



**WATFORD  
BOROUGH  
COUNCIL**

# Equality Impact Analysis

<b>Title of policy, function or service</b>	Licensing Act 2003 Statement of Licensing Policy 2018-2023 (revised April 2021)
<b>Lead officer</b>	Head of Community Protection
<b>Person completing the EIA</b>	Austen Young
<b>Type of policy, function or service:</b>	Existing (reviewed) <input type="checkbox"/> New/Proposed <input checked="" type="checkbox"/>
<b>Version &amp; Date</b>	V2 February 2021

## **1. Background**

### **Statement of Licensing Policy under the Licensing Act 2003**

Under the Licensing Act 2003, Watford Borough Council, in its role as licensing authority, is required to determine and publish a Statement of Licensing Policy (“policy”) every 5 years. The current policy, which was approved in 2018, is due to expire on 19 November 2023. The policy sets out the council’s approach to processing and determining applications submitted under the Licensing Act 2003.

The purpose of the policy is to ensure that all licence applications received are treated fairly and in a consistent manner, provide advice and information for all about how the council will enforce, administer and make decisions under the Licensing Act 2003 and support licensable activities for the wider benefit of the community. The council must have regard to the licensing objectives as set out in the Licensing Act 2003, which are;

1. The prevention of crime and disorder
2. Public safety
3. The prevention of public nuisance
4. The protection of children from harm

The policy is being reviewed due to the addition of a cumulative impact assessment, which proposes a revision to the council’s cumulative impact policy.

The Licensing Act 2003 requires that each application is considered on its own merits. It does not permit certain groups or applicants to be treated differently, and all applications are to be processed in the same manner. Licence applications can be submitted by individuals aged 18 or older, statutory bodies, non-commercial organisations and commercial companies. Objections against licence applications can be made submitted by any person or one or more of the prescribed responsible authorities.

The policy specifically mentions, on page 44, that the licensing authority must implement the policy in a manner which is consistent with equalities legislation.

A draft policy was sent out for consultation between 18 January and 14 February 2021. The Licensing Act 2003 prescribes the groups who need to be consulted.

## **2. Focus of the Equality Impact Analysis**

The policy determines the council’s approach to processing and determining applications made under the Licensing Act 2003. This EIA, therefore, considers the potential equality related impacts, both positive and negative of the 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.

### **3. Engagement and consultation**

The consultation on the policy took place between 18 January and 14 February 2021, during which time we consulted:

- the statutory responsible authorities
- relevant council departments (Parks, Open Spaces & Projects, Economic Development)
- Watford BID
- all premises licence and club premises certificate holders
- 543 residents within the town centre
- 21 residents' associations within the Borough

All parties were offered the option to contact us should they have any queries or should they require a hard copy of the documents.

The consultation was advertised on our website during this time, with people invited to participate in a survey on the proposed changes. We also advertised the consultation through a press release in the Watford Observer on 30 January 2021.

The survey asked questions on the proposed policy and allowed parties to submit their own comments. We advised that while we will prefer responses to be submitted through the online survey or by email, we would accept any comments in writing.

### **4. What we know about the Watford population**

#### **Population**

The current population of Watford is 96,600 (ONS mid-2019 estimate). This was slightly less than estimated in 2018 (96,800 rounded). The slowing of population growth across the UK (marked by a fall in Watford) is attributed to the lowest number of births for 14 years alongside an increase in emigration and a fall in international immigration.

Watford's population is currently projected to increase to 105,000 by 2025 and 110,300 by 2035, a rise from 2016 of 14.2%. This growth will be a challenge for Watford, given our tight borough boundaries and is recognised within the Council Plan, shaping a number of our commitments and areas for action in the Delivery Plan.

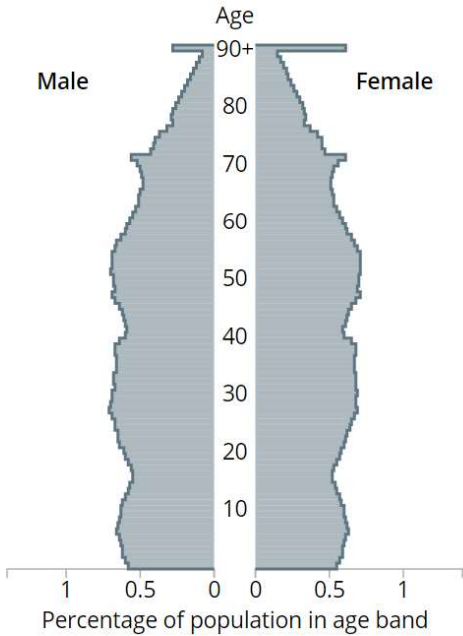
The graphs below show a comparison between the sex and age profile of England's population with that of Watford. (ONS 2018).

