Hoarding Policy

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You are advised that a printed version may not be the latest available version. The latest version, which supersedes all previous versions, is available on the Brighter Places Policy Index Sheet. Those to whom this policy applies, are responsible for familiarising themselves with the latest version and for always complying with the policy requirements.

Should colleagues require any reasonable adjustment to allow for engagement with this document please contact the policy lead

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1. Policy Statement

The policy sets out how Brighter Places approaches to identifying and managing customers who are Hoarding in a consistent manner. The policy aims to ensure any risks are managed effectively and the customer who is displaying hoarding behaviours receives appropriate support.

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.

2. Commitment

Brighter Places is committed to safeguarding customers, neighbours, colleagues and contractors by supporting individuals who hoard in a respectful, trauma-informed way while assessing health, fire and structural risks for those customers who are Hoarders.

We recognise that referring to an individual with hoarding behaviours, as a “Hoarder” can be damaging to the professional relationship and the individual. Throughout this policy the individual will be referred to as the customer or ‘an individual with hoarding tendencies,’ therefore, describing the behaviour as opposed to labelling the individual.

3. Linked Documents

- Equity, Diversity and Inclusion Policy
- Customer Risk Policy
- Safeguarding Adults Policy
- Safeguarding and Children Protection Policy
- Tenancy Agreement
- Tenancy Policy

- Dealing with Challenging Behaviours Policy
- Managing Communal Spaces and Torts Policy
- Pet Policy
- Tenancy Sustainment Team Policy
- Data Protection Policy
- Lone Working Procedure
- Damp and Mould Policy
- Property Safety Strategy
- Electrical Safety Policy and Procedure
- Gas Safety Policy and Procedure
- Fire Safety Policy
- Prescribed Hazards in Housing Policy

4. Legal and Regulatory Compliance

The key legislation around Hoarding is:

- Equality Act 2010 (Hoarding is classified as a mental health concern)
- Care Act 2014
- Mental Capacity Act 2005
- Mental Health Act 1983
- Public Health Act 1936 (for clearance of outside areas)
- Anti-social Behaviour Crime and Policing Act 2014
- The Children Act 1989
- Data Protection Act 2018
- Fire Safety Order 2005
- Health and Safety at Work Act 1974
- Housing Health and Safety Rating System Regulations 2005

5. Policy Detail

5.1. Introduction

This policy sets out how we will respond to cases / reports of Hoarding and what we ask customers to do to ensure their own safety and wellbeing.

We will work with customers, our partners, stakeholders and colleagues:

- To develop an understanding of why Hoarding has occurred and put an action plan in place to help customers manage their environment.
- To have a flexible approach in developing and maintaining our customer relationship where hoarding is identified through action plans.
- To promote and develop how we respond through safeguarding and multi-agency working.
- To work with partners to deliver specialist services for and with our customers who need it.
- To support the maintenance of fire safety and minimise the vulnerabilities of inappropriate storage which could compromise the safety and design of our buildings.
- To note customer vulnerabilities such as Hoarding on our systems to ensure we can support our customers wherever needed.

5.2. What is Hoarding?

Hoarding is having so many things that the customer cannot manage the clutter where they live, and they find it difficult or impossible to throw things away. Customers might hoard because they feel a strong need to keep things. The connection to these things can cause them distress if they are asked or expected to get things removed and impact of hoarding can significantly impact day-to-day life.

Hoarding disorder is a mental health problem that a psychiatrist or other mental health professional can diagnose. Customers might also experience hoarding as part of

another mental or physical health problem. We do not need a formal diagnosis to be able to offer support for our customers.

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 a person's life. A person who has not previously shown hoarding tendencies may have a life event which triggers the behaviour.

5.3 Types of Hoarding

There are three main types of 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 the inability to provide minimal standards of care. The customer may be unable to recognise that the animals are or may be at risk because they may feel they are saving them. In addition, to an inability to care for the animals in the home, customers who hoard animals are often unable to take care of themselves. As well, the homes with animal hoarding are significantly damaged by the accumulation of animal faeces and infestation by insects.

Data Hoarding: This is a new type of hoarding. This may not seem as significant as inanimate objects and animal hoarding. However, customers who hoard data could still present with the same issues that are characteristic of hoarding. Data hoarding could present with the storage of data collection equipment such as computers, electronic storage devices, CD ROM's or paper. Also, a need to store copies of emails, and other information in an electronic format.

