



This Policy sets out the aims, principles and values that will be adopted by Longhurst Group when dealing with customers that have been identified as hoarding.

# Hoarding Policy

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<b>Review frequency</b>	[Triennial]

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Part 1

## About this policy

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### Document management

Directorate	Finance
Policy sponsor	Deputy Chief Executive and Chief Financial Officer
Policy owner	Director of Housing and Customer Services
Policy author	Director of Housing and Customer Services
Summary	This Policy sets out the aims, principles and values that will be adopted by Longhurst Group when dealing with customers that have been identified as hoarding.
Target audience	Housing colleagues – Neighbourhoods and Housing Management, Property Services – including contractors. Specialist Housing and Home Ownership – Tenancy Support Officers

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### Review process

Approval route	Customer Forum – Directors Team
Approved by	Directors Team
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## Part 2

# Overview

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## Intent

The overall aim of this policy is to provide an effective and efficient approach to support customers with hoarding disorder working with partners and key stakeholders to deliver a co-ordinated approach that mitigates any risks identified not only to the customer(s) but also any neighbours, community and the local environment whilst taking into consideration the terms and conditions of the tenancy agreement.

The Group will provide an effective tenancy management service, which includes individuals with hoarding disorder, that meets the requirements of the Regulator of Social Housing (RSH) Neighbourhood and Community Standard and the criteria which is noted below;

- Ensure there is consistency across the Group when dealing with cases of hoarding disorder, whilst recognising variations in the level of partner engagement across our regions;
- Reflect the communities we work in and ensure that these communities are sustainable, safe and secure;
- To develop a pro-active approach to the management of our properties, estates and neighbourhoods;
- Ensure that we are clear and transparent in respect of customers understanding their rights and responsibilities and vice-versa;
- Take a proactive approach to ensure that no individual or group is discriminated against or treated differently as a direct or indirect result of our approach to hoarding.

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## Policy statement

This policy supports the Group's values and is a commitment to improving lives and supporting colleagues by ensuring that customers that hoard are supported whilst balancing the health and wellbeing of the individual and taking into account the risks posed to neighbours and potential disrepair to the property. Sustaining the tenancy whilst providing tailored support and mitigating risk and cost to the business is the key objective of the policy.

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## Scope

The terms 'Longhurst Group' and 'the Group' incorporate all member companies and subsidiaries.

This policy applies to all parts of Longhurst Group ('the Group'). This policy applies to all individuals who hold a tenancy or license with the Group

The policy does not form part of any colleague's contract of employment and the policy may be amended at any time.

## Part 3

# Policy details

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## Overview

Longhurst Group recognises that referring to an individual that hoards, as a 'hoarder' can be damaging to the professional relationship and the individual, as people who hoard can find the term offensive, derogatory and do not understand the term as they are not aware that they have a hoarding issue. Throughout this policy, the individual will be referred to as the customer or 'an individual with hoarding tendencies' which describes the behaviour as opposed to labelling the individual.

Longhurst Group uses the Frost and Hartls (1996) definition to define hoarding as:

- The inability of individuals to dispose of items that may or may not have a meaning to other individuals;
- Having rooms at home that are no longer fit for purpose;
- The impairment of a person's functioning (both physical and psychological);
- Excessive acquisition.

Longhurst Group recognises that with some customers the 'clutter' or deterioration of their property is not due to them having some form of hoarding disorder, as it may first seem, but is instead the result of issues not related to their mental health. For example, deterioration in physical health, combined with a lack of support, may lead to the property falling into disrepair.

We will work in partnership with other agencies to ensure services are provided in a co-ordinated way, to develop appropriate strategies for working with and responding to the needs of those customers who compulsively hoard and by regularly reviewing best practice in this area.

We aim to raise awareness of hoarding disorder, with respect to the impact on the individual, others within the property, neighbours and the economic and environmental impact, through appropriate training and communication.

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## Supporting Customers Who Hoard

Longhurst Group is committed to supporting our customers 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 homeowners.

As part of this offer, when a potential case of hoarding is highlighted Longhurst Group will complete a Person-Centred Risk Assessment (PCRA) with the Fire Service wherever possible.

