <td>56%</td> </tr> <tr> <td>41-59</td> <td>73</td> <td>32%</td> </tr> <tr> <td>60-80</td> <td>16</td> <td>7%</td> </tr> <tr> <td>Total (Main Applicants)</td> <td>227</td> <td></td> </tr> </tbody> </table> <p data-bbox="632 730 1414 801">The larger majority of current TA occupants range from the ages of 25 to 59 years. This is comparatively similar to the census figures</p> <p data-bbox="632 837 1414 1003"><b>Positive:</b> for the reasons of transparency and clarity as above. As priority for housing is generally through having dependent children, younger households are over represented in temporary accommodation .The placement policy means that children at key stages of their education are less likely to be placed out of the borough.</p> <p data-bbox="632 1039 1414 1137"><b>Negative:</b> There is a negative impact on school children not at a key stage of their education. Some may have to change their schools due to increased travel time.</p>	Age band	No	%	18-25	11	5%	25-40	127	56%	41-59	73	32%	60-80	16	7%	Total (Main Applicants)	227	
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<b>DISABILITY</b>																			
	<p data-bbox="632 1200 1366 1308">The ONS maintains records for areas with lowest and highest activity limitations and Watford does not fall into either of these groups.</p> <p data-bbox="632 1344 1414 1487">Elements of limited activity was indicated by 30% of TA applicants but was accepted in 5% of applications following medical assessment. This indicates that there is very limited number of affected applicants currently in TA</p> <p data-bbox="632 1523 1414 1765"><b>Positive:</b> Households with significant disabilities or medical needs, including mental health, where their health or welfare may be significantly adversely affect by moving out of the local area, as assessed by the Council's medical advisor would be prioritised to remain in the local area. 10% of households in TA are currently due to their possible priority from physical or mental illness, though this does not include families with disabilities as having dependent children grants them priority.</p> <p data-bbox="632 1800 1334 1863"><b>Negative:</b> Applicants with this characteristic may require specially adapted properties which are quite limited in supply in the area</p>																		
<b>GENDER REASSIGNMENT</b>																			
	<p data-bbox="632 1980 1034 2042">Records unavailable with the ONS We also do not report on this characteristic</p> <p data-bbox="632 2051 1378 2085"><b>Positive:</b> although we do not report on gender re-assignment, a</p>																		

	clearer more transparent process based on individual assessment is likely to be beneficial to all groups. If gender reassignment presented any impact on the placement it would be considered as part of the suitability assessment under 'Other factors'.															
<b>PREGNANCY AND MATERNITY</b>																
	<p>ONS generally retains records for the areas of high rates of occurrence for the characteristic. Watford is not recognised as an area of high rate of pregnancy and maternity.</p> <p>Pregnant applicants and those with young children in TA</p> <table border="1"> <thead> <tr> <th>Household Type</th> <th>No</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>Couples with children</td> <td><b>71</b></td> <td><b>31%</b></td> </tr> <tr> <td>Lone parent female</td> <td><b>114</b></td> <td><b>50%</b></td> </tr> <tr> <td>Lone parent male</td> <td><b>9</b></td> <td><b>4%</b></td> </tr> <tr> <td>Total No of Households in TA (includes single male and female households)</td> <td>227</td> <td></td> </tr> </tbody> </table> <p><b>Positive:</b> for the general reasons of clarity and transparency, 85% of residents fall into this group and many of who are prioritised for accommodation in the local area.</p> <p><b>Negative:</b> Some families may be placed out of area due to lack of suitable accommodation however they are prioritised for move back into the local area. Delays often arise when applicants refuse offers of suitable accommodation.</p>	Household Type	No	%	Couples with children	<b>71</b>	<b>31%</b>	Lone parent female	<b>114</b>	<b>50%</b>	Lone parent male	<b>9</b>	<b>4%</b>	Total No of Households in TA (includes single male and female households)	227	
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<b>RACE</b>																
	<p>According to the ONS, Watford population comprises of 75%(White British, Irish and other), 18% (Asian, Asian British, Indian, Pakistani) and 7% (Black, Black British, African and Caribbean) All ethnic categories except for White British and White Irish have increased over the time period, with notable percentage increase in White Other, Indian, Pakistani and Black African.</p> <p>There is significant difference with the TA population. Black and minority ethnic groups make up more than 60% of the existing applicants while the remaining 40% comprise of White (British, Irish and Other).</p> <p><b>Positive:</b> Overall, the change is positive as it formalises existing practises whilst at the same time making them more transparent, consistent and clearly defined. There is no adverse impact due to race.</p>															
<b>RELIGION AND BELIEF</b>																
	<p>According to the ONS, Watford population consists of 54% Christian, 21% had 'no religion', and under 10% as Muslim.'</p> <p>Most of the TA applicants do not indicate their preference.</p>															

