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European Observatory on Homelessness

Social Housing Allocation and Homelessness

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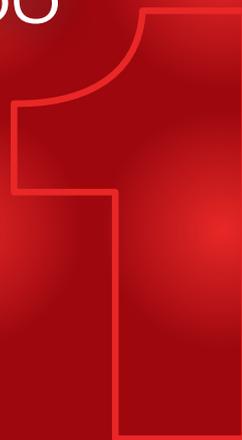
EOH Comparative Studies on Homelessness

Brussels – December 2011

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FEANTSA

Content

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1. Foreword

This research provides an interesting insight into the different housing allocation mechanisms employed by social housing providers across the European Union. It is important to have a better and more factual understanding of the role of social housing providers in the fight against homelessness and severe housing exclusion at a moment when the social housing sector is under pressure to clarify and justify its mission in terms of public interest.

There is increasing scientific evidence that rapid access to housing is a key determinant for the successful inclusion of homeless people in society. Many countries are currently experimenting with Housing First and Housing Led policies to address homelessness. In order to upscale and mainstream these policies, sufficient housing will have to be found for the several hundreds of thousands of people who are currently homeless in the European Union.

There is some room to encourage the private rental sector to take a more active part in the fight against homelessness in return for the considerable financial incentives the State makes available for private landlords. It is clear, however, that the most feasible and practical housing solution for homeless people is often to be found in the social housing sector.

Allocation mechanisms that are based on the urgency of the applicant's housing need are the easiest and most straightforward way for social housing providers to reach out to homeless people. However, this is not considered to be a key selection criterion in most countries; this inevitably leads, almost everywhere, to an enduring or aggravated homelessness problem managed by the shelter sector.

A better operational context must be developed to enable social housing providers to target homeless applicants more efficiently. Considerable public investment is required to increase rapidly the social housing stock, and social support has to be made available to enable homeless people to sustain their tenancies.

Research shows that targeting homeless people through allocation mechanisms is both possible and effective. Research also shows that the broader and more flexible the allocation mechanism is, the less likely homeless people are to access social housing. The social mission and good will of social housing providers seem not to be sufficient guarantee for homeless people. Our (subjective) reading of the research shows that, in spite of the difficult context, the social housing sector can do a bit more to help solve the problem of homelessness.

FEANTSA is working closely with CECODHAS (European federation of social housing providers) on the issue of homelessness at the European level. Both organisations believe that access to decent and affordable housing is a fundamental right for all, including for homeless people. We are confident that this research will further nourish our fruitful cooperation with CECODHAS.

We will encourage our members and partners to read and use this important piece of research.

Rina Beers
President of FEANTSA

2. Summary

Thirteen expert respondents were asked to complete a questionnaire on access to social housing for homeless people in their country. The questionnaire was distributed to experts in social housing and homelessness in Belgium (focusing specifically on Flanders), Bulgaria, the Czech Republic, Finland, France, Germany, Ireland, the Netherlands, Poland, Portugal, Sweden, Spain and the UK.

Social housing has been used to address a wide variety of housing needs. It was developed in some cases to tackle a perceived housing market failure by increasing the availability of affordable and adequate housing, although it has also been used as a tool to enhance labour mobility, and in urban planning in attempts to regenerate deprived urban space or replace shanty towns. Alongside these roles, social housing has often been used as a means to improve the housing situation of some of the poorest households and, to varying degrees, as a means to address some forms of homelessness.

This research was undertaken to understand better the role that social housing plays in responding to homelessness across the EU. The research was intended to look at how social housing providers, who are often seeking to meet various competing needs for social housing, respond to homelessness. The research was also intended to explore the extent to which barriers to social housing might exist for homeless people, and to explore the ways in which social housing might play a larger role in tackling homelessness by looking at practice in the 13 countries included in the study.

The research found that social housing meets the housing needs of homeless people in the 13 countries only partially. There were six main reasons for this:

- Low availability of suitable social housing relative to general housing need in the countries surveyed; social housing was not always viewed positively by policymakers, and there had been sustained reductions in social housing investment in several countries.

- The expectation that social housing fulfils multiple roles, such as meeting general housing need and facilitating urban regeneration, which creates competing needs for social housing.

• Allocation systems for social housing did not prioritise some forms of homeless-ness, concentrating instead on other forms of housing need. Social housing providers often avoided housing certain groups, to which homeless people sometimes belonged, including people with a history of rent arrears or nuisance behaviour, people with a criminal record, and people with high support needs.

• Barriers to social housing existed that were closely linked to how homeless people were perceived, particularly the view that homeless people would be 'difficult' tenants that would create high housing management costs.

• Tensions existed in some countries between a housing policy imperative for social housing providers to house poorer households (including homeless people), and an urban policy concern with avoiding spatial concentrations of poverty. This sometimes led to the restricted allocation of social housing to homeless people on the basis that they were poor and often faced sustained worklessness.

• A lack of policy coordination between different agencies restricted access to social housing for homeless people in some cases.

In some countries, the social housing stock was relatively small and could only play a restricted role in tackling housing need, including homelessness. In several countries, new investment in social housing had already decreased prior to the current recession, and the economic decline since 2008 had made the situation worse. While pressure on social housing was not uniform, demand for social housing was often significantly higher than the supply.

Social housing was often expected to fulfil multiple roles; in many countries, it played a part in addressing general housing need, meeting housing need among specific groups of people, and in policies centred on urban regeneration. In most countries, social housing was expected to have a specific role in ending at least *some* forms of homelessness, but this role often had to be balanced against other demands on often-limited resources, such as meeting general housing need.

Allocation systems for social housing tended to prioritise access for poorer house-holds and to some extent for households with children, though this pattern was not universal; in some countries, such as Germany, the Netherlands and Sweden, social housing was also intended to be accessible to employed people. Most social housing allocation systems tended to prioritise at least some groups of people who were homeless, but they were also selective and tended not to prioritise certain homeless groups, such as people living rough. In addition, allocation systems tended to exclude people with a history of being problematic social housing tenants or with a history of rent arrears, or those who were perceived as likely to cause housing management problems for social housing providers. Homeless people that fell into these categories were likely to have their access to social housing blocked.

The research found that social housing providers could be resistant to housing homeless households because homeless people were *perceived* as having certain characteristics; the view was sometimes taken that homeless people were likely to be 'difficult' tenants that would create housing management problems because they were considered more likely to cause nuisance or fail to pay their rent. For some social housing providers, dependent in whole or in part on banks and venture capital to develop new social housing, there was also a concern with showing investors that their investment was 'safe', which meant housing tenants who could be relied on to pay their rent and not cause high management costs because of nuisance behaviour.

In the most economically prosperous countries, social housing allocation often reflected a policy concern that a concentration of formerly homeless people in social housing estates should be avoided. This was linked to a wider policy and housing management concern that neighbourhoods in which large numbers of poor and unemployed people were concentrated could develop a culture where unemployment, drug use and crime were seen as socially normal. Some respondents were concerned that social housing providers could use this policy as a 'smokescreen'; for example, where a social housing provider did not want to house a homeless person whom they considered a potentially difficult tenant, they could argue that housing was being refused on the basis of trying to avoid negative area effects.

There was variation in the extent to which social housing was a part of strategic responses to homelessness. Not all countries had strategies to tackle all forms of homelessness, which in turn meant that social housing had no clear policy-level role in tackling some forms of homelessness. In some cases, coordination at service delivery level was also inadequate, with sometimes poor links between social housing providers and health and social care services. Where interagency coordination was poor, social housing providers could be reluctant to house homeless people with high support needs.

A major finding of the research was the extent to which there was disconnection between social housing policy, allocation systems, and planning and policy responses to homelessness. There were widespread barriers to social housing for homeless people across countries with radically different policy responses to homelessness, welfare systems and levels of general welfare spending.

In looking at the role of social housing in tackling homelessness it is important both to be realistic and to take into account the wider context in which social housing providers operate. Social housing providers often have very limited resources with which to meet a range of competing housing needs. Housing needs vary by location, which means that, for practical reasons, the prioritisation of housing need

is often handled mainly at the local level or at the discretion of social housing providers; as such, detailed strategic planning for social housing is often at the level of an individual municipality or city, or in some cases at regional level.

There can be surpluses in the social housing supply in some areas, and there are various means by which those in need of housing can be moved to where such surpluses exist. However, this is often in areas facing sustained economic decline, i.e. where there is low demand for social housing because of very high levels of worklessness and social problems associated with poverty.

In countries with a small social housing stock, expecting the social housing sector to deliver a large-scale response to homelessness is not practical. In countries with a larger social housing sector, the pressures on social housing services to respond to general housing need or urban policy priorities are still likely to be considerable, meaning that homelessness can be competing against other priorities.

However, while it is important to be realistic, the social housing sector still represents a major housing resource in many EU member states. Equitable and sufficient access to social housing for homeless people is an important component of any effective, integrated policy response to ending homelessness.

In countries with a larger social housing stock, even a marginal increase in the use of social housing for homeless people could make a major positive contribution to tackling homelessness. More generally, any increase, however small, in the adequate and affordable housing options available to homeless people, one of which can be social housing, is desirable.

This research suggests that various steps might be taken to enhance access to social housing for homeless people. These include:

- Modification of allocation systems to ensure that homeless people have more equitable access to social housing alongside other groups in housing need, and indeed, there are compelling arguments for enhancing the access of homeless people to social housing relative to other groups in housing need.

- Explore how to counteract the general shortage of social housing relative to housing need that was reported across all countries. In addition to creating a barrier to homeless people, a restricted supply of social housing also limits the capacity of the sector to respond to a wider range of housing needs. These issues of supply are very difficult to address in a situation of deep and ongoing fiscal constraint. However, measures such as making better use of existing social housing, facilitating social housing development in some planning systems, and a better coordination of demand side housing allowance schemes in general could help.

- Promoting awareness of homelessness and the fact that it exists in several forms among social housing providers would help to enhance access. If it is made clear that many homeless people have relatively low support needs and require little more than adequate, affordable housing, the cultural and perceptual barriers to social housing that exist for many homeless people could be reduced.

- Coordination of housing support services, social care, and health services may be essential if a formerly or potentially homeless person is to sustain a social housing tenancy successfully.

- It is not reasonable to expect social housing providers who manage ordinary social rented housing to work with those homeless people who have high support needs without assistance. High quality housing support services should enable such homeless people to live in social housing and address the concerns of social housing providers about housing them. Examples of effective housing support services include various Housing First and Housing Led models.

- Homeless people can find access to social housing blocked because a social housing provider is trying to avoid perceived negative area effects associated with spatial concentrations of poverty. In the most economically developed areas of the EU, there is a policy tension between the expectation that social housing providers will house people characterised by sustained worklessness and an urban policy imperative to avoid further spatial concentration of poverty. It is also important that social housing providers are not permitted to hide decisions not to house homeless people that are based on expectations of their being difficult tenants behind policies on area effects. Policies that seek to address negative area effects without preventing the housing of poorer households in social housing can also be explored.

- The private rented sector, where landlords are subject to regulation and inspection to ensure that minimum standards are met and housing rights are protected, may sometimes be a better option for homeless people where social housing is limited, unsuitable in design, in poor condition and/or very difficult to access. Social housing may not always be the best or only way to meet a homeless person's needs; there is evidence that a minority of homeless people with high levels of support need can be successfully rehoused in the private rented sector through innovative housing support services, like Housing First models that can also be used in social housing.

3. About the research

This chapter provides an overview of the research. The first section outlines the methodology, the second section describes the focus of the research, and the final section details the key research questions.

3.1 Method

A questionnaire was distributed to social housing experts in Belgium (Flanders), Bulgaria, the Czech Republic, Finland, France, Germany, Ireland, Netherlands, Poland, Portugal, Sweden, Spain and the UK (Map 3.1). Most of the experts were able to answer the questionnaire in English, but translation of the questionnaire and responses was undertaken where necessary. A list of the responding experts is presented in **Appendix 1.**

Map 3.1: The responding countries

The questionnaire method has been used in previous studies on homelessness and social policy. The technique provides a cost efficient means by which to gather directly comparable data across several countries.[1]

3.1.1 Defining homelessness and social housing

Existing research has shown that the terms 'homelessness' and 'social housing' are not necessarily used to mean the same thing in all EU member states.[2] As the terms were therefore likely to have different definitions across the 13 countries, the research team had to ensure that a consistent frame of reference was used in order to undertake a meaningful comparison of responses.

In practice, this meant establishing definitions that could be used as a basis to compare the different countries. The use of standard definitions of homelessness and social housing also provided a reference point against which the national and local definitions could be compared. This in turn enabled a more systematic comparison of how the countries compared with one another in terms of the roles of social housing providers in responding to homelessness. The definitions used in the questionnaire are described below.

3.1.1.1 Defining homelessness using ETHOS

In order to provide a consistent comparison of the different definitions of homelessness used in the 13 countries, the 'ETHOS' typology was used as a common reference point. ETHOS, the European Typology of Homelessness and Housing Exclusion, was launched by FEANTSA in 2005.[3] It is intended to promote a shared understanding and definition of homelessness across the EU, and to provide a common language with which to speak about homelessness. The ETHOS model is based around the idea of what constitutes a home, and draws on physical, social and legal definitions of adequate, safe and secure housing.