The PCRA will identify and assess whether the customer 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 co-ordinated action plan will then be made in conjunction with partner and support agencies. Where a customer is not willing to engage with the PCRA

and support process, tenancy enforcement may be considered on the merit of each individual circumstance.

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## Training

We will provide Hoarding Awareness training to our Housing Officers and ensure it is promoted to all housing management staff, contractors and maintenance staff who visit customers in their own homes, to increase their awareness and understanding of Compulsive Hoarding.

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## Partnership Working

Longhurst Group recognises customers who hoard can also have a variety of physical, mental, financial and other support needs. Working in partnership with other agencies is essential in meeting the needs of the customer and others living in or near the home.

There is an expectation that our contractors, in accordance with contractual arrangements, escalate cases of suspected hoarding with surveyors who will report into Housing Service.

Relevant personal identifiable information will be shared with Longhurst Group's partners (e.g. other agencies) in line with GDPR requirements and guidelines to ensure that a full collaborative service is delivered to the customer(s) irrelevant of which agency is responsible for delivering which part of the overall service the customer requires. We will take a lead in judging as to the right point in time to involve a partner agency, gaining consent from the customer(s) before this is done. Longhurst Group are aware that too many agencies involved at one time may overwhelm the customer.

Prior consent will be obtained from customers and recorded. If this is not possible, an assessment will be made against the Data Protection Act and GDPR by Longhurst Group to ensure customers rights and privacy are fairly respected and that it is in the interests of the customer when decisions are made.

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## Tenancy Enforcement

Longhurst Group 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 wellbeing. We do recognise, 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.

It is our aim to support customers in addressing their hoarding behaviours and enforcement action should only be taken in instances when;

- 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(s) and their actions have been proven to have a detrimental effect on the property and/or others;
- Where access to the property for gas safety checks is required, and has been repeatedly refused in line with our policy and procedures, to ensure we meet our duties under gas safety regulations (Health and Safety Executive, 1998);
- Where access to the property for any other statutory compliance checks are required and has been repeatedly refused in line with our policy and procedures, to

ensure we meet our regulatory duties.

We acknowledge that each case is individual and as such, Longhurst Group will consider the most appropriate method of resolving the problem, considering a range of available options, and taking into account the severity and urgency of the situation. Options may include, but are not exclusive to;

- Providing a dedicated Housing Officer to work with the customer to resolve their hoarding behaviours;
- Completion of PCRA and Housing Assessment Form, demonstrating clear timescales, actions and outputs;
- Meeting the costs of clearing the home;
- Sign posting to relevant partners and organisations;
- Making a safeguarding referral.

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### **Emergency Services and Supporting Agencies**

In the interest of public safety and on a case-by-case basis, the emergency services and supporting agencies may be informed of cases where the clutter within the property presents a risk to the welfare of others either through a safeguarding referral or direct referral into a partner agency, such as the fire service. ]

## Part 4

# Policy implications

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## Roles and responsibilities

**All persons involved with the Group, whether Board Member, or employee have delegated responsibilities. The key roles and responsibilities are listed below.**

### Group Board

The Board is responsible for ensuring that there is an effective policy with controls in place, but delegation is the Management Team of the Group.

### Executive Management Team

The Chief Executive, Executive Directors and Directors collectively are the officers responsible for ensuring the implementation of the Group's objectives in this policy.

### Policy Sponsor – Deputy Chief Executive and Chief Financial Officer

This person has strategic responsibility for the policy and how it relates to business plans, key strategies and other elements of the policy framework.

### Policy Owner – Director of Housing and Customer Services

Responsible for the policy's suitability; effective implementation; and commissioning new policy development and periodic policy review.

### Policy Author – Director of Housing and Customer Services

Responsible for drafting a new policy and proposing any amendments to an existing policy.

### Data Protection – Data Protection Officer

Responsible for identifying, assessing and mitigating privacy risks with data-processing activities that fall within the policy.

### Customer Engagement Team

Responsible for leading on policy consultation with customers and the Customer Forum.



### **Data protection**

We will handle personal identifiable information in a safe and secure manner and only share relevant information that meets the requirements of the Data Protection Act, 1998 and GDPR guidance and legislation.

