

Hoarding Policy

Policy Author: [REDACTED]	Policy Valid From: 27/07/2020
Policy Approved Date: July 2017	Policy Review Date: 01/05/2031

Policy/Strategy Control Statement

1	Document Title	Hoarding
2	Date of Document (Created Date)	June 2017
3	Service Lead	[REDACTED]
4	Author	[REDACTED]
5	Date Approved and approved by who i.e. Service Delivery Project Board, Executive, Group Board, etc. Head of Housing Services – Helen Lupton	
6	Date last reviewed	MAY 2026
7	Amendment record	
8	Next review date (Planned review Date)	01/05/2031
9	Staff Consultation	
10	Other Services Consultation	Consultation with Cotman Housing August 2017
11	Customer Consultation	
12	Equality Impact Assessment: insert priority as agreed with E/D team, Insert date copy of EIA sent to E/D team.	Reviewed - Awaiting Approval
13	Confirm that document meets current legislative requirements	Yes
14	Further Information/Comments	
15	Sign off of statement by Author and Service Lead (name and date):	[REDACTED] [REDACTED] Head of Tenancy Sustainment and Community Safety

Policy Applicable To

Business Area: Homes Plus
Applicable to: Homes Plus

Amendment Sheet Record

Revision Date	Description of Changes	Approved By	Date Approved
July 2016	Amended to reflect new job titles due to Homes restructure	BSSD – Service Improvement Coordinator	July 2016
June 2017	As part of the initial visit to complete a property audit Involve tenant is seeking solutions Introduces the expectation on the tenant to engage with PfP on resolving the issue Removal of the option of rehousing Reference to the Disability and Capacity Policy		
July 2020	No changes, policy fit for purpose following best practice training.		
May 2022	To include all housing provision Change of job description Include provision of proportionality for all cases	[REDACTED]	May 2022
July 2022	Inclusion for risk assessment to be completed in line with Fire risk assessment procedure for blocks of flats in communal areas	[REDACTED]	July 2022
May 2026	Review of policy	[REDACTED]	May 2026

Please summarise the current policy requirements and how this is changed in the new policy.

[Policy Key Changes Summary]

Please explain the reason for changes/improvements/new policy.

Policy due for review and need to reflect new way of working on proactive tenancy management
--

Please explain any new actions required to put the policy changes into practice.

--

Table of Contents

Policy/Strategy Control Statement	1
Policy Applicable To.....	2
Amendment Sheet Record.....	2
Revision Date	2
Description of Changes.....	2
Approved By.....	2
Date Approved	2
Please summarise the current policy requirements and how this is changed in the new policy.	2
Please explain the reason for changes/improvements/new policy.	3
Please explain any new actions required to put the policy changes into practice.	3
Contents	5
Policy Statement	6
Scope	6
Key Principles	6
Hoarding Case Management Process	7
Fire Safety and Evacuation	11
Where hoarding presents a fire risk or restricts safe exit:.....	11
Safeguarding	11
Multi-Agency & Support Networks	12
Recording Requirements	12
Roles and Responsibilities	13
Community Housing Managers/ Housing & Wellbeing Coordinators	13
Equality and Diversity.....	13
Information Sharing and Confidentiality	14
Information will be shared in line with data protection legislation and organisational policies.	14
Consent will be obtained where appropriate; however, information may be shared without consent where there is a safeguarding concern or risk of harm.....	14
Compliance and Assurance	14
Monitoring and Review.....	14
Legal and Regulatory Framework.....	14
Related Policies and Procedures	15
Appendix A: Hoarding Toolkit.....	Error! Bookmark not defined.
Appendix B: Hoarding Risk Assessment	Error! Bookmark not defined.
Safeguarding Actions	Error! Bookmark not defined.
5. Engagement Level	Error! Bookmark not defined.
9. Clutter Image Rating Scale (CIRS)	Error! Bookmark not defined.
12. Review Date	Error! Bookmark not defined.
REFERENCES.....	Error! Bookmark not defined.

Contents

1. Policy Statement
2. Scope
3. Key Principles
4. Hoarding Case Management Process
5. Fire Safety and Evacuation
6. Safeguarding
7. Multi-Agency & Support Networks
8. Recording Requirements
9. Roles and Responsibilities
10. Equality and Diversity
11. Information Sharing and Confidentiality
12. Compliance and Assurance
13. Monitoring and Review
14. Legal and Regulatory Framework
15. Related Policies and Procedures
16. Appendix A - Hoarding Toolkit
 - Appendix B – Hoarding Risk Assessment
 - Appendix C - Clutter Image Rating Scale (CIRS)
 - Appendix D – Process Map
 - Appendix E - Professional Practice Note

Policy Statement

This policy sets out the organisation's approach to identifying, managing, and resolving hoarding cases.

