

## **Item: 13**

**Education, Leisure and Housing Committee: 5 February 2020.**

**Draft Suspension Policy.**

**Report by Executive Director of Education, Leisure and Housing.**

### **1. Purpose of Report**

To consider a Suspension Policy for applicants for Council housing.

### **2. Recommendations**

The Committee is invited to note:

#### **2.1.**

That the Housing (Scotland) Act 2014 introduced amendments to the allocations provisions contained within the Housing (Scotland) Act 1987, specifically in respect of suspensions from the Council's waiting list, including a framework that social landlords can choose to use in order to suspend offers of housing to applicants at the point they apply for housing.

#### **2.2.**

That consultation on proposed amendments to the Lettings Policy included reference to suspensions, with over 50% of the respondents suggesting that a separate policy would be beneficial.

#### **2.3.**

The draft Suspension Policy, attached as Appendix 1 to this report, which includes a section on appeals, which, if approved, would require to be reflected in the Scheme of Delegation to Officers.

#### **2.4.**

The proposal that the Suspension Policy be implemented in tandem with the revised Lettings Policy, namely no later than 1 April 2021.

**It is recommended:**

#### **2.5.**

That the Suspension Policy, attached as Appendix 1 to this report, be approved, to be implemented no later than 1 April 2021.

## **2.7.**

That, should the Suspension Policy be approved, the Scheme of Delegation to Officers be amended to reflect the appeals process detailed within the Suspension Policy.

## **3. Background**

### **3.1.**

The Housing (Scotland) Act 2014 was being phased in predominantly during 2019. One of the changes introduced was amendments to the allocations provisions contained in the Housing (Scotland) Act 1987, specifically in respect of suspensions from the Council's waiting list.

### **3.2.**

A suspension is defined as a period of time during which an applicant or existing tenant (applying to move to another property) must remain on a housing waiting list before being considered for an offer of housing.

### **3.3.**

Applicants are not removed from the waiting list as anyone over the age of 16 has a right under the Housing (Scotland) Act 1987, to be placed on a housing waiting list. An applicant who is suspended therefore remains on the list but will not be given any offer of housing during the period of suspension.

### **3.4.**

The existing legislation did not allow an applicant to serve a minimum term on a waiting list before receiving an offer. Technically as soon as they were on the waiting list they were eligible for any offer.

### **3.5.**

However, once registered, an applicant could be suspended in certain circumstances. For example, if they had knowingly given false information in their application for housing.

## **4. Changes Introduced**

### **4.1.**

The changes introduced by the Housing (Scotland) Act 2014 mean that in certain circumstances landlords will be able to set a minimum period that an applicant will have to be on the waiting list from the date of application before they receive any offer.

### **4.2.**

The new ability to suspend is only for new applications including existing tenants who re-apply to the waiting list for a move or transfer.

### 4.3.

The ability to suspend applicants already on the waiting list in accordance with the allocations policy remains.

### 4.4.

Therefore, the impact of this legislative change is that the Housing (Scotland) Act 1987 (as amended) describes a statutory suspension framework that social landlords can choose to use to suspend offers of housing to applicants at the point they apply for housing. This also entitles applicants to appeal to the Sheriff Court.

### 4.5.

There is not a requirement to operate this framework in its entirety. The level of suspensions which apply at any one time is extremely small and suspensions would normally be applied after point of application. Therefore, an appropriate, proportionate, suspension policy has been devised.

## 5. Consultation Results

### 5.1.

During the consultation on the review of the Council's Lettings Policy, a specific question was posed regarding whether the Council should have a separate policy on suspensions as opposed to this information being contained within the Lettings Policy.

### 5.2.

Responses were:

Yes.	18.	51.43%.
No.	3.	8.57%.
Not sure.	14.	40.00%.

## 6. Suspension Policy

### 6.1.

The level of suspensions are very low and varies from time to time. Procedurally suspensions include households who have asked for their application to be deferred perhaps because of issues relating to health, work or study commitments. In a small number of cases an application may be suspended because the applicant is in hospital or prison. In addition, some applications are incomplete while additional information is sought. Currently 15 separate households are classified as being suspended. The reasons for the suspensions are predominantly (87%) due to their own requests.