The most acute forms of housing need are defined by ETHOS as those in which a household lacks adequate housing across one or more of the physical, legal and/or social domains. The first shortfall in living situation that ETHOS uses is centred on the physical, i.e. a lack of housing or adequate housing. The second shortfall in living situation is a legally insecure situation, which ETHOS defines as restricted

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[1] Fitzpatrick, S. and Stephens, M. (2007) *An International Review of Homelessness and Social Housing Policy* London: Communities and Local Government; Stephens, M.; Fitzpatrick, S.; Elsinga, M.; Steen, G.V. and Chzhen, Y. (2010) *Study on Housing Exclusion: Welfare Policies, Labour Market and Housing Provision* Brussels: European Commission.

[2] Busch-Geertsema, V.; O'Sullivan, E.; Edgar, B. and Pleace, N (2010) *Homelessness and Homeless Policies in Europe: Lessons from Research* Brussels: FEANTSA

[3] http://www.feantsa.org/code/en/pg.asp?page=484

rights or no rights to remain in accommodation. The third shortfall identified by ETHOS is social, i.e. accommodation or a living situation that impairs quality of life because it offers insufficient privacy, physical security or space for social relations within a household (Table 3.1). According to ETHOS, a state of homelessness in which a household's living situation is unacceptable under at least two of the physical, legal and social domains, is defined as either 'roofless' or 'houseless' (Categories 1.1 through to 7.2, Table 3.2).

Table 3.1: The seven theoretical domains of homelessness in ETHOS

Conceptual category		Operational category	Physical domain	Legal domain	Social domain
Homelessness	1	**Rooflessness**	No dwelling (roof)	No legal title to a space for exclusive possession	No private and safe personal space for social relations
	2	**Houselessness**	Has a place to live, fit for habitation	No legal title to a space for exclusive possession	No private and safe personal space for social relations
Housing exclusion	3	**Insecure and inadequate housing**	Has a place to live (not secure and unfit for habitation)	No security of tenure	Has space for social relations
	4	**Inadequate housing and social isolation within a legally occupied dwelling**	Inadequate dwelling (unfit for habitation)	Has legal title and/or security of tenure	No private and safe personal space for social relations
	5	**Inadequate housing (secure tenure)**	Inadequate dwelling (unfit for habitation)	Has legal title and/or security of tenure	Has space for social relations
	6	**Insecure housing (adequate housing)**	Has a place to live	No security of tenure	Has space for social relations
	7	**Social isolation within a secure and adequate context**	Has a place to live	Has legal title and/or security of tenure	No private and safe personal space for social relations

Table 3.2: European Typology of Homelessness and Housing Exclusion (ETHOS)

Situation	Category		Operational category		Living situation
Homeless	Roofless	1	People living rough	1.1	Public space or external space
		2	People staying in a night shelter	2.1	Night shelter
	Houseless	3	People in accommodation for the homeless	3.1	Homeless hostel
				3.2	Temporary accommodation
				3.3	Transitional supported accommodation
		4	People in women's shelters	4.1	Women's shelter accommodation
		5	People in accommodation for immigrants	5.1	Temporary accommodation or reception centre
				5.2	Migrant workers' accommodation
		6	People due to be released from institutions	6.1	Penal institution
				6.2	Medical institution
				6.3	Children's institution or home
		7	People receiving longer-term support (due to homelessness)	7.1	Residential care for older homeless people
				7.2	Supported accommodation for formerly homeless persons
Housing Exclusion	Insecure	8	People living in insecure accommodation	8.1	Temporarily with family or friends
				8.2	No legal (sub)tenancy
				8.3	Illegal occupation of land
		9	People living under threat of eviction	9.1	Legal orders enforced (rented)
				9.2	Repossession orders (owned)
		10	People living under threat of violence	10.1	Police-recorded incidents
	Inadequate	11	People living in temporary or non-conventional structures	11.1	Mobile home
				11.2	Non-conventional building
				11.3	Temporary structure
		12	People living in unfit housing	12.1	Occupied dwelling unfit for habitation
		13	People living in extreme overcrowding	13.1	Highest national norm of overcrowding

The European Consensus Conference on Homelessness, held in Brussels in December 2010, [4] concluded that ETHOS should be adopted across the EU as the standard measure of homelessness, noting that:

> The jury confronts "common sense" definitions of homelessness as rough sleeping and concludes that homelessness is a complex, dynamic and differentiated process with different routes and exits, or "pathways", for different individuals and groups. The jury recommends the adoption of the European

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[4] http://www.feantsa.org/code/en/pg.asp?Page=1301

Typology of Homelessness and Housing Exclusion (ETHOS), which was launched by FEANTSA in 2005 as a common framework definition of home-lessness. ETHOS uses physical, social and legal domains of a "home" to create a broad typology that classifies homeless people according to four main living situations of rooflessness; houselessness; living in insecure housing; and living in inadequate housing.[5]

3.1.1.2   The FEANTSA definition of social housing

This research drew on the FEANTSA definition of social housing to allow consistent comparison across the 13 countries. Social housing, according to the FEANTSA definition, has the following characteristics:

• Addresses housing market failure.

• Targets population groups that cannot arrange for accommodation in the private housing market (ownership or rented).

• Has clear allocation rules.

• Provides housing of adequate and regularly controlled standards.

• Is provided with public subsidies.

• Is provided on a non-profit basis.

• Is monitored by public authorities.

The definition of social housing employed in this research excluded fiscal subsidies that were designed to render housing sold or rented on the free market affordable, i.e. welfare benefits or allowances paid to tenants or landlords; for example, a tenant living in housing provided by a private rented sector landlord and receiving a welfare benefit to help pay their rent was *not defined* as living in social housing, while a tenant in housing that was directly subsidised to reduce the cost of living there, and to which access was governed by an allocation system, *was* defined as living in social housing.

The research excluded purpose-built or -modified accommodation for homeless people that was funded or provided by central governments, municipalities or NGOs, and that was designed solely as a space to deliver support services to homeless people. This included emergency accommodation, staircase services and homeless hostels.

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[5]   http://www.socialinnovationeurope.eu/node/2125

The definition of social housing employed in this research was quite broad. While certain key features were necessary, i.e. direct subsidy of 'bricks and mortar' and an allocation system based on housing need, many different types of social housing have these characteristics; it may be housing that is provided on a permanent or time-limited basis; that is partly or wholly developed through private finance; that is rented or sold at a deliberately limited profit that still makes a return on investment, but which keeps it affordable to poorer people in housing need. In addition, social housing can be largely or wholly funded through taxation; built and managed by a municipality or central government; and funded on the basis that there will be, at best, only partial financial return on the tax revenues invested.[6]

3.2 About the questionnaire

The questionnaire asked the expert respondents to describe how homelessness was defined in their country, to report on the main trends in homelessness, and to describe current policy responses to homelessness. Questions were also asked about how social housing was defined, current levels of social housing provision, and any important trends or changes that were occurring in social housing. These questions were asked in an effort to set the context for the focus of the research; before exploring access to social housing for homeless people, it had to be clear which definitions were being used in each country.

The questionnaire used a series of five vignettes, i.e. five hypothetical homeless households, to compare access to social housing across the 13 countries involved. This turned out to be one of the strengths of the questionnaire technique, because it allowed exploration of access to social housing for homeless people in identical circumstances in each country. The five vignettes were as follows:

• **Vignette 1:** A homeless single man in his 40s with a history of living rough and high support needs associated with problematic drug and alcohol use and mental health problems. This individual has not been in paid work for many years.

• **Vignette 2:** A homeless young mother, without support needs, with two young children who became homeless due to a relationship breakdown which meant she could no longer afford the costs of her existing housing.

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[6] See Bauer, E.; Czischke, D.; Hegedüs, J.; Teller, N. and Pittini, A. (2011) 'Social Housing' in Polacek, R. (2011) *Study on Social Services of General Interest* Brussels: Employment, Social Affairs and Inclusion Directorate General of the European Commission, pp. 109-150.

- **Vignette 3:** A homeless young woman with a history of being in state care during childhood. This young person has low educational attainment, no history of paid work, and has support needs linked to anxiety and depression.

- **Vignette 4:** A homeless documented migrant household containing a couple and children that has been in the country for under one year and that became homeless because they lost tied accommodation (housing that was part of their employment) when they recently lost their jobs.

- **Vignette 5:** A single man in his thirties with a criminal history who will become homeless when he leaves prison.

As homelessness was defined in different ways across the EU, it was important to establish a common standard definition to allow direct comparisons using the vignettes. The experts were therefore instructed to disregard local and national definitions of homelessness and use ETHOS as their reference point for what was meant when the vignettes referred to a household as being 'homeless'.

3.3 Key questions

The research was focused on understanding why more use is not made of social housing in responding to homelessness across the European Union. The key research questions were:

- How does access to social housing help tackle homelessness and potential homelessness?

- What factors facilitate access to social housing for homeless and potentially homeless people?

- What factors inhibit access to social housing for homeless and potentially homeless people?

- How can access to social housing for homeless and potentially homeless people be enhanced?

- What variations exist between countries, and can anything be learned from those variations?

The research had an interest in whether there was any variation in access to social housing for homeless people between different countries and why any such variation occurred. In addition, the research was designed to explore the extent to

which barriers to social housing were consistent across different countries. The research was also interested in any evidence of policies that were effective in improving access to social housing for homeless people.

3.4 Limitations of the methodology

The methodology used for this research had some limitations. The first was the level of detail that could be collected and reviewed. The nature and extent of social housing provision could vary between regions and municipalities within each country, and policy responses to homelessness and the role of social housing in responding to homelessness could vary in the same way. Different types of social housing providers in the same country could also have different attitudes towards homelessness, and there could be inconsistencies in how social housing providers of the same type – be they municipalities, housing companies, social enterprises or NGOs – responded to homeless people. Describing the relationship between social housing and homelessness in a highly decentralised society like Germany or the Czech Republic, or even in relatively centralised societies like France, meant that the expert respondents were often having to encapsulate a complex and varied pattern as accurately as they could.

Variation also existed in the level and quality of data available to experts. Broadly speaking, countries in the West and North of the EU tend to have fairly developed welfare systems, quite extensive social housing provision, and specific policies and services focused on tackling homelessness. While these countries are far from uniform in their approach, a longstanding policy focus on homelessness has often led to statistical data collection, policy research and an academic focus on homelessness. These countries therefore tend to have relatively rich data and good research on homelessness. By contrast, countries in the South have less research and data on homelessness, reflecting a relatively lower level of strategic priority and spending on homelessness. In Central and Eastern Europe, homelessness services tend to be more restricted, and the data and research available on the characteristics and numbers of homeless people (and social housing) can be very limited.[7]

This variation in service provision, strategic priority and collection of data can also be an issue within some countries; for example, the most populous region of German, North Rhine Westphalia, has a more extensive policy response to homelessness and better data on homelessness than other regions. Similarly, while major cities like Dublin, London and Paris have specific policies with regard to people living rough and collect data on this group, there may not be detailed data from elsewhere in the same country on people. No country in the EU has truly

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[7] Busch-Geertsema *et al* (2010) op cit.

comprehensive data on all forms of homelessness, [8] and even in countries in which data and research on homelessness were plentiful, it was never the case that an expert had access to truly comprehensive data on access to social housing for homeless people.

While the questionnaire could give a clear definition of homelessness and social housing for the experts to refer to, there were some countries in which the conceptualisation of homelessness and social housing were quite unlike the definitions used in the questionnaire. This meant that the expert respondents were being asked to think about homelessness and social housing in ways that were, perhaps, unfamiliar to them. There was also, in general, a much better fit between the views of homelessness and social housing in Northern, Southern and Western countries and the ETHOS and FEANTSA definitions than was the case for Eastern countries.

Another potential limitation of this methodology is ensuring consistency in the level and nature of the experts' knowledge. The research team was fortunate that the European Observatory on Homelessness and FEANTSA more generally were able to assist in the selection of appropriate experts. Nevertheless, it was the case that some experts knew more about specific areas than others.

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8   Busch-Geertsema *et al* (2010) op cit.

4. Homelessness and Social Housing

This chapter provides a brief overview of homelessness and social housing in the 13 countries. After looking at how local and national definitions related to the ETHOS typology of homelessness and the FEANTSA definition of social housing, the chapter explores the extent and nature of homelessness and social housing provision in each country. General trends in both are also discussed, as are the relationships between social housing and homelessness systems and policies.

4.1 Homelessness

4.1.1   How homelessness was defined

In several countries there was more than one definition of homelessness in use. In Spain, for example, homelessness is measured according to a definition developed by the National Statistics Institute, but policy-makers and service providers often use other definitions. In some countries, different municipalities and NGOs were free to use their own definition of what constituted a state of homelessness. What was regarded as homelessness might therefore vary between different parts of central government and across municipalities that had varying levels of autonomy depending on which country they were located in. NGOs providing services to homeless people might also have their own definitions; in Finland, for example, a high degree of devolution to many municipalities (Communes) led to variations in how homelessness was defined. By contrast, countries like Ireland and Sweden had national strategies that effectively defined homelessness from a policy perspective, though this definition would not necessarily always be accepted by NGOs or municipalities.

