



**WATFORD
BOROUGH
COUNCIL**

Equality Impact Analysis

Title of policy, function or service	Local Lottery
Lead officer	Natalie Frost
Person completing the EIA	Natalie Frost
Type of policy, function or service:	Existing (reviewed) <input type="checkbox"/> New/Proposed <input checked="" type="checkbox"/>
Version & Date	Version 0.1

1. Background

The voluntary and community sector in Watford is facing a challenging period. There are increasing demands on the services provided by the voluntary and community sector, having only recently emerged from the Covid-19 pandemic and then immediately entering into the cost of living emergency. This at a time when sources of funding are ever more constrained. The council's ambition is to support the town's voluntary and community sector to achieve sustainable, long term outcomes, allowing the organisations to flourish and continue to deliver their services to support all those who live and work in Watford.

The council recognises the value the sector brings to the town and to the lives of Watford residents and set up the Watford Community Fund during Covid-19 to provide additional financial support where possible. This fund has been supported by fundraising events, individual donations and donations from local businesses. Raising funds is challenging and the council is grateful for the support it receives from organisations across the town for help with organising events. However, it also recognises that the current funding streams are limited and that, for long term sustainability, there needs to be alternative ways of raising money to support the fund.

The council is exploring the feasibility of a local lottery scheme as a new, scalable and sustainable funding stream for organisations in Watford's voluntary sector. This reflects its Council Plan action to 'use innovative ways to support our local community financially' and Delivery Plan action 'to investigate a new local lottery to support our local community so that they can continue their good work in our town,

A lottery raises funds through ticket sales, with weekly draws offering cash prizes. Local lotteries operate on the principle of incentivised giving, raising money within the community whilst providing residents with an engaging way to provide their support that may also reward them financially. This type of community lottery is a new concept for Watford, with no local lottery scheme in place at this time for the town as a whole. Neighbouring authorities Hertsmere and St Albans have launched similar initiatives and over 100 councils in the United Kingdom have a scheme in place. This means the concept and delivery are well tested and there is a track record of them working elsewhere.

2. Focus of the Equality Impact Analysis

As this is a new initiative for the council an Equality Impact Analysis has been undertaken as the concept of the lottery been developed. This EIA, therefore, considers the potential equality related impacts, both positive and negative of a local lottery 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

Initial engagement has taken place with neighbouring local authorities with experience of schemes already established, with officers working with the voluntary sector, with members, and with the local CVS. This phase sought views on the benefits and dis-benefits of a local lottery scheme, including potential risks to vulnerable residents and how these can be addressed.

Further and full engagement is planned to take place during the implementation phase of the lottery, with the goal to shape the lottery scheme to address any concerns raised and deliver upon the needs of the voluntary sector. Engagement will also take place with groups identified in this EIA for the reasons outlined below.

