

Hoarding & Self Neglect Procedure

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Date	Owner	Version	Reason for Change
July 2023	Fiona Ross	2.0	3 yearly cyclical review

Summary of Changes

Section	Change
Title	Changed from HM49 to HAM01e as Assets may have involvement
1.2	Self- Neglect definition added
2.0	Amended to added different types of hoarding and to include self-neglect
3.2	Referrals to GP's added
3.3	Property Services Officer has been added as a party to be involved
3.4	Enforcement powers for self-neglect added
4.0	Management of self-neglect added Addition that the tenants doctor may be contacted
5.0	Senior Housing Services Officer/Head of Housing Services Officer has been added as parties to notified.

	Added hyperlink to the SSPCA website
7.0	The Property Team has been added as a party that must notified of the Action Plan
8.1	Added involvement of Senior Housing Services Officer and/or Head of Housing Services in making the decision about recharging
Appendix 8	Risk assessment added



Hoarding & Self Neglect Procedure

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1.0 Introduction

This procedure describes:

- How we will deal with tenants who have hoarding & self-neglect issues;
- The steps that we will take to assist the tenant in dealing with the problem;
- The action we will take against a tenant who fails to address resulting actions from the hoarding issue;
- How we can safeguard a tenant who has self-neglect issues.

1.1 Hoarding Definition

Hoarding is recognised by the World Health Organisation as a distinct mental health difficulty. Hoarding is the excessive collection and retention of materials to the extent that they affect day-to-day living and create a potential hazard. Hoarding causes a nuisance or hazard to others as well as to the individual.

This procedure exclusively deals with hoarding cases where hoarding has created severe deterioration of the tenants' home to the point that it is no longer able to function as a viable living space.

1.2 Self Neglect Definition

Whilst there is no standard definition of self-neglect, research has suggested that there are three recognised forms which include:

- Lack of self-care – this may involve neglecting personal hygiene, nutrition and hydration or health. This type of neglect would involve an assessment being made regarding what is an acceptable level of risk and what constitutes wellbeing;
- Lack of care of one's environment – this may result in unpleasant or dirty home conditions and an increased level of risk in the domestic environment such as health and safety and fire risks associated with hoarding. This may again be subjective and require a multi-agency assessment to determine whether the conditions within an individual's home environment are acceptable and/or safe;
- Refusal of Services that could alleviate these issues – this may include the refusal of care services, treatment, assessments or intervention, which could potentially improve self-care or care of one's environment.

1.3 Relevant legislation

- The Mental Health (Scotland) Act 2015;

- The Adults with Incapacity (Scotland) Act 2000;
- Adult Support and Protection (Scotland) Act 2007;
- The Humans Rights Act 1998.

2.0 Identifying Hoarding & Self Neglect Behaviour

Ark will promote tenancy sustainment and the right for all tenants to make individual choices even when this requires tolerance of unconventional lifestyles or where people appear to act in ways that are against their best interests.

In cases where the tenant display behaviours that pose a risk or have a detrimental impact on themselves or others around them Ark will, in most cases, take a graded approach in terms of the severity of hoarding to deal with the issue of hoarding. (**See Clutter Image Rating Appendix 1**). Hoarding has been categorised in to the following:

- Inanimate objects - This is the most common and 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 - Animal hoarding is on the increase. This is the obsessive collecting of animals, often with an inability to provide minimal standards of care;
- Data Hoarding - This could present with the storage of data collection equipment such as computers, electronic storage devices or paper. A need to store copies of emails, and other information in an electronic format.

Self-neglect behaviours may present in different forms, they can present as one or more of the following:

- Neglecting personal hygiene;
- Neglecting their home environment;
- Poor diet/ nutrition, may be noticeable if there is a significant change to weight;
- Lack of engagement with services (health professionals etc.);
- Not using required aids that have been provided;
- Substance misuse;
- Lack of engagement from the tenant or tenants family;
- A person deemed as having capacity is perceived to be making unwise decisions, withdrawing from agencies but continuing to be at risk of significant or serious harm;
- In many cases, the individual will present as a hoarding case which is then discovered to be as a result of self-neglect issues. Self-neglect issues should be explored when looking at any hoarding case.