The experts generally dealt with these complexities in a practical way by focusing on how homelessness was *generally* defined in their countries and how that definition related to ETHOS. Table 4.1 summarises the responses of the experts. Despite their efforts to provide a clear summary, it was not always possible for the experts simply to answer 'yes' or 'no' as to whether a specific ETHOS category was regarded as homelessness in their country, and Table 4.1 therefore includes responses where experts reported that local definitions reflected ETHOS 'to some extent'.[9]

Table 4.1 is an approximation of the extent to which the 13 countries had operational/policy definitions of homelessness that reflected the ETHOS categories. The definitions used in Belgium, Netherlands and Sweden were those that most closely reflected the ETHOS roofless and houseless categories, while France, the Czech Republic and Bulgaria had definitions that were the least reflective of these categories.

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[9]   Differing levels of detail were given by experts in respect of subcategories of people due to be released from institutions and in longer term support due to homelessness. Table 4.1 shows 'top level' responses under each category which were supplied by all the experts.

Table 4.1: The extent to which ETHOS (1-7) categories of homelessness were regarded as homelessness in the 13 countries

ETHOS category	Roofless		Houseless				
ETHOS operational category	People living rough	People staying in emergency accommodation	People in accommodation for the homeless	People in women's shelter (refuge)	People in accommodation for immigrants	People due to be released from institutions	People receiving support due to homelessness
Belgium (Flanders)	Yes	Yes	Yes	Yes	Yes	To some extent	Yes
Netherlands	Yes	Yes	Yes	To some extent	No	Yes	Yes
Sweden	Yes	Yes	Yes	Yes	No	To some extent	To some extent
Poland*	Yes	Yes	Yes	Yes	No	No	Yes
Ireland	Yes	Yes	Yes	Yes	No	Yes	No
Finland	Yes	Yes	Yes	Yes	No	To some extent	To some extent
Germany	Yes	Yes	Yes	To some extent	To some extent	No	To some extent
United Kingdom	Yes	Yes	Yes	To some extent	No	No	Yes
Spain	Yes	Yes	Yes	No	No	No	To some extent
Portugal	Yes	Yes	Yes	No	No	No	No
France	Yes	Yes	To some extent	No	No	No	To some extent
Czech Republic	Yes	Yes	Yes	No	No	No	No
Bulgaria	Yes	To some extent	To some extent	No	No	To some extent	No

Source: Questionnaire responses. *There was ongoing debate within Poland around how homelessness should be defined.

Local and national definitions of homelessness did not tend to match ETHOS exactly. Almost without exception, people living rough and people in emergency accommodation were regarded as homeless in local and national definitions, matching the two 'roofless' groups of homeless people as defined by ETHOS. Similarly, local and national local definitions of homelessness tended to match ETHOS in considering people living in accommodation for homeless people (including homeless hostels, temporary accommodation and transitional supported accommodation) as being homeless.

Local and national definitions of homelessness were less likely to reflect the ETHOS typology of homelessness when it came to the 'houseless' categories, and there were several groups of houseless households not considered to be homeless in many countries.

Not every country regarded women living in refuges as homeless; sometimes this was because there were separate, dedicated services for women at risk of gender-based violence. Women who were homeless and at risk of gender-based violence were therefore classified as in need of gender-based violence services (or an equivalent category), and not as homeless. In the UK, for example, homeless women at risk of gender-based violence can be assisted by a municipality's home-lessness services as provided under homelessness laws, but they might also seek direct help from a gender-based violence service, such as a refuge, and would then not necessarily be defined as homeless.

People due to be released from institutions were not regarded as homeless in most countries. Young people leaving state care, for example, would sometimes only be seen as homeless if they had no accommodation to go to, and were instead seen primarily as having a need for social care that included support in finding accommodation.

Similarly, a former offender leaving prison might only be regarded as homeless if they had no accommodation to go to, or sometimes only after the point at which they actually became 'homeless' according to the local definition (France, Germany, Poland, Portugal and Spain). In Poland, services were in place to ensure that long-term prisoners who were approaching the point of release had accommodation in place. Ireland had developed the Homeless Offenders Strategy Team (HOST) that used an integrated approach in assisting prisoners about to be released who had no accommodation available. The Netherlands also had extensive integrated services designed to ensure that housing was in place after release from prison, defining those who lacked adequate housing as homeless.

Undocumented migrants who were in a country illegally were almost never regarded as homeless. Across all responding countries, the definition of this group as 'not homeless' was based on the fact that they lacked entitlement to remain in the country – i.e. it was based on their immigration status rather than their housing situation. This meant that the homelessness of illegal and undocumented migrants was not recognised by most of the 13 countries.

Two countries, Bulgaria and the Czech Republic, were reported by their respective experts as lacking a widely used definition of homelessness. In both instances, people living rough and in emergency accommodation were generally regarded as homeless, but this was described by one of the experts as essentially reflecting public opinion as to what homelessness was.

The Polish expert noted 'sharp differences' between civil, political and academic understanding of what constituted homelessness; six NGOs had published a common declaration defining homelessness in Poland, according to which prisoners about to leave jail and those about to leave medical institutions that did not have suitable housing in place were considered homeless. However, this was a different definition of homelessness than that used by Polish policy-makers and some Polish service providers.

In some countries, the understanding of what constitutes homelessness is still undergoing change. In Bulgaria, the Czech Republic and Poland the concept of homelessness is still relatively new; homelessness – in the sense of being an acknowledged social problem – only emerged in the early nineties as their countries underwent social and economic transition. A further policy change is ongoing in Spain, where the ETHOS classification is slowly making its way into the Spanish Administration (the Catalan government's Sector-Specific Territorial Housing Plan draws on ETHOS). It is also worth noting that in the UK, the EU member state with perhaps the most widely accepted (and one of the broadest) definition(s) of home-lessness, arguments still exist between governments, NGOs and others as to what exactly constitutes homelessness.

4.1.2   Definitions of homelessness
in relation to welfare systems

In previous research it has been argued that overall levels of homelessness are related to the operation of wider welfare systems.[10] In essence, it is argued in this research that homelessness may be more widespread in countries with less extensive welfare states. This is difficult to prove clearly, one reason being that data on homelessness tend to be better and more extensive in countries with developed welfare systems, and these also tend to have homelessness services that count homeless people. This is sometimes known as the service-statistics paradox – countries with more welfare services tend to count a social problem more accurately, possibly making that social problem appear relatively bigger in that country, while other countries with fewer services and less data may appear to have a much smaller problem than is actually the case.[11]

Writing in 2005, Meert argued that in European societies with highly developed welfare systems, there was less homelessness.[12] It has also been argued elsewhere that well-resourced policies which reduce material deprivation and improve life chances might therefore be expected to reduce overall levels of homelessness and housing exclusion.[13] According to these theories, homelessness may exist in distinct forms that are associated with different welfare systems, because homelessness is shaped – at least in part – by those welfare systems. In later work, such as that of O'Sullivan, it has been argued that homelessness is shaped by the interplay between welfare, criminal justice and immigration systems – in other words, the form that homelessness takes in a society is related – again, at least in part – to the complex interplay between different aspects of how a society uses its welfare and criminal justice systems to organise itself.[14]

Homelessness may therefore not exist in entirely consistent forms across different member states, or within those member states where significant variations in welfare and criminal justice systems exist between different regions or municipalities. This is important, as differences may exist in the actual nature of homelessness across different countries, rather than simply in how it is defined.

[10] Fitzpatrick, S. and Stephens, M. (2007) op cit.; Stephens, M. *et al* (2010) op cit.

[11] United Nations Centre for Human Settlements (Habitat) (2000) *Strategies to Combat Homelessness* Geneva: Habitat.

[12] Meert, H. (2005) *Preventing and Tackling Homelessness: Synthesis Report of the Peer Review of Social Inclusion Policies Meeting Denmark 2005* Brussels: European Commission, Directorate-General for Employment, Social Affairs and Equal Opportunities.

[13] Busch-Geertsema *et al* (2010) op cit.; Stephens, M. *et al* (2010) op cit.

[14] O'Sullivan, E. (2011) 'Welfare States and Homelessness' in E. O'Sullivan *et al* (eds) *Homelessness Research in Europe: Festschrift for Bill Edgar and Joe Doherty* Brussels: FEANTSA.

Drawing on work that has reviewed and expanded Esping-Andersen's original classification of welfare regimes, it is possible to contrast how the 13 countries surveyed defined homelessness in relation to their welfare systems.[15] The 13 countries can be classified in the following ways:

- **Social Democratic Regimes: Finland** and **Sweden** can be defined as social democratic regimes, which redistribute wealth. Employment can be flexible and there are generous social welfare, housing and unemployment benefits.

- **Corporatist Regimes: Belgium (Flanders), France**, **Germany** and the **Netherlands** can be defined as corporatist regimes, which use a 'pooled risk' model, whereby citizens all contribute towards a social and health insurance system which they can draw upon when necessary. What citizens can get from these systems depends partly on what they pay into them.

- **Liberal Regimes: Ireland** and the **UK** are liberal regimes that emphasize the free market and provide a welfare safety net, which is means tested, for poor and unemployed households. These welfare systems can be extensive and relatively generous, although the policy emphasis is on a safety net rather than any redistribution of wealth.

- **Mediterranean Regimes: Portugal** and **Spain** are examples of the Southern European or Mediterranean regimes, where welfare intervention by the State is less comprehensive and people in need often rely relatively heavily on informal family support.

- **Conservative Post-Socialist Regimes: Bulgaria**, the **Czech Republic** and **Poland** can be described as Conservative Post-Socialist welfare Regimes. These societies have made a rapid transition from what was in effect a universal communistic welfare model towards a liberal regime safety net welfare system that is engineered to support the promotion of free enterprise. While there is a shared logic with liberal regimes like the UK and Ireland, welfare supports provided in conservative post-socialist regimes are generally much less extensive than in liberal regimes.

Table 4.2 summarises definitions of homelessness by welfare regime type. Looking at Table 4.2 it can be seen that, broadly speaking, the more extensive the welfare system, the closer local and national definitions of homelessness tend to be to the ETHOS typology. These broad findings are similar to those of earlier research.[16]

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[15] Busch-Geertsema, V. *et al* (2010) op cit. p. 25.

[16] Busch-Geertsema, V. *et al* (2010) op cit.; Stephens, M. *et al* (2010) op cit.

Table 4.2: Summary of the extent to which ETHOS categories of homelessness were regarded as homelessness in the 13 countries by welfare regime type

Welfare regime type	Country	Extent of match with ETHOS definition of homelessness
Conservative Post-Socialist	Poland*	High
Conservative Post-Socialist	Czech Republic	Low
Conservative Post-Socialist	Bulgaria	Low
Corporatist	Netherlands	High
Corporatist	France	Low
Corporatist	Germany	High
Corporatist	Belgium (Flanders)	High
Liberal	Ireland	High
Liberal	United Kingdom	High
Mediterranean	Spain	Low
Mediterranean	Portugal	Low
Social Democratic	Sweden	High
Social Democratic	Finland	High

Source: Questionnaire responses. *There was ongoing debate in Poland as to how homelessness should be defined.

4.1.3 Definitions of homelessness not encompassed by ETHOS

Table 4.3 summarises the other forms of acute housing need that were viewed as homelessness in the countries surveyed; these are grouped by broad welfare regime type. The UK had, by a considerable margin, the widest definition of homelessness; it was based on homelessness laws, which view homelessness as an absence of housing that is suitable for habitation, rather than as the simple absence of housing. In the UK, households at risk of gender-based violence or facing harassment from neighbours were defined as homeless using this logic. Belgium (Flanders), Germany, Ireland and Sweden also had relatively broad definitions of homelessness, which encompassed squatting, doubling up with other households and living in caravans. All of these countries had definitions of homelessness that encompassed one or more forms of housing need defined in ETHOS as 'housing exclusion' rather than homelessness (see Chapter 3).

As described in Chapter 5, even where certain countries did not regard particular forms of housing need as homelessness, it was nonetheless customary in many cases to prioritise access to social housing for certain groups without adequate housing, such as families with children. As such, some forms of housing need, defined as homelessness in terms of ETHOS but not regarded as homelessness in the country surveyed, were nevertheless considered priority in terms of access to certain services.

Countries sometimes made distinctions based on the characteristics of a household experiencing homelessness; where households included someone with a disability, long term limiting illness, mental health problems or other support needs, these would sometimes be defined and regarded as homeless, while other households in similar circumstances but without a household member with support needs would not be so defined. The definition of an individual or household as homeless could therefore be conditional on their level of support need, i.e. whether or not the household was seen as vulnerable and as unable to meet its own housing needs (Table 4.3).[17]

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[17] Pleace, N.; Burrows, R. and Quilgars, D. (1997) 'Homelessness in Contemporary Britain: Conceptualisation and Measurement' in Burrows, R.; Pleace, N. and Quilgars, D. (eds) *Homelessness and Social Policy* London: Routledge, pp. 1-18.