	<p><b>Positive</b> – although we have much limited data on religion and belief, a clearer, more transparent process based on individual assessment is likely to be beneficial to all groups. If religion and belief, presented any impact on the placement it would be considered as part of the suitability assessment under ‘Other factors’.</p>
<b>SEX (GENDER)</b>	
	<p>According to the ONS, men form 49.6% and women 50.4% of the Watford population indicating a balance.</p> <p>There is significant difference with the TA population as women represent 74% and men 26%</p> <p>Women are disproportionately affected as they represent 74% of households in TA, compared to 26% as men. Women are over represented is because the main reason for a local authority to have a duty to provide accommodation is dependent children. Overall it is positive as this group is prioritised for local area placements and also for the reasons of transparency and clarity as above.</p>
<b>SEXUAL ORIENTATION</b>	
	<p>The ONS do not maintain records for this characteristic.</p> <p>We do not record this characteristic for TA applicants.</p> <p><b>Positive</b> – although we do not record the characteristic, clearer and more transparent process based on individual assessment is likely to be beneficial to all groups. If sexual orientation, presented any impact on the placement it would be considered as part of the suitability assessment under ‘Other factors’.</p>
<b>MARRIAGE AND CIVIL PARTNERSHIP</b>	
	<p>According to the ONS, 38% of the population are either married or in a civil partnership</p> <p>This is represented in TA as 31% of applicants in TA have indicated to be in a form of relationship.</p> <p><b>Positive:</b> for the general reasons already given. We do not report on marital status, though the majority are single / single parent households, suggesting a relatively lower % of married / civil partnerships in this group</p>
<b>SOCIO-ECONOMIC FACTORS</b>	
	<p>The ONS reports Watford as a thriving town benefiting from growing young population of professionals and increased property prices.</p> <p>There is significant difference with the TA population most of who will require welfare support.</p>

	<p><b>Positive.</b> Most TA households are in receipt of household benefit. The affordability of accommodation is a significant factor in determining suitability. The policy allows for consideration to be given as to whether the applicant can afford housing without being deprived of basics such as food, clothing, heating, transport and other essentials; and in doing so will take account of costs resulting from the location of accommodation. The policy also allows for those in full time employment in Watford to be prioritised for the available local supply, of particular benefit to those in lower paid jobs</p>
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### 6.3 Consultation Findings

Consultation on the policy was conducted through questionnaire which was made available to the general public via online survey and also sent directly to the residents in Watford TA by post. The questions and analysis of the responses are below.

