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The Action Plan for Preventing Homelessness in Finland 2016-2019: The Culmination of an Integrated Strategy to End Homelessness?

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➤ **Abstract_** *The integrated Finnish National Homelessness Strategy is often seen as the envy of the economically developed world. Challenges remain and progress is not always even, but Finland is approaching a point at which recurrent and long-term homelessness will be nearly eradicated and experience of any form of homelessness will become uncommon. The 2016-2019 Action Plan for Preventing Homelessness in Finland is the third stage of the implementation of an integrated homelessness strategy, which began in 2008. After setting the Action Plan in context, this review provides a critical assessment of the Finnish preventative strategy and considers some of the potential lessons for other European countries.*

➤ **Keywords_** *Homelessness prevention, homelessness policy, Finland*

Introduction

This paper begins by setting the 2016-2019 Action Plan for Preventing Homelessness in Finland, hereafter the 'Action Plan', in the context of the wider Finnish homelessness strategy. Following a summary of the Action Plan, the paper then undertakes a critical analysis of the preventative approach being taken, considering the strengths of the Finnish approach and the challenges that exist in reducing Finnish homelessness. The paper concludes with a discussion of the potential lessons from the Finnish model for other European countries.

The History of the Finnish Strategy

Finland began an annual point-in-time (PIT) count of homeless people in 1987, using a consistent methodology, which has allowed trends in the homeless population to be explored over time. There are some reports of variations in measurement techniques and the data are, in part, estimations (Busch-Geertsema, 2010) and the usual caveats about PIT data, as opposed to longitudinal data collection, apply. Nevertheless, the counts are comprehensive and have given Finland a broad picture of the nature of homelessness, which has been built up over three decades (ARA, 2017).

Homelessness had been highlighted as a social problem in the 1980s, which had led to the introduction of the count. In 1987, 17 110 single people and 1 370 families were recorded as homeless. Over the following decades, the social housing programme and the development of homelessness services had brought this number down considerably. In 2008, 7 960 single people and 300 families were recorded as homeless, in a country of some 5.3 million people (source: ARA <http://www.ara.fi/en-US>). The definition of homelessness used was broad, this was not simply people on the street or in homelessness services, hidden homelessness was counted too (i.e. individuals, couples and families staying with friends or relatives in the absence of any alternative).

Finland faces some housing policy problems; the lowest income households and younger people face housing market disadvantage at disproportionately high rates. Helsinki has a highly pressured housing market and, in common with many other European capitals, has an insufficient supply of affordable housing. However, Finland has recently been assessed as a country that experiences the third lowest level of housing stress in Europe. Housing cost overburden is comparatively low and Finland also performs well in respect of housing conditions, reflecting sustained programmes to develop affordable housing supply (Benjaminsen and Knutagård, 2016; Foundation Abbé Pierre/FEANTSA, 2017).

It is hard to be certain about the relative levels of homelessness across Europe, as measurement systems vary and data collection is inconsistent (Busch-Geertsema *et al.*, 2014). Some regional comparisons are possible, as all four Scandinavian countries have at least some data on homelessness, although the frequency, extent and nature of data collection vary. Historically, in relative terms, Finnish homelessness levels were close to Sweden, while levels in Denmark and Norway were lower (Benjaminsen and Knutagård, 2016). At pan-European level, Finnish homelessness appeared to relatively low, i.e. similar to levels in other Scandinavian countries, which available data indicated tended to be amongst the lowest levels in Europe (Busch-Geertsema *et al.*, 2014).

Patterns in the homelessness data were a catalyst for what became significant changes in the Finnish response to homelessness. The annual counts of homelessness began to report, from 2004 onwards, that after initially falling quite steeply, the lone adult homelessness population appeared to have become static. Between 2004 and 2008, the annual counts reported a minimum of 7 400 and a maximum of 7 960 lone homeless people. Family homelessness had fallen to very low levels, but lone adult homelessness had apparently plateaued (source: ARA <http://www.ara.fi/en-US>).

The reason for this, according to the annual homeless counts, was that a group of long-term homeless people, with high support needs, were not exiting homelessness. As much as 45% of the total homeless population were in this long-term group (Tainio and Frederickson, 2009; Busch-Geertsema, 2010). Information from some service providers also indicated the presence of a long-term, high-need homeless population, whose needs were not being met by existing homelessness services (Pleace *et al.*, 2015). It was the presence of this 'long-term' population, on whom resources were being expended without resolving their homelessness that prompted the development of a new approach.