Table 4.3: Other households regarded as homeless in the 13 countries

Regime	Country	Homeless people with support needs, disabilities and/or limiting illness	People living in makeshift shelter or squatting	People 'doubling up' with friends or relatives	Travellers / people living in caravans	People living in housing unfit for habitation	People in overcrowded conditions	People at risk of losing housing	People at risk of harassment or violence from neighbours
ETHOS categorisation		*Homeless* Houseless or roofless	*Housing exclusion* inadequate housing	*Housing exclusion* insecure housing	*Housing exclusion* inadequate housing	*Housing exclusion* inadequate housing	*Housing exclusion* inadequate housing	*Housing exclusion* insecure housing	*Housing exclusion* insecure housing
Conservative Post-Socialist	Bulgaria	Yes*	No	No	No	No	No	No	No
Conservative Post-Socialist	Czech Republic	Yes*	No	No	No	No	No	No	No
Conservative Post-Socialist	Poland	No	No	No	No	No	No	No	No
Corporatist	Belgium (Flanders)	Yes	Yes	Yes	No	No	No	No	No
Corporatist	France	No	No	No	Yes	No	No	No	No
Corporatist	Germany	No	Yes	Yes	Yes	No	No	No	No
Corporatist	Netherlands	Yes*	No	No	No	No	No	No	No
Liberal	Ireland	No	Yes	Yes	Yes	No	No	No	No
Liberal	UK	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Mediterranean	Portugal	No	Yes	No	No	No	No	No	No
Mediterranean	Spain	No	No	No	No	No	No	No	Yes
Social Democratic	Finland	Yes	No	No	No	No	No	No	No
Social Democratic	Sweden	Yes	Yes	Yes	Yes	No	No	No	No

* Not defined as homelessness as such, but housing need addressed as part of a duty of social care.

4.2 Main trends in homelessness over the last five years

The experts often had access only to limited or incomplete data on homelessness, and it was difficult for some of the experts to say whether homelessness was rising or falling in their countries. Even those countries with more extensive welfare systems and dedicated homelessness services lacked truly comprehensive data in terms of a full statistical and research understanding of the groups that ETHOS would define as homeless. Each of the 13 countries could be described as belonging to one of the following three groups.

- Generally quite weak data on homelessness, though some information at the level of municipalities or individual cities (often on people living rough and in shelters): **Bulgaria, Czech Republic** and **Poland.**

- Some data on homelessness but with significant gaps in information: **Belgium (Flanders), Spain** and **Portugal.**

- Relatively extensive data on homelessness, but not covering all groups of homeless people or all regions of the country: **Finland**, **France**, **Germany, Ireland, Netherlands, Sweden** and the **UK**.

These findings are in line with previous research, which has noted inadequate data on homelessness across much of the EU.[18] Table 4.4 summarises the information on homelessness that the experts were able to report.

Most countries had at least some data on people living rough and in emergency shelters, and on people living in accommodation for homeless people. Similar demographic changes among people living rough were widely reported by the experts: a rising number of women and young people, increasing numbers of Eastern EU economic migrants (in the North, West and South), and increasing numbers of asylum seekers and undocumented migrants. Spain, in particular, was reported as experiencing a high level of migrants living rough.[19] The experts from Poland, France and Bulgaria reported (possible) increases in people who had become homeless following the loss of employment and among people with high support needs (Table 4.4).

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[18] This is an issue which the recent MPHASIS project sought to address. Edgar, B. (2009) *Review of Statistics on Homelessness in Europe* Brussels: FEANTSA, see also Mutual Progress on Homelessness Through Advancing and Strengthening Information Systems (MPHASIS) http://www.trp.dundee.ac.uk/research/mphasis/

[19] See also Bosch Meda, J. (2010) 'Homelessness among Migrants in Spain' *European Journal of Homelessness*, 4, pp. 139-154.

In Finland, Germany and England (though not in other parts of the UK), levels of homelessness were generally falling at the time the questionnaire was completed, [20] though this was not the case in all municipalities in those three countries.

Reductions in homelessness were associated by the experts with specific policy interventions, including preventative homelessness policies in Germany and England, and a new integrated policy response centred on a Housing First model in Finland. Other factors were also reported as important, such as demographic changes and increased rates of direct rent assistance payment to property owners in Germany. These reported reductions in homelessness also meant different things, as the English definition of homelessness encompassed more people in ETHOS categories described as 'housing exclusion' than the (still relatively broad) definitions of homelessness used in Finland and Germany. None of these countries had perfect data on homelessness, so trends reported by the experts were based on partial or incomplete information. Some experts reported that the recession appeared to mean that increases in some forms of homelessness were occurring, but there was not statistical evidence to confirm this at the time the research was conducted.

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[20] In the period since the questionnaire was completed, homelessness levels have begun to rise in England.

Table 4.4: Main reported trends in homelessness in the last five years

Regime	Country	General trend in levels	Increases in specific groups	Decreases in specific groups	Contextual factors	Data quality reported in country
Conservative Post-Socialist	**Bulgaria**	No official definition of homelessness.	People who have lost work and businesses. Returning migrants who have lost work abroad. Older people. Illegal migrants. People homeless due to natural disasters.	Uncertain.	Sustained mass emigration. Ongoing policy to reduce state spending and stimulate free market.	Very poor.
Conservative Post-Socialist	**Czech Republic**	No official definition of homelessness.	Unclear	Unclear. Homelessness is equated with living rough, and with mental health problems or problematic drug/ alcohol use	None reported.	Very poor. Some data on Prague.
Conservative Post-Socialist	**Poland**	Unclear at national level.	Some evidence of aging male homeless population. Possibility of sustained homelessness among those with high support needs.	Falling number of women and children in shelters.	Emphasis on reducing shelter use among women and children	Local data but no national level data. Focus on people in shelters and living rough.
Corporatist	**Belgium (Flanders)**	Reported as difficult to assess.	Sustained increases in number of homeless women over last 20 years, though numbers remain low. Increases in migrants. Rising number of homeless families in Brussels. Ongoing increases in young people, now approaching 30%.	Relative fall in middle-aged Belgian men, though they still predominate.	None reported	Variable. No national level data.
Corporatist	**France**	Trends are difficult to evaluate, but numbers do not appear to be falling.	Increasing diversity. Lone parents, people in low paid employment, asylum seekers (including people without leave to remain). People with mental health problems and people with problematic drug use. Some evidence of chronic and transitional homeless populations – mirrors US research findings to an extent.	No reported decreases, though growing diversity may be producing relative falls in numbers of lone men as proportion of entire population.	Tendency towards emergency responses rather than interagency coordination. March 2007 Act established right to housing with parallels to UK homelessness law; implementation had been patchy prior to this.	Major survey conducted in 2001 will be updated in 2012. Main source of data, although there are also administrative data.

Regime	Country	General trend in levels	Increases in specific groups	Decreases in specific groups	Contextual factors	Data quality reported in country
Corporatist	**Germany**	Data suggest relatively low levels and downward trend overall, with increases in some locations.	Some increases among young people and women.	Decreases in families becoming homeless.	Improved prevention. Decrease in population in some areas. Falls in migration. Demolition and replacement of temporary accommodation for homeless families.	Variable between regions. No national level data.
Corporatist	**Netherlands**	Sustained and rapid reduction in people living in rough/ emergency accommodation in four main cities.	Some increases in migrant groups from central and Eastern EU. Also undocumented migrants.	Growing diversity in homeless population. Decrease of people sleeping rough. Decrease of house evictions caused by debts (2005-2009)	Strategy Plan for the four biggest cities (G4) and local action plans to reduce homelessness. Increases in supported housing, accommodated by local partnership agreements and generous national earmarked budgets available for local governments / homelessness services since 2006.	Administrative data by G4 cities, monitor Strategy Plan, data collection in 39 other cities under development (Social Support Act).
Liberal	**Ireland**	Uncertain overall. Some evidence of decreases in people living rough in Dublin between 2005-8. However, latest reports show some increases.	Some growth in representation of migrant groups among people living rough and using emergency accommodation in Dublin. People of Irish origin still predominate, however. Some evidence of 'new recruits' to long-term living rough population.	None reported.	National and Dublin level strategies designed to counteract street homelessness.	Survey data on Dublin, less data available elsewhere, but limited data on other cities available.

Regime	Country	General trend in levels	Increases in specific groups	Decreases in specific groups	Contextual factors	Data quality reported in country
Liberal	**United Kingdom**	Rapid falls in homelessness in England until 2010/11 when levels started to increase again. Continuity in levels elsewhere. Very low levels of people living rough during last decade.	Growing evidence of transitional and chronic homeless population structure that mirrors that reported by US research. However, UK data are less robust than those from the USA. Evidence of central and Eastern EU migrants and asylum seekers among those in emergency shelters and living rough, though UK citizens still predominate.	Relative decreases in white males aged over 40 among people living rough. Homeless families predominate in England, but lone homeless people appear at a higher rate in other parts of the UK.	Emphasis placed on preventative services in England appeared to produce sustained, large-scale falls in households receiving assistance under homelessness law until 2009. Trends have remained level elsewhere.	Extensive national level data collection by services in England and Scotland. Relatively little survey data within large research base of variable quality. Detailed data on people living rough largely confined to London.
Mediterranean	**Portugal**	Uncertain overall.	Some increases among people with higher qualification levels and work experience. Growing numbers of young people. Some migrants.	Relative falls in proportion of white Portuguese males, though this group still predominates.	Global economic downturn may be causing homelessness linked to unemployment at a higher rate.	Surveys on people living rough and surveys of municipalities with partial coverage. Information system being built.
Mediterranean	**Spain**	Rising levels of people living rough and in shelters.	Rapid and marked growth in migrants, including central and Eastern European and Africans. Increases in women.	Relative falls in proportion of Spanish middle-aged men.	High levels of structural poverty rates (around 19%) and extreme poverty rates around 3-4% of population	Survey data focused on people living rough and in emergency accommodation.
Social Democratic	**Finland**	Downward trend over the long term.	Some increases in youth homelessness, homelessness among immigrants and families.	Falling numbers of people living rough long term.	2008-11 specific interventions to reduce long term homelessness including national Housing First programme	Not specified by respondent, but there are yearly survey and administrative data.
Social Democratic	**Sweden**	Evidence of increases to 1999. Data from 2011 survey not yet available.	Rising levels of people in emergency accommodation	None reported	None reported	Definitions of homelessness changed between surveys.

Source: Questionnaire responses.

4.3 Social housing

4.3.1   How social housing was defined

In order to contextualise the results of the research, the experts were asked to contrast local and national definitions of social housing with the FEANTSA defini-tion of social housing in the questionnaire. Social housing was defined in terms that most closely matched the FEANTSA definition in Finland, Belgium (Flanders), Ireland, Netherlands and France. Social housing was defined in terms that were dissimilar to the FEANTSA definition in the Czech Republic, Sweden, Bulgaria and Poland (Table 4.5).

**Table 4.5: Social housing in the 13 countries
in relation to the FEANTSA definition of social housing**

Country	Addresses housing market failure	Targets poorer households	Specific social housing providers*	Clear allocation rules	Adequate and controlled standards	Publicly subsidised	Non-profit	Monitored by public authorities
Finland	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Belgium (Flanders)	Yes	Yes	Yes	Yes	To some extent	Yes	Yes	Yes
Ireland	To some extent	Yes	Yes	Yes	To some extent	Yes	Yes	Yes
Netherlands	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes
France	Yes	To some extent	Yes	To some extent	To some extent	Yes	Yes	Yes
UK	To some extent	Yes	Yes	Yes	Yes	To some extent	Yes	To some extent
Spain	Yes	To some extent	Yes	To some extent	To some extent	Yes	Yes	To some extent
Portugal	No	To some extent	Yes	Yes	To some extent	Yes	Yes	To some extent
Germany	To some extent	To some extent	To some extent	To some extent	Yes	Yes	No	Yes
Czech Republic	No	Yes	No	Yes	No	To some extent	Yes	No
Sweden	To some extent	No	To some extent	To some extent	Yes	No	No	To some extent
Bulgaria	No	No	Yes	No	No	Yes	To some extent	To some extent
Poland	No	To some extent	No	To some extent	No	To some extent	To some extent	To some extent

Source: Questionnaire responses. *Is provided to end consumers by an intermediary body responsible for social housing provision and/or management which can be public or private (i.e. there are dedicated, specific social housing organisations that develop and/or manage social housing which can be public or private)

The comparison with the FEANTSA definition was not always straightforward. The German model of social housing was quite different from the FEANTSA definition in many respects. However, while German social housing did not *directly* reflect the FEANTSA definition, it often reflected the FEANTSA definition of social housing to some extent (Table 4.5).[21]

It is important to note that the FEANTSA definition of social housing was used as a reference point by this research; the definition is not designed as a set of standards for social housing, or as best practice that social housing providers should adopt. This said, countries whose definition of social housing was close to the FEANTSA definition were more likely to consider social housing as a means to counteract housing market failure, to regulate allocations and to target poorer households.