## **6.2.**

In addition, to the cases outlined above, an application may legally be bypassed if for instance they have rent arrears in excess of 1/12<sup>th</sup> of the annual rent and an arrangement for payment is either not in place or has not been in place for a reasonable length of time. While classified as a suspension, this is a more fluid situation than may be the case for some other suspensions and therefore precise numbers could not be quantified for this type of suspension locally.

## **6.3.**

The current housing waiting list is 674 applications and the level of suspensions which are currently applicable is 2.22%.

## **6.4.**

The current policy relating to suspensions, which is contained within the lettings policy, has generally been found to be effective in managing situations which may lead to suspension. There was however, a need to review and enhance the policy to ensure it aligned with both the law and good practice.

## **6.5.**

Therefore, a separate policy, attached as Appendix 1 to this report, has been produced on suspensions which incorporates the main reasons why it may be appropriate to suspend an applicant's housing application for a period of time including making a false statement or refusing one or more offers of housing unreasonably.

## **6.6.**

The policy covers the reasons why a suspension may be appropriate, the evidence that would be used to support a suspension and timescales that may be imposed. It is also clear on when a suspension may be inappropriate. This may be because the household has been found to be statutorily homeless and therefore permanent rehousing is required. In addition, the policy covers monitoring, staff training, complaints and appeals and should ensure there is clarity around the process of ensuring that applicants who are suspended are advised accordingly, are clear on the reasons why and any means by which they can remedy the situation, along with the timescale that will apply. Should the policy be approved, the Scheme of Delegation to Officers will require to be amended to reflect the appeals process accordingly.

## **6.7.**

If the draft Suspension Policy is approved, implementation would take place in tandem with the draft Lettings Policy being no later than 1 April 2021.

## **7. Equalities Impact**

An Equality Impact Assessment has been undertaken and is attached as Appendix 2 to this report.

## **8. Corporate Governance**

This report relates to the governance and procedural issues and therefore does not directly support and contribute to improved outcomes for communities as outlined in the Council and the Local Outcomes Improvement Plan.

## **9. Financial Implications**

There are no financial implications arising from this report.

## **10. Legal Aspects**

The legislation originates from the Housing (Scotland) Act 1987 section 20 with revisions being introduced through the Housing (Scotland) Acts 2001 and more recently 2014.

## **11. Contact Officers**

James Wylie, Executive Director of Education, Leisure and Housing, extension 2433, Email [james.wylie@orkney.gov.uk](mailto:james.wylie@orkney.gov.uk).

Frances Troup, Head of Housing, Homelessness and Schoolcare Accommodation Services, extension 2177, Email [frances.troup@orkney.gov.uk](mailto:frances.troup@orkney.gov.uk).

## **12. Appendices**

Appendix 1: Draft Suspension Policy.

Appendix 2: Equality Impact Assessment.



## Suspension Policy

	<b>DOCUMENT REF.</b>	<b>REV.</b>	<b>ISSUE DATE.</b>	<b>REASON FOR ISSUE.</b>	<b>REVIEWER.</b>	<b>SIGN.</b>
HD POL 127.	A.	Draft.	18 July 2019.	New Policy.	Head of Housing, Homelessness and Schoolcare Accommodation Services.	
HD POL 127.	A.	Draft 2.	11 January 2020.	New Policy.	Head of Housing, Homelessness and Schoolcare Accommodation Services.	

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This document can be made available in various formats such as in larger print, audio-format and Braille. It can also be made available in other languages, as appropriate.

## Section 1: Introduction

Orkney Islands Council has established this Suspension Policy to explain clearly when housing applicants may not receive offers of housing.

Our Suspension Policy links closely to our Lettings Policy and is explained within our Lettings Policy accordingly. However, it also links with other key policies. For example, suspension rules may apply in respect of certain types of antisocial behaviour as dealt with in our Antisocial Behaviour Policy.

