

# Hoarding Management Policy

Originator:	Policy and Strategy Team
Executive Management Team Approval Date:	February 2020
Review date:	February 2023

1	Introduction
1.1	One Vision Housing (OVH) is committed to promoting independence and personal choice for customers living in its Independent Living and general needs accommodation.
1.2	There may, however, be occasions when through life style choices or as a result of a medical condition the collection of excessive quantities of goods or objects by customers becomes problematic for themselves or a nuisance to others. This situation, although taking many different forms, is known collectively as 'hoarding'.
1.3	<p>This Policy sets out the approach OVH will take with its customers when it becomes aware of hoarding that has a detrimental effect in some form, including but not exclusive of:</p> <ul style="list-style-type: none"> <li>• Inability to use facilities within a home and surrounding areas</li> <li>• Inhibiting personal functions and hygiene</li> <li>• Increased risk of fire / flooding hazard</li> <li>• Environmental hazard, including noise nuisance, unsightly appearance of properties and outside spaces, risk of infestation</li> <li>• Offences under the Animal Welfare Act 2006</li> </ul>
1.4	<p>In operating this Policy, OVH will ensure it and other agencies it works with comply with the relevant legislation, the most notable of which includes:</p> <ul style="list-style-type: none"> <li>• The Mental Health Act 1983</li> <li>• Public Health (Control of Disease) Act 1984</li> <li>• Environmental Protection Act 1990</li> <li>• The Housing Act 1996</li> <li>• Mental Health Capacity Act, 2005</li> <li>• The Animal Welfare Act 2006</li> <li>• Care Act 2014 Statutory Guidance</li> </ul>
1.5	<p>The Policy also ensures OVH complies with the requirements of the Regulatory Framework for Social Housing adopted by the Regulator for Social Housing (RSH) as follows:</p> <ul style="list-style-type: none"> <li>• Registered providers shall:</li> <li>• treat all customers with fairness and respect</li> <li>• demonstrate that they understand the different needs of their customers, including in relation to the equality strands and customers with additional support needs</li> </ul>

	<ul style="list-style-type: none"> <li>• Meet all applicable statutory requirements that provide for the health and safety of the occupants in their homes</li> </ul>
1.6	<b>Access and Communication</b>
1.6.1	OVH is committed to ensuring that our services are accessible to everyone. OVH will seek alternative methods of access and service delivery where barriers, perceived or real may exist, that may make it difficult for people to work for us or use our services.
1.7	<b>Equality, Diversity and Human Rights</b>
1.7.1	OVH is committed to ensuring that no person or group of persons will be treated less favourably than another person or group of persons and will carry out our duty with positive regard for the following core strands of equality; Age, Disability, Gender, Race, Gender Reassignment, Sexual Orientation, Maternity and Pregnancy, Marriage and Civil Partnership and Status and Religion and/or Belief.
1.7.2	OVH also recognise that some people experience disadvantage due to their socio economic circumstances, employment status, class, appearance, responsibility for dependants, unrelated criminal activities, being HIV positive or with AIDS, or any other matter which causes a person to be treated with injustice.
1.7.3	OVH will endeavour to ensure that all services and actions are delivered within the context of current Human Rights legislation. Staff and others with whom OVH works, will adhere to the central principles of the Human Rights Act (1998).
1.8	This Policy should be read in conjunction with the OVH Needs and Risk Assessment Policy.
<b>2</b>	<b>Statement of Intent</b>
2.1	OVH will promote independent living and the right for all of its customers to make individual choices even when this requires tolerance of unconventional lifestyles or where people appear to act in ways that are against their best interests including.
2.2	<p>However, where customers display behaviours that pose a risk or have a detrimental impact on themselves or others around them, OVH will in most cases take a graded approach to intervention. In the case of hoarding issues this will involve:</p> <ul style="list-style-type: none"> <li>• <b>Provision of support</b> OVH will first look to provide support from within its own resources. This may include increased frequency of visits from Neighbourhood or Independent Living Officers. This approach may also involve contact with known friends, relatives of customers or advocates for low level assistance, where it is appropriate to do so and with the consent of the tenant(s), unless exemptions apply</li> <li>• <b>Enabling approach</b> The enabling approach may include providing clearing and cleansing services and in some circumstances a complete ‘clean start’ approach that could involve transfers to alternative properties</li> </ul>