Hoarding is recognised as a complex behaviour often linked to mental health, trauma, self-neglect, or other vulnerabilities. The organisation will adopt a support-led, proportionate, and evidence-based approach, balancing:

- The needs, safety, and wellbeing of the tenant
- The impact on neighbours and the wider community
- The condition, safety, and statutory compliance of the property

Where hoarding presents property safety hazards (including fire risk, blocked exits, excess clutter affecting repairs, damp and mould, or statutory health and safety hazards), these risks must be addressed alongside tenancy management and safeguarding responsibilities.

Enforcement action will only be taken where necessary, proportionate, and supported by clear evidence, and where support options have been exhausted.

Scope

This policy applies to:

- All staff responsible for tenancy management, community safety, and property management
- All residential properties managed by the organisation

Key Principles

- Hoarding will be managed using a support-first approach
- Early intervention and multi-agency working are essential
- Customers will be treated with dignity, respect, and without judgement

- Decisions must be evidence-based and clearly recorded
- A proportionate approach will always be taken
- Safeguarding responsibilities apply at every stage
- Enforcement is a last resort, not a first response

Hoarding Case Management Process

Stage 1: Identification

Lead responsibility: Housing Management function

(e.g. Community Housing Managers, Housing & Wellbeing Coordinators / Service Managers)

Triggers may include:

- Complaints from neighbours
- Routine or responsive property inspections
- Missed access appointments
- Partner agency reports

Actions:

- Record the concern on the case management system
- Consider any immediate risks to health or safety
- Notify Community Safety where risk appears medium or higher

Stage 2: Assessment

Lead responsibility: Housing Management function - Community Safety oversight: Where risk is identified or escalates

Actions:

- Conduct a property inspection
- Complete:
 - Clutter Image Rating Scale (CIRS)
 - Risk assessment (fire, health, structural, environmental)
- Assess tenant insight, vulnerability, and support needs
- Take and securely store photographic evidence
- Record findings clearly

Safeguarding

- Consider whether a safeguarding concern exists, including:
 - Self-neglect
 - Serious health or safety risk
 - Inability to manage the home
- Follow the Safeguarding Policy
- Record safeguarding concerns on ECO Online where required
- Update the housing case management system

Stage 3: Support and Engagement

Lead responsibility: Housing / Community Safety (depending on risk)

Actions:

- Clearly explain:
 - Tenancy breaches
 - Risks identified
 - Action Plan in writing
- Offer appropriate support, including:
 - Internal services (e.g. Inside Out)
 - External partner agencies
- Maintain a respectful, non-judgemental approach
- Seek tenant consent for referrals where appropriate

Where consent is not provided, but there are significant safeguarding or safety concerns, information sharing may still take place in line with the Safeguarding Policy and data protection legislation.

Stage 4: Action Plan

Joint responsibility: Officer and tenant

Actions:

- Agree a SMART action plan including:
 - Clear actions
 - Timescales
 - Support arrangements
- Confirm the action plan in writing

Stage 5: Monitoring and Review

Lead responsibility: Case officer

Review frequency based on risk:

- **High risk:** every 2 weeks
- **Medium risk:** every 4 weeks
- **Low risk:** every 8–12 weeks

Actions:

- Monitor progress and engagement
- Reassess risk levels where appropriate
- Record progress, decisions, and updates clearly

Stage 6: Escalation

Lead responsibility: Community Safety

Escalation may be required where:

- Risks remain high
- Engagement is limited or absent
- Actions are not completed
- Conditions deteriorate

Actions:

- Reassess safeguarding risk
- Update ECO Online where appropriate
- Consider a multi-agency meeting or case conference
- Ensure all decisions and rationale are clearly recorded

Stage 7: Enforcement Consideration

Lead responsibility: Community Safety (with management sign-off)

Enforcement must only be considered where:

- Significant risks remain
- Support has been offered and exhausted
- There is clear evidence of ongoing tenancy breach

Pre-Enforcement Checklist

- Property inspection completed
- Risk assessment and CIRS completed
- Support offered and recorded
- Referrals made where appropriate
- Written communication issued
- Minimum of three engagement attempts made
- Appropriate monitoring period allowed

Proportionality Assessment must consider:

- Risk to the tenant, neighbours, and property
- Vulnerability and mental health
- Mental capacity
- Impact of enforcement versus no action
- Whether all reasonable alternatives have been exhausted

Where there are concerns regarding mental capacity, legal action must not proceed without appropriate assessment, advice, and clear rationale being recorded.

