| HOUSING MANAGEMENT |
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| HOARDING AND SELF NEGLECT POLICY |
| August 2026 |
| Review August 2029 |

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## 1. Introduction

This policy will describe what is meant by hoarding, the types of behaviour exhibited and what the impact may be to the individual and those around them.

There are three broad response routes for addressing hoarding behaviour or self-neglect, depending on the circumstances, the people involved and the level of risk:

- Single agency response.
- Multi-agency complex case management
- Under Adult Support & Protection (Scotland) Act 2007.

Through this policy we will outline the risks to the individual and others, the steps that may be taken to mitigate these risks and outline the support available, both to the individual but also to the member of staff trying to assist an adult/tenant.

This policy should be read alongside the Hoarding and Self Neglect procedure which provides further details on how the Association will act and the steps that should be taken once a tenant with Hoarding Behaviours has been identified.

## 2. Existing policies

This policy should be read in line with the following policies, which provide more detail to specific situations:

- *Safeguarding Policy*
- *Tenancy Sustainment Policy*
- *Neighbour Relations Policy*
- *Child Protection Policy*
- *Domestic Abuse Policy*

Where a specific action is required under one of these policies because of the harm or risk identified, the relevant policy should be followed alongside this policy.

## 3. Aims

This policy applies to all tenants and household members where hoarding behaviour, self-neglect or associated property condition concerns may create a risk to the individual, other occupants, neighbours, staff, contractors or the Association's property. It should be used to guide early identification, assessment, support, referral and proportionate enforcement where required.

The purpose of this policy is to:

- Create a safer and healthier environment for the tenants and others affected by hoarding behaviour, e.g. family, neighbours.
- Create a person-centred approach to how the Association responds to tenants exhibiting hoarding behaviour or self-neglect.
- Allow the Association to work with tenants to agree a clear action plan, realistic milestones and appropriate support, with enforcement considered only where risks cannot be managed through engagement, support or referral.

- Support tenants to recognise hoarding behaviour and self-neglect and work towards a resolution.
- Standardise with the approach taken by the council and HSCP allowing us to maximise the use of existing services and resources to try and reduce the need for compulsory solutions.
- To establish best practice and improve knowledge of legislation that relates to hoarding behaviour

## 4. Definition

Hoarding is the excessive collection and retention of any material to the point that it impedes day to day function. Pathological or compulsive hoarding is a specific type of behaviour characterised by:

- Acquiring and failing to throw out a large number of items that would appear to have little or no value and would be considered rubbish by other people;
- Severe cluttering of the person's home so that it is no longer able to function as a viable living space;
- Significant distress or impairment of work or social life.

Hoarding has been recognised by the World Health Organisation as a mental health condition. Hoarding disorder is distinct from collecting and from general clutter. It is not simply a lifestyle choice. People who hoard often have strong emotional attachments to items that are disproportionate to their practical or financial value.

Hoarding does not favour a particular gender, age, ethnicity, socio-economic status, education/work history or tenure type.

Those with hoarding disorder may be conscious of their irrational behaviour but the emotional attachment to the hoarded objects far exceeds the motivation to discard the items. Hoarding can include new items that are purchased e.g. food items, refuse and animals. Many people with hoarding disorder may be well-presented to the outside world, appearing to cope with other aspects of their lives quite well, giving no indication of what is going on behind closed doors.

Compulsive Hoarding Behaviour has been associated with health risks, impaired functioning, economic burden and adverse effects on friends and family members.

The tendency to hoard can also be a symptom of Diogenes syndrome (DS), a behavioural disorder associated with older people. Symptoms include living in extreme squalor, a neglected physical state, and unhygienic conditions. This can be accompanied by a self-imposed isolation, the refusal of external help, and a tendency to accumulate unusual objects.

Trauma has now been hypothesised by researchers as a contributing factor to compulsive hoarding, particularly Traumatic life events and early material.

## 5. Equal Opportunities/GDPR

We are committed to the principles of equal opportunities and good practice.

We acknowledge the Scottish Social Housing Charter and the requirement that every tenant and other customer has their individual needs recognised, is treated fairly and with respect, and receives fair access to housing and housing services.

Accordingly, PHA promotes equal opportunities and will not discriminate between persons on grounds of gender or marital status, on racial grounds, or on grounds of disability, age, sexual orientation, language or social origin, or of other personal attributes, including beliefs or opinions, such as religious beliefs or political opinions.

PHA is committed to ensuring the secure and safe management of personal data relating to customers, staff and other individuals. PHA staff are responsible for complying with the UK General Data Protection Regulation, the Data Protection Act 2018, PHA's Privacy Policy and any related procedures when recording, sharing and storing information under this policy.

If you need any information to be in a different format/language please let us know - we may be able to help.