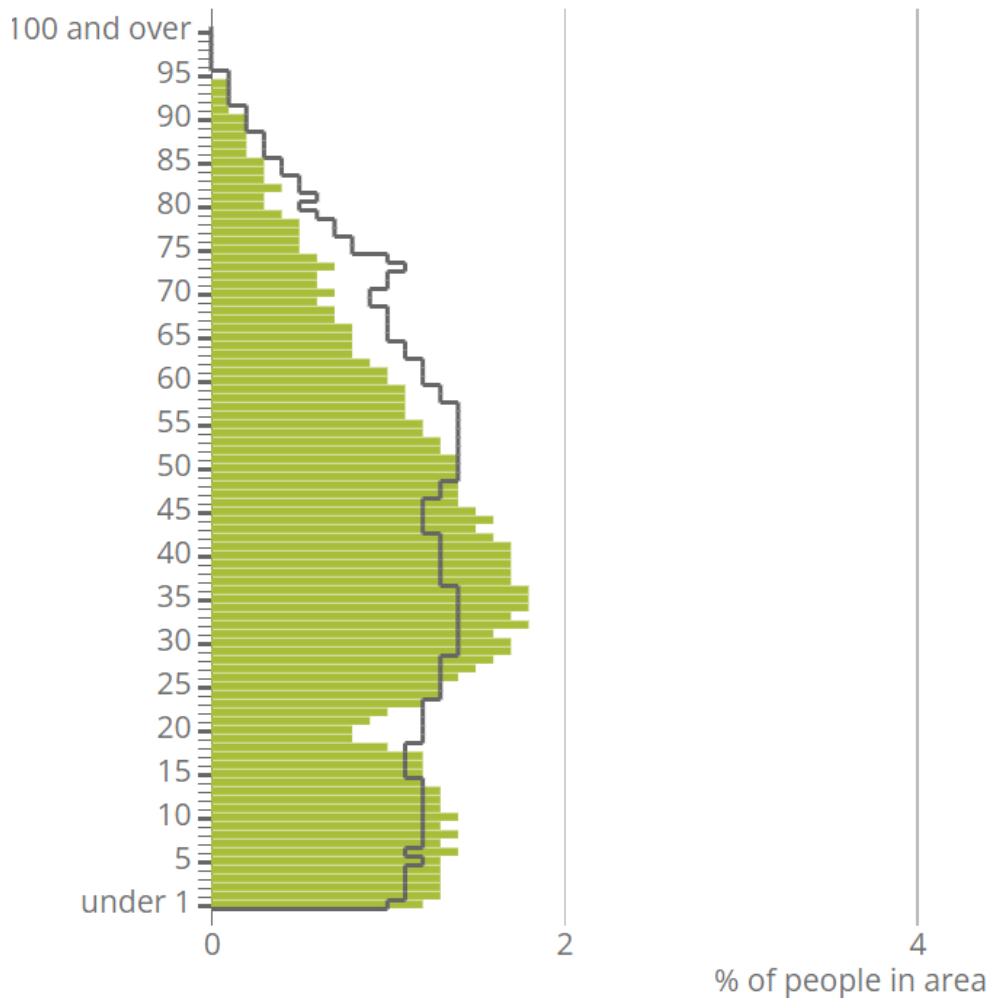
4. What we know about the Watford population

Population (including age)

Watford is a town with a growing population. The census data 2021 indicates that Watford has a population of 102,300, an increase of 13.3% since the previous census in 2011. This is higher than the overall increase for England (6.6%), where the population grew by nearly 3.5 million to 56,489,800.

Watford's population is currently projected to increase to 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 chart below shows Watford's age ranges between 0 – 100 and over in percentage of the population (green) compared with the England / Wales percentages (black line).



Overall, this comparison shows that Watford is a relatively young town. This is particularly the case in the 0 to 19 age range. Similarly the 30 to 49 cohort accounts for a significantly higher proportion of the Watford population than nationally.

The median age in Watford is 36 compared with 40 for England. 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. In terms of voluntary and community sector organisations, this means there are likely to be demands for help across all age profiles but those supporting families and younger children may face higher than average demand.

Population density

The population density for Watford is circa 4,770 people per square kilometre. This makes it the most densely populated district area in Hertfordshire and in the country (434 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.