**ENGLAND**

**55,977,178** people in 2018

All ages

**27,667,942** males 49.4%   
**28,309,236** females 50.6% 

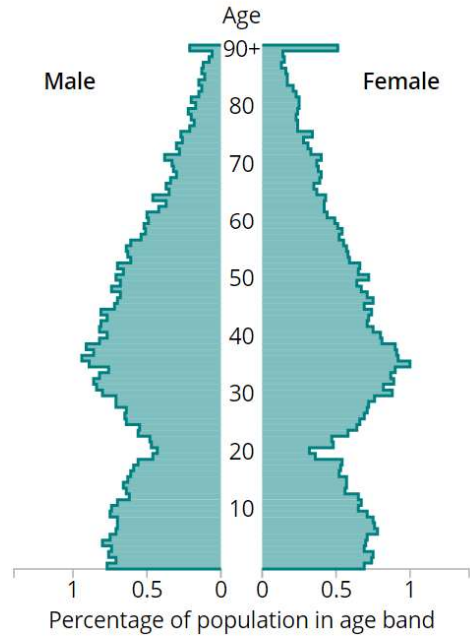


**WATFORD**

**96,767** people in 2018

All ages

**48,011** males 49.6%   
**48,756** females 50.4% 



Overall, this comparison shows that Watford is a relatively young town. This is particularly the case in the 0 to 19 age range where 26.5% of the population are between those ages, compared with 23.6% nationally. Similarly the 30 to 49 cohort accounts for a significantly higher proportion of the Watford population at 32.1%, compared to 26.1% nationally. This means that we are a town which is popular with families and, whilst we are a town for all, we recognise that our plans need to reflect our large number of young people and families.

**Population density**

The population density for Watford is circa 4,600 people per square kilometre. This makes it the most densely populated district area in Hertfordshire and in the country (432 per square kilometre). This is a reflection that we are an urban district, with many characteristics of a metropolitan borough. In comparison with many metropolitan boroughs, particularly those in and around the outskirts of London, our density is relatively low.

**Ward level populations (mid-year 2019 estimates)**

The ONS publishes experimental data on ward level populations. The last release date was for mid-year 2019. This showed Central ward had the highest population (9,556) and Tudor the lowest (6,713). Further analysis shows that Nascot ward had a significantly higher number of elderly residents than other wards in Watford, whilst Central a significantly higher number of under 20s.

Ward	Mid-year 2018
Callowland	7,943

Ward	Mid-year 2018
Oxhey	6,800

Central	9,556
Holywell	8,748
Leggatts	7,697
Meriden	7,876
Nascot	8,774

Park	8,698
Stanborough	7,395
Tudor	6,713
Vicarage	8,723
Woodside	7,678

ONS experimental data ([Ward Level Mid-Year Population Estimates \(experimental\), Mid-2019](#))

## Households

### Number of households

The ONS data, based on the census, says that there were 36,681 households in Watford at the time of the Census; as of 31 May 2020 the figure was 40,275 (council tax base).

The average household size in Watford is currently 2.45. This is currently average for the region. Nationally, there is downward trend in household size projected over the next 20 years. The Watford average household size is envisaged to drop to 2.33 person household in 2039, which this is larger than that projected for the English average (2.21 in 2039) and the Hertfordshire average (2.29 in 2039). These projections have implications for Watford in terms of development and growth.

### Household size

The 2014 projections estimate that, between 2014 and 2039:

- Watford's average household size will decrease from 2.45 to 2.33
- Hertfordshire's average household size will decrease from 2.42 to 2.29
- England's average household size will decrease from 2.35 to 2.21

### Household Composition

From the 2016 projections, one person households see the biggest increase in household growth in Watford, representing 44% of the total household growth.

However, households with dependent children see the next biggest rise, with 35% of household growth; couples with other adults make up 9%; other (multi-person adult) households make up 7% and couple households (without children or other adults) make up the remaining 6% of all estimated growth.