4.3.2 Definitions of social housing
in relation to welfare systems

Table 4.6 summarises the definition of social housing by welfare regime type. As can be seen, the definition of social housing tended to be relatively close to the FEANTSA definition across a range of welfare regime types. Examples of all forms of welfare regime, except countries with Conservative Post-Socialist regimes, had forms of social housing which, while they often differed from one another in key respects (Table 4.5), nevertheless often shared at least some key goals and patterns of regulation. This is not an exact comparison but the responses of the experts did broadly reflect the findings reported by earlier research that attempted to relate social housing to wider welfare systems. Earlier work tended to suggest that social housing regimes can be influenced by wider welfare regimes but that social housing policy does not necessarily always reflect wider welfare policy.[22]

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[21] Kirchner, J. (2007) 'The Declining Social Rented Sector in Germany' *European Journal of Housing Policy* 7, 1, pp. 85-101.

[22] Kemeny, J. (1995) *From Public Housing to the Social Market: Rental Policy Strategies in Comparative Perspective* London: Routledge. Stephens, M. *et al* (2010) op cit.

Table 4.6: Social housing in the 13 countries in relation to the FEANTSA definition of social housing and welfare regime type

Regime	Country	Extent of match with FEANTSA definition of social housing
Conservative Post-Socialist	Poland*	Low
Conservative Post-Socialist	Czech Republic	Low
Conservative Post-Socialist	Bulgaria	Low
Corporatist	Netherlands	High
Corporatist	France	High
Corporatist	Germany	High
Corporatist	Belgium (Flanders)	High
Liberal	Ireland	High
Liberal	United Kingdom	High
Mediterranean	Spain	High
Mediterranean	Portugal	High
Social Democratic	Sweden	Low
Social Democratic	Finland	High

Source: Questionnaire responses.

4.3.3 The scale of social housing provision

Although the available data on social housing were not always precise, it can be said that the 13 responding experts lived in countries where social housing represented very different proportions of the national housing stock. Using the FEANTSA definition, in the Netherlands, over one third of the total housing stock was social housing, while the experts reported that it represented under 5% of the total housing stock in the Czech Republic, Spain and Bulgaria (Figure 4.1).[23]

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[23] These estimates are based on data supplied by the experts and are noticeably lower than some other recently published figures. Estimates within European Housing Statistics (2010) suggested just under 9% of the Spanish rental housing stock was social rental housing according to EU SILC statistics. Part of the issue here was definitional; in the Czech Republic around 11% of stock is rent controlled by municipalities, but not all of this can be regarded as social housing, as the allocation rules would result in admitting more affluent households to tenancies. In Bulgaria, levels of social rented housing appear much lower than how EU SILC statistics estimated it at 8% of national housing stock in 2009.

Figure 4.1: Relative scale of social housing in the 13 countries
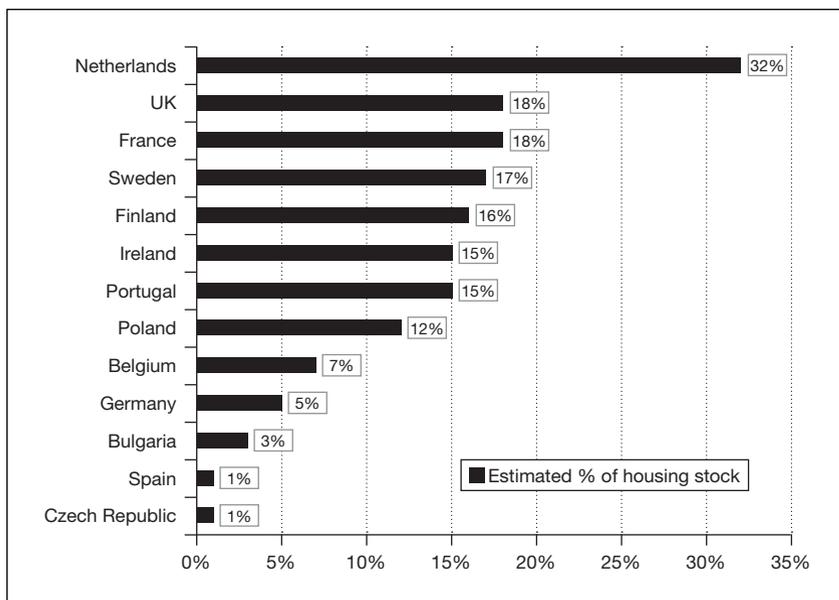
Source: Questionnaire responses. Percentages are rounded. Note: in the Czech Republic, the expert reported estimates varying between 1% and 10%. Some figures are estimates provided by the expert respondents.

There are historic reasons for these differences and they are influenced, in addition, by recent policy changes in some countries; it is also the case that changes to the extent and nature of social housing are ongoing, which means that the proportion of social housing in the housing stock of individual countries could be in a state of flux. The public housing sector in Sweden, for example, has been steadily moving away from 'social housing' functions and towards other roles, such as regeneration and local economic development.

In many of the 13 countries, social housing was provided through multiple mechanisms that were not always well coordinated.[24] In situations where multiple agencies are involved in social housing development, it can be difficult to count, or even produce a robust estimate of, the actual extent of social housing provision. Figure 4.1 is therefore broadly indicative of the relative scale of social housing (using the FEANTSA definition of social housing) in the 13 countries on which the experts reported.

The relationship between welfare regime type and the extent of social housing provision in the different countries was not straightforward. The degree of difference between countries is difficult to summarise, so the data and estimates that

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[24] Whitehead, C. and Scanlon, K. (eds) (2007) *Social Housing in Europe* London: LSE

were presented in Figure 4.1 are shown by welfare regime type in Table 4.7. Welfare regime was sometimes a relatively poor guide to the extent of a country's social housing provision; only the two social democratic countries and the two liberal countries showed similar patterns. However, it is also clear, given the ongoing shifts in the nature of social housing reported by the Swedish respondents and recent moves towards further privatisation of social housing in England, that these patterns are not fixed.[25]

Table 4.7: Social housing provision in the 13 countries by welfare regime

Country	Welfare Regime	Social housing as percent of total housing stock
Netherlands	Corporatist	32%
France	Corporatist	18%
UK	Liberal	18%
Sweden	Social Democratic	17%
Finland	Social Democratic	16%
Ireland	Liberal	15%
Portugal	Mediterranean	15%
Poland	Conservative Post-Socialist	12%
Belgium	Corporatist	7%
Germany	Corporatist	5%
Bulgaria	Conservative Post-Socialist	3%
Czech Republic	Conservative Post-Socialist	1%
Spain	Mediterranean	1%

Source: Questionnaire responses. Some figures are estimates provided by the expert respondents.

4.3.4   The mechanisms for providing social housing

Table 4.8 shows the type of social housing providers in each of the 13 countries. This is a summary of what were often complex and varied arrangements for the provision of social housing. In several of the countries, social housing was variously provided by municipalities, NGOs[26] and by housing companies, operating on either a for-profit or a limited-profit basis, and a number of countries had several different types of social housing providers. Germany and the UK have radically different ways of financing social housing, but both countries allowed diverse bodies to act as providers of social housing, including municipalities, state bodies, NGOs and the private sector (Table 4.8).[27]

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[25] Stephens *et al* (2010) op cit.

[26] This included charities.

[27] Kleinmann, M. (1996) *Housing, Welfare and the State in Europe: A Comparative Analysis of Britain, France, and Germany* Cheltenham (UK) / Brookfield (USA): Edward Elgar Publishing.

Table 4.8: Agency types that variously provided social housing

Country	Central government	Municipalities	NGOs /Charities	Housing companies
Bulgaria	Yes	Yes	No	No
Czech Republic	No	Yes	No	No
Poland	No	Yes	Yes	Yes
Belgium (Flanders)	No	No	No	Yes
France	No	Yes	Yes	Yes
Germany	No	Yes	Yes	Yes
Netherlands	No	No	No	Yes
Ireland	No	Yes	Yes	No
UK	No	Yes	Yes	Yes
Portugal	No	Yes	Yes	Yes
Spain	No	Yes**	Yes	Yes
Finland	No	No*	No	Yes
Sweden	No	No	No	Yes

Source: Questionnaire responses. *In Finland, there are housing companies that are owned by municipalities, **In Spain, regional governments can also be social housing providers.

As can be seen in Table 4.8, direct provision of social housing by central government was relatively unusual. However, municipalities would quite often either develop social housing directly and/or work alongside NGOs to provide it, and they would also sometimes commission social housing from for-profit companies and housing companies.[28]

Subsidy arrangements for social housing were often convoluted and have been described in detail elsewhere.[29] Sometimes there was one main route to social housing development, namely seeking subsidy from a municipality to develop social housing, while in other cases the process was much more complex and could involve several partners.

In some countries, such as Germany and France, social housing is delivered through financing arrangements that oblige landlords to rent homes to specific groups of people at specific rent levels for 10-40 years (depending on subsidy arrangements). After this period has elapsed, the landlord is free to let the housing to private tenants. This means that the social housing sector is in constant flux; it is increased through new investments, while simultaneously reduced through

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[28] Bauer, E. *et al* (2011) op cit.

[29] Bauer, E. *et al* (2011) op cit.; Whitehead, C. and Scanlon, K. (eds) (2007) op cit.; Donner, C. (2000) *Housing Policies in the European Union: Theory and Practice* Vienna: Christian Donner; Donner, C. (2006) *Housing Policies in Central Eastern Europe* Vienna: Christian Donner.

privatisation and the conversion of social housing into home-ownership or market rentals. In these countries, the option to convert social housing into market rental after a pre-defined period is an important factor in influencing investment decisions.

There was no consistent relationship between welfare regime type and the nature of social housing governance or management of across the 13 countries, another indication of the extent to which welfare systems and social housing systems may follow different paths and have unpredictable mutual relationships.

4.3.5 Trends in social housing

Recent research that mapped social housing in the EU concluded that social housing represents a low proportion of the total EU housing stock. Part of the reason for this is the accession of new central and Eastern Europe member states in which formerly collective housing was later subject to mass (and sometimes near total) privatisation. The legacy of Eastern European housing systems was, with few exceptions, characterised by highly residualised and very small social housing sectors.[30] In some Western member states, there has been a sustained fall in relative levels of investment in social housing, such as in Germany, or a combination of large-scale cuts in social housing budgets coupled with mass privatisation, such as in the UK. As noted above, the supply of social housing varied widely across EU member states and was much more extensive in some states than in others.[31] However, it is important to note that variations in data quality make it difficult to ascertain the exact scale of social housing in some member states.

Some of the experts noted a shift in political perspectives on social housing, whereby social housing *itself* is sometimes being seen as a social problem; some politicians, policy makers and academics believe that social housing distorts the free operation of the housing market, while more often there is a concern that social housing might be concentrating and exacerbating poverty.

The social rented sector varied in size and nature, as did the household income profiles of those living in social housing. For example, while relatively affluent households were common in social housing in the Netherlands, they were highly unusual in the UK or the Czech Republic. Nevertheless, expert respondents reported a general relationship between social housing and poverty; [32] while many poorer people

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[30] Hegedüs, J. (2010) 'Towards a New Housing System in Transitional Countries: The Case of Hungary' in Arestis, P.; Mooslechner, P. and Wagner, K. (eds) *Housing Market Challenges in Europe and the United States* London: Palgrave Macmillan, pp. 178-202.

[31] European Commission (2011) *Second Biennial Report on Social Services of General Interest* Brussels: Directorate-General for Employment, Social Affairs and Inclusion.

[32] EUROSTAT (2010) *The Social Situation in the European Union 2009* Brussels: European Commission, DG Employment, Social Affairs and Equal Opportunities.

lived in the private rented sector or owner occupation in all 13 countries, concerns about social housing stemmed from the fact that it often housed, or was perceived to house, relatively more poor households than other tenures.[33]

This relative concentration of poverty and exclusion was a source of policy concern in some of the 13 countries, mainly due to the idea that spatial concentrations of poverty in social housing created negative area effects that were seen as creating 'problem neighbourhoods' with 'alternative' cultures in which crime, nuisance behaviour and sustained worklessness were the norm, constraining life chances for those born in those areas and representing a series of threats (centred on crime and nuisance behaviour) to the economic and social cohesion of surrounding towns and cities (see Chapter Five).

The reasons for these trends in social housing, as reported by the expert respondents and in previous research, were complex.[34] Social housing was often viewed as an at least partially failed policy response. Decreases in social housing investment were not universal, nor were downward trends proceeding at a consistent rate in those countries where they did exist, but social housing was quite often seen by policy-makers as not always offering good quality housing options and as having had unintended negative side effects on economic, social and urban policy.[35]

4.4 Homelessness strategies

The experts reported a diverse range of policies and strategies for tackling homelessness. Table 4.9 groups the 13 countries into four groups; a broad summary is used to group countries with generally similar responses to homelessness together. Each individual country – and very often the elected national, regional and municipal authorities within individual countries – had responses to homelessness that were to some extent distinctive. The four groups shown in Table 4.9 are as follows:

• **Group 1:** A comprehensive national strategy with duties, and in some cases legal requirements, placed on municipalities to respond to homelessness. This group included **France**, **Ireland**, the **Netherlands**[36] and the **UK**.