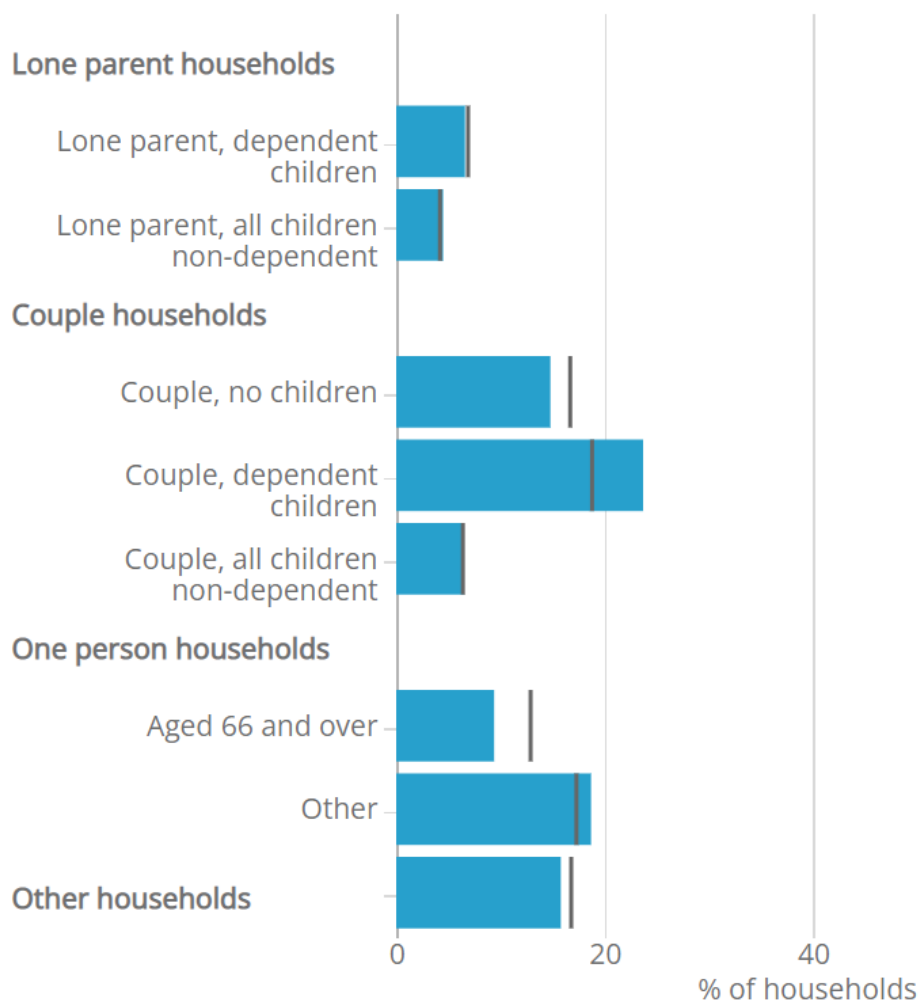
Households

Number of households

The ONS data, based on the census, says that there were 39,628 households in Watford at the time of the Census. The average household size in Watford is currently 2.57. This is slightly higher than the national average of 2.45 and is in line with the Census 2021 household composition data below.

Household Composition

The chart below sets out the composition of Watford households in the Census 2021, with Watford's percentage shown in the blue bars compared to the England and Wales percentages shown by the vertical black bar. Watford has a higher percentage of households with dependent children than England and Wales. As a town with a relatively young population it has fewer one person households with residents aged 66 and over.



The second chart on household composition shows that Watford has higher than England and Wales average for larger sized households – 3 or more people. Again this reflects that Watford is a ‘family

town' with different generations living together in one household.



Language spoken at home:

Below is the data collected in Census 2021 with regard to household language. This is another indication that Watford benefits from groups and organisations set up to support those who may have arrived in the town more recently.

	Number	Percentage
All adults in household have English as a main language	30443	76.8%
At least one but not all adults in household have English as a main language	3486	8.8%
No adults in household, but at least one person aged 3 to 15 years, has English as a main language	1438	3.6%
No people in household have English in England as a main language	4261	10.8%

Main Language

The Census asked people their main language, with over 90 choices. Whilst English was significantly

the most chosen language with nearly 80,000 residents citing English as their main language, there are a substantial number of residents with other main languages. The top ten after English are below (see Appendix 1 for the full list of languages).

Language	Number
Other European language (EU): Romanian	3,361
Other European language (EU): Polish	1,659
South Asian language: Urdu	1,486
South Asian language: Tamil	1,193
Portuguese	1,140
South Asian language: Gujarati	954
South Asian language: Malayalam	643
Other European language (EU): Italian	551
Other European language (EU): Hungarian	489
Other European language (EU): Bulgarian	435

Disability/Health

The health and disability data from Census 2021 is not available until later in January 2023.