***In developing this policy an Equalities Impact Assessment has been conducted by Alan Graham, no significant amendments have been made.***

## 6. Scottish Social Housing Charter and Legal Framework

The Association in preparing this policy and any related procedures has given consideration to and sought compliance with;

Scottish Social Housing Charter, as defined by The Scottish Housing Regulator – the regulatory body for Housing Associations. The Relevant Charter Outcome Numbers 6 and 11 state:

**6. Estate Management, anti-social behaviour, neighbour nuisance and tenancy disputes:**

*Social Landlords working in partnership with other agencies, help to ensure as far as reasonably possible that: "Tenants and other customers live in well-maintained neighbourhoods where they feel safe"*

**11. Tenancy Sustainment, Social Landlords ensure that:**

*"Tenants get the information they need on how to obtain support to remain in their home; and ensure suitable support is available, including services provided directly by the landlord and by other organisations".*

## 7. Legal Framework

The Acts of the Scottish Parliament which relate specifically to adult protection and capacity are:

- **Adults with Incapacity (Scotland) Act 2000**
- **Mental Health (Care and Treatment) Scotland Act 2003**

- **Adult Support and Protection (Scotland) Act 2007**
- **Children (Scotland) Act 1995**
- **Protection of Children (Scotland) Act 2003**
- **Housing Scotland Act (2025)**

Social Work Services are responsible for making enquiries and carrying out investigations to establish whether or not a person is at risk from harm and, if so, which, if any, of the protective measures available in terms of the legislation are most appropriate to an adult at risk's individual circumstances.

Employees should familiarise themselves with the **Adult Support and Protection (Scotland) Act 2007: Code of Practice (updated 2022)** and **National Guidance for Child Protection Scotland 2021 (updated 2023). These can be accessed via the Scottish Government website.**

Paisley HA staff's role is to report suspected or actual harm immediately to the relevant statutory bodies.

## 8. Types and Features of Hoarding

There are typically three types of hoarding:

- **Inanimate objects:** This is the most common. This could consist of one type of object or collection of a mixture of objects, such as clothes, newspapers, food, containers, or papers.
- **Animal hoarding:** This is on the increase and often accompanied with the inability to provide minimal standards of care. The hoarder is unable to recognise that the animals are at risk because they feel they are saving them. The homes of animal hoarders are often eventually destroyed by the accumulation of animal faeces and infestation by insects.
- **Data hoarding:** This is a relatively new phenomenon. It 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.

## 9. General Characteristics of Hoarding

- **Fear and anxiety:** compulsive hoarding may have started as a learnt behaviour or following a significant event such as bereavement. The person who is hoarding believes buying or saving things will relieve the anxiety and fear they feel. The hoarding effectively becomes their comfort blanket. Any attempt to discard the hoarded items can induce feelings varying from mild anxiety to full panic attack with sweats and palpitations.
- **Long term behaviour pattern:** possibly developed over many years or decades of 'buy and drop'. Collecting and saving with an inability to throw away items without experiencing anxiety and fear.

- **Excessive attachment to possessions:** people who hoard may hold an inappropriate emotional attachment to items.
- **Indecisiveness:** people who hoard may struggle with the decision to discard items that are no longer necessary, including rubbish.
- **Unrelenting standards:** people who hoard will often find faults with others; requiring others to perform to excellence while struggling to organise themselves and complete daily living tasks.
- **Socially isolated:** people who hoard will typically alienate family and friends and may be embarrassed to have visitors. They may refuse home visits from professionals, in favour of office-based appointments.
- **Large number of pets:** people who hoard may have a large number of animals that can be a source of complaint from neighbours. They may be a self-confessed rescuer of strays.
- **Mentally competent:** people who hoard are typically able to make decisions that are not related to hoarding. That said, hoarding is now considered a stand-alone medical disorder and can also be a symptom of other mental disorders.
- **Extreme clutter:** hoarding behaviour may prevent several or all of the rooms being used.
- **Self-care:** a hoarder may appear unkempt and dishevelled due to lack of useable toileting or washing facilities at their home. Some hoarders will use public facilities, in order to maintain their personal hygiene and appearance.
- **Poor insight:** hoarders typically see nothing wrong with their behaviour and the impact it has on them and others.
- **Churning:** hoarding behaviour can involve moving items from one part of the property to another, without ever discarding them.

## 10. Other considerations

- Forced clean-up is not an optimal response and rarely works in the longer term.
- Meaningful engagement is the most effective tool - trusted person to engage with to affect change.
- Where animal hoarding is involved, referral to the appropriate statutory or specialist agencies may be required, alongside consideration of mental health, welfare and environmental health risks.
- Diogenes syndrome is linked to brain injury, anxiety and depression so assessment needs to be thorough.
- Recognition of the impact on other people.
- Multi-agency approach can be needed.