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[33] Burrows, R. (2008) 'Geodemographics and the Construction of Differentiated Neighbourhoods' in Flint J. and Robinson D. (eds) *Cohesion in Crisis? New Dimensions of Diversity and Difference* Bristol: Policy Press, pp. 219-237.

[34] Peck, J. and Tickell, A. (2002) 'Neo-liberalizing Space' *Antipode*, 34, 3, pp. 380-404; Edgar, B.; Doherty, J. and Meert, H. (2002) *Access to Housing: Homelessness and Vulnerability in Europe* Bristol: The Policy Press.

[35] Malpass, P. (2005) *Housing and the Welfare State* Basingstoke: Palgrave.

[36] Technically a quasi-national strategy covering the four major cities and the bulk of the population in the Netherlands.

- **Group 2:** A highly devolved structure with strategic planning evident at the level of individual cities, regions and municipalities. This group included **Belgium (Flanders), Germany, Poland** and **Spain**.

- **Group 3:** A broad national strategic response within a context of a high degree of devolution to municipalities and/or regions with specific strategic planning for homelessness varying by area. This group included **Finland, Portugal** and **Sweden**.

- **Group 4:** No national strategic response or plan, and varied but generally limited strategic responses within regions or municipalities. In some cases no specific planning in relation to homelessness. This group included **Bulgaria** and the **Czech Republic**.

Table 4.9 Strategic responses to homelessness in the 13 countries

Country	Regime	Social housing stock	Extent of match with FEANTSA definition of social housing	Extent of match with ETHOS definition of homelessness	Homeless Strategy Grouping
Netherlands	Corporatist	32%	High	High	1
Ireland	Liberal	15%	High	High	1
France	Corporatist	16%	High	Low	1
United Kingdom	Liberal	18%	High	High	1
Germany	Corporatist	5%	High	High	2
Belgium (Flanders)	Corporatist	7%	High	High	2
Spain	Mediterranean	1%	High	Low	2
Poland*	Conservative Post-Socialist	12%	Low	High	2
Sweden	Social Democratic	17%	Low	High	3
Finland	Social Democratic	16%	High	High	3
Portugal	Mediterranean	15%	High	Low	3
Czech Republic	Conservative Post-Socialist	3%	Low	Low	4
Bulgaria	Conservative Post-Socialist	3%	Low	Low	4

Source: Questionnaire responses. *There was ongoing debate within Poland around how homelessness should be defined.

Some countries fitted more easily into a specific 'homeless strategy' group than others. The Netherlands has what might best be termed a 'near-national' level strategy that centres on the four major cities and includes central government, but it did not quite have the equivalent of the national strategies found elsewhere.

Likewise the UK, which can be classified as part of Group 1, is, in terms of home-
lessness and housing policy, effectively four nations that each has a strategy, three
of which share an infrastructure placing legal duties on municipalities.[37] France, by
contrast, has a strategic response that is led by central government but which relies
entirely on NGOs for delivery.

Germany did not have a national level strategy, but North-Rhine Westphalia, the
most populous region, had a regional strategy (known as an Action Programme)
and service provision for homeless people that was relatively extensive. By contrast,
Poland with a similarly devolved structure did not typically have the same degree
of homelessness service provision.

Some countries combined a national level strategic response with a high degree of
devolution. The emphasis placed on homelessness at the centre was therefore not
always reflected at strategic or service delivery level within regions or municipalities.

In two countries, there was little or no strategic response to homelessness at national,
regional or municipal level. Bulgaria and the Czech Republic had limited strategic
responses to homelessness, and what activity there was centred on Sofia and Prague.

There was a clear disconnect between the strategic response of countries towards
homelessness and social housing. Definitions and levels of social housing provision
were not clearly associated with homelessness strategies; countries whose defini-
tions of homelessness were most consistent with the ETHOS categories did not
always have elaborate homelessness strategies, and it also did not always follow
that countries with the most developed social housing and welfare systems had the
most developed homelessness strategies. This finding suggested that homeless-
ness policy and social housing policy were often being developed in at least some
degree of isolation from one another.

Coordination between social housing, homelessness and welfare policies was
reported as an unresolved issue in several countries by the expert respondents.
Policy 'silos' existed that were not well coordinated. Social housing had its own set
of policy goals, as did the welfare system, and policy had often been developed
separately to deal with homelessness.

Part of the explanation for this disconnection was linked to how homelessness was
defined. A municipality, region or, indeed, central government that defined home-
lessness solely or largely in terms of vulnerable people living rough and in

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37 In Northern Ireland a government agency (the Northern Ireland Housing Executive), with regional
     offices across the province, is responsible for managing most social housing and for responding to
     homelessness. The Welsh Assembly recently secured devolved powers to allow it to legislate on
     homelessness for Wales. Scotland has a separate homelessness system and its own legal system.

emergency shelters did not necessarily see a role for social housing in responding to homelessness. Defining homelessness as an individual problem of people with high support needs, to be solved by correcting individual behaviour and meeting support needs, effectively removed the responsibility of social housing providers for homeless people. Dealing with homelessness meant building emergency shelters, funding specialist support services and tackling drug and alcohol use and mental health problems, because homelessness meant only people living rough or in shelters. Thus, definitions of homelessness – along with definitions of what social housing is and what it is for – may contribute to the creation of a disconnection between social housing and homelessness policy.

However, as has long been argued by FEANTSA, referring only to people living rough and in emergency shelters as homeless represents a very narrow and inaccurate definition of what homelessness actually is. Where homelessness is defined with reference to the ETHOS typology, the homelessness of many people with low or no support needs, who mainly require adequate and affordable housing, becomes visible, and this greatly increases the role that social housing can take in tackling homelessness and housing exclusion. There is increasing evidence that families and lone people experiencing homelessness who have low or no support needs may actually constitute the majority of homeless people in Europe.[38]

In addition, if tackling homelessness among those with high support needs is approached using innovative support services, there is also a greater potential role for social housing. For example, Housing First and Housing Led support services can use any adequate and affordable housing with a mix of mobile support services to re-house successfully vulnerable homeless people with a history of living rough in ordinary housing, [39] including social housing.

4.5 Homelessness service provision

It is difficult to generalise about the relative levels of service provision in the 13 countries because the data on homelessness services available to the experts were often quite poor. The five countries with Mediterranean and Conservative Post-Socialist welfare regime types tended to rely more heavily on charities and the churches to provide homelessness services, while in Corporatist, Social Democratic and Liberal countries, support for homelessness services was more likely to come from various levels of government, though there was also charitable and church-led service provision. At least some level of government support for homelessness

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[38] Busch-Geertsema, V. *et al* (2010) op cit.

[39] Johnsen, S. and Teixeira, L. (2010) *Staircases, Elevators and Cycles of Change: Housing First and Other Housing Models for People with Complex Support Needs* London: Crisis.

services was commonplace, though there was some variation, with for example Ireland having a higher level of government commitment towards homelessness services than was the case in the Czech Republic or Bulgaria (Table 4.10).

Table 4.10 Broad levels of governmental support for homelessness services

Country	Municipal funding of services for people living rough	National level funding of services for people living rough	Legal duties placed on municipalities to respond to homelessness	Preventative services	Welfare benefits to meet housing costs of poorer people
Ireland	Varies	Yes	Yes	Yes	Yes
United Kingdom	Varies	Yes	Yes	Yes	Yes
Poland	Yes	Yes	Yes	No	Yes
Finland	Varies	Yes	No	Yes	Yes
Netherlands	Varies	Yes	Yes	Yes	Yes
Portugal	Varies	Yes	No	Yes	Yes
Belgium (Flanders)	Varies	Yes	No	Yes	Yes
Germany	Varies	No	Yes	Yes	Yes
France	Varies	Yes	Yes	No	Yes
Sweden	Varies	No	Yes	Yes	Yes
Spain	Varies	No	Yes	No	Yes
Czech Republic	No	No	No	No	Yes
Bulgaria	No	No	No	No	No

Source: Questionnaire responses

If clearer and more comprehensive data on homelessness services had been available to the experts or in the research literature, some attempt at grouping and ranking the countries by their level of governmental commitment and homelessness service levels may have been possible. However, there was not enough data to group the countries according to the level of public and charitable spending on homelessness services, nor to rank or group the countries in terms of their relative levels of homelessness service provision. Generally speaking, it would be expected that countries with relatively higher levels of welfare spending would have more extensive provision of homelessness services, but the data are not available to verify this.[40]

Preventative services appeared to be most developed in the UK, but were appearing elsewhere, e.g. in Sweden and in Spain. Preventative services can be defined as including:

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[40] Busch-Geertsema, V. *et al* (2010) op cit.

- rent deposit and related schemes (providing financial deposits to enable poten-
  tially homeless people to move into the private rented sector when a landlord
  requires one or two month's rent in advance and/or a security deposit);

- family mediation (designed to use counselling to prevent relationship and family
  breakdown, including young people making unplanned exits from their family home);

- domestic/partner violence support (including refuges and Sanctuary Schemes
  which install enhanced security to enable women at risk of violence to remain at
  home, while the perpetrator of violence is removed);

- assistance for (ex)-offenders, including housing advice and floating support
  services to enable and sustain access to housing; and,

- tenancy sustainment/floating support (for households with high support needs
  whose actions, e.g. failure to pay rent or anti-social behaviour, place them at risk
  of homelessness through eviction);

- an emphasis on providing good quality and easily accessible housing advice
  services.

There was evidence of policy transfer between EU member states and between the
EU and North America. For example, Housing First services, based primarily on a US
service model, had a core role in shaping strategic responses in Finland, Belgium
(Flanders), Ireland, France and Portugal. There was also evidence of some use of
Housing First in Sweden and the UK, though it was more limited than elsewhere.

Housing First services vary considerably in their operation. Some services directly
resemble the Pathways Housing First model originally developed in New York. This
service uses a harm reduction model and has a strong emphasis on giving choice
and control to service users. Homeless people with high support needs are rapidly
placed in ordinary rented housing scattered across a city or region, and are
supported by mobile support services. This is a very different model from the
'staircase' approach that used shared supported housing with on-site staffing and
tried to make homeless people 'housing ready' before offering them ordinary
homes. There are also less intensive, Housing Led services using ordinary housing
and low intensity mobile support services. The general principle of providing
'housing first' and then supporting homeless people with mobile support services
is being widely adopted, though the scale remains limited in some countries.[41]

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[41] Pleace, N. (2011) 'The Ambiguities, Limits and Risks of Housing First from a European Perspective'
European Journal of Homelessness 5, 2, pp. 113-128.

4.6 Homelessness and social housing

It could be argued that a limitation of the above analysis is that it omits a key variable, which is the relative level of welfare spending in each of the 13 countries. Drawing on expenditure on social protection as a proxy measure of general levels of welfare expenditure, Table 4.11 summarises the data presented so far by relative welfare expenditure.

As can be seen, while certain types of welfare regime (predictably) spent relatively less, rising levels of general welfare expenditure, expressed in terms of social protection spending per capita, were not always associated with higher levels of social housing provision (Table 4.11). Nor was it the case that social housing was always most focused on addressing housing need among poorer households in those countries that spent relatively more on social protection. Equally, while definitions of homelessness were often closer to the ETHOS categories in countries with relatively higher social protection spending, definitions of homelessness did not become consistently closer to ETHOS as welfare spending levels rose.

Table 4.11 Homelessness and social housing by relative welfare spending

Country	Social housing stock	Extent of match with FEANTSA definition of social housing	Extent of match with ETHOS definition of homelessness	Relative welfare spending*	Homeless strategy grouping	Regime
Netherlands	32%	High	High	140%	1	Corporatist
Sweden	17%	Low	High	130%	3	Social Democratic
Germany	5%	High	High	123%	2	Corporatist
Ireland	15%	High	High	121%	1	Liberal
Belgium (Flanders)	7%	High	High	120%	2	Corporatist
Finland	16%	High	High	117%	3	Social Democratic
France	16%	High	Low	116%	1	Corporatist
United Kingdom	18%	High	High	111%	1	Liberal
Spain	1%	High	Low	88%	2	Mediterranean
Portugal	15%	High	Low	73%	3	Mediterranean
Czech Republic	3%	Low	Low	59%	4	Conservative Post-Socialist
Poland**	12%	Low	High	41%	2	Conservative Post-Socialist
Bulgaria	3%	Low	Low	26%	4	Conservative Post-Socialist

Source: Questionnaire responses and EUROSTAT. *Expressed as a percentage of the per capita spending on social protection average across all 27 member states, calculated using the purchasing power standard, the 2009 data were most up to date available at time of writing. **There was ongoing debate within Poland around how homelessness should be defined.