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### **Safeguarding**

Given the nature of hoarding and the potential risk involved to the individual, based on the circumstances of the case we may choose to make a safeguarding referral. This policy has no implications to making any sort of safeguarding referral.

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### **Equality, diversity and inclusion**

We will ensure that this policy is applied fairly and consistently to all our tenants and customers. and is in line with the guidance set out in our Equality and Diversity policy.

In respect of this policy, particularly in respect of mental health and physical health as these are noted as being primary causes of hoarding, we will ensure that along with the housing assessment form, PCRA and subsequent action plan, that a proportionality assessment is completed should there be a need to proceed with tenancy enforcement action to demonstrate we have been fair and reasonable in our approach.

We will engage with partner agencies that we are aware of that are working with the customer and should it be the case that there is currently no support being provided, will make a safeguarding referral to initiate support. We will identify partners who can help to provide support to tenants with mental and or physical health issues within our localities through our action plan to engage and assist in sustaining the tenancy.

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### **Complaints and feedback**

Longhurst Group will handle any complaints received as relating to the policy through the Group's Complaints Policy and in line with the timescales outlined within the Housing Ombudsman Complaint Handling Code.

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### **Risk analysis**

The Risk Analysis section within the Policy Development Plan (PDP) identified the following risks and mitigating actions:

- The risks associated have been outlined above throughout this policy and the mitigating risks noted for both the customer, the community and the business.
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### **Evaluation, review and performance reporting**

This policy will be reviewed on a triennial basis to ensure that it remains fit for purpose. A policy review may also be required earlier, in response to internal or external changes for example changes in legislation. Prompt and effective action will be taken where improvements are identified.

Each company will carry out audits to monitor compliance. Regular checks will also be completed by our auditors.

This policy will be reviewed every three years. In addition, it will be reviewed:

- following information suggesting that the policy is not effective;
- to reflect any service enhancements; and/or
- following the introduction of relevant new legislation, regulations or guidance. |

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### **Summary of local variations**

|There are no local variations in respect of the Hoarding Policy; this is to be applied consistently across all of our localities. |

## Part 5

# Compliance

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## Legal and regulatory compliance

**This policy fully complies with the Group's legal and regulatory obligations.**

- Please list all relevant compliance. Please check that the most relevant/current legislation is listed, including dates
- Complies with Regulator of Social Housing (RSH) Neighbourhood and Community tenancy standard; the Housing Acts; The Torts (Interference of Goods) Act 1977, Care Act 2014 and the Data Protection Act 1998.
- This Policy complies with the Health and Safety at Work etc Act 1974, Management of Health and Safety at Work Regulations 1999, The Occupiers Liability Act 1957, The Occupiers Liability Act 1984 and the Regulatory Reform (Fire Safety Order) 2005.
- Care Act 2014
- Human Rights Act 1998

**This list is not exhaustive, and policy authors will undertake thorough research and/or seek professional advice to ensure the Group meets its obligations and complies with the current and relevant legislation and regulations.**

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## Related policies

- Starter Tenancy Policy
- Tenancy Management Policy
- Lettings Policy
- Mutual Exchange Policy
- ASB and Neighbourhood Management Policy
- Hate Crime Policy
- Domestic Abuse Policy
- Data Protection and Confidentiality Policy
- Health and Safety Policy
- Safeguarding Policy
- Heating Safety Policy

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Part 6

## Appendices

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### A. Glossary of terms

<b>Term</b>	<b>Definition</b>
<b>Legislation</b>	The legal requirements that must be followed.
<b>Policy</b>	A statement of intent describing our approach towards a particular activity or area – usually comprising a set of rules or standards that must be followed.
<b>Policy Development Plan (PDP)</b>	The document used to support planning policy development and review.
<b>Procedure</b>	An agreed way of doing things that describes how a policy will be implemented. The specific steps and/or actions that must be taken to put policy into practice and ensure a consistent service.
<b>Regulation</b>	The rules or standards set by a governing body such as the Housing Ombudsman, Regulator of Social Housing and Financial Conduct Authority.