5.4 What's the difference between Hoarding and collecting?

Many people collect items such as books or stamps, and this is not considered a problem. The difference between a "hoard" and a "collection" is how these items are organised.

A collection is usually well ordered, and the items are easily accessible. A hoard is usually very disorganised, takes up a lot of room and many items are largely inaccessible.

For example, someone who collects newspaper reviews may cut out the reviews they want and organise them in a catalogue or scrapbook. Someone who Hoards may keep large stacks of newspapers that clutter their entire house and mean it's not actually possible to read any of the reviews they wanted to keep.

5.5 When is Hoarding a problem?

Hoarding is considered a significant problem if:

- The amount of clutter interferes with everyday living – for example, the person is unable to use their kitchen or bathroom and cannot access or move between rooms easily.
- The clutter is creating a pest infestation within and / or outside the property.
- The clutter is causing significant distress or negatively affecting the quality of life of the person or their family
- When excessive number of items can become a fire hazard by fire loading (increasing combustibility) or blocking escape routes or exits, therefore impacting on the customer and neighbours' safety.
- When we as the landlord are unable to access and carry out tenancy inspections, including and health and safety requirements, compliance actions and emergency repairs visit. This can be a particular problem for us as the landlord if we need to legally gain access to carry out compliance visits for health and safety including annual landlord gas safety inspections (GSR) and 5 yearly Electrical Safety Tests (EICR) and/or other inspections.

- Brighter Places properties are not meeting the expected health and safety level that is required and customers are not safe in their homes.
- Hoarding disorders are challenging to treat because it may affect their life or the lives of others. Many do realise they have a problem but are reluctant to seek help because they feel extremely ashamed, humiliated, or guilty about it. An individual with hoarding tendencies may not see Hoarding as a problem or have little awareness of how it's affecting themselves or others.

There are five diagnostic criteria for identifying a case of hoarding disorder:

- Persistent difficulty with discarding or parting with possessions regardless of their value.
- 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.

Brighter Places colleagues 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.

5.6 Recognising Hoarding tendencies

Brighter Places is likely to become aware of Hoarding / clutter issues: -

- During routine and / or planned maintenance works required at the property (gas / electric services, routine repairs or property upgrades).
- When complaints of anti-social behaviour are received; for example, those concerning the presences of rodents or clutter in outside spaces.
- When reports of welfare concerns from family members / anonymous / external services or neighbours are received.
- When we are unable to gain access to a property for a routine inspection or other issue.

During home visits, colleagues may see that the customer may:

- Keep or collect items that may have little or no monetary value, such as junk mail and carrier bags, or items they intend to reuse or repair.
- Appears to be finding it hard to categorise or organise items, or have difficulty making decisions.
- Struggle to manage everyday tasks, such as cooking, cleaning and paying bills.
- Become extremely attached to items, refusing to let anyone touch or borrow them.
- Have poor relationships with family or friends.

Hoarding can begin as early as the teenage years and often becomes more noticeable over time. For many people, hoarding tends to have a greater impact in later life, although patterns of behaviour are usually well established by this stage. It is estimated that around 1–2 people in every 100 experience hoarding behaviours that significantly affect their day-to-day life.

To identify the level of hoarding that officers are dealing with, there are clutter rating photographs that help identify the level of assistance required. See Appendix 1

5.7 Why people may hoard

The reasons why someone begins Hoarding are not fully understood. It can be a symptom of another condition. For example, someone with mobility problems may be physically unable to clear the huge amounts of clutter they have acquired, and people with learning disabilities or people developing dementia may be unable to categorise and dispose of items.

Mental health conditions associated with Hoarding include:

- Severe depression.
- Psychotic disorders, such as schizophrenia.
- Obsessive compulsive disorder.

In some cases, Hoarding is a condition and often associated with self-neglect. People who hoard may also have a family history of hoarding and grown up in a cluttered home and never learned to prioritise and sort items.

Attempts to discard things often bring up very strong emotions that can feel overwhelming, so the person hoarding often tends to put off or avoid making decisions about what can be thrown out.

Often, many of the things kept are of little or no monetary value and may be what other people would consider rubbish. The person may keep the items for reasons that are not obvious to other people, such as for sentimental reasons, or feeling the objects appear beautiful or useful. Most people with a hoarding disorder have a very strong emotional attachment to the objects.