	<ul style="list-style-type: none"> <li>● <b>Referral</b> This may involve the use of outside agencies including but not exclusive of referral to General Practitioners (GP), Fire Services, relevant psychiatric professionals, adult and or children’s Social Services and Environmental Health Officers Where there is evidence of ‘self-neglect’ as per the Care Act 2014 Statutory Guidance, OVH will work in partnership with external partners in line with the Multi-Agency Hoarding Toolkit and will make a referral to the relevant ‘Safeguarding Teams’ of local authorities, if necessary</li> <li>● <b>Enforcement</b> Where the above actions have failed to bring about appropriate improvements and only as a last resort will OVH consider taking enforcement actions which may include legal action to recover tenancies</li> </ul>
2.3	OVH will assess each case of hoarding from its customers on an individual basis and will respond appropriately to the circumstances involved. Normally the graded approach outlined above would be followed but this will depend on the severity of cases and the point at which OVH become aware of the problem. Occasionally it may be necessary to take steps out of sequence.
2.4	Where vulnerabilities are identified OVH will consider on a case-by-case basis (if it is in the best interest of the individual) sharing information with external agencies without permission, if required.
2.5	OVH is committed to working in partnership with multiple agencies to find lasting solutions to the problems created by hoarding and where required case conferencing approaches will be adopted, maintaining Data Protection Act requirements at all times (unless exemptions around public /personal safety apply).

<b>3</b>	<b>Policy</b>
----------	---------------

3.1	<b>Routes to Intervention Measures</b>
3.1.1	<p>OVH will identify customers who may be experiencing problems with hoarding issues by a variety of means, including:</p> <ul style="list-style-type: none"> <li>● Through staff observations from regular tenancy visits</li> <li>● Via regular visits for Independent Living customers</li> <li>● Via tenancy audit visits or annual gas safety checks</li> <li>● Via reporting from third parties, including neighbours, friends, family, advocacy groups or statutory enforcement agencies</li> <li>● Via self-referral or requests for assistance</li> </ul>
3.1.2	OVH may also check properties on a periodic basis as part of support planning in cases where customers may have exhibited previous hoarding behaviours before being accepted for an OVH Tenancy.
3.2	<b>The Approach to Hoarding Management</b>
3.2.1	In all identified hoarding cases the Team Leaders, Independent Living Officers and Neighbourhood Service Officers (NSOs) will ensure an objective, sensitive and non-judgemental approach is adopted to customers. There will always be an assumption of

mental capacity unless an assessment by a relevant psychiatric professional and diagnosis proves otherwise, in which case the use of qualified advocates must be considered.

- 3.2.2 Following an initial visit to the property (or based on a report of the Neighbourhood Service/ Independent Living Officer, as appropriate) the Team Leaders / ILO's in conjunction with the NSO's, will carry out a risk assessment to determine the best approach for dealing with the hoarding issue.
- 3.2.3 The risk assessment will result in the formation of an action plan with a realistic timescale for resolving the problem. This would normally follow the steps identified in 2.2 above but will depend on the severity of the problem and any threats it poses to the customer(s) concerned or their neighbours.
- 3.2.4 The action plan will in all cases be shared with the subject of the hoarding issue and any advocates that may be involved. The emphasis will always be on provision of support and 'action by consent' in the first instance, collaborating with the person(s) responsible for the hoarding and getting them to work through their own solutions to the problem.
- 3.2.5 Where the person(s) responsible for the hoarding fails to stick to plan or there is a sudden worsening of the situation, OVH may have to consider escalation to the next stage in the process, which may involve providing some form of enabling service including clearing / cleansing services.
- 3.2.6 OVH may choose to recharge the customer the costs of any clearing / cleansing works and each case will be considered on its merits. OVH may consider waiving reasonable recharge costs if the customer(s) lack mental capacity / is physically incapable of removing hoarded items or has no friends or advocates that could otherwise assist them.
- 3.2.7 OVH will ensure any clearing / cleansing of items from properties is carried out with due regard to the legal requirements of the Data Protection Act and all relevant environmental legislation.
- 3.2.8 In extreme cases OVH may consider as part of a managed solution to the problem moving the person(s) responsible to alternative accommodation to provide a 'clean start'.
- 3.2.9 If customer(s) responsible for hoarding behaviour fail to respond to the above measures or OVH are forced to repeat these measures, referrals may be made to external agencies including General Practitioners, Social Services Departments and for enforcement issues - Environmental Health Officers (if this has not already been previously required).
- 3.2.10 Where this does occur OVH are likely to adopt a case conferencing approach between the multiple agencies concerned and will where possible and appropriate, involve the subject of the hoarding concern in any discussions and subsequent revisions to the action plan.
- 3.2.11 If all of the above measures have failed to bring about a satisfactory resolution to the hoarding issue and only as a last resort may OVH consider instigating legal action to bring the tenancy of a person with problematic hoarding to an end. In such cases, OVH will follow pre-court protocols and ensure appropriate support is provided to the customer as required.