Further, as suspending offers are very important, we have established this comprehensive policy to support our Lettings Policy. This demonstrates that we regard suspensions as a serious matter that must be dealt with comprehensively in the interests of applicants.

Our Suspension Policy is linked to law and good practice guidance; the legal and guidance framework is summarised in Appendix 2.

This policy contains a range of inter-dependent sections to ensure that our policy principles are implemented effectively (see Section 3).

Before considering our policy principles, a summary of relevant law and guidance relating to suspensions is provided in Section 2.

In developing and using this policy we will ensure the promotion of equal opportunities by publishing information on suspensions in different languages, as required, and in other formats such as in large print, tape and braille.

This document has been produced by Housing Services and is intended to ensure that we:

“act in a manner which encourages equal opportunities and in particular the observance of the requirements of the law for the time being related to equal opportunities” (Housing (Scotland) Act 2010, Section 39).

In particular we strive to comply with the Scottish Social Housing Charter’s Standard on Equalities in that:

- Every tenant and other customer has their individual needs recognised, is treated fairly and with respect, and receives fair access to housing and housing services.

This outcome describes what social landlords, by complying with equalities legislation, should achieve for all tenants and other customers regardless of age, disability, gender reassignment, marriage and civil partnership, race, religion or belief, sex, or sexual orientation. It includes landlords’ responsibility for finding ways of understanding the rights and needs of different customers and delivering services that recognise and meet these.

In addition we endeavour to comply with the Scottish Social Housing Charter’s Standard on Access to Social Housing in that:



“People looking for housing find it easy to apply for the widest choice of social housing available and get the information they need on how the landlord allocates homes and on their prospects of being housed. This outcome covers what social landlords can do to make it easy for people to apply for the widest choice of social housing that is available and suitable and that meets their needs. It includes actions that social landlords can take on their own and in partnership with others, for example through Common Housing Registers or mutual exchange schemes, or through local information and advice schemes”.

In reviewing this policy we have taken into account the Counter Terrorism and Security Act 2015 and related guidance and procedures. No specific measures are required in respect of our suspension policy.

## **Notes**

Orkney Islands Council is generally referred to as “we” throughout this document.

The term “housing applicant” that is used in this policy covers any applicant for housing, including tenants applying for other housing.

## **Section 2: Law and statutory guidance**

This section summarises the law concerned with suspensions before describing good practice guidance.

It is not intended as a precise statement of law, but is a plain language summary of key issues.

A suspension is defined as a period of time during which an applicant or existing tenant must remain on a housing list before being considered for an offer of housing.

### **The law concerning suspensions of offers and our policy**

The Housing (Scotland) Act 1987 (as amended) describes a statutory suspension framework that we can choose to use to suspend offers of housing to applicants at the point they apply for housing. This also entitles applicants to appeal to the sheriff court.

Appendix 2 includes the provisions from within the legislation which we may choose to use.

We do not require to implement this framework in its entirety and we operate our own internal Suspension Policy which is reflective of the area in which we operate.

## **Section 3: Suspending offers: our policy**

We do not operate the statutory suspension framework, but use our own Suspension Policy. This policy is in accordance with the law and, in particular, the statutory guidance.

Under our policy, we can suspend offers to applicants in the following circumstances:

- Made a false statement, knowingly or recklessly, in their application for housing.
- Specific debts, for example, owing rent arrears that are over a month's rent without having a suitable repayment arrangement in place.
- Failed to maintain their house and common parts, as appropriate, and a court order to repossess the property is in force.
- A court order granted against her/him that prevents re-housing in a particular area.
- Abandoned their home and the tenancy has now been ended formally.
- Deliberately worsened their housing circumstances (for example moving to a property that is unsuitable for medical or social reasons or because it is of poor quality or insecure).
- Refused one or more previous offers unreasonably (see note).
- Been convicted of specific offences such as allowing their home to be used for illegal or immoral purposes for example, dealing in unlawful drugs.
- Where the applicant (or any member of the applicant's household) has been:
  - Evicted within the previous three years for anti-social behaviour from any Local Authority or Registered Social Landlord (RSL) within the United Kingdom.
  - Taken to court and a decree for possession of their house has been granted, within the previous three years, on the grounds of anti-social behaviour but the applicant left prior to eviction taking place.
  - The subject of an Anti-Social Behaviour Order (ASBO) within the past three years (see note two).