5.8 Intervention and Support

We aim to work with our customers to sustain their tenancies and help them to improve property condition as well as the quality of their lives. Brighter Places recognises that each case is different in terms of the type and extent of items hoarded, the risk, and the reasons behind the hoarding behaviours. 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 Scale to assess the degree of hoarding, to provide a measured response to the issue dependent upon its severity.

Each case will be assessed on an individual basis and response will be appropriate to the circumstances of the person involved. Sometimes, it may be necessary to take steps out of sequence for a tailored and person-centred response. Very often supportive action can assist an individual with hoarding tendencies in addressing some of the behaviours. Colleagues should always explore what support is required and make any necessary referrals. We will work with the customer to support them in managing their hoarding and de-escalating risk as we recognise it cannot always be resolved.

Where a person with hoarding tendencies is not currently engaged, but appears willing to accept assistance, we will attempt the following to support engagement:

- Persevere to find ways to engage with the customer and we will work over a reasonable amount of time to get a result.
- Find the right person who can best engage with the customer.
- Set up multi-agency meetings early on to determine who has the best engagement and how efforts can be co-ordinated most effectively.
- Invest in resources or agencies, as these cases take a disproportionate amount of time compared to other cases.
- When a case is resolved, regular check-up visits are needed to ensure the issue does not occur again.

We may start legal action if despite reasonable efforts the customer refuses to work with us, and /or there are serious Health and Safety concerns and/or breach of tenancy. Legal action can be injunction or possession proceedings that will be dependent on the severity of the problem and ability or willingness of the customer to engage and work with us to address the hoarding. Each case is looked at individually and always aim to work with the customer to attempt to sustain the tenancy.

Where support and above is offered but refused, this needs to be recorded within the housing system.

Reason for the legal proceedings be started include that:

- the property is considered to be in a seriously poor condition and/or
- there is a fire risk that cannot be managed in any other way and/or
- the customer or their household is at risk and
- assistance and/or access is repeatedly refused.

The Tenancy Sustainment Team can support customers who are experiencing hoarding tendencies and not meeting the basic compliance requirements such as gas and electrical safety checks. The support will be jointly worked with the Housing

Officer to ensure the condition of the home is addressed as well as supporting the customer.

Brighter Places may also refer customers to a specialist service who are able to provide intense support to them to make changes to the condition of their home and sustain those changes for the longer term.

5.9 Partnership Working

Supporting customers who hoard can be resource-intensive, and some individuals may require specialist or intensive support and skills beyond those we are able to provide as a housing provider.

Where appropriate, we will therefore work alongside relevant partners and stakeholders, including local charities and private organisations, to ensure customers can access the support they need.

If Hoarding is making a customer unwell and negatively affecting their wellbeing, for example they are unable to wash or cook for themselves, we will make a referral to Adult Safeguarding at the relevant Local Authority based on self-neglect. Any safeguarding referrals must also be logged with the Safeguarding Team who oversee all referrals are actioned by the relevant authority. Brighter Places promotes a multi-agency approach and will work in partnership with Adult and / or Children Social Care and any other relevant service to help protect vulnerable people from abuse or neglect. Brighter Places will work with a range of services such as social care, community mental health teams, the Fire Service, environmental health service and any other relevant person / agency as required.

Brighter Places will share information with relevant agencies in order to support the customer and reduce the impact of the Hoarding behaviour. Taking a multi-agency approach is necessary so the risks can be understood and appropriately managed in conjunction with the individual. Wherever possible the customer themselves should be included in any meetings along with the relevant support or advocates.

5.10 Agencies who can provide support / further information

Bristol

We care Home Improvements – Making Space
https://wecr.org.uk/making-space-help-with-hoarding/

National

Mind
https://www.mind.org.uk/information-support/types-of-mental-health-problems/hoarding/about-hoarding/

Hoarding UK
https://hoardinguk.org/

Clouds End CIC
https://cloudsend.org.uk/

NHS
https://www.nhs.uk/mental-health/conditions/hoarding-disorder/

The British Psychological Society
https://cms.bps.org.uk/sites/default/files/2024-05/Understanding%20Hoarding%20-%20Information%20Leaflet.pdf

6. Training Requirements

Housing Officers and Tenancy Sustainment Officers will be provided with additional training to ensure they are able to provide the most appropriate support to our customers.