Paavo I and Paavo II

Paavo I, the first stage of the integrated Finnish national homelessness strategy was launched in 2008, with the goal of halving the level of long-term homelessness by 2011. The Paavo I strategy was designed to deliver 1 250 new dwellings and supported housing units in 10 cities, replacing emergency shelters and communal services with supported housing units that offered permanent tenancies. As has been noted elsewhere, Paavo I was distinguished as much by the political acumen with which the strategy was orchestrated, the bringing together all levels of government, quasi-governmental agencies and the homelessness sector, as it was by the adoption of a Housing First model (Pleace *et al.*, 2016).

Experience in the homelessness, mental health and drug and alcohol service sectors in Finland had shown that an emphasis on personalisation (consumer choice), a housing-led approach in which housing was provided first, rather than last, and a harm-reduction framework, led to better outcomes (Pleace *et al.*, 2015). The emergence of Housing First as a Federal strategy in the USA was in line with the approaches the Finns were adopting, and a decision was made to create links to those developing and advocating Housing First elsewhere in the world.

The decision to share their experiences and engage with the wider world enabled the Finnish strategy to draw upon North American experience, helping to refine their own ideas. The Housing First Finland network drew together international expertise as the Name on the Door programme, the development project for Housing First, became operational (http://www.housingfirst.fi/en/housing_first). Finland developed the first truly national-level homelessness strategy using a Housing First model (Pleace, 2016).

To meet the deadline set by Paavo I, Finland needed to deliver quite a lot of affordable, adequate and sustainable housing quickly. Converting existing, communal, institutional services into blocks of self-contained apartments – to provide congregate models of Housing First – made logistical sense in this context. This decision was to prove somewhat contentious, with some taking the view that this represented a ‘low fidelity’ version of Housing First that was likely to be less effective than replicating or closely following the original ‘Pathways’ Housing First model from New York (Tsemberis, 2011; Stefancic *et al.*, 2013; Busch-Geertsema, 2013). At the core of these arguments was the idea that social reintegration would be hampered by someone using Housing First not living in ordinary housing, i.e. being ‘separated’ from the community rather than a part of it (Quilgars and Pleace, 2016).

Debates about fidelity in Housing First had initially arisen because of inconsistencies in American interpretation of Housing First, which Federal Government had interpreted in quite broad terms (Pearson *et al.*, 2007). Some of the ‘Housing First’ provision in the US was – indeed is – in the form of congregate/communal services (Larimer *et al.*, 2009). Arguments began, which continue at the time of writing, as to whether this congregate/communal approach was as effective as the original, scattered housing, model, developed by Sam Tsemberis (Greenwood *et al.*, 2013). A perceived Finnish emphasis on congregate/communal models became part of European debates about Housing First (Busch-Geertsema, 2013).

In reality, Finland has never pursued a national homelessness strategy that was built entirely on congregate models of Housing First. Paavo I certainly incorporated the conversion of existing congregate and communal services into self-contained apartments for Housing First. However, the use of scattered housing models of

Housing First, housing-led (lower intensity, mobile support) services using scattered housing, and specialist, congregate and communal services, was also a part of the integrated strategy (Pleace *et al.*, 2015).

Equally, while there are those who assert that only high fidelity Housing First can be effective, the reality may be more complex. Congregate models of Housing First have encountered problems, including some Finnish services (Kettunen, 2012) and can perform less well than scattered site Housing First (Benjaminsen, 2013). Experience in Australia, with the Common Ground model, which has operational similarities with a congregate model of Housing First, has highlighted the challenges that can arise from accommodating a group of high-need formerly homeless people in an apartment block, on a single site (Parsell *et al.*, 2014). However, some recent results from Canada have cast doubt on the idea that congregate models of Housing First are – inherently – less effective than scattered site approaches (Somers *et al.*, 2017).

From a Finnish perspective, the strategy proved broadly effective. The original goal for Paavo I was not achieved, but while long-term homelessness was not halved, levels fell by 28% between 2008-2011, with 1 519 housing units – more than the original target – being delivered (Pleace *et al.*, 2015).

The next phase of the strategy, Paavo II (2012-2015), brought a considerable shift in approach. The original goals in relation to long-term homelessness were extended, with targets to effectively eliminate long-term homelessness by 2015 and to make the use of social rented stock more efficiently to achieve that end. Housing First remained integral, but was one of an array of service models being used.

Importantly, Paavo II was clearly focused on homelessness prevention. Housing advice services and other preventative services had been in place for some time, but were now expanded. In 2012-2013, 280 evictions were prevented in Helsinki (Pleace *et al.*, 2015).

Paavo II was also notable in focusing on ‘hidden’ forms of homelessness, i.e. those living temporarily and insecurely with friends, acquaintances and family, because they had no home of their own. In Finland, these populations are defined and counted as being homeless, reflecting the ETHOS Light typology (Edgar *et al.*, 2007; Busch-Geertsema, 2014).