The 2020/21 NHS Health Profile's summary conclusion is that the health of people in Watford is 'varied' compared with the England average. About 12% (2,256) of children live in relatively low income families and about 10% live in absolute low income families.

Sexual orientation and gender reassignment

Watford has no specific data on the transgender community within the borough or for the sexual orientation of its community. The information on sexual orientation is due to be released later in January 2023

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 place to be. This diversity is an opportunity for our voluntary and community sector in terms of how they respond to the various needs of the Watford community and how they reach out to engage and include people in what they do.

	WATFORD 2011	WATFORD 2021
		102,245 TOTAL
White: English/Welsh/Scottish/Northern Irish/British	61.9% (55,875)	46.0% (46,820)
White Irish	2.3% (2,063)	2.1% (2,149)
White: Gypsy or Irish Traveller	0.1% (61)	0.1% (80)
White: Roma	Not a category in 2011	0.3% (343)
White: Other White	7.7% (6,947)	12.6% (12,836)
Mixed or Multiple ethnic groups: White and Black Caribbean	1.1% (990)	1.3% (1,300)
Mixed or Multiple ethnic groups: White and Black African	0.5% (412)	0.7% (692)
Mixed or Multiple ethnic groups: White and Asian	1.0% (939)	1.4% (1,408)
Mixed or Multiple ethnic groups: Other Mixed or Multiple ethnic groups	0.8% (763)	1.4% (1,444)
Asian/Asian British/ Asian Welsh: Indian	5.5% (4,923)	9.7% (9,954)
Asian/Asian British/Asian Welsh: Pakistani	6.7% (6,082)	8.0% (8,197)
Asian/Asian British/Asian Welsh: Bangladeshi	0.4% (362)	0.5% (493)
Asian/Asian British/Asian Welsh: Chinese	0.9%	1.0%

	(822)	(1,024)
Asian/Asian British/Asian Welsh: Other Asian	4.4%	5.3%
	(3,981)	(5,369)
Black, Black British, Black Welsh, Caribbean or African: African	3.5%	3.9%
	(3,142)	(3,954)
Black, Black British, Black Welsh, Caribbean or African: Caribbean	1.7%	1.7%
	(1,558)	(1,733)
Black, Black British, Black Welsh, Caribbean or African: Other Black	0.6%	0.8%
	(529)	(801)
Other ethnic group: Arab	0.3%	0.7%
	(294)	(763)
Other ethnic group: Any other ethnic group	0.6%	2.8%
	(558)	(2,885)

Religion or belief

Religious groups in Watford, 2021 census:

- Christian - 45,447 people or 44.6%
- Buddhist - 1,021 people or 0.85%
- Hindu - 8,398 people or 8.2%
- Jewish - 944 people or 0.93%
- Muslim - 13,262 people or 11.0%
- Sikh - 664 people or 0.6%
- Other - 859 people or 0.71%
- No religion – 25,340 people or 24.8%

6,311 people did not answer this question

Gender

The 2021 census did not allow for any option other than female or male.

FEMALE	50.8%
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MALE	49.2%
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Marriage and Civil Partnership

For census 2021, this has been updated to reflect the revised Civil Partnership Act that came into force in 2019.

Category	Number of Watford households
Does not apply <i>not eligible for a legal partnership</i>	21,282
Never married and never registered a civil partnership	30,974
Married: Opposite sex	38,023
Married: Same sex	192
In a registered civil partnership: Opposite sex	85
In a registered civil partnership: Same sex	60
Separated, but still married	1,744
Separated, but still in a registered civil partnership	7
Divorced	6,074
Formerly in a civil partnership now legally dissolved	18
Widowed	3,782
Surviving partner from civil partnership	5

5. How will the council ensure equality is promoted through a local lottery

Under the Equality Act 2010, three areas need to be considered when analysing the equality impact of a local lottery:

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

The potential positive effects of a local lottery can have far reaching effects across the borough and on our more vulnerable residents.