**Note 1:** In this policy, we assess each case on merit and would suspend offers to applicants, on this ground, only if this were reasonable. For example, if an applicant were to refuse an offer of the right size and type of housing in an area that she/he has selected out of choice.

**Note 2:** If the anti-social behaviour criteria highlighted applies we may choose to offer housing under a Short Scottish Secure Tenancy (SSST) with a tailored package of support.

In our Suspension Policy, offers may be suspended on any of the grounds above after the application for housing has been accepted onto the housing list.

In implementing this policy, we operate suspension procedures. The key procedural sections of our suspension procedures are outlined at Section 5.

### **Suspending offers: appeals and reviews**

In our policy, applicants do not have the right of appeal to the sheriff court. However, applicants can appeal our decisions through our internal process; and decisions are reviewed on a regular basis. Information about appeals and reviews are provided to any applicant to whom this policy applies.

## Summary

The law specifies a range of circumstances in which we may suspend offers of housing to applicants. This law applies only at the point when applicants apply for housing. We operate our own Suspension Policy that takes account of specific issues. In our suspension system, we have established a formal review and monitoring process.

## Section 4: Our suspension policy objectives

This section explains our main policy objectives in relation to suspension of offers to applicants.

### **Objective 1:** Meeting appropriate standards.

We suspend offers of housing to applicants taking account of legal, statutory guidance and policy standards.

### **Objective 2:** Mainstreaming of equality.

We include equality matters throughout our Suspension Policy, for instance, ensuring our suspension processes do not inadvertently inconvenience or adversely affect members of any equalities group.

### **Objective 3:** Information and advice.

We offer housing applicants information and advice about our Suspension Policy and related procedures, including length of suspensions applied.

### **Objective 4:** Organisational policies.

We apply suspensions to promote a range of organisational objectives, for instance, suspending offers to people engaged in anti-social behaviour.

### **Objective 5:** Staff development and training.

We provide staff with comprehensive training on our suspension policy and related procedure.

### **Objective 6:** Managing suspension of offers.

We use a range of performance indicators to monitor suspension of offers, including reasons for suspension.

### **Objective 7:** Consultation.

We consult with tenants, housing applicants and other people when developing our suspension policy that forms part of our allocation policy.

In development of this policy, the process of consultation was aligned with that of our lettings review in accordance with the Housing (Scotland) Act 2014.

**Objective 8:** Appealing and reviewing decisions to suspend offers.

We advise applicants of their appeal rights if an applicant wants to appeal our suspension decision; and we inform them of our review processes.

**Objective 9:** Complaints.

We advise applicants of their right to complain in line with the Council's corporate complaint system.

**Objective 10:** Review of policy.

We review our Suspension Policy every 5 years or sooner, if appropriate, for instance, due to changes in law.

## **Section 5: Key procedural stages**

Our suspension procedure is used by Housing staff to implement the Suspension Policy effectively.

Additionally we hold suspension procedure which is an internal document that covers the following elements:

- Clarification of key terms (bypassing; deferred and suspended offers).
- Reasons why suspension of offers may be applied.
- How suspensions are applied in practice.
- Length of suspensions.
- Advice and information to applicants, including information about their appeal rights (and complaint rights).
- Standard forms and documentation to ensure consistency.
- Performance management.

## **Section 6: Development and training**

Staff training is essential if we are to meet our Suspension Policy objectives.

Suspension policy training may include the following persons:

- Housing staff.
- Tenant groups.
- Other council services and/or organisations.

### **Housing staff**

Examples of suspension training may include:

- Law on suspensions, including relevant guidance.
- Our Suspension Policy and related procedures.
- Performance management.