It is worth reemphasizing the strategic shift that had occurred in Finland. Paavo I focused on long-term homelessness. Paavo II continued the work undertaken under Paavo I, but was focused on homelessness prevention and hidden homelessness and incorporated new forms of service development. Finland placed Housing First at the forefront of Paavo I, but now Housing First, focused on long-term homelessness, was one aspect of a much broader strategic response to homelessness.

Long-term homelessness continued to fall according to the annual counts, which recorded 2628 long-term homeless people in 2012 and 2047 in 2016, a drop of 23%. Falls in long-term homelessness were reported year-on-year between 2013 and 2015 (source: ARA <http://www.ara.fi/en-US>).

Overall levels of homelessness also fell in the context of rising levels of homelessness almost everywhere else in Europe (Foundation Abbé Pierre/FEANTSA, 2017). In 2012, 7850 lone homeless people and 450 families were reported as homeless in the annual count; in 2016, the levels were 6684 lone homeless people and 325 families (source: ARA <http://www.ara.fi/en-US>).

Available data suggested 400 people had experienced recurrent homelessness, i.e. become homeless again after receiving a service, between 2012 and 2015, again suggesting low levels of attrition were being achieved by homelessness services. Estimates from a follow-up survey were that 5-10% of homeless people would experience recurrent homelessness from existing services (Ympäristöministeriö, 2016).

An international review of the Finnish National Homelessness Strategy, which involved academics from Finland, Sweden, the UK and the USA, reported that as at the end of 2015, the strategy was a success. Finland contrasted very positively with the policies and strategies employed in Sweden, the UK and the USA, through successful use of Housing First within an array of services to tackle long-term homelessness and through emphasising homelessness prevention and hidden homelessness (Pleace *et al.*, 2015).

Finland had not achieved a state of zero homelessness at the end of 2015. Levels of homelessness have been brought down, from something close to those experienced in Sweden, to the lower levels of homelessness in Denmark and Norway (Benjaminsen and Knutagård, 2016). The most recent Norwegian data, from the 2016 homelessness survey, also show a decline in homelessness, a 36% reduction reported between 2012 and 2016, (Norway Today, 2017). Denmark, by contrast, experienced increases in homelessness between 2009-2015 (Foundation Abbé Pierre/FEANTSA, 2017). Total homelessness in Finland fell by 16% between 2012-2016, at a faster rate for lone adults than for families (source: ARA, <http://www.ara.fi/en-US>).

While Finland does not have uniquely low levels of homelessness, it is clear that a great deal has been achieved in a short space of time. Paavo I and II have brought levels of homelessness down, particularly in relation to long-term homelessness among adults with complex needs and increased the level of homelessness prevention (Pleace *et al.*, 2015 and see <http://www.ara.fi/en-US>).

The extremes of homelessness, people living rough and in emergency shelters, are being dealt with. However, Finland is still wrestling with the issues of hidden homelessness and migrant homelessness.

The concept of hidden homelessness is not universally accepted, because for some European policy makers and researchers, the situation of an individual, couple or family staying with someone because they have nowhere else to go, is an issue of overcrowding and inadequate housing supply, not one of homelessness (Busch-Geertsema *et al.*, 2014). By some measures, for example, if homelessness is defined as only meaning people living rough and in emergency accommodation, Finland effectively has almost no homelessness whatsoever.

Yet, the Finns define hidden homelessness as part of the problem and, by that measure, there is still some work to do. In 2016, ARA reported that 82% of what the Finns define as lone homeless adults in Finland were living temporarily with friends or relatives. This included the bulk of the remaining long-term homeless population (1 554 people out of 2 047 lone long-term homeless people recorded, 76%, were living temporarily with family or friends) (source: ARA <http://www.ara.fi/en-US>). Most family homelessness was also hidden homelessness (Pleace *et al.*, 2015).

The dilemmas around migrant homelessness are those faced by most of the more economically prosperous parts of Europe. In Finland, as in other EU Member States, humanitarian concerns must be balanced against both popular politics and practical considerations in respect of border control. The issues in relation to asylum seekers, economic migrants from outside the EU and economic migrants from within the EU all being to some extent distinct. Here, Finland is faced with complex questions that are not easily or quickly addressed (see Pleace *et al.*, 2015 for more discussion on migrant homelessness in Finland).

The successes in Paavo I and II flowed from developing a political consensus, coordination of local, regional and national policy, and bringing together all the key organisations. Building agreements was as important as the pursuit of specific innovations, including various housing-led and Housing First service models and innovation in, and intensification of, preventative services.