It is important to note that these figures are from 2009 and that some expenditure cuts on welfare may have occurred, or be about to occur, in many of the 13 countries. What Table 4.11 suggests is that the apparent variation between countries and the degree of apparent disconnection between welfare systems, social housing systems, and definitions of and responses to homelessness reported by the experts is not explained by relative welfare expenditure.

Table 4.11 summarises the main two messages of this chapter. The first message is simply the degree of variation in social housing policy between the different countries and among countries with nominally similar welfare systems. The second finding was the degree of disconnection that can exist between social housing and homelessness policy. Social housing and social housing allocation did *not* necessarily reflect homelessness policies or wider welfare policies.

It would be useful to include some estimate of the level of homelessness (and relative levels of homelessness service provision) in Table 4.11, but for the reasons discussed above this is difficult. Data were poor in many instances and were never universally accurate across all forms of homelessness, even in those countries with relatively systematic and extensive monitoring of homelessness levels, not least because what constituted homelessness in one country was not necessarily regarded as such in another. It has been argued, although the data are yet to be collected that would confirm the assertion, that overall levels of homelessness are lower, and that homelessness itself becomes a smaller social problem, in contexts where general welfare spending is high.[42] While the assertion of a broad link between welfare spending and homelessness does sound reasonable, the relationships between welfare expenditure, homelessness levels and homelessness service provision may not be straightforward. One reason for thinking this is that the relationships between social housing, welfare systems, definitions of homelessness and homelessness strategies did not follow consistent patterns across the 13 countries.

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[42] Meert, H. (2005) op cit; Stephens, M. and Fitzpatrick S. (2007) op cit.

5. Access to social housing for homeless people

This chapter looks at the barriers to accessing social housing faced by homeless people across the 13 countries. The first section considers the shared barriers that existed in several countries and the second section explores the findings of the illustrative vignettes, which were used to compare how consistently social housing providers would have responded to a series of 'ideal types' of homeless people across the 13 countries. The chapter concludes by drawing a broad comparison of access to social housing for homeless people across the 13 countries.

5.1 Barriers to social housing for homeless people

The experts reported six main factors that limited access to social housing for homeless people across all or most of the 13 countries:

• Insufficient supply of social housing relative to all forms of housing need.

• Allocation systems run by social housing providers focused on meeting forms of housing need other than homelessness.

• The requirement on social housing providers in some countries to balance different roles, including pressures to continue to meet housing need while also moving towards marketisation and social enterprise models.

• Attitudinal and perceptual barriers centred on a belief that homeless people would be 'difficult' tenants and 'difficult' neighbours.

• Perceived tensions between avoiding spatial concentrations of poverty and associated negative area effects, and housing significant numbers of homeless people.

• Poor policy coordination between NGOs, social services and social housing providers.

5.1.1 Shortages of social housing

All 13 countries were reported as having a shortfall in adequate and affordable housing. The expert respondents tended to interpret this shortfall as meaning that there was an insufficient supply of social housing and that more should be built. The experts' views would not necessarily be shared by policy-makers. While there was general consensus that affordable and adequate housing supply was insufficient in most of the countries, social housing was often seen as expensive and as generating negative side effects on housing markets, in urban planning and in the wider economy. In some countries, such as Sweden and the UK, social housing was not seen as an effective policy response to general housing need. An increase in social housing supply was politically unlikely in most countries, and had in any case become more difficult to afford as the global recession brought reductions in public expenditure in many countries. In Spain, where social housing is basically a low-cost ownership scheme, the prevailing challenge was seen by the expert respondent as an insufficient supply of social rented housing.

Social housing supply could also be constricted in other senses. In the Czech Republic and Portugal, the experts reported issues with the state of repair and quality of social housing, and noted that social housing residents often had to live in poor physical conditions.

Social housing could be in the 'wrong' place. The experts reported on cities and rural areas where demand for social housing was relatively low, usually because the housing was in areas with very high unemployment, high rates of crime and nuisance behaviour, and/or was in poor repair. While some countries might, in some areas, have a nominal surplus of social housing, that surplus could be in bad condition and/or located in areas where no-one wants to live and in which little paid work is available. In some cases, associations between social housing and 'problem' neighbourhoods meant that popular attitudes to social housing were generally negative; this was the case in Belgium (Flanders), France, Poland and the UK.

Besides regional and location mismatch of social housing demand and supply, social housing providers in some countries faced difficulties because their available housing was not the right design for many people in housing need. In Belgium (Flanders), Sweden and the UK a shortage of social housing for larger families was reported, which also had the potential to affect access to social housing for some ethnic and cultural minorities. In Germany and Portugal this problem was reversed, and there was an insufficient supply of smaller social housing, creating difficulties in housing single households.

In several countries, there were low vacancy (void) rates as people who got into social housing tended to remain there for long periods. This constrained access to the social rented sector in contexts where there was little building of new social housing. The Czech Republic, Portugal, Poland and Bulgaria were reported as having very few vacant social housing units. In some countries – and some municipalities and regions within some countries – new tenancies in social housing were very difficult to obtain. The affordability gap between social housing, private renting and home ownership remained large in many countries, and moving out from social housing was financially difficult or impossible for large groups of social housing tenants.

5.1.2   The focus of allocation systems for social housing

In some countries, including Belgium (Flanders), Portugal, Ireland and Finland, the allocation of social housing was at least partially regulated by central government, while in Spain, regional governments had a regulatory role. By contrast, in countries such as the Netherlands, social housing allocation was more closely based on the local negotiation of need and supply. There were also countries with no central rules or law governing social housing allocation and these included Poland, Sweden, Germany and the Czech Republic. In the Czech Republic, similarly to other central and Eastern European countries, over six thousand municipalities determined local social allocation policies in a country of 10 million people. In Bulgaria, the rules were set at both the national and the municipal level.

Social housing providers tended to have considerable control over the applicant households to be allocated social housing, even in countries with a relatively high level of government regulation, and none of the experts reported a situation in which social housing providers did not exercise at least some control over allocations.

Social housing was most often intended to house households with low incomes and limited financial assets.[43] In most countries there were asset and household income limits, such as in Bulgaria and Portugal, while in some countries, including Belgium (Flanders), France, Germany, the Netherlands and Sweden, there is no upper income limit or a generous upper limit, granting potential access to social housing for more economically prosperous working households. Table 5.1 summarises some of the main features in control of social housing allocation for each country.

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[43] Assets were defined as savings, land, housing or other physical property that could be sold for a significant sum of money (i.e. enough money for a household to meet its own costs for adequate housing on a temporary or permanent basis).

Table 5.1: Control in allocation systems for social housing

Country	State level regulation	Household asset limits	Household income limits
UK	Yes	Yes*	Yes*
Portugal	Yes	Yes	Yes
Bulgaria	Yes	Yes	Yes
Finland	Yes	No	No
Ireland	Yes	To some extent	To some extent
Spain	Yes	Yes	Yes
Poland	No	Yes	Yes
Netherlands	To some extent	To some extent	Yes
Belgium (Flanders)	To some extent	Yes	Yes
France	To some extent	To some extent	Yes
Germany	To some extent	No	Yes
Czech Republic	No	To some extent	To some extent
Sweden	No	No	To some extent

Source: Questionnaire responses. *Present in England, Wales and Northern Ireland but not in Scotland

Both governmental regulation and social housing provider discretion could be beneficial to *some* groups of homeless people. Allocation of social housing often prioritised the housing needs of specifically defined groups; homeless people within these groups could get priority access to social housing, but based on characteristics and needs *other* than their being homeless. For example, roofless and houseless households that included a disabled person, families with children, or households that included a vulnerable older person received priority access to social housing in several countries. The categories of household that received priority access included:

• Households that include a disabled person (France, Poland, UK (including long term limiting illness), Spain, Ireland, Finland)

• Lone parent families and other families with children (Netherlands, Bulgaria, Germany, Finland, France, UK)

• Older people (Ireland, Belgium (Flanders), Czech Republic, UK, Spain)

• People at risk of gender-based violence (France, UK, Spain)

• Key workers (Sweden, Czech Republic, UK (some forms of social housing))

• Groups at heightened risk of housing exclusion (France, Poland, UK, Ireland, Netherlands, Spain)

• Other specific groups including returning migrants (Spain), Roma (Bulgaria), the victims of natural disasters (Poland and the UK), and people living in homes that have to be demolished due to urban regeneration actions (Portugal and Sweden).

It is important to note that households in these categories would also receive priority if they were, in the terms defined by ETHOS, in a situation of housing exclusion as well as if they were homeless. Social housing was therefore often targeted at both homelessness and housing exclusion with regard to these specific categories of people. However, social housing was rarely targeted at all forms of homelessness or housing exclusion among all of the population (see Table 5.2).

As is shown in Table 5.2, some allocation systems excluded some groups of homeless and houseless people. Swedish, Belgian (Flanders), Portuguese and Czech social housing was not specifically targeted at overcrowded households, those in substandard conditions, families, lone parents, women at risk of gender-based violence, or people with support needs (including disabled people). In other cases, such as in Finland and the UK, social housing was targeted at a wide range of groups.

Belonging to a priority group did not, however, guarantee access to social housing in any of the 13 countries. Resource issues could sometimes mean that a social housing provider was unable to provide adequate or suitable housing where needed. Whether or not a household was defined as belonging to a priority group also depended in some cases on which social housing provider was approached, as housing law and central regulation (if any) could be interpreted in various ways. As noted, some social housing providers asserted considerable control over whether or not a specific household was housed, and most social housing providers had at least some discretion as to whom they housed.

Table 5.2: Priority groups in allocation systems for social housing

Country	Overcrowded households	Households in substandard conditions	Families	Lone parents	Women at risk of gender-based violence	People with high support needs
UK	Yes	Yes	Yes	Yes	Yes	Yes
Finland	Yes	Yes	Yes	Yes	No	Yes
Poland	Yes	Yes	To some extent	No	No	Yes
France	To some extent	To some extent	To some extent	No	Yes	Yes
Bulgaria	No	No	Yes	No	Yes	Yes
Ireland	Yes	Yes	No	No	No	Yes
Spain	To some extent	To some extent	No	Yes	No	Yes
Netherlands	No	To some extent	No	Yes	No	Yes
Germany	To some extent	To some extent	To some extent	To some extent	No	No
Czech Republic	To some extent	To some extent	To some extent	To some extent	No	No
Portugal	To some extent	To some extent	To some extent	No	No	No
Belgium (Flanders)	To some extent	To some extent	No	No	No	No
Sweden	No	To some extent	To some extent	No	No	No

Source: Questionnaire responses.

Social housing allocation policies also tended to deny access to some types of households. Households that would be given priority due to one particular characteristic, for example families with children, might lose that priority because of another characteristic, such as a history of rent arrears. Table 5.3 shows some of the household types that were often excluded from social housing by allocation systems. Sweden, Poland, the Netherlands and the UK were described by their expert respondents as having social housing allocation policies that excluded the largest number of groups, whereas France, Bulgaria and Spain were described as less likely to use a system of social housing allocation that excluded the groups shown in Table 5.3.

Table 5.3: Household types wholly or partly excluded from social housing

Country	Previously evicted households	Households with history of rent arrears	Households with history of nuisance or criminal behaviour	Households at risk of homelessness	Roofless people	Houseless people
Sweden	Yes	Yes	Yes	Yes	Yes	Yes
Poland	Yes	Yes	Yes	Yes	Yes	Yes
Netherlands	Yes	Yes	Yes	Partly	Yes	Yes
UK	Yes	Yes	Yes	Partly	Partly	Partly
Finland	Yes	Yes	Yes	Partly	Partly	Partly
Ireland	Yes	Yes	Yes	Partly	Partly	Partly
Belgium	Yes	Yes	Yes	Partly	Partly	Partly
Germany	Yes	Yes	No	Partly	Yes	Partly
Czech Republic	Partly	Partly	Partly	Partly	Yes	Yes
Portugal	No	No	No	Yes	Yes	Yes
France	No	Yes	No	Partly	Yes	Partly
Bulgaria	No	No	No	Yes	Partly	Partly
Spain	No	No	No	Partly	Partly	Partly

Source: Questionnaire responses.

Social housing providers were generally reluctant to house households, including homeless people, where there was a history of housing management problems, such as rent arrears or nuisance behaviour. Expert respondents submitted that in many cases they were also reluctant to house some groups of homeless people as these were seen as likely to cause housing management problems (Table 5.3).

Homeless people that fell into specific groups could also face barriers to social housing in some countries. In France and Poland, social housing providers were reportedly reluctant to house people who were Roma or travellers. There could also be reluctance to house some cultural and ethnic travellers in large numbers where this may lead to a spatial concentration, or what might almost be termed a 'ghetto', of people of one ethnicity, culture or religious faith.

Social housing allocation systems tended primarily to target groups at higher risk of poverty. This general safety net function meant that a range of what ETHOS defines as homelessness and housing exclusion was being responded to by social housing providers. However, it was again the case that this general targeting of social housing did *not* apply to all forms of homelessness.