The key positive impact of a local lottery, is that it provides a new source of funds for the voluntary and community sector. There are two opportunities created:

- Firstly, organisations can encourage ticket sales that are attributed to their organisation.
- Secondly, organisations can bid for funding from the ‘central pot’ raised from ticket sales. A process will be designed to monitor, govern and award this funding.

The positive impact of the funds raised will allow organisations to become more sustainable and enable them to support Watford residents. Whilst the success of an organisation participating in the lottery is reliant upon the strength of their communications to supporters, encouraging ticket sales on a regular basis, this is a good opportunity for groups to explore. According to conversations with local authorities already running schemes (Hertsmere and St Albans), successful organisations can see annual funds equivalent to a small grant award. From the work the council does around small grant funding, there is evidence of both the positive impact this has on an organisation in terms of boosting their income and either sustaining or expanding their services to the community.

A further positive impact is the opportunity to take part in a new participation initiative for residents. As part of the local lottery, the council is exploring creating a form of residents’ panel to take part in awarding funding to the voluntary sector. Participating in democracy in this way is a rewarding experience, giving residents the opportunity to gain insights into the valuable work done by local organisations and shape how they are supported.

There is significant benefit to those who live and work in Watford from a local lottery, as a result of the new source of funding for voluntary and community sector organisations. With new funding to strengthen the services delivered, residents will have more opportunity to find the support that they need and address their challenges. The voluntary and community sector has a key role to play in delivering support and services for those with protected characteristics, and the lottery serves to help facilitate stronger and longer term delivery.

A further benefit is identified for those who participate as it is possible to win prizes, with a maximum prize of £25,000 available. Participants also experience the benefit of taking part in this

form of incentivised giving, knowing that money raised by ticket sales goes to support the local voluntary sector.

B. Negative impacts

Four potential negative impacts have been considered during the course of this analysis.

The first impact relates to the potential issue of ‘problem gambling’. According to the gambling commission, lotteries are a form of gambling and as such societies and local authorities are required to ensure that children and other vulnerable people are not exploited by their lottery.¹ The council must, therefore, consider the risk of a negative impact whereby the lottery might cause or exacerbate problem gambling for players. The recommendation to help mitigate this risk is to address it with the following measures:

1. The lottery will (and must) be registered with the Gambling Commission and, through the operator, be compliant with their regulations designed to address social responsibility. These include minimum age to participate, rules on advertising and a maximum prize amount.
2. The lottery will have limits and rules in place to ensure vulnerable people are protected, including restrictions on the number of tickets that can be purchased in a timeframe

The second impact relates to faith-based organisations who may not be willing, or able, to accept funding raised from a form of gambling. Although a lottery is considered a ‘soft’ form of gambling, the council will assume for the purposes of this EIA that some faith based organisations will be impacted in that they will not be able to participate in accepting funds from this source. The recommendation is to keep funds raised via the lottery separate from alternative funding streams such as the Neighbourhood CIL and Mayor’s Small Grants funds or other elements of Watford Community Fund, and direct organisations to apply to these funding streams as an alternative to the new funding stream of the lottery, should they not deem it appropriate to apply for these funds.

The third impact follows on from the above, in that some residents will be unable to play the lottery, again due to it being a form of gambling. The decision, ultimately, on participation sits with individuals, and the council will share information as transparently as possible so that this decision can be made on the basis of facts around the format of the lottery and the conduct / background of its operator. Residents who do not wish to play the lottery but would like to support local voluntary and community sector groups can do so through direct donations or by taking part in other fund raising activities.