Equally importantly, Finland did not attempt to bring an end to homelessness without thinking about housing supply. The international review also highlighted the Finnish strategy as incorporating a clear role for social housing which incorporated an expansion in supply. By contrast, Sweden, the UK and the USA were all attempting responses to homelessness that paid relatively little attention to obvious gaps in supplies of affordable, adequate housing which offered reasonable security of tenure (Pleace *et al.*, 2015; Pleace *et al.*, 2016).

The Action Plan for Preventing Homelessness in Finland 2016-2019

The Action Plan builds on Paavo I and II and also draws on the results of the 2015 international review (Pleace *et al.*, 2015). The Action Plan reports that Finnish housing, social, health care and employment services, as constituted in 2016, did not allow for the early identification and prevention of homelessness. A multidisciplinary plan, developed in tandem with a strategy to further increase affordable housing supply, including 2 500 new housing units (ordinary and supported housing), is the next step being taken to prevent and reduce homelessness (Ympäristöministeriö, 2016). Other issues highlighted in the Action Plan are:

- Gender
- Youth homelessness
- Migrant homelessness

Women's experience of homelessness is also mentioned in the Action Plan. This is an issue of growing concern across Europe as evidence mounts that definitions that exclude hidden homelessness have led to systemic underestimation of the extent of female homelessness and a consequent neglect of gender issues, both in terms of policy and service design, and also in terms of research (Mayock and Bretherton, 2016). ARA reported that 23% of lone homeless people in the 2016 homelessness count were women (source: ARA <http://www.ara.fi/en-US>).

Migrant homelessness is defined in terms of those people who have been given residence permits in Finland, i.e. it is homelessness among migrant people given leave to remain in Finland. As the Action Plan notes, youth and family homelessness are disproportionately experienced by migrants. There are specific measures in respect of both migrant, family and youth homelessness within the Action Plan (Ympäristöministeriö, 2016).

The Action Plan links to a broader strategy around socioeconomic exclusion based on what is described as the Housing First principle. As the Action Plan notes:

In practice, this means ensuring that housing is secured whenever the client is met in the service system. The target group of the programme includes people who have recently become homeless and those who have been homeless for longer periods, as well as people at risk of becoming homeless, such as young people or families overburdened by debt or at risk of eviction, some of the young people leaving their childhood home for independent life, people undergoing mental health rehabilitation and substance abuse rehabilitation clients transitioning from institutions to independent living, child welfare after-care service clients and some of the young people whose child welfare after-care ends when



they become 21, asylum seekers who have received a residence permit but have failed to integrate, as well as homeless released prisoners or prisoners going on parole (Ympäristöministeriö, 2016, p.3).

The range of homelessness identified, within a broad strategy to provide housing as quickly as possible, illustrates that the Action Plan is highly ambitious. The Action Plan is the third element in an ongoing strategic programme, begun with Paavo I and II, designed to effectively eradicate all forms of homelessness from an entire society.

Known triggers and risk factors for homelessness are counteracted by a comprehensive preventative strategy, while a second tier of innovative services, including Housing First, minimise recurrent and sustained homelessness. The budget was announced as €78 million, of which €24 million was service development, the remainder being focused on housing supply (Ympäristöministeriö, 2016).

Integration and joint working across social work, health, welfare, employment and social housing services is highlighted as a means to identify and target potential homelessness, with encouragement at national level to develop best practice locally, which can then be shared. The Action Plan is not specific about what this means, but innovations around the development of housing 'social work' services which provide a package of support to potentially homeless people, were already well underway under Paavo II, and were described as a key element in future strategic planning (Pleace *et al.*, 2015).

The Action Plan draws on research in Finland indicating that cost savings can be generated by homelessness prevention and by ending long-term homelessness. Rather than using these savings to lessen public expenditure on homelessness – which is very much the agenda in countries like the UK or USA – the Action Plan requires any savings to be invested in expansion of preventative services (Ympäristöministeriö, 2016). The emphasis on actually delivering an end to homelessness, evidenced in the spending on increasing suitable housing supply, is again shown by the decision to reinvest any efficiency savings from the Action Plan into further efforts to reduce homelessness.

The Action Plan presents a considerable number of specific objectives, beginning with the development of 2500 new housing units, concentrated on Helsinki but also extending to other cities and specific provisions for developing housing units for young people. The Action Plan also notes an intention to build housing for asylum seekers with residence permits and develop support systems designed to ensure transitions between reception centres and housing do not raise the potential risk of migrants – with residence permits – becoming homeless.