### Ethnicity

Watford has a very diverse population, more so than the rest of Hertfordshire; it is one of the strengths of our town and what makes us such a vibrant and diverse town.

For Watford, the Census 2011 shows the following main breakdown in terms of ethnicity: White British (61.9%), White other (7.7%), Pakistani (6.7%), British Indian (5.5%), British other Asian (4.4%) and African (3.5%), White Irish (2.3%) and Caribbean (1.7%).

The full breakdown from Census 2011 is at Appendix A.

In 2016, the ONS published population estimates by ethnicity. This did not report ethnicities to the level of granularity that the Census reported ethnicity. The estimates for 2016 were: White British (59% - 57,000 residents), Asian / Asian British (19% - 19,000 residents), All Other White (12% - 12,000 residents), Black / African / Caribbean / Black British (4% - 4,000 residents), Mixed / Multiple Ethnic Group (4% - 4,000 residents) and Other Ethnic Group (1% - 1,000 residents).

**National insurance registration:** Census information is now nearly 10 years old and it is likely that the ethnic profile of the borough has changed during this time. For example, it would not have captured the more recent EU arrivals to the borough (EU2 countries – Romania and Bulgaria, who were given residency rights in 2014).

We know from other data such as National Insurance Registration that Watford has experienced a relatively high increase in nationals from the EU2 countries applying for National Insurance registrations as Watford residents. This follows a period of a high number from EU8 countries (including Poland, Latvia, Lithuania) who were given freedom of movement to the UK from 2004. Throughout the period the arrival of new residents from south Asia (e.g. Pakistan / India) has remained relatively constant.

The National Insurance Registrations year to September 2020 shows there were 1,258 registrations in Watford, of which 608 were from the EU, 331 were from Romania and Bulgaria, 342 from South Asia and 211 from Austria, Belgium, Denmark, Finland, France, Germany, Greece, Ireland, Italy, Luxembourg, Netherlands, Portugal, Spain, Sweden. 90 came from sub Saharan Africa and 22 from North Africa.

**Language spoken at home:** Other data sources, including school language survey on the languages spoken by Watford school children at home, endorse the National Insurance findings that Watford remains a town with a diverse community with English still the predominant language (at around 60%) followed by (in order of self-selection by Watford families): Urdu, Polish, Tamil, Romanian, Gujarati, Punjabi, Gujarati and Hindi. The most selected African language spoken is Arabic (113 families – although not spoken exclusively in Africa) and Akan/Twi-Fante (78 families).

**Births and origin of parents:** In 2018, nearly 60% (59.6%) of children born to Watford based parents, had one or both parents born outside of the UK, with 42% having both parents born outside of the UK. 52% of new mothers in Watford were born outside of the UK (1397 births in total, with 667 to mothers born in the UK and 730 born outside of the UK. Of these 257 mothers were born in the 'new' EU countries – those that had joined since 2004) and 252 in the Middle East and Asia. 88 mothers were born in Africa.

**EU Settlement Scheme (EUSS) quarterly statistics (28 August 2018 to 31 March 2020) – experimental data:** In May 2020, the Government issued data on the number of applications made to the EUSS from 28 August 2018 to 31 March 2020, and applications concluded during the same time period. This shows that up to March 2020, 11,630 people in Watford had applied for EUSS. Of these the following were the highest number of nationalities who had applied: Romanian (3,530), Polish (1,810), Portuguese (1,020) and Bulgarian (580).

### **Age**

The largest populations by age band in Watford are:

- 35-39 years (8,537)
- 30-34 years (7,921)
- 40-44 years (7,458)
- 5-9 years (7,027)

Compared with other districts in Hertfordshire, Watford has fewer 65+ years residents. The age profile of the borough is more comparable with cities who have younger age profiles and where younger people are attracted by lifestyle opportunities, affordable housing and good transport links.

**Median age:** the median age in Watford is 37 years. This compares to 40 for England (mid-year 2019 population estimates)

### **Disability / Health**

Around 85% of the population of Watford state that they have 'good health' and just under 14% record a disability. We do not have details as to what these disabilities are but they will include a wide range of physical and mental health disabilities or impairment (Census 2011).

The 2019 NHS Health Profile's summary conclusion is that the health of people in Watford is 'varied' compared with the England average. About 12% (2,300) of children live in low income families – this is an improvement on 2016 (14% / 2,700). Life expectancy for men at 65 is similar to the England average but for women it is significantly worse (2016-18).

