



## Hoarding Policy

<b>Date of approval</b>	<b>14/03/2023</b>
<b>Responsible director</b>	<b>Paul Seymour, Executive Director – Customers &amp; Communities</b>
<b>Policy monitoring body</b>	<b>Customer Experience Committee</b>
<b>Resident input into policy date</b>	<b>14/03/2023</b>
<b>Date for policy review</b>	<b>Every 2 years</b>
<b>Linked strategies/policies</b>	<b>Safeguarding policy</b>
<b>Version/date</b>	<b>14/03/2023</b>
<b>Owner</b>	<b>Amanda Seals, Head of Living Well</b>

## **1. Introduction**

- 1.1 This policy sets out the approach to be adopted by Wythenshawe Community Housing Group ( “WCHG”, “we” ) in relation to all customers affected by hoarding to ensure that all are treated fairly and receive adequate support and guidance to resolve any issues or live safely with their hoarding condition.
- 1.2 Hoarding is the persistent collecting of goods, objects or animals and being unable to discard of such possessions when the quantity has become excessive. Hoarding can vary from mild to severe cases whereby it may not impact a person’s life at all or could seriously affect their functioning on a day to day basis.
- 1.3 Hoarding is a recognised mental health condition which can affect:
  - The health and safety of our customers in their homes
  - The ability and steps needed to be taken by WCHG to ensure it meets its building safety compliance obligations
  - The health and safety of their neighbours or adjacent properties
  - The condition and value of the properties that WCHG own and rent
- 1.4 WCHG recognises the reduction to social care and mental health budgets and the impact it has on our statutory partners. In response to this and the growing awareness of hoarding and its impact on customers, households and neighbours, WCHG is taking a proactive and “lead” stance in tackling this problem and seeking to support customers living with a hoarding mental health condition.
- 1.5 The policy will also ensure that cases of hoarding are investigated in a collaborative way and that information on the problems related to hoarding is shared amongst partner agencies, in compliance with data sharing protocols and arrangements. This will enable incidents of hoarding to be dealt with in an evidence based, structured, systematic, co-ordinated and consistent way.

## 2. Definition

2.1 WCHG has adopted the NHS definition of Hoarding as:

***“A hoarding disorder is where someone acquires an excessive number of items and stores them in a chaotic manner, usually resulting in unmanageable amounts of clutter. The items can be of little or no monetary value.”***

## 3. Context

3.1 All colleagues entering the homes of our customers, WCHG properties (including Wythenshawe Works colleagues and contractors) should immediately report any hoarding related concerns to the Living Well and Tenancy Audit teams for investigation and follow up.

The policy is shared with all contractors through our procurement portal, linked to our safeguarding obligations.

3.2 Reports can also be received from neighbours and outside agencies, such as Environmental Health, Social Services, Animal Welfare Organisations (RSPCA) and the emergency services.

3.3 WCHG may need to refer to or consider some or all of the following legislation when addressing hoarding cases depending on the individual or household circumstances.

- Mental Health Act 1983 (as amended)
- NHS and Community Care Act 1990
- Mental Capacity Act 2005
- Equality Act 2010 (duty to make reasonable adjustments)
- ASB Crime and Policing Act 2014
- Care Act 2014
- The Health and Care Act 2022

### 3.4 There are three types of Hoarding:

- Inanimate
- Animal Hoarding
- Data Hoarding

#### Inanimate objects

This is the most common. This could consist of one type of object or a collection of a mixture of objects such as old clothes, newspapers, food, containers or papers.

#### Animal Hoarding

This is the obsessive collecting of animals, often with an inability to provide minimal standards of care. The hoarder is unable to recognise that the animals are or may be at risk because they feel they are saving them. In addition to an inability to care for the animals in the home, people who hoard animals are often unable to take care of themselves. As well, the homes of animal hoarders are often eventually destroyed by the accumulation of animal faeces and infestation by insects.

#### Data Hoarding

This is a new phenomenon of hoarding. There is little research on this matter and it may not seem as significant as inanimate and animal hoarding. However, people who hoard data could still present with same issues that are symptomatic of hoarding. Data hoarding could present with the storage of data collection equipment such as computers, electronic storage devices or paper. A need to store copies of emails, and other information in an electronic format.

