

# HOARDING AND SELF-NEGLECT POLICY FOR HOUSING

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## 1. Legal and Regulatory Framework

- 1.1. The Council has a duty under the Equality Act 2010 to advance equality of opportunity for persons with the protected characteristics set out in the Act. However as a Council we also formally recognise other characteristics including socio-economic class and having experience of care.
- 1.2. Under the Care Act 2014, local authorities are required to ensure that people living in their areas receive services that prevent their care needs from becoming more serious, including in the provision of accommodation. Housing must form part of an integrated care, support and health service, with a duty for relevant partners to co-operate.
- 1.3. The Social Housing Regulation Act 2023 introduced new consumer standards. The Transparency, Influence and Accountability Standard requires social landlords to “use relevant information and data to: a) understand the diverse needs of tenants, including those arising from protected characteristics, language barriers, and additional support needs; and b) assess whether their housing and landlord services deliver fair and equitable outcomes for tenants.”. Additionally, the Neighbourhood and Community Standard sets outcomes that social landlords must deliver about working with other parties so that tenants live in well maintained neighbourhoods, and feel safe in their homes.
- 1.4. Mental Capacity Act 2005 The Mental Capacity Act (MCA) sets out how organisations protect and empower people aged 16 and over who may lack the mental capacity to make their own decisions about their care and treatment.
- 1.5. Safeguarding Vulnerable Groups Act 2006 aims to avoid harm, or risk of harm, by preventing people who are deemed unsuitable to work with children and vulnerable adults from gaining access to them through their work. It requires organisations with responsibility for providing services or personnel to vulnerable groups to refer relevant information to the Disclosure and Barring Service (DBS).

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## 2. Equality

- 2.1. In line with the Equality Act 2010, we will ensure that no tenant is treated less favourably on the grounds of gender, ethnicity, age, religion, sexuality or any other protected characteristic.
- 2.2. Some decisions involving tenants may also be subject to individual equalities impact assessments (EqIAs). This is particularly common in cases involving enforcement, repossessions and prosecutions.

## 3. Scope and terminology

### Scope

- 3.1. This policy applies to secure, introductory and fixed term tenants of Newham Council homes and members of their household. Some aspects also apply to those who occupy as leaseholders and households placed in temporary accommodation (non-secure tenancies) in Newham Council-owned properties, and the policy makes clear which parts are applicable to which groups.
- 3.2. It covers both sheltered and general needs properties owned by Newham Council.

### Terminology

- 3.3. Hoarding is a mental health disorder which leads people to acquire and retain many possessions, which leads to them experiencing difficulty in managing the resulting clutter in their homes. People who hoard may feel a strong desire to keep items, but their connection to the items may cause them distress.
- 3.4. Self-neglect is a lack of personal hygiene, health or surroundings to such an extent that it threatens personal health and safety. It may include a failure to seek help or access services to meet health and social care needs, and an inability or unwillingness to manage personal affairs.
- 3.5. Hoarding and self-neglect can often be related, but this is not always the case.
- 3.6. When this policy refers to a 'resident', this means any member of the household of a Council tenant, tenant placed in Council-owned temporary accommodation, or resident leaseholder.
- 3.7. When this policy refers to a 'tenant', this means any member of the household of a Council tenant or tenant placed in Council-owned temporary accommodation.

## 4. Aims and objectives

- 4.1. The aim of the policy is to set out the Council's Housing Service's response to addressing hoarding among Council tenants, leaseholders and tenants of non-resident leaseholders.
- 4.2. The objective of the policy is to prevent harm to residents by effectively addressing hoarding behaviour.