Cities participating in the Action Plan are required to have a strategy in place by 2017, including preventative services, the use of affordable housing stock and plans for the use of Housing First and other support services. It is noted that services will need to include what are termed 'location-specific special measures' to prevent homelessness and recurrent homelessness, which means cities' plans should reflect any local issues and challenges (Ympäristöministeriö, 2016).

There is a broad emphasis on strengthening and extending 'housing guidance' (the Finnish term for housing advice services), including making housing guidance available to low threshold services, which are designed to be accessible to groups like vulnerable young people, who may be intimidated or find it challenging to seek help from mainstream services. There will also be a focus on preventing eviction, with a specific concern to prevent eviction among younger people (aged under 25) and the use of 'Pienlaina', which are small loans, intended to prevent low-income households being overwhelmed by debt. This will work in combination with existing social lending by the municipalities, enabling debt management to prevent eviction for financial reasons. The Action plan also includes a commitment to explore improving interagency working between mainstream agencies, including debt recovery and welfare agencies, again with an emphasis on preventing eviction (Ympäristöministeriö, 2016).

A history of rent arrears, where debts are comparatively minor and a repayment plan is in place, should not be a barrier to accessing housing, according to the Action Plan, with new agreements and working arrangements being put in place. A new project, 'Riskivakuutus' (risk insurance), led by the Ministry of the Environment, will enable provision of cover similar to household insurance, for people who have lost their credit rating.

There are a range of measures specifically targeted on preventing homelessness among young people, including housing guidance, the specific support around eviction just mentioned and the provision of integrated support services. Services to prevent homelessness among asylum seekers with a residence permit and quota refugees are to be enhanced, with transitions to independent housing being facilitated by support services. There will also be provision of help and support with managing independent living, including supporting young people and migrants with residence permits to live independently in their own housing (Ympäristöministeriö, 2016).

In relation to recurrent and sustained homelessness, reforms to mental health, substance abuse and social welfare laws and practices are intended to enhance joint working. This is intended to promote 'seamless' coordination between drug/alcohol, mental health, housing and housing guidance services. Alongside this, 'at risk' groups, transitioning from institutional settings such as long-stay hospitals,

psychiatric wards and facilities and prison, will be managed through a combination of social worker and peer worker support. Although Finland is a country in which harm-reduction services are in the mainstream of provision, the Action Plan nevertheless requires comprehensive availability of services that follow Housing First principles in relation to drugs and alcohol. Specifically, this refers to extending these services outside the Helsinki metropolitan area (Ympäristöministeriö, 2016).

Education and employment services focused on formerly homeless people, including provision of work-related and 'meaningful' activities (an example would be using art-based projects as a means of learning about structure and working with others), will also be promoted. This is another dimension of the broad emphasis on multidisciplinary joint working across the Action Plan.

As noted, the Finnish Government estimates an attrition rate of between 5-10% from existing homelessness services, i.e. up to 10% of people having contact with current services, may not exit homelessness on a sustainable basis (Ympäristöministeriö, 2016). The importance of interagency working and a multidisciplinary response is also noted, including an ACT team, which is active in Helsinki.

Other innovations include the 'pienet tuvat', which is not described in detail, but appears to mirror the Danish Skaeve Huse model (Meert, 2005). Skaeve Huse, represents an alternative to models like scattered-site Housing First, providing a permanent, small, congregate home, with on-site staffing, which may suit the 10%-20% of homeless people with high and complex needs, for whom Housing First can be unsuccessful (Pleace, 2016). An emergency accommodation service for young people in Helsinki that will triage young people into appropriate support and housing services is also being developed.

Experts by experience, i.e. people who were formerly homeless, feature quite heavily in the Action Plan. Their roles include consultation about how services should be designed and run, through to direct provision of services as peer support workers. This incorporation of service user representation is widespread in the delivery of health and social services, in some economically developed countries (Ympäristöministeriö, 2016).

As with earlier stages of the strategy, delivery is based on a series of formal agreements between the cities, municipalities and various governmental, quasi-governmental and non-governmental agencies. These agreements spell out what is required from each party, ensuring there is clear involvement from the required parties and that there is consistency across Finland. There is some reorientation of services, not least in respect of collaborative working to deliver better homeless-

ness prevention. The Action Plan spells out which agencies are involved in each aspect of this phase of the homelessness strategy, including the lead agency or agencies in each aspect of service planning and delivery.

Strengths, Challenges and Key Lessons

Clearly, the Action Plan is being introduced by a prosperous society, with relatively low levels of housing stress, and a relatively small homelessness problem. This is not to suggest there are not challenges; there can be shortages of affordable housing supply and there is still a homelessness problem. However, Finland is approaching a point where the overall level of homelessness and the rates of recurrent and long term homeless are becoming very low.