The profile also shows that Watford is below average for a number of important health indicators, which may have had some impact on the town's rate of deaths from COVID-19. These include: residents eating the recommended 5 a day portions of fruit and vegetables, over-18s who are obese and physically active adults. All reported cancer screenings were below average for Watford and emergency admissions for falls from the age of 65 plus were worse than for the England average.

### **Religion / belief**

The religious breakdown in the Census 2011 of the main religions in Watford was: Christian (54.1%), Muslim (9.8%), Hindu (4.8%), with no religion stated at 21.4%.

In 2016, the ONS published population estimates by religion. This took an estimated population of 94,000 for Watford and the main religions identified through the estimates were: Christian (53%), Muslim (10%), Hindu (9%) with no religion at 26%.

### **Sexual orientation / Transgender**

Watford has no specific data on the transgender community within the borough or for the sexual orientation of its community. It is anticipated that these questions will be asked in the Census 2021.

### **Education and skills**

A skilled workforce supports the economic development and employment aspirations for Watford. There has been a mostly increasing trend in educational attainment in Watford over the last few years. Watford's working age population has the fourth highest percentage (44.4%) in Hertfordshire of those with qualifications at NVQ 4 and above (Three Rivers is the highest with 63.5%, St Albans the second highest at 58.5% and East Herts third highest with 45.7%); this is close to the Hertfordshire average of 42% average but higher than the Great Britain average of 40.3%.

83.7% of Watford residents have achieved 5 A\*-C or equivalent. This is the better than the England average of 75.6 (Jan – Dec 2019)

### **Homelessness**

Whilst this is not a protected characteristic under the Equality Act 2010, the council recognises that the particular circumstances of people without their own home might be a factor in their taking an active role in our community. We currently have 27 statutory homeless (September 2020) and 95 households in temporary accommodation (September 2020).

### **Deprivation**

The English Indices of Deprivation (IoD) 2019 were published by the Government in September 2019, and updates the previous 2015 Indices, published in September 2015. The Indices of Deprivation measure relative levels of deprivation in 32,844 small areas or neighbourhoods, called Lower-layer Super Output Areas, in England

The IoD2019 is based on 39 separate indicators, organised across seven distinct domains of deprivation which are combined and weighted to calculate the Index of Multiple Deprivation 2019

In the IMD 2019, Watford is ranked 195 out of 317 authorities, putting it in the 7<sup>th</sup> decile nationally. This means that, overall, Watford is less deprived than half the authorities in England.

Watford is the third most deprived authority in Hertfordshire. (Stevenage and Broxbourne are the most deprived.) However, three Hertfordshire authorities are among the 10% least deprived authorities in England (Three Rivers, East Herts and St Albans).

Overall, Watford is not an area with significant deprivation issues and the majority of the LSOAs within the town are in the bottom 50% of LSOAs nationally for deprivation; the borough's position has improved relative to that of 2015.

The combined deprivation index, which weights income and employment more heavily than the other domains, obscures the more deprived areas in Watford, which are affected by crime, living environment deprivation, health and disability, and education, skills and training deprivation in particular. This is, at least in part, because income and employment deprivation are less of an issue for Watford than for other areas.

The ten most deprived LSOAs in Watford, as ranked in the IMD 2019 are as follows (the ranking for the last IMD data in 2015 is shown in brackets in the first column). Deprivation has also been identified as an indicator for poorer COVID-19 outcomes so understanding our areas of deprivation, particularly if we apply greater granularity around health and income deprivation. The LSOA, which contains some of Whippendell Road, Chester Road and Durban Road West is within the second most deprived health and disability quartile does not feature in the top 10 most deprived LSOAs.