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## 5. Recognising Hoarding and Self-Neglect

5.1. Newham Council expects all its housing officers and contractors to exercise professional curiosity. All Council staff who interact with residents or enter their homes are responsible for recognising and reporting signs of hoarding and self-neglect. Signs of hoarding might include:

- People not being able to move around their home because of hoarding
- Sleeping and living in only one room of their home
- keeping or collecting items that may have little or no monetary value, such as junk mail and carrier bags, or items they intend to reuse or repair
- keeping several or more animals which they may not be able to look after properly.
- finding it hard to categorise or organise items
- having difficulty making decisions about items
- struggling to manage everyday tasks, such as cooking, cleaning and paying bills as a result of their belongings or the state of their property
- becoming extremely attached to items, refusing to let anyone touch or borrow them

5.2. Signs of self-neglect can be environmental or in terms of self-care. Environmental indicators of self-neglect often overlap with hoarding, but may also include unsanitary or hazardous living conditions and/or rough sleeping. Self-care related indicators of self-neglect may include:

- Poor personal hygiene and unkempt appearance
- Malnutrition and/or dehydration
- Non-engagement with health and social care support
- Inability or unwillingness to take medication or treat illness or injury
- A lack of essential food, clothing or shelter

5.3. Both hoarding and self-neglect can be associated with mental health problems including dementia, severe depression or anxiety, psychotic disorders like schizophrenia and obsessive compulsive disorder (OCD). It might also be the result of a learning disability or brain injury, or a physical illness or mobility issue that affects an individual's ability to care for themselves or surroundings (for example by affecting energy levels or motor skills). In some cases, it may simply be a result of an individual becoming overwhelmed or being unable to manage the volume of their belongings.

5.4. Hoarding may also be a condition in itself (a hoarding disorder) and is associated with self-neglect. Residents who experience a hoarding disorder are more likely to:

- live alone
- be unmarried
- have had a deprived childhood, with either a lack of material objects or a poor relationship with other members of their family
- have a family history of hoarding
- have grown up in a cluttered home and never learned to prioritise and sort items
- be struggling to cope with a stressful life event such as bereavement

### Reporting hoarding and self-neglect

5.5. Where a family member, caregiver, neighbour or other member of the public suspects that an individual or household is hoarding or affected by self-neglect, they should inform their Housing Liaison Officer. If you know who the Housing Liaison Officer is for your area, please use the contact details with which you have been provided. If you do not know who your Housing Liaison Officer is,

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please contact the team by email at [HLOTeam@newham.gov.uk](mailto:HLOTeam@newham.gov.uk) and an officer for your area will respond. You can also call the team by telephoning the Contact Centre on 020 8430 2000 and asking for the Housing Liaison Team.

- 5.6. As with all vulnerabilities, it is the responsibility of all housing staff to report suspected cases of hoarding and/or self-neglect. Where any member of staff suspects that a tenant, leaseholder or a member of their household may be affected by hoarding and/or self-neglect, they should report it in the first instance to the Independent Living Team within Housing. A member of this team will arrange a home visit, or in some cases a phone call, to assess the issue if the individual or household member is a tenant. If the individual or household member is a leaseholder, the issue may be referred to Adult Social Care depending on the circumstances.

## 6. Recording Hoarding and Self Neglect

- 6.1. When a resident is identified by a member of Housing's Independent Living team as having an issue with either hoarding or self-neglect, this is recorded on our secure internal management systems and this information will be accessible to relevant officers.
- 6.2. For hoarding cases, the level of clutter is recorded. The Clutter Image Rating Scale (CIRS) is used to record the severity of hoarding and guide the appropriate response. A follow-up meeting and/or visit may be required with the Council's Fire Safety team and/or the London Fire Brigade, where the level of clutter presents an additional fire risk to the property.
- 6.3. The details of any intervention from the Independent Living Team or fire safety team in response to hoarding and/or self-neglect will be accessible to housing officers, to ensure they are aware when a resident has a history of hoarding and/or self-neglect and can look out for signs going forward.

## 7. Responding to Hoarding and Self Neglect

### Independent Living Support

- 7.1. The Housing Service's Independent Living Team is responsible for undertaking initial assessments of cases of hoarding and self-assessment among Council secure tenants. For cases where the tenant is willing to work with the Council to manage clutter and arrange personal care, the Independent Living team will lead casework. An officer will work closely with the tenant and, where appropriate, family members or carers, to reduce the clutter in their property or improve their personal care arrangements in order to allow them to live independently.
- 7.2. The support from the Independent Living Team focusses on managing the tenant's home and tenancy, paying bills, finding employment and managing health. Independent Living officers do not provide personal care, but will work with the resident to liaise with health services and make arrangements with family members and carers where appropriate.
- 7.3. In exceptional cases the Independent Living Team may provide support to leaseholders, however the cost of cleaning and repairs would be recharged to the leaseholder.