## **Elected Members**

Our local councillors are responsible for policy development.

Elected Members receive information through the committee process relating to:

- Suspension law and guidance.
- Performance monitoring.

## **Tenant groups**

We must consult with tenants, applicants and other groups when we are developing and/or changing our Suspension Policy. This includes information about our Suspension Policy, as well as training for tenants involved in Suspension Policy development.

## **Other Council services and/or organisations**

As part of our training programmes, we may provide similar training to other Council services and/or organisations, as appropriate.

## **Summary**

We provide suspension policy and procedure training to staff who implement our Suspension Policy. We may also provide information and training to other specific groups, as appropriate. Training, it is stressed, is essential if our Suspension Policy is to be implemented effectively.

# **Section 7: Managing our performance**

## **Monitoring suspensions**

We monitor any suspensions that are applied to ensure that our policy objectives are being met in practice.

Our monitoring covers the following issues:

- The number of suspensions applied.
- Reasons for suspensions.
- Number of reviews of suspensions requested immediately by applicants and their outcomes.
- Number of appeals/reviews and their outcomes.
- Number of subsequent requests for reviews of suspensions, or reviews initiated by us as landlord and their outcomes.
- Specific equality profiles of applicants.

## **Summary**

Managing performance is a key part of governance in relation to our Suspension Policy and practice. We monitor information, not simply for statistical returns, but to

use this information to improve our services. Information that we gather is also used to inform our consultation processes with tenants, applicants and other people.

## **Section 8: Appeals and complaints**

This section provides information about our separate appeals and complaints procedures. Detailed information on these procedures is contained in our information pack that applicants receive. This includes making applicants aware of their right to appeal and be advised that independent agencies such as the Citizen's Advice Bureau and Advocacy Orkney can assist them with this process if they wish.

### **Appeals against decisions**

If an applicant is dissatisfied regarding any decision made in the letting process, they have the right to appeal. This includes suspensions of offers. We advise applicants, in writing, of the appeal process, including time scales for making an appeal. This is done through our procedural appeal information.

### **Complaints**

Complaints can be made if applicants are dissatisfied with our processes or actions. For example, someone might complain if she/he feels that the Suspension Policy has not been implemented properly.

A copy of the Council's Corporate Complaints Procedure is available on request from the Council Offices or can be downloaded from our website.

Applicants should note that an independent review of decisions is available by referring a case to the Public Sector Ombudsman after the complaints procedure has been used.

This is a free and impartial service and a leaflet giving details is available at the Council offices.

The Ombudsman address is:

Scottish Public Services Ombudsman  
Bridgeside House  
99 McDonald Road  
Edinburgh  
EH7 4NS

Telephone: 08003777330

Fax: 08003777331

Email: [CSA@spsso.gov.scot](mailto:CSA@spsso.gov.scot)

Website: <https://www.spsso.org.uk/>

## **Section 9: Policy review**

We review our Suspension Policy every five years or sooner, as appropriate. For example, we may review our Suspension Policy because of changes to law.

### **Appendix 1: Other relevant policies**

Other organisational policies that are linked to the suspension policy include:

- Lettings policy.
- Antisocial behaviour policy.
- Rent arrears policy.

**Note:** Other policies that are mainstreamed through this policy include equality and diversity.

### **Appendix 2: Law and guidance framework**

This Appendix describes the legal and guidance sources.

#### **Statutory grounds for refusing offers of housing**

Under the statutory suspension provisions, we may withhold offers of housing, from the date an applicant applies for housing, if the applicant:

- Has acted in an antisocial manner towards someone else, for example, if a tenant were to harass another resident of their area.
- Has been convicted of specific offences such as allowing their home to be used for immoral or illegal purposes, for example, dealing in unlawful drugs.
- Has a court order granted against her/him that ends their tenancy.
- Has abandoned their home and the tenancy has now been ended through using our abandonment procedures.
- Fails to maintain their house and common parts, as appropriate, and a court order to repossess the property is in force.
- Has specific debts, for example, owing rent arrears that are over a month without having a suitable repayment arrangement.
- Has made a false statement, knowingly or recklessly, in their application for housing.
- Has refused one or more previous offers (see note).

