

TENANT POLICY
Hoarding Policy

Version No. 2

POLICY STATEMENT:

Woven recognises that hoarding is a complex issue which may be associated with physical health conditions, mental health conditions, trauma, bereavement, social isolation, disability, neurodiversity or other life experiences. Hoarding should not be viewed solely as a tenancy management issue but as a matter requiring a balanced approach involving support, risk management, safeguarding, partnership working and, where necessary, proportionate enforcement action.

Woven recognises that hoarding is a complex issue that can have significant impacts on a person's health, wellbeing, safety and ability to sustain their tenancy. Hoarding behaviours can vary in severity and may be associated with a range of personal, social, physical or mental health factors.

This policy sets out Woven's approach to identifying, assessing and managing hoarding and severe clutter within its homes and communities. The Association is committed to working with tenants in a supportive, person-centred and proportionate manner to reduce risks, promote wellbeing and maintain safe living environments.

Woven will collaborate with tenants, their families and relevant partner agencies to prevent hoarding behaviours from escalating and to achieve sustainable outcomes wherever possible. We will seek to balance support with individual responsibility, recognising that intervention may be required where hoarding presents a risk to the tenant, staff, visitors, neighbours, property or the wider community.

Enforcement action will only be considered where support and engagement have been unsuccessful or where there is an immediate and significant risk to health, safety or tenancy sustainability. Woven recognises that successful outcomes are rarely achieved through enforcement alone and will prioritise engagement, support, partnership working and tenancy sustainment wherever possible.

POLICY SCOPE

This operational policy sets out Woven's approach to identifying, assessing and managing hoarding behaviour within its homes and communities. It provides a framework for staff to collaborate with tenants and partner agencies to reduce risks, safeguard individuals, sustain tenancies and maintain safe living environments. The policy applies to all tenants, household members and occupants where hoarding behaviours may impact on health, safety, wellbeing, property condition or tenancy obligations.

POLICY OBJECTIVES:

The purpose of this policy is to set out Woven's approach to supporting tenants who are affected by hoarding and managing the risks associated with hoarding behaviours. The policy aims to:

- To identify and address hoarding behaviours at the earliest opportunity, reducing risk and supporting sustainable behavioural change.
- Promote early identification and intervention to prevent hoarding behaviours escalating and impacting on health, safety and wellbeing.
- Take a balanced and proportionate approach using prevention, support, engagement, partnership working and, where necessary, enforcement action.
- Reduce risks to tenants, staff, visitors, neighbours and the wider community arising from hoarding, including fire, safeguarding and environmental health risks.
- Support tenants to sustain their tenancy and maintain their home in a safe and manageable condition.
- Deliver an initiative-taking, person-centred and trauma-informed approach to case management.
- Work collaboratively with statutory agencies, support providers and specialist services to achieve sustainable outcomes.
- Treat tenants affected by hoarding and those impacted by hoarding behaviours with dignity, respect, sensitivity and fairness.
- Promote shared responsibility by encouraging tenants to engage with support and take reasonable steps to manage risks within their home.

LEGISLATIVE AND REGULATORY REQUIREMENTS:

Woven is committed to managing hoarding cases in a lawful, fair, proportionate and person-centred manner. This policy supports the Association's obligations in relation to health and safety, safeguarding, tenancy management and regulatory compliance.

In implementing this policy, Woven will have regard to the following legislative and regulatory requirements

Housing and Tenancy Management

- Housing (Northern Ireland) legislation and relevant tenancy law.
- The terms and conditions of Woven tenancy agreements, including tenant responsibilities for maintaining their home in a safe and reasonable condition.
- Woven's obligations to protect its housing assets and ensure the peaceful enjoyment of homes by neighbouring residents.

Health and Safety

- Health and Safety at Work (Northern Ireland) Order 1978.
 - Relevant health and safety legislation that requires Woven to take reasonable steps to protect employees, contractors, tenants, visitors and members of the public from foreseeable risks arising from hoarding and severe clutter.
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Fire Safety

- Fire and Rescue Services (Northern Ireland) Order 2006.
- Fire Safety Regulations (Northern Ireland) 2010.
 - Associated fire safety guidance and standards relating to means of escape, access for emergency services, fire loading and prevention of fire risks within residential properties.

Safeguarding

- Adult Safeguarding Prevention and Protection in Partnership arrangements.
- Co-operating to Safeguard Children and Young People in Northern Ireland.
 - Relevant safeguarding legislation, policies and multi-agency procedures where hoarding, self-neglect or severe clutter may place adults, children or other household members at risk of harm.

Equality and Human Rights

- Section 75 of the Northern Ireland Act 1998.
- Disability Discrimination Act 1995.
- Human Rights Act 1998.