Watford rank	Ward	LSOA code	Hertfordshire		England	
			Rank	Decile in Herts (1st = most deprived)	Rank	Decile (1st = most deprived)
1 (1)	<b>Central</b> (Water Lane, Gladstone Road, Grosvenor Road, part of Radlett Road, Brockleberry Close, Raphael Drive, top part of Queens Road)	E01023860 (009B)	5 (5)	1st (1st)	5055 (5005)	2nd (2nd)
2 (3)	<b>Holywell</b> (Caractacus Green, part of Charlock Way, Moor View, Jellicoe Road, Stripling Way, Rose Gardens)	E01023865 (011C)	21 (22)	1st (1st)	7239 (7800)	3rd (3rd)
3 (2)	<b>Meriden</b> (Garsmouth Way, Aldbury Close, Harvest End, part of York Way)	E01023876 (003D)	26(19)	1st (1st)	7924 (7590)	3rd (3rd)
4 (4)	<b>Holywell</b> (Ascot Road, Greenhill Crescent, Caxton Way, Croxley View)	E01023866 (011D)	27 (30)	1st (1st)	8294 (9203)	3rd (3rd)
5 (7)	<b>Woodside</b> (Haines Way, Queenswood Crescent, Sheriff Way, Nottingham Close)	E01023906 (001C)	61 (41)	1st (1st)	10719 (10062)	4th (4th)
6 (10)	<b>Oxhey</b> (Deacons Hill, Blackwell Drive, Riverside Road, Eastbury Road, Thorpe Crescent)	E01023883 (012B)	62 (49)	1st (1st)	10758 (10710)	4th (4th)
7 (13)	<b>Callowland</b> (Maude Crescent, St George's Road, Breakspere Close, Nicholas Close)	E01023857 (006C)	67 (56)	1st (1st)	10894 (10812)	4th (4th)
8 (9)	<b>Meriden</b> (Gaddesden Crescent, Bovingdon Crescent, Garston Lane)	E01023877 (003E)	73 (75)	2nd (2nd)	11225 (11837)	4th (4th)
9 (12)	<b>Leggatts</b> (The Harebreaks, Chestnut Walk, Foxhill, Brushrise, Elm Grove)	E01023870 (004C)	78 (52)	2nd (1st)	11515 (10734)	4th (4th)
10 (5)	<b>Stanborough</b> (Clarke Way, Rushton Avenue, Orbital Crescent, Harris Road)	E01023891 (002B)	92 (31)	1st (1st)	11970 (9377)	4th (3rd)

### MOSAIC profile

Our MOSAIC profiling of the borough enhances our understanding of our population and provides valuable context for our decision-making as well as underpinning our communications and engagement. It confirms we are a young and diverse borough.

Old Code	Type Code	Type Label	Type Description	2020 Households	2017 Households	2020 Watford %	2017 Watford %	Difference	Trend	2017 Rank
J40	O61	Career Builders	Professional singles and couples in their 20s and 30s progressing in their field of work from commutable properties	5257	4045	13.3%	12.5%	0.8%	▲	1
D14	G26	Cafés and Catchments	Affluent families with growing children living in upmarket housing in city environs	3660	2499	9.2%	7.7%	1.5%	▲	3
I36	N58	Culture & Comfort	Thriving families with good incomes in diverse suburbs	3575	3321	9.0%	10.3%	-1.3%	▼	2
J44	O63	Flexible Workforce	Successful young renters ready to move to follow worthwhile incomes from service sector jobs	2927	1954	7.4%	6.0%	1.4%	▲	6
M56	I36	Solid Economy	Stable families with children, renting higher value homes from social landlords	2701	2172	6.8%	6.7%	0.1%	▲	5
I37	N57	Community Elders	Established older households owning city homes in diverse neighbourhoods	2574	1128	6.5%	3.5%	3.0%	▲	9
H35	H30	Primary Ambitions	Families with school-age children, who have bought the best house they can afford within popular neighbourhoods	2434	1550	6.1%	4.8%	1.3%	▲	7
D17	G27	Thriving Independence	Well-qualified older singles with incomes from successful professional careers in good quality housing	1949	2422	4.9%	7.5%	-2.6%	▼	4
I39	N60	Ageing Access	Older residents owning small inner suburban properties with good access to amenities	1731	1099	4.4%	3.4%	1.0%	▲	10
B08	B05	Premium Fortunes	Asset-rich families with substantial income, established in distinctive, expansive homes in wealthy enclaves	1448	1237	3.6%	3.8%	-0.2%	▼	8
				<b>Total (Top 10)</b>	<b>28,256</b>	<b>21,427</b>				
				<b>Total Households in Watford</b>	<b>39,675</b>	<b>32,370</b>				

## Watford's MOSAIC profile (2020)

### Key issues identified from our borough profile:

- A young population with a higher proportion of those under 50, which, given the higher proportion of under 20s indicates Watford is a town with a high number of families
- A growing population where there will be more smaller households but where there will still be a need for family homes
- A very diverse population and a town that continues to attract people from across the globe and with a high proportion of BAME residents
- Some underlying health related issues, particularly around preventative health measures and healthy living
- Areas where residents are experiencing less positive outcomes – often as a result of multiple issues but which could be impacting on life chances and opportunities