3.0 Approaches to Hoarding & Self-Neglect

The following approaches are attempted to ensure tenancy sustainment in accordance with the Landlord Responsibilities Policy, HAM01 and the Tenancy Sustainment Procedure, HAM01e.

3.1 Provision of Support

Ark will first look to provide support from within its own resources. This may include involving care and support staff for tenants who have support packages and increasing the frequency of visits from housing staff. This approach may also involve contacting known next of kin, advocates, social work department and support workers for low level assistance where it is appropriate to do so and with consent of the tenant.

3.2 Referral Approach

Ark may involve the use of partnership agencies, including but not exclusive of, referral to Health and Social Care Agencies, GP's, Fire Service, Environmental health officer, Local Authorities or any other organisation that can assist the tenant.

3.3 Enabling Approach

Ark may provide clearing and cleansing services and in some circumstances a complete clean start approach. This approach may involve the tenant being decanted from the affected property for a short period of time. The Property Services Officer will be involved in this process. Prior to any work being carried out consent has to be received from the tenant affected and they would be consulted on the possible costs of the work, for which they will be liable. The form used in **Appendix 2** will be used as a basis for making this referral.

Prior to proceeding with any clear out or cleaning services Ark will ensure that the tenant concerned has made contact with a health professional or other agency. Ark will ensure that the tenant has adequate support in place throughout the clearing out process.

3.4 Enforcement

Where the above actions have failed to bring about appropriate improvement, and only as a last resort, Ark will consider taking legal action to recover possession of the property in accordance with Ark's Decree for Possession and Eviction procedure, HAM01f.

Section 53 of the Adult Support and Protection (Scotland) Act 2007 recognises self-neglect as a category of harm and under S4 of the 2007 Act we have a duty to inquire when a person who is self-neglecting meets the three-point test. The Act defines an adult at risk as people aged 16 years and over who:

- are unable to safeguard their own wellbeing, property, rights or other interests; and
- are at risk of harm; and
- because they are more affected by disability, mental disorder, illness or physical or mental infirmity, are more vulnerable to being harmed than adults who are not so affected.

In this context, G57a Adult Support & Protection should also be considered.

4.0 Management of Self-Neglect

Once it has been identified that an individual may be suffering from self-neglect, the individual should be contacted and a house visit arranged. This should be put in place to discuss the individual's needs and assess what care/support is needed, the self-neglect risk assessment form should be completed (**Appendix 3**). Social work, and/or the tenant's Doctor, should be contacted when there are any concerns for an individual's well-being and ability to safeguard themselves. We have a duty to share all information related to the concern with them and do not need the individual's consent if there is reasonable concern.

5.0 Management of Hoarding

In all identified hoarding cases the Housing Services Officer (HSO) will consult with the Senior Housing Services Officer (SHSO) and Head of Housing Services (HoHS) to ensure that an objective, sensitive, non-judgemental approach is adopted to the tenant.

Ark will always assume that the tenant concerned has mental capacity unless an assessment by a relevant professional proves otherwise. In instances where the tenant is deemed to not have capacity Ark will ensure the appropriate guardian/advocate is consulted.

In the cases where animal hoarding is a factor, the SSPCA should be contacted on 03000 999 999, <https://www.scottishspca.org/>

5.1 Visits to the Property

In cases where it has been identified that a tenant has started to hoard items in their property, prior to a visit, the relevant HSO will discuss the matter the Health & Safety Advisor and will complete the generic risk assessment (**Appendix 4**). The HSO will arrange a visit to the property (**Letter - Appendix 5**). At the visit the HSO will complete a form (**Appendix 6**) and decide the best approach for dealing with the individual's hoarding (see 4.0).

5.2 Use of the Clutter Scale

To make sure Ark gets an accurate sense of a clutter problem, it will use a series of pictures of rooms in various stages of clutter – from completely clutter-free to severely cluttered, (**Appendix 1**) tenants can pick out the picture in each sequence which comes closest to the clutter within their home. In general, clutter that reaches the level of picture #4 or higher impinges enough on a person's life that Ark would encourage them to get help for their hoarding problem.