Woven recognises that hoarding behaviours may be linked to disability, mental health conditions, trauma, bereavement, neurodiversity or other vulnerabilities. Woven will ensure that decisions are made fairly, proportionately and with appropriate consideration of individual circumstances and reasonable adjustments where required.

- UK General Data Protection Regulation (UK GDPR).
- Data Protection Act 2018.

Information relating to hoarding cases will be managed and shared in accordance with data protection legislation, Woven's Information Governance Framework and safeguarding responsibilities. Information may be shared with appropriate agencies where there is a lawful basis to do so, including where significant health, safety or safeguarding concerns exist.

Regulatory Standards and Governance

Woven will manage hoarding cases in a manner that supports:

- Safe and well-maintained homes.
- Effective risk management and assurance.
- Protection of vulnerable tenants.
- Customer-focused service delivery.
- Compliance with relevant regulatory standards and good practice guidance for registered housing associations.

The Association will adopt a balanced approach that promotes early intervention, tenancy sustainment, safeguarding and partnership working, whilst ensuring that enforcement action remains available where serious risks persist or tenancy conditions are breached.

ROLES AND RESPONSIBILITIES:

Tenants

- Engage positively with support and intervention measures where appropriate.
- Permit reasonable access for inspections, assessments and works.
- Take reasonable steps to reduce identified risks within their home.
- Comply with agreed action plans and tenancy obligations.
- Work collaboratively with Woven and partner agencies to achieve sustainable outcomes.

Housing Officers

- Identify potential hoarding concerns.
- Complete initial assessments.
- Develop support plans.
- Coordinate partner agency involvement.
- Monitor progress and review risks.

Maintenance Officers

- Identify and report hoarding, clutter or property-related risks observed during visits
- Provide advice on property condition, repairs, access issues and health and safety risks.
- Work with Housing Officers and other agencies to reduce risks and support agreed action plans.
- Maintain accurate records and follow safeguarding, health and safety and lone working requirements.

Senior Older Person and Supported Living Officer (Safeguarding Lead)

- Provide advice on safeguarding concerns arising from hoarding cases.
- Support referrals to Adult and Children's Services.
- Promote a multi-agency safeguarding approach where appropriate.
- Monitor safeguarding themes and learning from hoarding cases.

Housing Managers

- Provide oversight and management of hoarding cases.
- Review and authorise risk assessments and intervention plans where required.
- Escalate high-risk or complex cases for senior management review.
- Authorise enforcement action where appropriate.
- Ensure safeguarding concerns are identified and referred promptly.
- Monitor case outcomes and ensure compliance with policy and procedures.

Director of Homes, Communities and Customer

- Lead the operational implementation of the Hoarding and Severe Clutter Policy and associated procedures.
- Ensure hoarding cases are managed consistently, effectively and in accordance with policy, procedure and relevant legislation.
- Oversee the management of high-risk and complex hoarding cases.
- Ensure appropriate assessments, support plans, safeguarding referrals and interventions are implemented.
- Monitor performance, case outcomes and compliance across housing management services.
- Ensure staff receive appropriate training, guidance and support in identifying and managing hoarding behaviours.

- Promote a person-centred, trauma-informed and tenancy sustainment approach to case management.
- Ensure effective partnership working with statutory agencies, support providers and emergency services.
- Escalate significant risks, emerging issues and serious cases through the Association's governance and assurance arrangements.

Executive Director of Homes, Communities and Customer

- Provide executive leadership, strategic oversight and assurance regarding the management of hoarding and severe clutter across the Association.
- Act as the Executive Sponsor for the Hoarding and Severe Clutter Policy.
- Ensure appropriate governance, risk management and assurance arrangements are in place.
- Monitor compliance with legislative, regulatory and organisational requirements relating to safeguarding, health and safety, tenancy management and customer services.
- Receive assurance on high-risk cases, organisational trends and emerging risks arising from hoarding and self-neglect.
- Ensure adequate resources, systems and organisational capacity are available to support effective implementation of the policy.
- Provide assurance to the Chief Executive, Board and relevant Committees regarding the effectiveness of arrangements for managing hoarding risks.
- Promote continuous improvement through learning, performance monitoring and service review.
- Ensure that the management of hoarding cases supports Woven's strategic objectives relating to customer wellbeing, tenancy sustainment, safeguarding and safe homes

Health & Safety / Compliance Staff

- Advise on fire, building safety and environmental risks.
- Support risk assessments.

TRAINING:

Woven will ensure that relevant staff receive appropriate training to:

- Recognise signs of hoarding and self-neglect.
- Complete hoarding and risk assessments.
- Understand safeguarding responsibilities.
- Apply trauma-informed and person-centred approaches.
- Manage information sharing and confidentiality requirements.
- Collaborate effectively with partner agencies.