During every new colleague's induction, hoarding is discussed within the Safeguarding Induction and the impact of this on our customers.

7. Monitoring and Review

The ongoing application of this policy is monitored via the Tenancy Sustainment Team to ensure that it remains relevant, up to date and accessible to the relevant audience.

The policy will be reviewed at least every 3 years.

The partnership agreement with the hoarding agency will be reviewed every 3 months.

8. Data Protection

Any personal data created, collected, shared or retained in connection with abandonment or tenancy fraud investigations will be processed in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and Brighter Places' Data Protection Policy and Privacy Notices.

In applying this policy, Brighter Places will ensure that:

- Personal data is processed lawfully, fairly and transparently, and only where there is a clear and legitimate purpose connected to tenancy management, fraud prevention, safeguarding, or compliance with legal and regulatory obligations.
- Only relevant and proportionate information is collected and recorded, and data is limited to what is necessary to establish facts and support decision-making.
- Information obtained from third parties (including neighbours, contractors, local authorities, and partner agencies) is handled sensitively and assessed for reliability and relevance before being relied upon.
- Personal data may be shared with appropriate internal teams, local authorities, law enforcement agencies, fraud bodies, or regulators where lawful and necessary, including for the prevention or detection of crime, recovery of possession, or regulatory reporting.

- Appropriate access controls, security measures, and audit trails are maintained on all systems used to record and store investigation data.
- Personal data is retained only for as long as necessary and in line with Brighter Places' retention schedule, recognising that fraud-related records may need to be retained for evidential, audit, or regulatory purposes.
- Individuals' data protection rights are respected, subject to lawful exemptions that apply in the context of fraud prevention, crime detection, or legal proceedings.

All colleagues involved in abandonment or tenancy fraud investigations must ensure that data protection considerations are embedded throughout the investigation process and must seek advice where there is any uncertainty.

9. Equity, Diversity and Inclusion

Where required, reasonable adjustments will be considered to support colleagues to engage with this policy. Please speak to the policy owner for assistance.

Brighter Places is committed to ensuring that this policy is applied fairly, consistently and without discrimination.

In applying this policy, colleagues must have due regard to the Equality Act 2010 and ensure that decisions relating to suspected abandonment or tenancy fraud are:

- Fair, proportionate and evidence-based, and do not result in unlawful discrimination, either directly or indirectly.
- Sensitive to individual circumstances, including where a tenant or occupier may be vulnerable due to disability, mental or physical health conditions, age, caring responsibilities, language barriers, or other protected characteristics.
- Inclusive and accessible, including consideration of reasonable adjustments to communication, timescales or processes where required to enable engagement with the investigation or review process.
- Informed by safeguarding considerations, particularly where concerns relate to household members who may be at risk, or where absence or non-occupation may be

linked to hospitalisation, care arrangements, domestic abuse, or other complex personal circumstances.

Where vulnerability or protected characteristics are identified, colleagues must ensure these are appropriately considered and, where necessary, seek advice from relevant internal teams before progressing enforcement or legal action.

10. Health and Safety

Customers with Hoarding tendencies can accumulate volumes of rubbish or clutter leading to unsafe and unhygienic conditions to the property which can impose a significant health and safety and fire risk.

Where there is a risk to the Health, Safety and Wellbeing to customers, contractors, colleagues and / or the public due to the customers hoarding tendencies, Brighter Places will carry out works to return the property to a safe standard. The customer will be charged for all works carried out in relation to this that fall outside the landlord's legal obligations. An example of this could be the elevated risk of fire and blocked access routes, as well as the increased risk of vermin or damage being caused to the property. This will also apply if contractors are unable to gain sage access to a property to complete repairs, planned works or carry out statutory and legal inspections (i.e. annual gas safety checks, legionella, etc). This list is not exhaustive.

11. Summary Roles and Responsibilities

Activities	Exec	HoH	HM- TST	HM's	TST	HO's	HR	Gov
Owner of the policy		X	X					
Monitoring & review of the policy	X	X	X					X
Approval of changes to the policy	X	X						X
Responsible for policy implementation			X					
Addressing issues in the implementation of the policy			X	X				
Version control of live policy			X					
Training of colleagues			X				X	
Delivery of policy		X	X	X	X	X		

Appendix 1 - Clutter Ratings

Clutter-Image-Rating
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