6.0 Risk Assessment

If the Health & Safety Manager identifies that a risk assessment is required in the property, a joint visit will be arranged (**Letter - Appendix 7**).

6.1 Fire Safety

Where identified, regardless of the risk, tenants need to be advised of the increased risk and identify a safe exit route. Appropriate professional fire safety advice must be sought. A fire safety check undertaken by the fire service may be appropriate.

If the HSO feels it is necessary they should share information with appropriate emergency services by alerting them to such properties. This will allow crews to respond appropriately.

7.0 Action Plan

The HSO, in conjunction with a Social Worker, will create an action plan on how to deal with the issue of hoarding (**Appendix 8**). This will be shared with other relevant departments with Ark, such as the Property Team, the tenant and any advocates/guardians that are involved. Ark's emphasis will always be on the provision of support to the tenant and will practice 'action by consent' in the first instance. The action plan will have realistic timescales for tenant adherence.

7.1 Failure of Action Plan

If the tenant responsible for hoarding fails to adhere to the action plan, or there is a sudden deterioration of the condition of the property, Ark will consider the following:

Stage 1 – Tenant will be issued with a written breach of tenancy warning. Letters will also be issued to any support agencies involved and/or legal guardians. Following the issue of the written warning the HSO will make arrangements to carry out a further home visit to discuss breaches of tenancy.

Stage 2 - If the tenant fails to respond to the 1st written warning and the property condition is not improving and/or the tenant is failing to make efforts to improve the condition of the property a second written warning will be issued. Following the issue of the written warning the HSO will make arrangements to carry out a further home visit to discuss breaches of tenancy.

Stage 3 – Where all of the above measures have failed, in Ark's view, to bring about a satisfactory resolution to the hoarding issue, Ark will issue a Notice of Proceedings to the tenant concerned to recover the property.

8.0 Clearance of property

Ark will adopt an 'action by consent' approach as far as possible. If it is decided that the condition of the property is deteriorating and the tenant is not cooperating to improve its condition, Ark may decide to have the property cleared or use cleansing services. Ark will ensure that any clearing/cleansing of items from a property is carried out in accordance with relevant legislation.

8.1 Recharging of Work

If Ark decides to clear the property Ark may choose to recharge the tenant the cost of any clearing/cleansing work that is carried out. Each case will be considered on its merits and will be discussed with the SHSO or HoHS. Ark will assist in contacting charities and other organisations to assist the tenant concerned to gain financial assistance.

9.0 Management Transfer

In certain circumstance Ark may consider, as part of a managed solution to the problem, moving the tenant responsible for hoarding to alternative accommodation to provide a 'clean start'. Ark will require prior consent of the tenant for these cases. (See Allocations Policy s.2 HMO1)

10.0 Implementation and Review

10.1 Implementation

The HoHS is responsible for ensuring that this procedure is implemented when required by the appropriate staff.

10.2 Review

The HoHS will ensure that this procedure is reviewed at least every three years in accordance with Ark's procedure review framework.

Appendix 1 - Clutter Scale

These are Clutter Image Ratings that have been done from a previous study which are widely used across the world.

This shows the severity of the problem in many homes across the UK, where it is estimated that between 3% and 6 % of the UK are affected by this disorder.

Please click here to view the: [Clutter Image Ratings](#)

The ratings are from The International OCD Foundation and originate from a study by Frost RO, Steketee G, Tolin DF, Renaud S. Development and validation of the Clutter Image Rating. *Journal of Psychopathology and Behavioral Assessment*. 2008; 32:401–417.

Appendix 2 - Referral Form For Tenant Assistance

Referral for support to assist tenant improve condition of property

Housing Association Mandate

Housing Association Name: Ark Housing Association Ltd

Address: The Priory,
Canaan Lane
Edinburgh EH10 4SG

Telephone: 0131 478 8146

Tenants Name: _____

Tenants Address: _____

To be completed by tenant

I hereby confirm that I am happy for my landlord to make contact with 3rd party organisations to assist me in improving the condition of my property.