- 3.5 This policy sets out clear good practice guidelines to ensure that issues are dealt with in a supportive, fair and consistent manner, ensuring a flexible approach for customers with disabilities or vulnerability, complying with current legislation.

## 4. Policy statement

- 4.1 We will aim to identify and support customers who display signs of excessive hoarding.
- 4.2 We will differentiate between those who excessively hoard and those customers breaching the terms of their tenancy through neglect, waste or default of the property and act accordingly.
- 4.3 We will, once signs of hoarding have been identified, attempt to contact the customer and engage with them to resolve the issue, this may include (with the customers consent) seeking 3<sup>rd</sup> party support from partner agencies. Where a safeguarding is identified we will attempt to visit the same day.

- 4.4 Where family or friends are already involved and impacted, and willing to co-operate, we encourage their assistance, however in doing this we will always comply with GDPR principles. Our priority is to engage with the customer personally, wherever possible.
- 4.5 We will attempt to identify any vulnerabilities or mental/physical disabilities the customer suffers from and, if relevant, will seek to manage the process with regard to those vulnerabilities/disabilities in a fair and transparent way.
- 4.6 We will consider the impact our requests could have on the customer's mental health and will ensure they understand our obligations as a landlord to protect and maintain their health and safety and our assets.

Hoarding may adversely impact not only the hoarder's home environment but beyond it too, with infestations and complaints from neighbours often necessitating a duty to investigate and support.

- 4.7 We will assess if a hoarding issue exists and will use the Clutter Image Rating Scale (CIRS) as a preliminary and objective assessment tool. CIRS is an image template showing a model room and the progressive degenerative impact of hoarding. Images from CIRS can be compared with the state and condition of the property for assessment purposes. See appendix A for the CIRS
- 4.8 We will work in partnership with other agencies to ensure services are provided in a co-ordinated way and to develop appropriate strategies for working with and responding to the needs of those customers who hoard in order to address the issue.
- 4.9 We will raise awareness of hoarding disorder, with respect to the impact on the individual, others within the property, other residents and the financial and environmental impact through appropriate training for WCHG colleagues, communications, anti -stigma campaigns and publicity.

## **5. Assessment Levels - Clutter Image Ratings (CIRs - Appendix 1)**

### **5.1 High Risk - Safeguarding issue**

Immediate and considerable health and safety dangers are present that can cause severe disrepair (fire hazards, access issues, structural damage and inability to complete essential property maintenance) – refer to photos 7-9 in Clutter Image Rating Scale. This level requires immediate and urgent action to safeguard the customer, other occupants, neighbours and/or assets. A Safeguarding referral will be made in this case.

## 5.2 Medium Risk - Immediate health and safety issues

Substantial cluttering preventing rooms from being used. Low-medium disrepair present in the property (including possibility of damp caused by clutter) - refer to photos 4-6 in Clutter Image Rating Scale. This level requires immediate action to safeguard the customer, other occupants, neighbours and/or assets

## 5.3 Low Risk– No immediate health and safety issues.

Property may appear cluttered in places but rooms can be used, no potential hazards and no risk to asset or individuals, or neighbours. Has potential to escalate therefore monitoring required to ensure the property does not deteriorate to medium or high risk - refer to photos 1-3 in Clutter Image Rating Scale.

## 5.4 The outcome of the visit will be recorded on the housing management system and follow up action will be carried out depending on the severity of the case.

# 6. **Prevention and Support**

## 6.1 WCHG is committed to supporting individuals with a hoarding tendency, who are willing to engage with support, whilst balancing the needs of other impacted people living in the property, residents and home owners.

## 6.2 We aim to refer customers we deem to be at risk of self-neglect and/or at serious risk of harm to the appropriate social services department for the purposes of assessment and support, if appropriate. The property and tenancy will also be flagged with colleagues in the Greater Manchester Fire and Rescue Service (GMFRS) as a high-risk property.

