

Hoarding Policy

1.0	SCOPE
	Purpose
1.1.	<p>This Policy sets out how we will respond to cases of hoarding and what customers are expected to do to ensure their own safety and wellbeing, to create a safer and healthier environment for individuals and others that are affected by hoarding behaviours:</p> <ul style="list-style-type: none"> • To develop an understanding of why hoarding has occurred and to put an action plan in place to help customers better manage their environment. • To reduce the risk of harm to others by taking steps to deal with hoarding where it is found. • To have a flexible approach to deal with hoarding where it is identified. • To promote and develop how we respond through safeguarding and multi-agency working. • To work with partners to ensure customers receive the specialist services they require in order to remedy the situation. • To support the maintenance of fire safety and minimise the vulnerabilities of inappropriate storage compromising the design of our buildings. • To maintain the terms of the tenancy and take action where required.
1.2.	<p>We will work with our partners to maximise the opportunity of support and resolution by referring customers to engage with:</p> <ul style="list-style-type: none"> • Support pathways that address issues of self-neglect. • Multi agency locality panel case reviews to ensure the right intervention is accessible for the customer. • Education on the items that can be stored on balconies • Information, advice and guidance through multi-disciplinary teams. This will ensure our customers and their family members are supported throughout the agreed period of support or intervention put in place.
1.3.	<p>We will consider our responses to the impact of hoarding on a case by case basis and with full communication and consent for referrals with the customer in accordance with the Data Protection Act 2018. Where consent is not given and the level of hoarding is measured on the Clutter Image Rating Scale as</p>

	levels 6 – 9 or poses an immediate hazard, health and safety concern we will refer without customer consent.
1.4.	This Policy will be applied having regard to the Safeguarding, and the Fire Risk Assessment Policy. When applying the Safeguarding Policy, we will use the 'Think Family' approach to safeguarding which refers to the steps taken by children's, young people's and adult's practitioners to identify wider family needs which extend beyond the individual they are supporting to ensure all of the household members are considered.
	Legal and Regulatory Framework
1.5.	The Homes Standard of the Regulator for Social Housing (RSH) requires us to meet all applicable statutory requirements that provide for the health and safety of tenants in their homes.
1.6.	The Tenant Involvement and Empowerment Standard of the RSH requires us to treat tenants with fairness and respect and to demonstrate we understand the different needs of our tenants, including tenants with additional support needs.
1.7.	<p>The Mental Capacity Act 2005 provides a statutory framework for people who lack capacity to make decisions for themselves, based around five statutory principles that underpin the legal requirements of the act.</p> <ul style="list-style-type: none"> a) A person must be assumed to have capacity unless it is established that they lack capacity. b) A person must be given all practicable help before they are treated as not being able to make their own decisions. c) A person should not be treated as lacking capacity to make that decision, because they make what might be seen as an unwise decision. d) Any decision made on behalf of a person who lacks capacity must be done or made in their best interests. e) Before a decision is made for or on behalf of a person who lacks capacity, regard must be given to find a way that is the least restrictive on their basic rights and freedom of action.
1.8.	The Mental Health Act 1983 provides the Local Authority and/or statutory agencies powers to intervene where someone may be at risk due to their mental health illness or issues.
1.9.	The Public Health Act 1936 as amended provides the Local Authority powers to force homeowners, landlords and tenants to respond to remove, cleanse and/or destroy articles and/or premises that contravene the terms of the act relating to noxious matter, dirty or verminous premises/matter.

1.10.	<p>The Environmental Protection Act 1990 provides for Local Authorities to respond to public statutory nuisances which relates to a reduction in an amenity or environmental quality that may affect someone.</p> <p>1.11 Section 79 (1)</p> <p>a) any premises in such a state as to be prejudicial to health or a nuisance; b) fumes or gases emitted from [private dwellings] premises so as to be prejudicial to health or a nuisance; c) any accumulation or deposit which is prejudicial to health or a nuisance; d) any animal kept in such a place or manner as to be prejudicial to health or a nuisance.</p>
1.11.	<p>The Anti-Social Behaviour Crime and Policing Act 2014 gives Registered Providers civil tools, and statutory agencies powers to respond to the impact of unacceptable conduct or behaviour either on the person or the premises in which unacceptable behaviour is conducted.</p>
1.12.	<p>The Housing Health and Safety Rating System (HHSRS) applies to residential properties and provides a risk-based evaluation tool to help us identify and protect against potential risks and hazards identified in our homes, initially introduced through the Housing Act 2004.</p>
1.13.	<p>The Housing Act 1988, Schedule 2 allows us to apply to court under ground 13 for acts of waste or negligence on the part of the customer, their relatives or anyone living in the household, subject to reasonableness.</p>
1.14.	<p>The Regulatory Reform (Fire Safety) Order 2005 requires us to reasonably manage our buildings/assets and to carry out fire risk assessments – this is specifically related to flatted accommodation. Hoarding poses a significant risk to both the people living in the hoarded property and those living nearby. Where a hoarded property is identified regardless of the risk rating, those individuals need to be advised of the increased risk and identify a safe exit route. Appropriate professional fire safety advice must be sought. Sharing information with appropriate emergency services by alerting them to hoarded properties will allow them to respond appropriately. Once properties are cleared the information must be updated. A Safe and Wellbeing visit undertaken by the Fire & Rescue Service may be appropriate.</p>
1.15.	<p>We will work in partnership with Local Authorities in our areas of operation to respond to issues that may occur on our property and land, and work in accordance with the Environmental Protection Act (as amended by the Environmental Health Amendment Act 2018).</p>
2.0	POLICY PRINCIPLES