I agree that **relevant 3rd party organisations** may make enquiries to my landlord concerning my property and tenancy with Ark Housing Association. This includes requests for further information/evidence:

Signed: _____

Name (Printed): _____

Date: _____

Appendix 3 - Self-Neglect Risk Assessment

Name:

Address:

	Details
What behaviour, allegation, complaint, circumstances, or event has prompted this assessment? (Detail the nature of the behaviour or incidents which put/or is likely to put the person at risk, e.g. the nature and extent of sexual/physical/financial harm; the specific areas of self-neglect (eating, medication, wandering) Do you consider the harm identified as serious?	
Who is the source of concern, and who is involved in the risk events?	
When does this/do these circumstances occur - and how often ? (Evenings/weekends/every day/mealtimes etc; rarely, frequently, occasionally, etc)	
Where does this/do these circumstances occur? (Day centre, at home, on the streets, travelling)	
Particular triggers or risky circumstances that heighten the risks? (e.g. when person is alone; if carer/support person is late; if relative makes contact/does not make contact; arrival of benefit; contact with specific person/staff member etc)	
Protective factors , or circumstances, that have <u>protected</u> the subject, or <u>reduced the risk</u> in the past? (include here any change in subject's ability to manage these risks)	

Agreed Actions including Risk Management Plan if necessary

What	By Who (If on system)	By Who (If not on system)	By When	Progress

Appendix 4 - Generic Risk Assessment for Visiting Tenants with Hoarding Behaviours at Home

Department		Date	
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Work Task	Hazards	Risks	Workplace Precautions
<p>Preparing to visit a property where hoarding behaviour has been identified.</p>	<p>Lack of Information pre visit.</p> <p>Tenant / Others Behaviours of Concern (Physical / Verbal)</p> <p>Candles / Smoking materials are known to be next to flammable items (paper / cardboard)</p>	<p>Potential injuries connected to condition of property.</p> <p>Physical or verbal aggression from tenant /others.</p> <p>Second hand smoke</p>	<p>Letter or other communication informing tenant / guardian that a visit is planned to look at condition of property.</p> <p>Decide prior to visit if H&S or Care & Support assistance for Lone Working / Personal Safety risks.</p> <p>Discuss condition of property with relevant people prior to visiting and decide if suitable Personal Protective Equipment is needed such as gloves / masks /coveralls are required.</p> <p>Pre agreement to confirm who will be in attendance during visit.</p> <p>Pre agreement to no smoking and candles in use for 1 hour pre visit and during visit.</p>
<p>Access to property for inspection that agreed with all relevant parties</p>	<p>Slip /Trip /Fall hazards.</p> <p>Collision with items hoarded.</p> <p>Inadequate entrance and exit to property or surrounding area.</p>	<p>Muscular / Skeletal Injuries</p> <p>Crush injuries</p> <p>Blocked exits in an emergency situation</p>	<p>Ark staff to make a decision at entrance to ascertain if visit can go ahead looking safe entrance and exit.</p> <p>Ark staff to not enter the property if un invited</p>

	Tenant / Others Behaviours of Concern (Physical /Verbal) Fire hazards		people are in the property. Ark staff to not enter if there are candles burning or evidence of people smoking in the property.
Inspecting a property / area where hoarding is identified	Slip /Trip /Fall hazards. Collision with items hoarded. Tenant / Others Behaviours of Concern (Physical /Verbal) Unhygienic areas Electrical hazards	Muscular / Skeletal Injuries. Illness connected to unhygienic areas.	Wear any identified Personal Protective Equipment. Do not enter areas / rooms that do not have suitable entrance / exit. Do not move items or go near areas where items are above head height Do not enter rooms that re unhygienic Only stay in property for the minimum amount of time or have a discussion in a safe area in or outside the property. End visit if and leave by nearest exit if tenant or others display Behaviours of Concern / start smoking / other safety reason.

Assessment carried out by:

Assessor's Signature		Employee's Signature	
Name		Name	
Job Title		Job Title	
Date		Date	

Please review this risk assessment on an annual basis or after an incident. Contact Brian Gunn for advice if required.