The fourth potential negative impact relates to accessibility of the local lottery, being primarily an online system. Tickets for the lottery are sold via an online website, with players required to have a valid bank account in order to participate. Those who do not have access to the internet or a digital device will be able to play, via a phone line option – the operator provides a phone line service whereby users can register their details and set up a direct debit to purchase their regular tickets via this channel. Those who do not have bank accounts will, however, be unable to purchase a ticket due to this system. According to Statista², 97% of the UK population in 2017 had a bank account. Research into the unbanked indicates that the primary reasons to not have a bank account include poor credit history or low income. With these issues outstanding, playing the lottery is unlikely to be a priority. Information and support is available from the Citizens Advice, for individuals seeking to open a basic bank account.³

6. Overall conclusion

¹ <https://www.gamblingcommission.gov.uk/licensees-and-businesses/guide/page/social-responsibility>

² [Number of retail bank accounts 2017 | Statista](#)

³ [Getting a bank account - Citizens Advice](#)

On the basis of this EIA, it is felt that the overall positive impacts of a local lottery outweigh the negative impacts, with the lottery bringing significant benefits both to the voluntary and community sector and directly to residents across the borough. This is on the basis that the negative impacts, which have been identified, are addressed with the recommendations and measures set out above, ensuring that the council enters into this with full transparency and a responsible process in place to protect people in the groups or with the characteristics protected in the Equalities Act 2010.

Summary of potential positive impacts and ways in which they can be ensured

Positive Impact	Protected characteristics	Ways to ensure the positive impact
New source of funds for the voluntary and community sector	<p>All:</p> <ol style="list-style-type: none"> 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. 	<p>Ensuring that as a wide a range of groups as possible can participate in the lottery and benefit from the opportunity to raise funds. This ensures that these groups can then deliver directly to Watford's residents, across a diverse range of the population.</p> <p>Ensuring that groups are supported in their efforts to communicate about the lottery, through provision of digital materials produced by the council/operator.</p>
Opportunity to create a new participation initiative	<p>All:</p> <ol style="list-style-type: none"> 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. 	<p>Ensuring that a new initiative is explored, to allow residents this opportunity to participate. This initiative should have a clear criteria to allow a diverse range of people to participate and experience the benefits of taking part and shaping decisions.</p>

Positive Impact	Protected characteristics	Ways to ensure the positive impact
Benefit to those who live and work in Watford	All: <ol style="list-style-type: none"> 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. 	As above, ensuring that as a wide a range of groups as possible can participate in the lottery and benefit from the opportunity to raise funds. This ensures that these groups can then deliver directly to Watford’s residents, across a diverse range of the population.
Benefits to those who participate	All: <ol style="list-style-type: none"> 1. Age 2. Disability 3. Gender Reassignment 4. Pregnancy and maternity 5. Race 6. Religion or belief <i>[partial]</i> 7. Sex (gender) 8. Sexual Orientation 9. Marriage and Civil Partnership. 	Ensuring that the processes listed in this document are implemented and adhered to, so that the experience is a positive and successful one. Taking opportunities to support those who wish to participate but might struggle to do so.

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
Potential negative impact of problem gambling	Other – Addiction/mental health	<p>To implement full and comprehensive processes to ensure that the scheme does not cause or exacerbate problem gambling in any form</p> <p>To provide clear information on support for those struggling with problem gambling in tandem with any promotion of the scheme</p>
Impact to organisations who cannot accept funding from gambling	Religion or belief	<p>To engage with faith groups during the implementation phase of the lottery, explaining the decision, measures taken and alternative routes to funding</p> <p>Ensuring that monies raised are maintained separately from alternative funding streams</p>
Impact to residents who cannot participate	Religion or belief	<p>To engage with faith groups during the implementation phase of the lottery, explaining the decision and measures taken to protect participants should gambling be a concern.</p> <p>Ensuring that monies raised are maintained separately from alternative funding streams</p>
Impact of accessibility due to the lottery requiring a bank account and digital access	<ul style="list-style-type: none"> • Age • Disability • Other – Low income/Digital exclusion 	<p>To deliver and promote the telephone line option for those without digital access, and provide computer/internet access at the council's CSC area or direct residents to alternative locations.</p> <p>To promote local charities and organisations supporting residents with these challenges, such as the Citizens Advice Bureau who can provide support for those in financial difficulty.</p>

Negative Impact	Protected characteristics	Ways to mitigate the negative impact
		To provide clear information outlining why the scheme is made available in a digital format.