## 5. How will the council ensure equality is promoted through the Statement of Licensing Policy

Under the Equality Act 2010, three areas need to be considered when analysing the equality impact of the Statement of Licensing 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

The council is not in a position where it can proactively affect the profile of licence holders, or objectors against licence applications, but the policy and our experience in processing applications and objections ensures that the process of obtaining a licence is fair and free of discrimination and we can evidence this as follows:

- Although not specifically mentioned in the policy, we are mindful of people’s ability to understand hearings and meetings if English isn’t their first language, and have services such as Language Line available as a council, or allow people to be supported or represented to assist them. We have had two hearings so far this year where this has been the case, and in one case we arranged for the decision to be translated
- We have a number of licence holders from different nationalities which is evidence that there is no existing barrier, and we not proposing to add any in
- The law requires objections and applications to be in writing, but doesn’t prevent other people from representing them or acting on their behalf for whatever reason, so they can be assisted if they want to be – we confirm this in our correspondence when consulting on applications and again can evidence where this has been put into place.
- The law allows applications to be submitted online or by post, and we do still receive handwritten applications and objections, so there are options for people who are confident with computers and those who are not.
- Our documents and policies are available on our website, which can be viewed through Browsealoud, and are available upon request.
- The only barriers to applying or objecting to a licence are those set out in the legislation – we can’t accept an application from any person under the age of 18, can’t accept applications or objections not made in writing, can only process applications which are valid under the law (submitted with completed forms, plans, the correct fee, advertised as required etc)

The policy informs prospective applicants what is expected of them and what specific areas a licensing sub-committee will take into account when determining an application. The policy also informs objectors how their objections will be considered, and again these must be considered in a fair manner, against legal requirements, and free of discrimination.

Responses were received during the consultation period, and our responses to those comments have been analysed and summarised in the report to the Licensing Committee which will consider them on 8 March 2021.

Comments were received during the consultation exercise that highlighted that we specifically only mentioned homophobic attacks as an aggravating factor to consider for licence reviews, and didn’t specifically cover any other protected characteristic. As a result of this feedback, we have amended the policy for clarity to state that discrimination, harassment, or victimisation of any people or community with protected characteristics shall be deemed to be an aggravating factor.

It must be noted that the sub-committee may depart from policy when determining an application, although such departures should be explained with detailed reasons upon the conclusion of the hearing.

In the policy, no particular group is given priority over another in relation to implementation of the policy and how any applicant is dealt with. The Act requires that each application is to be assessed on its individual merits, so all groups should be treated equally. All applicants are required to comply with all of the relevant legislation. In general, it is felt that the policy has a positive effect on all people who live, work or socialise in Watford.

## **6. Overall conclusion**

On consideration, the overall conclusion of the EIA is that there is no negative impact on any specific characteristic or group as a result of this Policy has been identified.

**This EIA has been approved by:**

**Kathryn Robson    Date 02/03/2021**

**Appendix A:**

**Census 2011: Watford Borough ethnicity data**

	<b>WATFORD 2011</b>
White: English/Welsh/Scottish/Northern Irish/British	61.9% (55,875)
White Irish	2.3% (2,063)
White: Gypsy or Irish Traveller	0.1% (61)
White: Other White	7.7% (6,947)
Mixed/multiple ethnic group: White and Black Caribbean	1.1% (990)
Mixed/multiple ethnic group: White and Black African	0.5% (412)
Mixed/multiple ethnic group: White and Asian	1.0% (939)
Mixed/multiple ethnic group: Other Mixed	0.8% (763)
Asian/Asian British: Indian	5.5% (4,923)
Asian/Asian British: Pakistani	6.7% (6,082)
Asian/Asian British: Bangladeshi	0.4% (362)
Asian/Asian British: Chinese	0.9% (822)
Asian/Asian British: Other Asian	4.4% (3,981)
Black/African/Caribbean/Black British: African	3.5% (3,142)
Black/African/Caribbean/Black British: Caribbean	1.7% (1,558)
Black/African/Caribbean/Black British: Other Black	0.6% (529)
Other ethnic group: Arab	0.3% (294)
Other ethnic group: Any other ethnic group	0.6% (558)