Enforcement Options

- Injunction (access or behaviour control)
- Possession proceedings (serious tenancy breach)

Stage 8: Aftercare

Lead responsibility: Housing / Community Safety

Actions:

- Ensure ongoing support arrangements are in place
- Conduct 3–4 follow-up visits within the first 12 months
- Apply a risk-based approach to continued monitoring

Fire Safety and Evacuation

Where hoarding presents a fire risk or restricts safe exit:

- Staff must assess the tenant's ability to evacuate safely
- Consider:
 - Blocked escape routes
 - Fire load
 - Vulnerability

Where concerns exist:

- Refer to Fire and Rescue Service
- Consider safeguarding referral
- Record clearly

Where a tenant cannot safely evacuate, this must be treated as a high-risk case.

Safeguarding

Hoarding may indicate self-neglect

Staff must:

- Consider safeguarding at all stages

- Make referrals where required
- Record on ECO Online
- Review regularly

Multi-Agency & Support Networks

Staff should engage with:

- Adult Social Care
- Mental Health Services
- Fire Service
- Environmental Health
- Health professionals
- Voluntary agencies

Friends & Family

Where appropriate:

- Consider involvement of family/friends
- Obtain consent
- Record involvement

Where consent is not provided, this must be respected unless safeguarding concerns override.

Recording Requirements

The following must be recorded:

- Inspection notes
- Risk assessments and CIRS scoring
- Photographic evidence
- Safeguarding decisions and referrals
- Actions agreed and timescales

- Support offered and referrals made
- All contact attempts
- Review outcomes
- Rationale for any enforcement action

Safeguarding concerns must also be recorded on ECO Online in line with the Safeguarding Policy.

Roles and Responsibilities

Community Housing Managers/ Housing & Wellbeing Coordinators

- Manage cases in line with this policy
- Complete assessments and action plans
- Maintain accurate records

Area Managers

- Provide oversight
- Approve escalation and enforcement decisions
- Provide guidance on safeguarding decisions
- Support referrals and complex cases

Equality and Diversity

The organisation is committed to ensuring this policy is applied fairly and consistently.

Consideration will be given to individual needs, including disability, mental health, and vulnerability, in line with the Equality Act 2010.

Information Sharing and Confidentiality

Information will be shared in line with data protection legislation and organisational policies.

Consent will be obtained where appropriate; however, information may be shared without consent where there is a safeguarding concern or risk of harm.

Compliance and Assurance

The organisation will ensure that this policy is applied consistently and effectively through the following measures:

- Staff will receive appropriate training to support the implementation of this policy and associated procedures.
- Managers will provide oversight of hoarding cases, including review of risk assessments, safeguarding decisions, and escalation actions
- Case audits will be undertaken periodically to assess compliance with this policy and identify areas for improvement.
- Learning from complaints, Ombudsman determinations, and legal proceedings will be used to inform service improvements.
- Any identified non-compliance will be addressed through management oversight, additional training, or corrective action where required.

The organisation is committed to ensuring that decisions made under this policy are evidence-based, proportionate and auditable.

Monitoring and Review

The organisation will monitor the effectiveness of this policy through:

- Case audits
- Complaint outcomes
- Legal case reviews

This policy will be reviewed every three years or sooner if required to reflect changes in legislation, regulation, or organisational learning.

Legal and Regulatory Framework

This policy is informed by, and must be applied in accordance with relevant legislation and regulatory expectations, including:

- Care Act 2014
- Mental Capacity Act 2005
- Housing Act 1988
- Human Rights Act 1998
- Anti-social Behaviour, Crime and Policing Act 2014
- Housing Health and Safety Rating System (HHSRS)
- Equality Act 2010
- Social Housing (Regulation) Act 2023
- Awaab's Law – Hazards in Social Housing (Prescribed Requirements) (England) Regulations 2025

Where hoarding results in, contributes to, or exacerbates housing hazards (including fire risk, blocked access, damp and mould, or other HHSRS hazards), statutory duties under Awaab's Law must be considered alongside tenancy management and safeguarding responsibilities.

Individual circumstances, including disability and protected characteristics, will be considered in decision-making.

All actions, decisions, and timescales must be clearly evidenced and recorded, particularly where enforcement action is being considered.

Related Policies and Procedures

This policy should be read in conjunction with the following:

- Safeguarding Policy (including ECO Online)
- Mental Capacity Policy
- Anti-Social Behaviour Policy
- Tenancy Management Policy
- Fire Safety Policy
- Health and Safety Policy

- Equality, Diversity and Inclusion Policy