This EIA has been approved by:

Kathryn Robson **Date** 3 January 2023

Appendix 1

Full details of main languages spoken in Watford

Language	Number of residents
English (English or Welsh in Wales)	79,640
Other European language (EU): Romanian	3,361
Other European language (EU): Polish	1,659
South Asian language: Urdu	1,486
South Asian language: Tamil	1,193
Portuguese	1,140
South Asian language: Gujarati	954
South Asian language: Malayalam	643
Other European language (EU): Italian	551
Other European language (EU): Hungarian	489
Other European language (EU): Bulgarian	435
Spanish	432
East Asian language: Tagalog or Filipino	411
Arabic	390
South Asian language: Panjabi	380
South Asian language: Telugu	350
South Asian language: Hindi	343
South Asian language: Nepalese	310
West or Central Asian language: Persian or Farsi	270
South Asian language: Sinhala	268
Other European language (non EU): Albanian	260
French	244
South Asian language: Any other South Asian language	228
African language: Akan	224
Other European language (EU): Greek	223
Russian	199
Turkish	195
East Asian language: All other Chinese	170
South Asian language: Bengali (with Sylheti and Chatgaya)	158
Other European language (EU): Lithuanian	156
East Asian language: Cantonese Chinese	136
Other European language (EU and non-EU): Bosnian, Croatian, Serbian, and Montenegrin	116
West or Central Asian language: Pashto	96
Other European language (EU): Czech	89
South Asian language: Marathi	78
Other European language (EU): Slovak	77
African language: Any other African language	58
Other European language (EU): German	54
African language: Any other West African language	54
East Asian language: Japanese	53
East Asian language: Mandarin Chinese	49
African language: Shona	48

South Asian language: Pakistani Pahari (with Mirpuri and Potwari)	46
African language: Somali	46
Sign language: British Sign Language	45
Other European language (non EU): Ukrainian	44
East Asian language: Any other East Asian language	38
Other European language (EU): Latvian	34
Other European language (EU): Dutch	34
East Asian language: Thai	33
East Asian language: Korean	31
East Asian language: Vietnamese	28
African language: Igbo	26
African language: Afrikaans	25
West or Central Asian language: Kurdish	24
Other European language (EU): Swedish	21
Other European language (EU): Any other European language (EU)	21
African language: Swahili or Kiswahili	19
Other UK language: Romany English	17
West or Central Asian language: Any other West or Central Asian language	15
East Asian language: Malay	13
African language: Yoruba	12
African language: Tigrinya	10
Other European language (EU): Danish	9
West or Central Asian language: Hebrew	9
Other European language (EU): Estonian	8
Welsh or Cymraeg (in England only)	7
Caribbean Creole: Any other Caribbean Creole	7
African language: Amharic	7
Sign language: Any sign communication system	7
Other European language (EU): Slovenian	5
Other European language (EU): Finnish	4
African language: Any other Nigerian language	4
Other European language (non EU): Northern European language (non EU)	3
African language: Krio	3
African language: Lingala	3
Sign language: Any other sign language	3
Other UK language: Gaelic (Irish)	2
Other European language (EU): Maltese	2
African language: Luganda	2
Other European language (non EU): Any other Eastern European language (non EU)	1
Oceanic or Australian language	1
Caribbean Creole: English-based Caribbean Creole	1
Other UK language: Gaelic (Scottish)	0
Other UK language: Manx Gaelic	0
Other UK language: Gaelic (Not otherwise specified)	0
Other UK language: Cornish	0

Other UK language: Scots	0
Other UK language: Ulster Scots	0
Other UK language: Irish Traveller Cant	0
Other European language (non-national): Any Romani language	0
Other European language (non-national): Yiddish	0
North or South American language	0
Does not apply	3,892