We have chosen to operate our own Suspension Policy which is reflective of the area in which we operate.

#### **Legal sources**

Allocation law is contained in the Housing (Scotland) Act 1987, as amended. This contains law on suspensions too.

## **Suspension guidance**

Scottish Government, 2019, Social Housing Allocations in Scotland: A practice guide, Edinburgh: Scottish Government. Web link:

<https://www.gov.scot/publications/social-housing-allocations-scotland-practice-guide/>

Scottish Government, 2019, Minimum period for applications to remain in force – suspensions under section 20 B of the Housing (Scotland) Act 1987, Statutory Guidance, Edinburgh: Scottish Government. Web link:

<https://www.gov.scot/publications/minimum-period-applications-remain-force-suspensions-under-section-20b-housing-scotland-act-1987-statutory-guidance/pages/1/>





## Equality Impact Assessment

The purpose of an Equality Impact Assessment (EqIA) is to improve the work of Orkney Islands Council by making sure it promotes equality and does not discriminate. This assessment records the likely impact of any changes to a function, policy or plan by anticipating the consequences, and making sure that any negative impacts are eliminated or minimised and positive impacts are maximised.

<b>1. Identification of Function, Policy or Plan</b>	
Name of function / policy / plan to be assessed.	Suspension Policy
Service / service area responsible.	Housing Services
Name of person carrying out the assessment and contact details.	Frances Troup, Head of Housing, Homelessness and Schoolcare Accommodation Services Ext 2177 E-mail <a href="mailto:frances.troup@orkney.gov.uk">frances.troup@orkney.gov.uk</a>
Date of assessment.	15 January 2020
Is the function / policy / plan new or existing? (Please indicate also if the service is to be deleted, reduced or changed significantly).	New for 2021

<b>2. Initial Screening</b>	
What are the intended outcomes of the function / policy / plan?	<p>Suspensions are a process which applies as part of the process of the allocation of council housing.</p> <p>Currently the Suspensions Policy is within the lettings policy.</p> <ul style="list-style-type: none"> <li>Following a review of the current lettings processes during 2019, through consultation it was determined that a separate Suspension Policy should be devised to accompany the new Lettings Policy which will be implemented no later than 1 April 2021.</li> </ul>

	It is intended that the Suspensions Policy will ensure there is clarity on the reasons why an applicant can be suspended and the process surrounding this.
Is the function / policy / plan strategically important?	Yes. It is a key part of the Council's allocations process and is underpinned by legislation.
State who is, or may be affected by this function / policy / plan, and how.	Applicants for Council housing. These may include existing Council tenants applying for a transfer and non-tenants who have applied to be housed.
How have stakeholders been involved in the development of this function / policy / plan?	<p>A consultation on the Council's new Lettings Policy was undertaken during 2019 and suspensions were a part of this consultation.</p> <p>This included a letter being sent to all tenants with written information. There were also two consultation events, one in Kirkwall, one in Stromness which allowed tenants to hear a presentation, ask questions and to make any points they may wish to raise.</p> <p>A questionnaire was used alongside Smart Survey and all responses were manually assessed.</p> <p>The outcome of the consultation was reported to the Council's Education, Leisure and Housing Committee in November 2019.</p>
Is there any existing data and / or research relating to equalities issues in this policy area? Please summarise. E.g. consultations, national surveys, performance data, complaints, service user feedback, academic / consultants' reports, benchmarking (see equalities resources on OIC information portal).	<p>There is significant data and research relating to this area.</p> <p>The Scottish Government has undertaken research and has produced guidance which is available from:</p> <p>Scottish Government, 2019, Social Housing Allocations in Scotland: A practice guide, Edinburgh: Scottish Government. Web link: <a href="https://www.gov.scot/publications/social-housing-allocations-scotland-practice-guide/">https://www.gov.scot/publications/social-housing-allocations-scotland-practice-guide/</a></p> <p>Scottish Government, 2019, Minimum period for applications to remain in force – suspensions under section 20 B of the Housing (Scotland) Act 1987, Statutory Guidance, Edinburgh: Scottish Government. Web link: <a href="https://www.gov.scot/publications/minimum-period-applications-remain-force-suspensions-under-section-20b-housing-scotland-act-1987-statutory-guidance/pages/1/">https://www.gov.scot/publications/minimum-period-applications-remain-force-suspensions-under-section-20b-housing-scotland-act-1987-statutory-guidance/pages/1/</a></p>