## 11. Advocacy

People who hoard may not agree to engage with an advocate any more than they may agree to engage with any other professional. However, the need for advocacy should be considered and kept under review, particularly where the person's circumstances may lead to statutory intervention. Staff should make every effort to ensure the adult is consulted, included in discussions and made aware of concerns at the earliest appropriate opportunity.

## 12. Our approach

Our approach will be to perform an assessment of any identified hoarding situations or where a tenant is identified as being at risk of Self-Neglect. Our Tenancy Support Officer will conduct the assessment and will categorise the extent of the issue on the Clutter Image Rating Score (CIRS), which is a recognised tool for this purpose. The Tenancy Support Officer will work in partnership with the allocated Housing Officer to support the tenant to remedy the situation. The procedure to be followed is outlined in the Hoarding and Self Neglect procedure.

Housing legislation and Scottish secure tenancy provisions require tenants to keep the property in a reasonable state of cleanliness and to avoid deterioration caused by the tenant, a sub-tenant or anyone in the household. Where the Association has evidence that these obligations have been breached, enforcement action may be considered as a last resort, following appropriate assessment, support, referrals and legal advice.

**Housing enforcement** could focus on how the Hoarding Behaviour is impacting on the fabric of the property or affecting the neighbours and will range from:

- housing officer visits; guidance and support from the Tenancy Support Officer to people who are in need, to avoid them losing their tenancy; alongside clear messages about what can occur if people do not cooperate, such as court action.
- verbal warning; referral to housing support; referral to partner agencies, including ASP; request facilities to assist in clearing a property and recharge tenant (may not transfer tenant to temporary accommodation in instances where property is unsuitable for habitation).
- Housing enforcement within factored properties would rest with Environmental Health.

**Housing Officers and Asset Officers** are in a key position to be able to identify early indicators of hoarding behaviour, support the individual to access help, and avoid eviction. As a result, it is essential that concerns are raised through early identification and referral.

## 13. Rationale

Through early identification, categorisation, agreed milestones and support we will seek to support tenants to resolve the hoarding issue and to access support to address underlying issues.

This will benefit the Association by improving the general maintenance and state of repair of our housing stock and by reducing the potential for neighbour disputes.

This will also allow the Association to use evidence and recorded data to monitor the scale of the issue, evaluate progress against agreed milestones and identify where further support or intervention may be required.

## 14. **Responsibilities**

The Board is responsible for approving the policy.

The Director of Housing & Communities is responsible for reviewing the policy and for identifying suitable training for staff.

All staff have the responsibility for implementing the policy with line managers acting to provide guidance for staff prior to referrals being made to Social Work.

PHA staff regularly come into contact with vulnerable persons through:

- carrying out house visits to tenants/ housing applicants
- people visiting our office
- carrying out property & estates visits
- people attending public meetings/events

## 15. **Referrals to Social Work**

If a staff member has concerns about an adult or child, they must discuss this with their line manager without delay, unless there is an immediate risk of harm requiring direct contact with emergency services or the relevant statutory agency.

After discussion/ agreement with their line manager, the staff member must then immediately report their concerns by telephone call to the duty social worker at the local area team, followed up on the same day, with a written referral.

On receipt of the referral, Social Work will decide how to proceed.

As the referrer, SW will send a written response outlining their actions within 5 working days from receipt of the referral form.

A copy of the referral form and Social Work response should be given to the area Housing Officer.

If the Association is concerned that the Social Work response does not adequately address the identified risk, the matter should be escalated through the appropriate Social Work management route and recorded on the tenant's file.

If no further action is agreed and further concerns emerge, a further referral should be made.

16. **Recording of Information**

The Association is regulated by the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. As such our customers can request access to the personal information we hold on them. It is the responsibility of our staff to ensure all written information is accurately recorded and reported in a suitable format for public scrutiny.

Any significant incidents or changes following a referral should be recorded on the tenant's file and, where relevant, reported to Social Work or the appropriate statutory agency. Records should be factual, proportionate, dated and limited to information required to manage risk, provide support and evidence the Association's actions.

17. **Staff Training**

We will ensure that all staff are aware of this policy and receive appropriate training.

Joint training with Renfrewshire Council/ Social Work will be carried out through partnership working.

18. **Complaints**

Although we are committed to providing high levels of service, we accept that there may be occasions where customers may not be satisfied with the service received from us. We value all complaints and use this information to help us improve our services. Our complaints policy details our complaints procedure and how to make a complaint.

**19. Policy Review**

This policy will be reviewed every 3 years or earlier if required to respond to a change in legislation or good practice.

## Strategic Linkages

| Policy / Strategy | • *Safeguarding Policy*<br>• *Tenancy Sustainment Policy*<br>• *Neighbour Relations Policy*<br>• *Child Protection Policy*<br>• *Domestic Abuse Policy* |
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