Refresher training will be provided periodically and where changes to legislation, regulation or guidance occur

RISK STATEMENT:

Hoarding and severe clutter can create significant risks for tenants, household members, neighbours, visitors, staff and Woven. Risks may include:

- Fire and Building Safety Risks – The accumulation of combustible materials can increase the likelihood and severity of fires, obstruct escape routes, restrict access for emergency services and compromise the safety of occupants and neighbouring properties.
- Health and Environmental Risks – Excessive clutter may result in unsanitary living conditions, pest infestations, dampness, mould, disease and increased risks of trips, falls and injury.
- Structural and Property Risks – Excessive storage of possessions may contribute to property damage, structural concerns, blocked access to repairs and deterioration of the home.
- Safeguarding Risks – Hoarding may place vulnerable adults, children and other occupants at risk of harm, neglect, self-neglect or exploitation.
- Wellbeing Risks – Hoarding can adversely impact a person's physical health, mental wellbeing, independence, social relationships, employment and overall quality of life.
- Tenancy and Community Risks – Hoarding may affect a tenant's ability to comply with tenancy obligations and can have a detrimental impact on neighbours and the wider community.
- Organisational Risks – Hoarding cases may result in increased management costs, legal action, property damage, reputational risk and regulatory compliance concerns for Woven.
- Woven will use the Clutter Image Rating (CIR) tool and a structured hoarding risk assessment process to determine severity, intervention requirements and review frequency.

Woven is committed to identifying and managing these risks through early intervention, person-centred support, partnership working and proportionate enforcement where necessary. Joint working with Environmental Health, the Northern Ireland Fire & Rescue Service, Health and Social Care services and other relevant agencies is essential to achieving sustainable outcomes.

Woven will maintain a register of hoarding cases, assess and monitor risk levels, and review high-risk cases in accordance with its assurance and risk management arrangements.

Where concerns arise regarding an individual's ability to understand risks, make decisions or engage with support, Woven will seek appropriate advice from Health and Social Care professionals and will act in accordance with safeguarding procedures and relevant legislation.

INFORMATION SHARING:

Woven may share information with statutory agencies and support providers where:

- Consent has been obtained; or
- There is a lawful basis under UK GDPR; or
- Health, safety or safeguarding concerns justify information sharing.

Only the minimum necessary information will be shared.

MONITORING AND REVIEW OF THIS POLICY:

Woven will:

- Maintain a central register of hoarding cases.
- Record risk levels and review dates.
- Review high-risk cases at least quarterly.

- Monitor referrals to partner agencies.
- Monitor enforcement action arising from hoarding cases.
- Report significant risks through operational and governance assurance processes.
- Use lessons learned to improve services and staff training.

This policy will be formally reviewed at least every three years to ensure it remains effective, relevant and compliant with current requirements. An earlier review will be undertaken where there are significant changes in legislation, regulatory requirements, statutory guidance, organisational needs, or recognised best practice that impact upon the policy.

ASSOCIATED EXTERNAL GUIDANCE:

As Woven is a Housing Association regulated by Department for Communities, this policy adheres to the Housing Association Guide as set out by the DfC.

ASSOCIATED POLICES AND PROCEDURES:

- Hoarding procedure
- Complaints procedure
- Tenancy Audit Visits procedure
- Tenancy agreement and handbook
- Safeguarding procedure
- Safeguarding Policy
- Health and Safety Policy
- Anti-Social Behaviour Policy
- Data Protection Policy
- Fire Safety Policy
- Reasonable Adjustments Policy
- Lone Working Policy
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APPENDIX 1

Definitions

Hoarding

Hoarding is the acquisition of, and failure or inability to discard, possessions regardless of their actual value, resulting in the accumulation of items that clutter living spaces, restrict their intended use, and create risks to health, safety, wellbeing, tenancy sustainment, property condition, or the wider community.

Hoarding Disorder

Hoarding Disorder is a recognised mental health condition characterised by persistent difficulty discarding or parting with possessions, regardless of their value, due to a perceived need to save them or distress associated with discarding them. The condition can significantly impair an individual's ability to live safely within their home and maintain social, physical and emotional wellbeing.

Additional Definitions to Include

Clutter

The accumulation of items within a property which may affect cleanliness, access, maintenance or safe use of a home but does not necessarily constitute hoarding behaviour.

Squalor

A living environment that has become unsanitary due to neglect, accumulation of waste, poor hygiene or lack of cleaning. Squalor may exist with or without hoarding behaviour.

Self-Neglect

The inability or unwillingness of an individual to care for their personal health, hygiene, living environment or safety, potentially placing themselves or others at risk.

Animal Hoarding

The accumulation of a large number of animals where the individual is unable to provide appropriate standards of care, resulting in welfare concerns for the animals and potential risks to occupants or neighbours.

Clutter Image Rating (CIR)

A recognised assessment tool used to evaluate the severity of clutter and hoarding within a property and inform appropriate levels of intervention and risk management.