## 6.3 As part of this offer, when a potential case of hoarding is highlighted WCHG will conduct an initial assessment, providing the customer is willing to engage with the assessment process. Reasonable attempts will be made to persuade the customer to engage with WCHG and relevant support will be offered.

## 6.4 The assessment will assess whether the individual struggles with hoarding, the degree of risk to the individual and others living in or near the property, and the individual's willingness to engage with support. A decision over the appropriate course of action will then be made.



- 6.5 We acknowledge that each case is individual and as such, WCHG will consider the most appropriate method of managing the case, considering a range of available options, and considering the severity and urgency of the situation. Options may include:
- An initial assessment of the property condition will be undertaken by a Living Well Coordinator from the Tenancy audit team by attending the Property with the customer(s).
  - Providing a Living Well Coordinator to agree a plan with the customer to resolve their hoarding behaviours and start to clear the property of hoarded items.
  - Where appropriate, referral onto another support provider.
  - Sign posting to relevant organisations.
- 6.6 Where a customer is not willing to engage with the assessment and support process tenancy enforcement will be considered, with each case being assessed by a Living Well or Tenancy Audit Manager alongside the relevant Neighbourhood Manager.
- 6.7 Where neighbours are impacted, WCHG will offer support as long as they are willing to co-operate, we encourage their assistance, however in doing this we will always comply with GDPR principles.

## **7. Enforcement**

- 7.1 WCHG acknowledges that forcing a customer who hoards to participate in large clearances, without their will, can often lead to the exacerbation of the individual's condition and have a long term negative impact on their mental health and well-being.
- 7.2. WCHG recognises, however, that an individual's hoarding behaviours can have a significant negative impact on others living in the property, neighbours and the property itself and, therefore, tenancy enforcement may be necessary. This may include the use of:
- Civil Injunctions
  - Possession Proceedings
  - Liaising with environmental health for enforcement

7.3 It is our aim to support customers in addressing their hoarding behaviours and enforcement action should only be taken where:

- The customer's behaviour is so extreme as to cause significant harm to themselves or other persons.
- There has been continuous failed engagement with the customer and the customer's actions have been proven to have a detrimental effect on the property and/or others.
- Where access to the property for gas safety checks or other building safety compliance or repairs and improvements is required, and has been repeatedly refused, to ensure we meet our duties and obligations as a registered provider.

7.4 However, should enforcement action begin to take place, the offer of support should remain open. Where it is suspected someone may lack mental capacity the Living Well Coordinator should refer, as a matter of urgency, through to adult social services for a mental capacity assessment.

7.5 In the interest of public safety, the emergency services will be notified of cases where the clutter within the property presents an immediate risk to the welfare of others so that Fire Risk Assessments can be carried out.

7.6 Where a customer will engage but the most appropriate solution is for that customer to be supported to move to an alternative property so that the clearance can take place, there will be only one offer of alternative accommodation made.

The alternative accommodation may be a temporary decant whilst the property is fixed/cleared due to an emergency, ie structural damage, infestation. However, if a permanent move is required we must consider all aspects, personal/health & safety risks, schooling, work commitments, family/friend support and financial implications of alternative accommodation temporary or permanent and the solution in order for the customer maintain their tenancy.



## **8. Training**

- 8.1 WCHG will provide Hoarding Awareness Training to all customers & communities colleagues where relevant, and ensure it is promoted to other colleagues across WCHG including, customer committees/panels, contractors and maintenance colleagues who visit customers in their own homes, to increase their awareness and understanding of hoarding.

## **9. Responsibility**


- 9.1 The Executive Director of Customers & Communities shall be responsible for the implementation and review of this policy.
- 9.2 The Head of Living Well is responsible for the overall compliance and the day to day implementation of this policy.

## **10. Consultation, Monitoring and Review**

- 10.1 WCHG will consult with all the relevant key stakeholders, including customers, colleagues and other residents and key partners on all our policies to tackle hoarding and to improve their effectiveness.
- 10.2 WCHG will seek feedback from customers and carry out regular monitoring and reviews of all reported cases of hoarding, including the numbers, progress and outcomes of cases.
- 10.3 The Hoarding Policy will be reviewed every two years by the Customer Experience committee or earlier where there has been a significant change to existing applicable regulatory or statutory provision.