Appendix 5 - Letter re Condition of Property

Date

Tenant

Address 1

Address 2

Post Code

Dear Tenant

Condition of Property

It has been brought to my attention that the condition in and around your home (**DELETE AS APPROPRIATE**) is not being maintained to the standard that we would expect.

As stated in your **tenancy/occupancy** agreement:

“You are responsible for taking reasonable care of the house. This includes keeping the house in a reasonable state of cleanliness.”

“Where you have exclusive use of the garden attached to your house you agree to keep the garden including footpaths and driveways in good and tidy order, free from weeds, free from litter and free from dog and other animal dirt. You hereby agree to cut the grass frequently so that it is no longer than ten centimetres. You agree to cut hedges so that the hedges do not exceed one metre in height where the vision of motorists would be impeded and two metres elsewhere.”

I have arranged to visit you in your home on **DATE at around TIME**. At this visit I would like to carry out a full inspection of the property. Please ensure all rooms are accessible.

If this time is not suitable for you, please contact me on *****.

I look forward to meeting with you.

Yours sincerely,

Housing Services Officer

Appendix 6 - Condition of Property Visit Form

TENANT NAME:
ADDRESS:
HOUSING OFFICER:
ANY OTHER PERSONS PRESENT:

Property structure, services & garden area

Does the tenant have clear access to all entrances and exits for the property?

YES	NO
-----	----

Does the tenant have access to roof space?

YES	NO
-----	----

Does the property have a smoke alarm?

YES	NO
-----	----

Visual Assessment (non-professional) of the condition of the services within the property e.g. plumbing, electrics, gas, air conditioning, heating

VERY GOOD / GOOD / POOR / VERY POOR

Are the services connected?

YES	NO
-----	----

Comments on Garden: e.g. size/access/condition
Additional Comments on Property & Services:

Household Functions

Assess the current functionality of each of the rooms and the safety for their proposed use. e.g. can the kitchen be safely used for cooking or does the level of clutter within the room prevent it. Provide information on % of floor space covered by clutter/height of clutter in each room.
--

YES	NO
-----	----

Are the pets well cared for; are you concerned about their health?
 Is there evidence of any infestation? E.g. bed bugs, rats, mice, etc.
 Are animals being hoarded at the property?

Support/Guardian Details

Does the tenant have a support package in place?

Details of tenants' legal guardian if applicable

Does the tenant have any family/friends they would like Ark to contact to help with hoarding identified in property?

Is the tenant happy for Ark to make contact with external agency to request support for condition of the property?

YES NO

****If yes, please ask tenant to complete mandate at end of this form granting permission to contact 3rd party agencies****

Risk Assessment

Following your visit will you be making referrals for external agencies to be involved going forward?

Have you identified any significant risks?

Should future visits require personal protective equipment/visits in pairs?

Appendix 7 - Letter re Follow Up and Concern for Condition of Property

Date

Tenant

Address 1

Address 2

Post Code

Dear Tenant

Follow up Visit – Condition of Property

Following my recent visit on **DATE** I believe that there are a number of health and safety issues that could put you and people visiting your home at risk.

I have arranged to visit on **DATE** with Ark's health and safety advisor **NAME**. At this visit a full risk assessment will be carried out and recommendations will be made.

Having large numbers of items in your home can be a safety hazard as well as being detrimental to the fabric of our building. If articles are all piled up next to the walls this restricts air flow and can lead to many problems this can cost a lot of money to rectify.

Ark will endeavour to assist you with to the best of their ability to improve your living conditions. I trust you will cooperate and begin to remove items from your house and seek help from external agencies, if required. As an Ark tenant *"You are responsible for taking reasonable care of the house. This includes keeping the house in a reasonable state of cleanliness."*

If this time is not suitable for you, please contact me on *****.

I look forward to meeting with you.

Yours sincerely,

Housing Services Officer

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Appendix 8 – Action Plan

Action Plan

Tenants Name:		Date Commenced:	
Address:		Target Completion:	
Objective (List of Goals)	Tasks (what you need to do complete your goals)	Resources (money/time/people)	Time frame for completion

Possible Challenges:			
Signed off by SHSO/HoHS:			
Date:			