



# HOARDING MANAGEMENT POLICY

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| Originator:    | Policy and Strategy Team    |
| Approval date: | 12 <sup>th</sup> April 2022 |
| Review date:   | April 2025                  |

| 1   | Introduction  |
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| 1.1 | Pine Court Housing Association (PCHA) 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 PCHA 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, PCHA 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 Animal Welfare Act 2006</li> <li>● The Housing Act 1996</li> </ul>   |
| 1.5 | <p>The Policy also ensures PCHA 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 must use relevant information and data to: <ul style="list-style-type: none"> <li>a) understand the diverse needs of tenants, including those arising from protected characteristics, language barriers, and additional support needs; and</li> </ul> </li> </ul>   |

b) assess whether their housing and landlord services deliver fair and equitable outcomes for tenants

## 1.6 Access and Communication

1.6.1 PCHA is committed to ensuring that our services are accessible to everyone. PCHA 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.

1.6.2 Working with our customers we have established a Vulnerable Persons and Reasonable Adjustments Policy to ensure we make best use of every customer interaction to meet customers' needs in our service delivery and ensure this information is kept up to date.

## 1.7 Equality, Diversity and Human Rights

1.7.1 PCHA 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 its duty with positive regard for the following core strands of equality; Age, Disability, Gender, Race, Gender Identity / Gender Expression, Sexual Orientation, Maternity and Pregnancy, Marriage and Civil Partnership, Religion and/or Belief.

1.7.2 PCHA 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 PCHA will also ensure that all services and actions are delivered within the context of current Human Rights legislation. Staff and others with whom PCHA works, will adhere to the central principles of the Human Rights Act (1998).

1.8 This Policy should be read in conjunction with the PCHA Needs and Risk Assessment Policy.

## 2 Statement of intent

2.1 PCHA 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.

2.2 However, where customers display behaviours that pose a risk or have a detrimental impact on themselves or others around them, PCHA will in most cases take a graded approach to intervention. In the case of hoarding issues this will involve:

- **Provision of support**

- PCHA will first look to provide support from within its own resources. This may include increased frequency of visits from the Housing staff. 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

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|          | <ul style="list-style-type: none"> <li>● <b>Enabling approach</b> <ul style="list-style-type: none"> <li>○ 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> </li> <li>● <b>Referral</b> <ul style="list-style-type: none"> <li>○ This may involve the use of outside agencies including but not exclusive of referral to General Practitioners (GP), Fire and Rescue Services, relevant psychiatric professionals, adult and or children’s Social Services and Environmental Health Officers</li> </ul> </li> <li>● <b>Enforcement</b> <ul style="list-style-type: none"> <li>○ Where the above actions have failed to bring about appropriate improvements and only as a last resort will PCHA consider taking enforcement actions which may include legal action to recover tenancies</li> </ul> </li> </ul> <p>2.3 PCHA 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 PCHA become aware of the problem. Occasionally it may be necessary to take steps out of sequence.</p> <p>2.4 PCHA 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).</p> |
| <b>3</b> | <b>Policy</b>   |
| 3.1      | <b>Routes to Intervention Measures</b>  |
| 3.1.1    | <p>PCHA 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    | <p>PCHA 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 PCHA Tenancy.</p>   |
| 3.2      | <b>The Approach to Hoarding Management</b>  |
| 3.2.1    | <p>In all identified hoarding cases, the Housing Officers/Assistants will ensure an objective, sensitive and non- judgmental 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.</p>   |

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| 3.2.2  | Following an initial visit to the property (or based on a report of the Housing Officer/Assistant as appropriate) the Senior Housing Officer 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, PCHA 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  | PCHA may choose to recharge the customer the costs of any clearing / cleansing works and each case will be considered on its merits. PCHA 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  | PCHA 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 PCHA 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 PCHA 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 PCHA 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 | Where all of the above measures have failed to bring about a satisfactory resolution to the hoarding issue and only as a last resort will PCHA consider instigating legal action to bring the tenancy of a person with problematic hoarding to an end.   |
| 3.2.12 | In all hoarding cases that have some form of detrimental impact to adjoining neighbours, PCHA will endeavour to keep those most affected informed of actions taken to resolve the issue, whilst maintaining confidentiality of the person(s) responsible.  |

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| <b>4</b> | <b>Implementation</b>  |  |
| 4.1      | All PCHA 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 Senior Housing Officer in consultation with the Operations Director.   |  |
| <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 PCHA 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 Customer Empowerment Panel has been consulted in the development of this Policy on 29 <sup>th</sup> March 2022. All PCHA 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 PCHA Departmental Management Team (DMT) approval or sooner if required by changes to PCHA 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 Policy and Strategy Manager and Policy Writer.  |
| 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 behaviours, did not indicate there would be any differential or adverse service towards these people. |
| <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   | DMT  |
| 9.2      | Responsible officer for formulating Policy and reporting to committee on its effective implementation  | Operations Director -PCHA  |

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| 9.3 | Responsible officer for formulating, reviewing and monitoring implementation of procedures | Operations Director -PCHA |
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| <b>10</b> | <b>Amendment log</b> |
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| Date of revision:                                   | Reason for revision:             | Consultation record: | Record of amendments:                           |
|---|----------------------------------|----------------------|---|
| New Policy- This is the first version of the Policy | Not applicable                   | See Section 6        | Not applicable                                  |
| 26 February 2019                                    | In line with the review schedule | See Section 6        | There are no significant changes to the Policy. |
| 12 <sup>th</sup> April 2022                         | In line with the review schedule | See Section 6        | There are no significant changes to the Policy. |