Achieving what is sometimes called 'functional zero' in homelessness is a relative concept. This is because definitions of homelessness vary and in the Finnish case, the persistence of 'homelessness' is, in part, because Finland includes concealed or hidden homelessness as part of the problem. As noted, by some other definitions, such as when homelessness is regarded only as people living rough and in emergency accommodation, Finland has almost no homelessness. Progress in tackling Finnish homelessness is being tested against a higher target than is used in some other European countries.

From an external perspective, the most striking aspects of the Finnish strategy are the ambition and breadth of the approach being taken. A key point here, which again relates to the debates about Finnish use of Housing First, is that the Finnish strategy is not a 'Housing First' strategy; it is an integrated strategy. The strategy began with a focus on long-term homelessness, but has broadened into a systematic attempt to prevent homelessness and to reduce hidden homelessness.

Another point, which has not been discussed thus far, is the openness to ideas that characterises the strategy. Finland consulted with experts across the world about how to tackle long term homelessness, involved Sam Tsemberis in discussions of Housing First, and continues to interact with the wider world. When the impact of Paavo I and II was evaluated, three of the four academics involved were brought in from outside Finland (Pleace *et al.*, 2015).

The Action Plan does not presume homelessness is structural, or individual; instead, it attempts to make provision for every type of homelessness. There is as much emphasis on homelessness caused by low income and debt – and nothing else – as there is on homelessness associated with being a former offender, or homelessness associated with a mix of complex drug, alcohol and mental health

needs. Preventative services range from quite simple systems designed to stop eviction linked to debt and low incomes, through to social work and peer support targeted on specific, high-need, groups like vulnerable young people.

The Action Plan clearly incorporates primary, secondary and tertiary prevention (Busch-Geertsema and Fitzpatrick, 2008). Primary prevention centres on general housing policy, welfare safety nets and health and other services, i.e. on public services for the entire population that should – at least in theory – stop someone becoming homeless because they have no money, or because they develop a support or treatment need like a mental health problem. If these systems are working properly – which they appear to be in Finland – the inflow into homelessness will be less than countries where these services are limited, dysfunctional or not provided. Secondary prevention is focused on high-risk groups, ranging from those with high support needs through to those facing homelessness due to eviction or relationship breakdown, while tertiary prevention is essentially focused on stopping recurrent homelessness.

The Action Plan reflects much of the state of the art in terms of the understanding it shows of homelessness and in what is effective in ending homelessness (O’Sullivan, 2008; Busch-Geertsema *et al.*, 2010; Lee *et al.*, 2010). In many senses, Finland is the example that should be referred to when considering how to tackle homelessness at the strategic level.

It is important to note that the Action Plan is still in the process of implementation, which will not be complete until 2019. The Action Plan is not described as the final stage in the strategy (although homelessness is becoming very low), and the Finns may introduce a new action plan, from 2020 onwards, if thought necessary to complete the homelessness strategy.

The Action Plan is not, of course, perfect, any more than the Finnish strategy is perfect. Finnish achievements are not unique in the context of Scandinavia, although it is arguable that the emphasis and speed with which homelessness is being attacked since the advent of Paavo I, may be unique.

In considering the limitations, one point, which is carried over from the international review of Paavo I and Paavo II, relates to the nature and extent of data on homelessness in Finland and the recording of service activity and outcomes (Pleace *et al.*, 2015). Finland has a strategic overview of homelessness from its annual count, providing sufficient data from which to plan the interventions in Paavo I and Paavo II. The scale of long-term/recurrent homelessness, shown in the count, was a driver for restructuring homelessness services around tackling long-term homelessness, in much the same way as evidence of ‘chronic’ homelessness fuelled the development of Housing First in the USA (Pleace, 2011).

Yet the Finnish data are not yet all they could be. In part, this is because of the inherent problems with PIT methodology and due to some of the data being estimated, but also because those data are not very fine grained. There are clear benefits in being able to combine administrative data and track patterns of service use, service outcomes and the characteristics of potentially homeless and homeless people at national scale. Service and strategic level effectiveness, alongside the costs of homelessness and the potential cost benefits of homelessness prevention and ending long-term/recurrent homelessness, are best understood by tracking people using those services over time, to ensure everything is working and that exits from homelessness are sustained. The benefits of data merging and longitudinal tracking are evident in the US and, particularly, Denmark (Benjaminsen and Andrade, 2015).