## **11. Equality and Diversity**

- 11.1 WCHG will ensure that the Hoarding Policy and procedure is accessible to its diverse customers and will consider the different needs of our customers when considering action.
- 11.2 WCHG recognises that customers of all races, ages, religions, gender, sexual orientation, literacy levels and disability should be treated equally and fairly.

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- 11.3 WCHG recognises that hoarding cases may be complicated by virtue of a person's individual need and that we will provide a tailored response to reports of hoarding according to individual circumstances.
- 11.4 WCHG will provide support to residents who have difficulty in managing their tenancy due to mental health issues, learning disabilities, physical disabilities, special needs or old age.
- 11.5 WCHG will provide information in languages other than English, in Braille and Large Print where required. Our receptions and interview rooms are fitted with a hearing loop system.

## **12. Associated Policies, Procedures and Strategies**

- 12.1 This policy may be read in conjunction with the following documents:

- Data Protection Policy
- Anti-social Behaviour Policy
- Equality & Diversity Policy & Framework
- Repairs Policy and procedure
- Rechargeable Repairs Policy and procedure
- Safeguarding Policy and procedure
- Tenancy Management Policy
- Mutual exchange procedure
- Tenancy Audit Procedures
- Allocations Policy

## **13. Appendix A – Clutter Image Ratings (CIR)**





## **Appendix A – Clutter Image Rating Scale**

## Clutter Image Rating: Bedroom

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



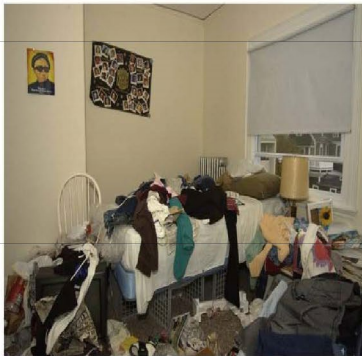
1



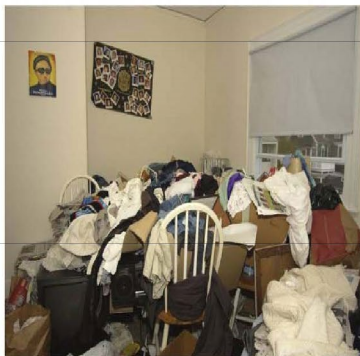
2



3



4



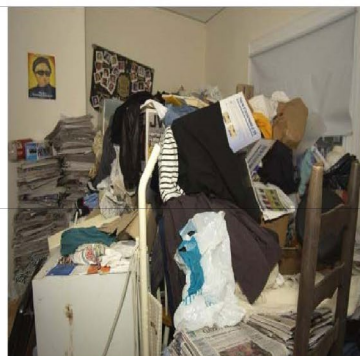
5



6



7



8



9



## Clutter Image Rating Scale: Kitchen

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



1



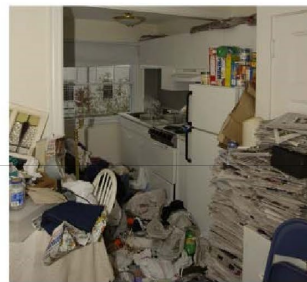
2



3



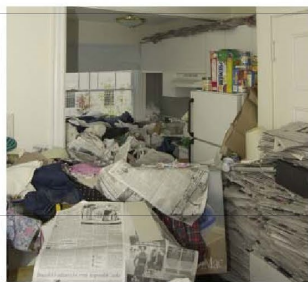
4



5



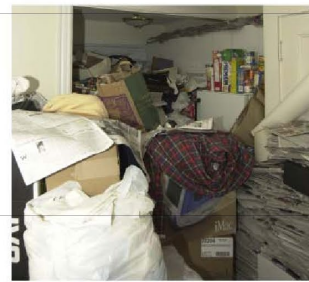
6



7



8



9

## Clutter Image Rating: Living Room

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