#### 6.31 Demography

Race	Percentage
White British, Irish, Other	55%
Black British, African, Caribbean	15%
Asian British, Pakistani, Indian, Bangladeshi	20%
Did not say	10%

#### 6.32 Survey Questions and Responses

Question	Response
<i>Do you agree that, in order to meet the current high level of demand for urgent, temporary accommodation, the council</i>	50% disagreed; 30% agreed; 20% did not comment

Question	Response
<p><i>should look for suitable properties outside of Watford?</i></p>	<p>We accept that applicants and their households would prefer to be placed in the local area and this is what we would want to achieve.</p> <p><b>Mitigation:</b> The Council will prioritise the transfer of affected applicants back into the area as soon as suitable accommodation become available. There is increased efforts to source and build more TA in the area</p>
Question	Responses
<p><i>Thinking about each one, do you agree that they are important factors when the council is making a decision?</i></p>	<p><i>a. People with a severe and ongoing health problem that requires treatment in Watford</i></p> <p>80% agreed; 10% disagreed; 10% did not comment</p> <p>We accept that applicants and their households would prefer to be placed in the local area and this is what we would want to achieve.</p> <p><b>Mitigation:</b> The Council will prioritise the transfer of affected applicants back into the area as soon as suitable accommodation become available. There is increased efforts to source and build more TA in the area</p> <p><i>b. Families with a child with special educational needs who is being educated in Watford</i></p> <p>70% agreed; 20% disagreed; 10% did not comment</p> <p>We accept that applicants and their households would prefer to be placed in the local area and this is what we would want to achieve.</p> <p><b>Mitigation:</b> The Council will prioritise the transfer of affected applicants back into the area as soon as suitable accommodation become available. There is increased efforts to source and build more TA in the area</p> <p><i>c. People who are providing care and support to a family member who lives in Watford</i></p> <p>70% agreed; 20% disagreed;</p>

Question	Response
	<p>10% did not comment</p> <p>We accept that applicants and their households would prefer to be placed in the local area and this is what we would want to achieve.</p> <p><b>Mitigation:</b> The Council will prioritise the transfer of affected applicants back into the area as soon as suitable accommodation become available. There is increased efforts to source and build more TA in the area</p>
Question	Responses
<p><i>The council is also looking to prioritise finding accommodation within reasonable travelling time [this is 90 minutes by public transport] for people in the categories</i></p>	<p><i>a. Families who have a child, or children, over the age of 14 who are enrolled in public examination courses (e.g GCSEs or A' levels) in Watford</i></p> <p>30% agreed; 60% disagreed; 10% did not know</p> <p>We accept that applicants and their households would prefer to be placed in the local area and this is what we would want to achieve.</p> <p><b>Mitigation:</b> The Council will prioritise the transfer of affected applicants back into the area as soon as suitable accommodation become available. There is increased efforts to source and build more TA in the area</p> <p><i>b. People who have worked in Watford for more than six months (16 hrs /week for a single person or lone parent and 20 hrs/ week for a couple</i></p> <p>30% agreed; 60% disagreed; 10% did not know</p> <p>We accept that applicants and their households would prefer to be placed in the local area and this is what we would want to achieve.</p> <p><b>Mitigation:</b> The Council will prioritise the transfer of affected applicants back into the area as soon as suitable accommodation become available. There is increased efforts to source and build more TA in the area</p>

## -6.4 Conclusions and justification

<b>Conclusions</b>	<b>Justification</b>
<p><i>The main conclusions of this EIA?</i></p> <p><i>What, if any, disproportionate negative or positive equality impacts identified?</i></p> <p><i>Grounds for justifying them and how will they be mitigated?</i></p>	<p>As with any policy which allocates housing in Watford, with demand far exceeding supply, there will be positive and negative impacts. The policy aims to make this a fair process as much as possible. By formalising existing practises in a clear, transparent and equitable way, the introduction of this policy is positive from an equalities perspective.</p> <p>Overall the impact on any particular equalities group is limited. Each case is assessed on its merits. Statistical analysis of the current use of out of area placements indicates that there is no indirect discrimination taking place.</p>
<b>Equality Issues</b>	<b>Mitigation</b>
<p>Increased use of out of borough placements may incur unforeseen outcomes</p>	<p>Regular review of equality impacts of this policy.</p>