### Referral to Adult Social Care

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- 7.4. Where the resident's circumstances are particularly complex, or where they are unwilling or unable to engage with the Independent Living officer, the case will be referred to Adult Social Care.

## **Enforcement Action**

- 7.5. Where a resident's hoarding or self-neglect behaviour is putting their property, and the safety of their neighbours at risk, and they are unwilling to take action to address their behaviour, the Council may consider taking enforcement action. Eviction will only be considered when all options for engagement have been exhausted.
- 7.6. Where a tenant who is known to be hoarding refuses access to Council officers for required visits, for example electrical safety testing or works to resolve damp and mould issues, the Independent Living Team will engage with the tenant to achieve access. Where this is unsuccessful, the tenant will be made aware that enforcement action will be taken.

## **Mental Capacity**

- 7.7. Because of the links between hoarding, self-neglect and mental illness, mental capacity is a key consideration. Where this is in question, a referral would be made to Adult Social Care to make an assessment of mental capacity. Mental capacity is not assumed as a result of any characteristic or behaviour, and is only determined through a formal assessment. We also take into account medical evidence, for example a letter from a hospital or GP.
- 7.8. In accordance with the Mental Capacity Act 2005, we will liaise with appropriate representatives where a tenant lacks mental capacity to make decisions about their belongings, behaviour, care, property and tenancy. We recognise that not all decisions a tenant has to make may be the responsibility of their representative. We will work within the guidance set out by the Mental Capacity Act Code of Practice.
- 7.9. If a resident is assessed as lacking mental capacity, the Council will act in the resident's best interests and all decisions must be fully documented. A best interest decision will consider:
- Involving the resident in the process as far as possible, with support for the resident to get participate in the process if required
  - Consulting with others involved in the resident's care
  - Consideration of the resident's past and present expressed wishes

## **8. Implementation of the policy**

- 8.1. The operational management of this policy is the responsibility of the Head of Independent Living and the Head of Housing Services, although all Council officers are expected to have regard to this policy in their interaction with and identification of tenants and leaseholders who are hoarding or self-neglecting.
- 8.2. This policy will be reviewed every three years, or in order to respond to relevant changes in legislation, guidance or best practice. This review is the responsibility of the Housing Strategy and Partnerships team.
- 8.3. Where successful delivery of the policy requires the development of new systems, this is the responsibility of the Director of Housing.

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## 9. Appeals and complaints

- 9.1. Our approach to handling housing complaints is set out in our Housing Complaints Policy. This notes that where required we will make reasonable adjustments to support a vulnerable tenant to make a complaint.

## 10. Data protection

- 10.1. The delivery of this policy must be consistent with the Council's policy on managing personal data. More information on the Council's approach to this issue is available on the following link:

<https://www.newham.gov.uk/contact-information/processing-personal-data-privacy-notice>

## 11. Policy author

| Name                  | Role                     | Service area and directorate      |
|-----------------------|--------------------------|-----------------------------------|
| Emma Brunskill-Powell | Housing Strategy Manager | Housing Strategy and Partnerships |

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## APPENDIX – POLICY RECORD

|                                                 |                                                                                                                                                                                                             |
|-------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Policy approval process</b>                  | Housing Cabinet Accountability Portfolio Meeting<br><br>The policy was approved on: 5th August 2025                                                                                                         |
| <b>Record of changes to the policy</b>          | N/A                                                                                                                                                                                                         |
| <b>Risk management</b>                          | N/A                                                                                                                                                                                                         |
| <b>Equality impact assessment (EQIA)</b>        | N/A                                                                                                                                                                                                         |
| <b>Data protection impact assessment (DPIA)</b> | N/A                                                                                                                                                                                                         |
| <b>Next review date for the policy</b>          | This policy is will be reviewed by the following financial year 2026/27<br><br>N.B. Please note the above date is indicative, and may be subject to change due to legal, regulatory or operational reasons. |

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