	Definition of Hoarding
2.1.	It is the acquisition and an inability or unwillingness to discard of objects that cover the living areas of the home and cause significant distress or impairment (Frost & Hartl, 1996). It can be a disorder where someone acquires an excessive number of items and stores them in a way, usually resulting in unmanageable amounts of clutter. The items may be of little or no monetary value.
2.2.	This condition can also result in the storing of bodily liquids and human waste. This is at the most severe end of the condition and will almost certainly need the support of professional mental health experts to help resolve. Hoarding can also be a symptom of another problem such as severe depression, obsessive compulsive disorder, or can be indicative of self-neglect. Hoarding is as such not necessarily a lifestyle choice.
2.3.	<p>Hoarding does not favour a particular gender, age, ethnicity, socio-economic status, education or occupation or tenancy type and it can be triggered at any point of someone's life. Someone who has not previously shown hoarding tendencies may have a life event which triggers the behaviour.</p> <p>It is important to note that anything can be hoarded, in any area of the customer's property including the garden and communal areas, items that are hoarded range from animals, clothes, newspapers, bills and food to own faecal matter and urine.</p> <p>Hoarding is considered significant if:</p> <ul style="list-style-type: none"> • The amount of clutter interferes with everyday living. • The clutter is causing significant distress or negatively affecting the quality of life of the person and/or their family; for example, they become upset if someone tries to clear the clutter and their relationship suffers. • It is affecting other residents and neighbours who live close by, this could be because the hoarding has extended to outside areas, such as gardens, and is an eyesore; or it can be because the clutter has attracted pests and vermin or is starting to smell, which is impacting on surrounding properties. • It is affecting the condition of the property and is breaching the tenancy; this can include structural concerns where the clutter is particularly significant and the weight of this is a concern. • Where we are not able to safely access the property to complete our legal safety checks and/or to complete repairs.
2.4.	<p>There are five diagnostic criteria for identifying a case of hoarding disorder:</p> <ul style="list-style-type: none"> • Persistent difficulty with discarding or parting with possessions regardless of their value.

	<ul style="list-style-type: none"> • A perceived need to save items and being distressed when discarding them. • Accumulation of items/possessions that clutter/block living areas. • The hoarding causes clinically significant distress or impairment in social, occupational or other areas of human functioning. • It is not because of another medical condition or mental disorder.
2.5.	We may come across customers who display one or more of the criteria above. Should this be the apparent, an action plan will be developed, and intervention and support referrals will be considered.
	Intervention and Support
2.6.	We will identify customers who may be hoarding, by using the Clutter Image Rating Scale see Appendix 1.
2.7.	Where customers display behaviours that pose a risk or have detrimental impact on not only themselves but others around them, we will in most cases take a graded approach to intervention. We will use the Clutter Image Rating Scale to assess the degree of hoarding, in order to provide a measured response to the issue dependent upon its severity.
2.8.	Hoarding can be identified via any mechanism to the Community Housing Team, such as through tasks, phone calls or visits and as such we will refer colleagues to the guidance document on how we will manage and assess each case. Each case will be assessed on an individual basis and responses will be appropriate to the circumstances of the person involved. Colleagues will be able to refer to the Hoarding Procedure and associated guidance when dealing with any identified case. Sometimes it may be necessary to take steps out of sequence. We aim to ensure that the referral pathways are followed, managed and monitored.
	Partnership working
2.9.	We will work with our external contractors and partners and be actively involved with multi agency groups such as Walsall's Self Neglect referral group and Walsall Adult Safeguarding Partnership.
2.10.	We will work with internal and external teams and partners to ensure our approach is robustly implemented to ensure risk is reduced and an opportunity for our customers to improve their living environment is increased. We will work with the relevant agencies to increase capacity for the customer to remain independent, resilient and safe in their own home.
2.11.	Where there is evidence of self-neglect, a referral will be made in accordance with the Safeguarding Policy.