3.2.13	In all hoarding cases that have some form of detrimental impact to adjoining neighbours, OVH will endeavour to keep those most affected informed of actions taken to resolve the issue, whilst maintaining confidentiality of the person(s) responsible.	
<b>4</b>	<b>Implementation</b>	
4.1	All OVH staff have a responsibility to be aware of the Hoarding Management Policy to be able to direct any customer queries that may arise.	
4.2	Any decisions to bring a tenancy to an end as a result of hoarding will be taken by the Neighbourhood Services Manager (general needs accommodation) or the Independent Living Manager (for Independent Living).	
<b>5</b>	<b>Performance</b>	
5.1	There are no additional performance requirements as a result of this Policy.	
<b>6</b>	<b>Consultation</b>	
6.1	All OVH Staff have been consulted in the development of this Policy. Detailed consultation has taken place with officers that have specific responsibility for providing advice and managing actions in hoarding cases.	
6.2	The Tenant Policy Review Group has been consulted in the development of this Policy on 13/12/2019. All OVH Staff have been consulted about the development of this Policy.	
<b>7</b>	<b>Review</b>	
7.1	The Policy will be reviewed every three years from the date of Executive Management Team (EMT) approval or sooner if required by changes to OVH working practices, changes in relevant legislation or as a result of system audits.	
<b>8</b>	<b>Equality Impact Assessment</b>	
8.1	Was a full Equality Impact Assessment (EIA) required?	No
8.2	When was EIA conducted and by who?	An EIA Relevance Test conducted by the Independent Living Manager and the Policy and Strategy Officer is still relevant for this Policy review.
8.3	Results of EIA	The EIA Relevance Test although, identifying that certain groups of people (elderly and those experiencing mental health issues) are more likely to display hoarding
<b>9</b>	<b>Scheme of Delegation</b>	
9.1	Responsible committee for approving and monitoring implementation of the policy and any amendments to it	EMT

9.2	Responsible officer for formulating policy and reporting to committee on its effective implementation	Operations Director- Housing Services	
9.3	Responsible officer for formulating, reviewing and monitoring implementation of procedures	Operations Director – Housing Services	
<b>10</b>	<b>Amendment Log</b>		
Date of revision:	Reason for revision:	Consultation record:	Record of amendments:
22/12/2017	In line with the Review Schedule	See section 6	<ul style="list-style-type: none"> <li>The words 'tenants/residents' have been replaced with 'customer'</li> <li>The titles have been updated to reflect the current practices (i.e. 'Tenancy Support Officers' to 'Independent Living Officers' and 'Neighbourhood Housing Officers' to 'Neighbourhood Service Officers')</li> </ul>
4 <sup>th</sup> February 2020	In line with changes to OVH's business practices	See section 6	<ul style="list-style-type: none"> <li>Change at 2.2- inclusion of provisions to deal with 'hoarding' associated with 'self-neglect'</li> <li>Change at 3.2.11 - inclusion of the requirement for adherence to pre-court protocols before taking legal action</li> </ul>