

Hoarding policy

1. Introduction

- 1.1 This policy outlines our approach to supporting customers within our managed properties to address their hoarding behaviour. It also sets out the action we would take to resolve the impact their hoarding has on their home, household, neighbours and the local community.
- 1.2 This policy aims to ensure that cases of hoarding are dealt with in a sensitive manner in accordance with need. It aims to ensure all employees act in a non-judgemental way, remain outcome focused and appropriate action is taken after careful assessment of each case.
- 1.3 We recognise the risk hoarding can pose to the hoarder and those around them. This policy aims to ensure any risks are managed effectively and that the hoarder receives appropriate support through a multi-agency approach.
- 1.4 This policy should be read in conjunction with the following policies:
 - Safeguarding Adults Policy
 - Safeguarding Children Policy
 - Mental Capacity Act Policy
 - Antisocial Behaviour Policy
 - Fire Safety Management System and Fire Safety Requirement
 - Fire Risk Assessment
 - Data Protection Policy
 - Equality, Diversity and Inclusion Policy

2. Scope

- 2.1 This policy applies to customers in general needs, intermediate market, affordable and market rent properties, sheltered and supported housing. It does not apply to leaseholders or shared owners. However, we will signpost customers to support agencies where possible.
- 2.2 Where the property is managed by another provider the managing agent's policy will apply

3. Key terms and definitions

- 3.1 We recognise **hoarding** as a disorder or pattern of behaviour in which the individual excessively acquires and fails to discard any material to the point that it impedes their day-to-day living and it creates a hazard, or a potential hazard, for the individual or causes a nuisance or hazard to others. Hoarded items can be inanimate objects or animals.

4. Our approach

- 4.1 We will engage with those who hoard at an early stage and help them to access appropriate support, so that they can manage and maintain their tenancy.
- 4.2 We will train colleagues and have the appropriate procedures in place so that they can:
 - Identify, assess and engage with customers who may be hoarding;
 - Provide guidance and support to those who hoard and, where applicable, refer them to further support;

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- Promote awareness of hoarding and establish best practice and an awareness of legislation relation to hoarding.
- 4.3 We recognise that the nature and causes of hoarding are complex and that each case will be different. We will take a person-centred approach to managing all cases and will wherever possible, work with the customer to find actions and solutions that take their needs and circumstances into account.
- 4.4 It should be assumed that a first instance everyone has capacity to make decisions. Where someone is judged as not having capacity to make an informed decision about their own wellbeing, these will be made in their best interest on their behalf. This decision will be made in accordance with the requirements of the Mental Capacity Act 2005, and in liaison with the necessary statutory services and agencies, involving carers and family members as appropriate.
- 4.5 We take all hoarding cases seriously and carry out a risk assessment using the Clutter Image Rating scale to assess the severity of the hoarding and the risk posed to the customer, their property and its surroundings. This includes looking at the vulnerability of the customer so that our response recognises and meets their additional support needs. For example, we may arrange for more frequent visits for a longer period of time whilst they are de-cluttering and cleaning their property.
- 4.6 We use risk assessments to determine the action that needs to be taken on a case-by-case basis. As a guide level of risk and action taken are:
- **Negligible risk** where there is negligible risk or issue has been identified or the customer is not considered as a hoarder
 - A **low risk** where minimal risk or issues are identified
 - A **moderate risk** where potential risks and issues are identified, which if not tackled or monitored and the behaviour continues, the problem may get worse
 - A **high risk** where there are unacceptable risks and issues which need to be resolved urgently.
 - An **excessive risk** where level of hoarding is extremely dangerous and there is immediate risk of harm or urgent safeguarding needs.
- 4.7 We report all moderate, high and excessive risk cases in the first instance to relevant specialist support agencies (such as the fire service, social services or community mental health teams) to help us support customers to manage the risks posed by their hoarding. Where appropriate we take a multi-agency approach to supporting hoarders to sustain their tenancy and resolve the impact their hoarding is having on others, by participating in, and where necessary setting up, partnerships with councils and other agencies.
- 4.8 We immediately notify the relevant authorities where we identify any safeguarding issues, such as self-neglect or where children and young people are at risk.
- 4.9 Where we identify a property as posing a moderate, high or excessive risk we will work sensitively with customers alongside the appropriate support agencies to draw up a support plan which helps them make long-term changes to sustain their tenancy with us
- 4.10 Where a property poses a low risk we will not take any further action unless we identify the need for an early intervention, or issues / risks which are not related to hoarding but still need to be resolved, such as any outstanding repairs or pest control are identified.
- 4.11 Where a customer is willing to work with us, we may support them to de-clutter and deep-clean their property. This will typically consist of a phased approach where we initially clear problematic areas and remove or move any items which may cause a health and safety hazard to a safe location.

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- 4.12 We offer support and attempt to monitor the condition of the customer's property before and after the clearing and cleaning of the property, to help the customer maintain the property. We expect the customer to engage with our decluttering process to monitor the condition of the property after the property has been cleared.
- 4.13 We take all possible steps to work with the customer, their advocates and other relevant agencies before we begin any enforcement action. Where appropriate, especially in cases of extreme hoarding which have been identified as posing an excessive or high risk, we assess whether a customer has capacity before we take any further action.
- 4.14 We will consider a range of actions – including enforcement – against a customer where they refuse to engage with offers of support and where:
- A customer does not provide access for essential health and safety checks such as gas safety and electricity safety
 - The condition of the property makes it virtually impossible or presents a fire safety risk for works to be carried out by a member of staff or contractor
 - We are required to respond to a statutory Environmental Health Notice
 - The health and safety of the customer or others is at risk
- 4.15 We will continue to offer support to the customer to clear their property even after we begin enforcement action, as we recognise that a customer may change their perspective of the situation at any point.
- 4.16 We will work to consider legal action only as a last resort or where there are sufficient risks. If we feel that it is appropriate, that we have exhausted all avenues and where the customer has not engaged with offers of support.
- 4.17 We may recharge the customer where we de-clutter and deep clean a property or for the cost of any repairs caused by hoarding behaviour.
- 4.18 We will record and monitor cases of hoarding to ensure best practice and effective service delivery.
- 4.19 We will handle data in accordance with the Data Protection Act, UK General Data Protection Regulation and the Peabody Data Protection Policy.

5. Equality, Diversity and Inclusion

- 5.1 We value diversity and promote equality, ensuring people are treated accordingly to their individual needs. This ensures that no person or other organisation is discriminated against on the grounds of race, colour, nationality, ethnic origins, sex, disability, sexual orientation, gender reassignment, marital or civil partner status, pregnancy, unrelated criminal activities, illness or any other matter that may cause a person to be treated with prejudice.
- 5.2 We will endeavour to ensure that services are delivered fairly and equally to all and to the highest possible standard. We provide all customers, prospective customers and other stakeholders with the information they require, in a format to meet their individual needs, using clear language which is easy to understand.

6. Legislation and Regulation

- Equality Act 2010
- Housing Act 1988

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- Animal Welfare Act 2006
- Environmental Protection Act 1990
- Data Protection Act 1998 and General Data Protection Regulation
- Mental Capacity Act 2005

7. Responsibilities

- 7.1 The Managing Directors of all regions have overall responsibility for delivery and compliance with the policy

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Approval

Version number	01
Effective from	<i>01 April 2023</i>
Policy owner	Managing Director South London and Hackney