	Equality Impact Assessment
2.12.	We understand that some customers may have additional, complex or challenging needs which may influence the way that they maintain their home and consequently how we manage their contact with ourselves, but we will always treat them fairly and with respect.
	Tenancy Management
2.13.	whg recognises that each case of hoarding is different, especially in terms of the extent of what is hoarded and the risks that are posed. whg may deal with hoarding as a tenancy breach and will use a range of legislative, intervention and enforcement measures in order to tackle cases of hoarding, if our attempts to engage using non-enforcement methods fail. This will include enforcing the terms of the tenancy agreement and following the appropriate policies and procedures relating to Tenancy Management and Anti-Social behaviour if appropriate.
	Health and Safety
2.14.	whg have a responsibility to ensure we are not endangering field-based colleagues (e.g. contractors, trades colleagues etc); we may be unable to carry out our responsibility as a landlord if a property is hoarded, as it may not be safe for colleagues to enter and work safely. Once a case of hoarding is identified and reported to Community Housing Team, the Community Housing Officer will arrange to visit the property and discuss the concerns raised with the customer. Following which the hoarding procedure will be followed.
	Training
2.15.	The Clutter Image Rating Scale is the national tool used to assess levels of hoarding; we will use it as a tool to raise awareness across all customer facing teams of the role and responsibility of colleagues who work with customers that compulsively hoard. This will ensure effective interventions, resolutions and prevention planning is managed and maintained in accordance with this and the Safeguarding Policy.
3.0	PERFORMANCE MEASURES
3.1.	We will monitor the number of hoarding cases we manage, and the associated costs in each financial year.
4.0	TRAINING AND DISSEMINATION
4.1.	Training will be delivered to front facing colleagues, in particular:

	<ul style="list-style-type: none"> • Community Housing Officers • Neighbourhood Inspectors and Neighbourhood Community Officers • Health Champions • Social Prescribing Link Workers <p>A communications and training plan will be developed by the Regional Community Manager and Learning and Development Lead.</p>
5.0	MONITOR AND REVIEW
5.1.	This Policy will be monitored by the Director of Housing and Customer Services, and the Head of Health and Well Being and reviewed every three years by the Customer Service Oversight Committee.
6.0	ASSOCIATED DOCUMENTS, POLICIES AND PROCEDURES
6.1.	<p>Documents, policies and procedures associated with this policy are:</p> <ul style="list-style-type: none"> • Tenancy Agreements • Hoarding procedures • The Mental Capacity Act 2005 • The Housing Act 1985, 1988 and 1996 • Environmental Protection Act 1990 • The Animal Welfare Act 2006 • The Public health Act 1936 • Anti-Social Behaviour Crime and Policing Act 2014 • Regulatory Reform (Fire Safety) Order 2005 • Public Health (Control of Disease) Act 1984 • Fire Risk Assessment Policy • Repairs Policy • Safeguarding Policy • The Clutter Image Rating Scale • Data Protection Act 2018 • The Housing Health and Safety Rating System (HHSRS) • The Care Act 2014 • Equality Impact Assessment (Nov 2023)

Document author	Regional Community Housing Manager
Document owner	Director of Housing and Customer Services
Legal advice	Not required. The body of the policy covers actions leading to legal action, at which point any breach of the tenancy agreement would apply, along with other existing policies and procedures, such as the No Access procedure.
Consultation	<ul style="list-style-type: none"> - Director of Stronger Communities - Assistant Director of Housing

	<ul style="list-style-type: none"> - Corporate Housing Director of Housing & IT - Regional Community Housing Managers - Community Housing Officers - Customer Consultation
Approved by	GEXEC – December 2023
Review Date	November 2026
Corporate Plan aim	<ul style="list-style-type: none"> • Deliver high quality homes and services to our customers • Promote health and prosperity where we can make a difference
Equality analysis	Yes
Key changes made	General amendments to clarify whg's stance on hoarding.

Clutter Image Rating Scale (CIRS)¹

The purpose of this tool is to gauge the impact of hoarding on the person with the hoarding behaviour.

Clutter Image Rating Scale: Part 1 of 3 – Kitchen

Please select the photo below that most accurately reflects the amount of clutter in your room.



1



2



3



4



5



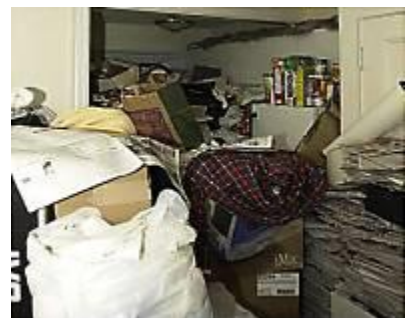
6



7



8



9