<p>Is there any existing evidence relating to socio-economic disadvantage and inequalities of outcome in this policy area? Please summarise.</p> <p>E.g. For people living in poverty or for people of low income. See <a href="#">The Fairer Scotland Duty Interim Guidance for Public Bodies</a> for further information.</p>	<p>The Joseph Rowntree Foundation has produced a range of research focussing on poverty and disadvantage and the links between this and housing and homelessness. Research such as this relates directly to the introduction of the Fairer Scotland Duty.</p> <p>There is significant research indicating that homeless households suffer socio-economic disadvantage and this is intensified if they are rough sleepers. The provision of housing or lack of it is recognised as being intrinsically linked to a range of indicators related to health, wealth and educational achievement.</p>
<p>Could the function / policy have a differential impact on any of the following equality strands?</p>	<p>(Please provide any evidence – positive impacts / benefits, negative impacts and reasons).</p>
<p>1. Race: this includes ethnic or national groups, colour and nationality.</p>	<p>No specific impact identified.</p>
<p>2. Sex: a man or a woman.</p>	<p>No specific impact identified.</p>
<p>3. Sexual Orientation: whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.</p>	<p>No specific impact identified.</p>
<p>4. Gender Reassignment: the process of transitioning from one gender to another.</p>	<p>No specific impact identified.</p>
<p>5. Pregnancy and maternity.</p>	<p>No specific impact identified.</p>
<p>6. Age: people of different ages.</p>	<p>No specific impact identified.</p>
<p>7. Religion or beliefs or none (atheists).</p>	<p>No specific impacts identified.</p>
<p>8. Caring responsibilities.</p>	<p>No specific impact identified.</p>
<p>9. Care experienced.</p>	<p>No specific impact identified.</p>
<p>10. Marriage and Civil Partnerships.</p>	<p>No specific impacts identified.</p>
<p>11. Disability: people with disabilities (whether registered or not).</p>	<p>No specific impact identified.</p>

12. Socio-economic disadvantage.	Socio-economic disadvantage is likely to be more prevalent amongst particularly homeless households and some other households applying for Council housing. However, the Suspension Policy is intended to assist in ensuring fairness in respect of any suspensions being applied.
13. Isles-proofing.	No specific impact identified.

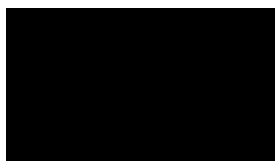
### 3. Impact Assessment

Does the analysis above identify any differential impacts which need to be addressed?	Socio-economic disadvantage may be more prevalent amongst some groups who may apply for Council housing than the general population. These have been addressed throughout the EQiA.
How could you minimise or remove any potential negative impacts?	Socio-economic disadvantage is likely to be more prevalent amongst particularly homeless households and some other households applying for Council housing. However, the Suspension Policy is intended to assist in ensuring fairness in respect of any suspensions being applied.
Do you have enough information to make a judgement? If no, what information do you require?	Yes

### 4. Conclusions and Planned Action

Is further work required?	<b>No.</b>
What action is to be taken?	N/A
Who will undertake it?	N/A
When will it be done?	N/A
How will it be monitored? (e.g. through service plans).	N/A

Signature:



Date: 15 January 2020

Name: Frances Troup

(BLOCK CAPITALS).

Please sign and date this form, keep one copy and send a copy to HR and Performance. A Word version should also be emailed to HR and Performance at [hrsupport@orkney.gov.uk](mailto:hrsupport@orkney.gov.uk)