One, rather obvious, point is that there may be more homelessness, or a greater experience of homelessness than the Finns realise, because data are PIT-based rather than derived from longitudinal monitoring. In terms of the other, largely qualitative, evidence around levels of homelessness in Finland, this seems unlikely, but the Finnish data are not as accurate as they could be.

There is not a single approach to data collection and analysis that provides a perfect solution. Being able to 'flag' homeless people as they use services is clearly very useful in terms of understanding the patterns and costs of homelessness, and also in terms of fine-tuning the targeting of preventative and homelessness services. Equally, sharing data across homelessness services themselves, so that there is a picture of who is using prevention, Housing First and other services, how often and with what outcomes, clearly facilitates planning and targeting.

However, such data are not perfect, there are homeless populations who are not in touch with homelessness services, nor necessarily engaging with welfare, health or other publicly funded systems. Recent American research has highlighted the risk in reading too much into administrative data on service use by homeless people, as that homeless population may not be the whole population (Metraux *et al.*, 2016). This shows the value in the Danish practice of combining administrative and survey data on homelessness (Benjaminsen, 2016), which may be one way forward for Finland. Data on patterns of service use are of considerable potential use as Finland attempts to further integrate service responses to homelessness, which is a central element of the Action Plan.

A criticism that can be directed at some homelessness strategies, services and policies is their reliance on assumptions about the nature of homelessness. Linear residential treatment or staircase services are posited on the idea that homeless people have a shared pathology that is the cause of their homelessness. The

staircase model presumes a standardised process of behavioural correction and treatment compliance, to make someone 'housing ready', is required, because it has operational assumptions about the nature of homelessness.

Failure in staircase services is relative, there are successes, but there is also clear evidence that such services do not end homelessness at the same rate as Housing First and similar services. The relatively poorer performance of staircase models appears linked to this presumption that each homeless person has broadly the same characteristics and that they have to be required to reorient themselves and/or comply with treatment in set ways. Housing First and related services, by contrast, deliver a bespoke service centred on understanding individual needs and following individual preferences (Pleace and Bretherton, 2013). This seems to be the reason why Housing First is markedly more effective at ending homelessness than staircase services, albeit that the evidence is less conclusive in respect of other outcomes, such as health and social integration (Quilgars and Pleace, 2016; Somers *et al.*, 2017). One caveat to note here, is that is a behavioural modification element, a recovery orientation, within some North American models of Housing First, which also seeks to promote behavioural change, albeit in a quite different way from staircase services (Hansen-Löfstrand and Juhila, 2012).

Oversimplifications about homelessness arise from data limitations and from cultural, historical and ideological images of who homeless people are. Part of the reason why some homelessness services have met with limited success in the past, and why research has sometimes missed the true nature of homelessness, is because a mishmash of partial data, ideology and culture – a false, or at best only partially accurate, construct of 'homelessness' – has been wrongly assumed to be an accurate picture of homelessness.

This relates to the Action Plan in the sense that, where data are patchy or not complete, the Action Plan does sometimes lapse into using quite broad assumptions about homeless populations. There is sometimes a tendency to assume 'clusters' of similar homeless people exist, when they may not, and occasional ascribing of presumed characteristics to certain groups. The brief discussion of gender is the strongest example of where this happens:

The work on homelessness supports gender equality and taking the special needs of both women and men into account. Home and its environment are usually understood in different ways in the experiences of women and men. Women clients, on one hand, need and value in particular one-to-one conversations, support in learning everyday life and domestic skills, and taking advantage of the competences and talents obscured by the[ir] problems. Men, on the other hand, emphasise the importance of offering work activities and activities with a low threshold as a part of housing services (Ympäristöministeriö, 2016, p.3).

There are a couple of issues here. The evidence base that is available indicates that three key issues are: that the causation of women's homelessness is strongly linked to male (domestic) violence, that family homelessness is highly gendered (disproportionately experienced by younger lone women parents with dependent children) and that women tend to seek shelter from relatives, friends and acquaintances when they become homeless. Women may avoid homelessness services and only use them when informal options have been exhausted. Hidden female homelessness may also be sustained and recurrent, with a high human cost for the women experiencing it (Mayock and Bretherton, 2016). The Action Plan does not, at present, reflect this kind of evidence, appearing to assume differences exist that are linked to traditional gender roles, women are identified as needing to learn about 'domestic skills', while men are linked to needing to learn 'work activities'. In reality, meeting the needs of homeless women is likely to involve understanding of the needs that arise from experiencing domestic violence and in understanding and responding to women's broad tendency to take particular trajectories through homelessness, i.e. relying on friends, relatives and acquaintances to a higher degree than formal services.

It is worth asking whether all the needs identified in the Action Plan do exist in quite the way they are presumed to. It may be that low- and no-need groups, whose homelessness or potential homelessness is related to low income and debt, and the high-need groups, in which morbidity rates of severe mental illness and problematic drug/alcohol use are high, are much more significant than whether someone is young, or an ex-offender. Of course, the need for distinct services may well be there, but before creating anything new, or expanding existing provision, it is important to be clear that doing something distinct for a specific population is necessary. Equally, as with gender, where there is evidence that distinct patterns exist – for example, women will need support around gender-based/domestic violence at far higher rates than men to avoid and exit homelessness – it is vital that the right services are in place.

No one data source can answer every question, administrative data can be invaluable in understanding pathways through services and barriers to services, but it does not cover those homeless people who do not engage with services, which can include women and young people experiencing hidden homelessness, as well as groups like long-term rough sleepers or squatters. Surveys can answer some of those questions, but again there are limits to what can be achieved. However, as the Danish example shows us, while no data source is entirely reliable, it is possible to arrive at a very detailed understanding of the nature of homelessness and the needs of the people who experience homelessness (Benjaminsen, 2016).

Levelling this criticism feels a little harsh in the light of what has been achieved in Finland. The criticism is also made in the knowledge that work is ongoing in respect of service and strategic development; the Action Plan is a work in process, being adapted and refined as it is implemented. There is oversimplification about gender in the Action Plan, but during the time this paper was being written, the author was contacted by Finns seeking to learn about the UK's experience of developing and delivering services for homeless women.

The other area for potential criticism is the use of experts by experience. Again, this is a question of precision, about what consumer choice, co-production or asset or strength-based service design mean in practice. Involving experts by experience raises questions about who those people are, how representative they are, how many of them should be involved and on what basis. Clearly, there is evidence, not least from Housing First, that the more choice and control homeless people have, the more effective services tend to be, at least in terms of reducing experience of homelessness, even if the evidence is still a little ambiguous in terms of other outcomes (Quilgars and Pleace, 2016). However, the practicalities of implementation, i.e. what this involvement means and what it can deliver, need to be carefully planned. Housing First, which includes elements of peer support, has been interpreted as a user-led model, with formerly homeless people delivering support, but it has also been implemented as a service that just consults with homeless people (Pleace, 2016).

Again, making this criticism does feel a little harsh, in this instance because the meaning and nature of strength-based and consumer-led homelessness services – and indeed the use of experts by experience in homelessness strategies – is arguably not very clearly defined anywhere. The intention to involve homeless people is both laudable, because it recognises both the validity of their opinions and their status as citizens, and practical, because there is evidence that enhancing the power of service users improves homelessness services. The Action Plan could, however, be more detailed in its consideration of what involving experts by experience means in practice.

Finally, there is the question of what other countries can learn from Finland. Clearly, Finland has made a considerable investment available and there are questions about how transferrable this kind of approach is in practice to some of the poorer European countries. Finland also has a level of investment in social housing, both in a financial and also political sense, that is not widespread in Europe.

The evidence is not conclusive, but there are data indicating that where welfare systems and social housing are well developed, homelessness levels are lower. In practice, what this may mean is that Finland has been dealing with a particular sort of homelessness problem, i.e. a relatively small population containing high rates of complex needs, which may not exist in countries without equivalent levels of social

protection. To put this another way, Finland could be seen as having an 'easier' (or at least smaller) target in respect of tackling homelessness, because its welfare, health and housing systems, in and of themselves, already stop a lot of potential homelessness (Benjaminsen and Andrade, 2015).

So what can we learn from Finland? Yes, Finland may be comparatively rich, yes its welfare and housing systems may stop a lot of potential homelessness from happening and yes, it is not without parallel when you contrast it with wider Scandinavian experience. However, two points can be made here. The first is that Finland has gone further and faster in tackling homelessness than equally, or more, prosperous European countries. Look at French, German or Swedish homelessness policy, or that of the UK, or indeed the experience of America, and they do not compare well with Finland (Pleace *et al.*, 2015; Foundation Abbé Pierre/FEANTSA, 2017). The second point is that the strategy borders on being audacious, Finland has pursued a hugely ambitious response to homelessness, and that ambition is paying off.

The Action Plan represents further refinement and expansion of a successful strategy, a strategy that has been thought through, that has considered local and global evidence, drawn on experience and recognised the need for political and interagency coordination. It is also a homelessness strategy that is broadly defined, tackling all aspects of homelessness and, perhaps crucially, which does not neglect the essential role of housing supply. Finland is dealing with homelessness and there is every reason to expect that levels will continue to fall during the course of the Action Plan. The key lesson for Europe, as a whole, is that homelessness can be stopped.

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