People living rough were generally not a focus of social housing allocation, nor were the populations living in emergency accommodation and shelters. Living rough was rarely, in itself, enough to secure access to social housing, even in the minority of countries with relatively extensive housing rights legislation.

In some countries, debates had taken place on whether or not the social housing sector should have *any* role in housing the most vulnerable people, including homeless people with high support needs (e.g. Sweden, Finland and the Czech Republic). The debates centred on whether the needs of this group could really be seen primarily in terms of housing, and whether their homelessness was just one in a series of pressing, intensive, mutually reinforcing support needs that meant this group of people required far more than just a roof over their heads.

There is also, however, the question of whether or not social housing providers *want* to house some homeless people; a social housing provider will naturally, from an operational perspective, want tenants and residents who will not be difficult for other people to live alongside, who will treat their housing well and who will pay their rent on time.

5.1.3   Balancing different roles

The expert respondents in several countries reported that social housing providers sometimes had difficulty in balancing the different roles they were expected to fulfil. Two particular issues were noted:

- Managing competing demands for social housing in a context where resources had often been shrinking for some time and had, since the beginning of the recession, been cut still further.

- Difficulties reconciling the requirement for a business-like role with an ongoing social role.

In France, central and local governments were described as having different priorities for social housing allocation. This meant that social housing providers could be put in the position of trying to reconcile inconsistent allocation priorities set by two levels of government.

If governments adopted new social housing allocation priorities, targeting selected groups of people in housing need and sometimes offering incentives for social housing providers to house specific groups, some groups might benefit while others would find it harder to access social housing. In Spain, a policy priority to maximise labour mobility placed expectations on social housing providers that made it difficult, in the context of restricted resources, to respond to other forms of housing need. In Portugal, in the early 1990s, social housing was targeted at re-housing populations living in shanty towns, which meant that other forms of housing need, and the general maintenance of the social housing stock, received less attention than it should have.

In practical terms, different priority groups, such as older people, disabled people, young people, immigrants and (to varying degrees) homeless people were reported by the expert respondents as being in competition for scarce social housing. Operational tensions were reported as existing among social housing providers that were attempting to meet multiple housing needs with insufficient and often constricting resources.

A general challenge existed for social housing providers in setting rent levels. These had to be affordable for target groups (with or without housing benefit schemes) and at the same time cover the maintenance and housing management costs of the homes.

In some instances, social housing providers also had to generate sufficient 'profit' from rents to meet the costs of the loans they had taken out with private (or state) banks to develop social housing. This led to particular tensions for some social housing providers, as making the case to a bank that investment in social housing was low risk and would yield a good profit had implications for the type of people a social housing provider could target.

It was reported that the need to present a good business case put an operational pressure on social housing providers, reliant on bank financing for new social housing development, to focus on 'low risk' tenants. Poor people with high support needs are likely to present higher housing management costs, be more unreliable in paying rent and/or be less able to afford rents that were sufficiently high to produce a good financial return.

In countries where social housing includes low-cost home ownership and rent-to-own schemes (Spain and the UK), social housing developers faced challenges obtaining cheap land in order to keep the investment costs low and the housing affordable to the poorest households.

5.1.4 Attitudinal and perceptual barriers

Images of homelessness, and the way in which homelessness is defined in the popular imagination, still tend to focus on people with high support needs who are living rough or in emergency shelters. Growing research evidence, mainly from the USA but at least partially supported by work in Belgium, France and the UK, strongly suggests that this group is a *minority* among homeless people (when using a definition of homelessness based on ETHOS categories).[44]

The expert respondents reported that social housing providers may not be willing to house homeless people due to the following attitudinal and perceptual barriers:

- A perception among social housing providers that all homeless people will create housing management problems, resulting in decisions to block social housing access for this group. This is an attitudinal barrier because it is based on the incorrect presumption that all homeless people are likely to exhibit challenging behaviour and have high support needs.

- The homeless person or household was previously in social housing and was a problematic tenant – for example, losing their social housing through not paying rent or committing acts of criminal or disruptive behaviour.

- The high support needs of homeless people; some social housing providers will not house this group because there is a requirement for housing support services, social care, or health services that is problematic or difficult to organise.

The research showed there was inequality in access to social housing based on presumptions about homelessness among social housing providers. The second and third reasons for not wanting to house particular groups of homeless people are related to the first, in that they are essentially about a wish to avoid housing management problems, but the logic behind these barriers to social housing is more nuanced. Here it could be argued that in differentiating between subgroups of homeless people, social housing providers were, in at least some cases, making more careful decisions about which homeless people it was possible and practical to house.

The issue here may be partly one of service coordination and resource levels. It is conceivable that support packages, such as those using Housing First and similar Housing Led mobile support service models, would enable social housing providers to work with groups of homeless people that have high support needs and/or a history of housing management problems.

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[44] Busch-Geertsema, V. *et al* (2010) op cit.

A possible mitigating factor, which this research did not explore in detail, is that social housing providers may have used careful individual assessment of applicant households who were homeless; such case-by-cases assessment would indicate a very different approach to allocation when compared with a social housing provider that had a simple ban on housing all homeless households.

In Poland, the policy emphasis in creating paths out of homelessness centred on promoting paid and official work, on regulating relationships with family and relatives, and on preparing homeless people for renting an apartment on the free housing market. This restricted access for some groups of homeless people to the social housing sector.

5.1.5   Area effects and homelessness

Almost all the experts in Northern and Western European countries identified a social housing policy concern with the spatial concentration of poverty. As noted earlier in this report, the concern was that many poor people living together create a different culture in which worklessness, sustained reliance on welfare benefits, petty criminality and problematic drug use are normal. Previous research has identified two sets of policy responses to negative area effects. The first response is to demolish problematic neighbourhoods of social housing and to scatter former residents over a wide area. The second policy response is to break up spatial concentrations of poverty in social housing by adding more affluent, working and middle class residents to poor neighbourhoods.[45]

The experts in Northern and Western Europe all noted a tension between an urban policy focus on avoiding spatial concentrations of poverty and the role of social housing vis-à-vis poor and homeless households. In these countries, tension was seen as existing on two levels:

• a general reluctance to house any homeless person that was linked to concerns about the spatial concentration of workless households in urban areas; and

• a specific set of concerns whereby homeless people were seen a 'high cost, high risk' group that could disrupt social cohesion in neighbourhoods, particularly by creating conditions that would cause more affluent households to leave, and/or make more affluent households reluctant to move into a neighbourhood.

[45] Andersson, R.; Musterd, S.; Galster, G. and Kauppinen, T.M. (2007) 'What Mix Matters? Exploring the Relationships between Individuals' Incomes and Different Measures of their Neighbourhood Context' *Housing Studies* 22, 5, pp. 637-660.

Some experts commented that the policy priority of avoiding spatial concentrations of poverty in urban areas could serve as a smoke screen for social housing providers who wished to avoid housing groups they perceived as difficult tenants, among them homeless households, in order to minimise housing management problems.

The seven countries in which avoidance of spatial concentrations of poverty in social housing was seen as a barrier to social housing for homeless people were the most economically affluent societies among the 13 countries:

- Belgium

- Finland

- France

- Germany

- The Netherlands

- Ireland

- The UK

In the Netherlands, tensions were reported in reconciling policies aimed at building social housing for lower income groups and policies aimed at creating more diverse neighbourhoods. The Swedish case was reported as demonstrating how a social mix policy can be easily abused by social housing providers in allocating housing to more well-off people while keeping some groups, for example poorer recent immigrants, out of the sector. In the UK, a tension between the promotion of social mix in social housing, and the housing of homeless people, was widely reported by social housing providers.[46]

In some countries, more recent changes on the policy agenda, for example large interventions promoting social mix in social housing, were reported as heavily influencing both the composition of tenants and the housing stock portfolio of social housing providers (France, Sweden, Netherlands and Germany). These policy interventions were viewed by some expert respondents as limiting the opportunities to access social housing for various vulnerable and/or poor groups of people, including homeless people.

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[46] Bretherton, J. and Pleace, N. (2011) 'A Difficult Mix: Issues in achieving socioeconomic diversity in deprived UK neighbourhoods' *Urban Studies*, Volume 48 Issue 16, pp. 3429 – 3443.

5.1.6   Policy coordination and access to social housing

The expert respondents also noted some administrative and logistical problems acting as barriers to social housing. In the relatively highly centralised example of France, strategic coordination had sometimes proven difficult, and inconsistencies were reported in the delivery of the March 2007 law that created a right to housing for anyone lawfully residing in France without access to adequate housing. In the UK, variations in how homelessness legislation was interpreted and implemented were widely reported, with evidence of much stricter interpretation of law in London and other areas of high housing stress.

In France, the expert respondent stressed that, besides the availability of social housing at local level, allocation decisions were largely dependent on the quality of partnership between homelessness service providers and social housing providers. This meant that two factors were important:

• local relationships between agencies were key to how social housing allocation worked in France.

• poor relationships between social housing providers and other agencies created the possibility of homeless people in France going into homelessness services from which there were no clear exits to social housing.

In Sweden, the national respondent reported that social housing generally does not accommodate homeless people, as rental agreements largely depend on having a good housing history, which has made the development of coordination between homelessness services and social housing providers problematic.

In Portugal, there was a clear dividing line between social housing and homeless-ness policy. Social housing was primarily reserved for those households that needed to be moved out of shanty towns. Homeless service provision focused on social services, often with little or no communication with the social housing sector.

In Belgium (Flanders), for each and every homeless person seeking access to social housing, local social services have to initiate a claim for an accelerated social housing allocation, which then has to be supplemented by social assistance (mobile support workers) offered by the same local social services. Access to social housing was only possible for a homeless person if social services could guarantee mobile support, and social housing providers only granted tenancies on the condition that a mobile support service was to be made available.

In Germany, some social housing providers had special agreements with a munici-pality to provide housing to single homeless people, but some also required financial guarantees and the availability of mobile support services. These arrange-ments could sometimes function as a barrier because the two sets of services were

supposed to coordinate, and the failure of one to respond could lead to the other considering itself unable to assist the homeless person. It was reported that in certain situations, it would be easier and cheaper if neither service responded to the needs of homeless people.

In Finland, the municipalities, as social housing providers, worked in cooperation with social workers. There was the potential for more social housing to be made available for homeless people, but social housing providers would again request more support from social workers for formerly homeless tenants. It is, however, important to note that Finland has a large dedicated homelessness service, has introduced a large scale introduction of Housing First models, and has a large scale non-profit social housing provider in the Y Foundation, which offers housing specifically for single homeless people and refugees.

The Netherlands was reported as demonstrating that a policy focus on enhancing the cooperation of social services, homelessness services and the social housing sector could improve outcomes when housing homeless people. However, while there were increasing successes in interagency cooperation, some problems with coordination remained.

In the UK, municipalities have legal duties and responsibilities to prevent and tackle homelessness but are often no longer significant providers of social housing in their own right. Coordination with housing associations (specialist NGOs providing social housing) can sometimes be difficult. While housing associations expect to allocate a share of their stock to homeless people, this does not always happen in practice, and there may be resistance to housing some homeless people for the reasons detailed earlier in this chapter.[47] In recent years, reduced spending on support services has made it more difficult for social housing providers to access mobile support services for homeless people with support needs, which can make them more reluctant to work with vulnerable groups.

The Irish municipalities had responsibilities similar to their UK counterparts, although allocation levels to homeless people varied across municipalities and was without central regulation. This meant that access to social housing for homeless people could vary in different regions.

In both Spain and Bulgaria, social housing was described as a tenure of last resort, but were no specific provisions enhancing access to social housing for homeless people. In the Czech Republic, the public housing stock accommodates only a few homeless people – as reported by the expert respondent – and only in cases where NGOs rent out public social housing for their clients.

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[47] Bretherton, J. and Pleace, N. (2011) op cit.

5.2 Comparing barriers to social housing across countries

5.2.1   The vignettes

The expert respondents were asked to use five vignettes to provide hypothetical case studies of the barriers that five types of homeless household might face when seeking access to social housing in their country. Each of the vignettes represented a real life situation involving people with different housing and homelessness histories, some of whom presented with challenging behaviour or problematic drug/alcohol use, and covering a variety of household types and age groups. The respondents had to answer the following questions relating to each of the five vignettes:

• How likely is it that this homeless household will be able to access social housing in your country?

• Are there policies and practices in your country that facilitate access to social housing for people in this situation?

• Are there any specific barriers to accessing social housing for this household?

• Are there any differences in access to social housing by types of social housing provider?

• Are there any differences in access to social housing by region/ local area?

The vignettes were as follows:

• **Vignette 1:** A homeless single man in his 40s with a history of sleeping rough and high support needs associated with problematic drug and alcohol use and mental health problems. This individual has not been in paid work for many years.

• **Vignette 2:** A homeless young mother, without support needs, with two young children. They became homeless due to a relationship breakdown that meant they could no longer afford the costs of their existing housing.

- **Vignette 3:** A homeless young woman with a history of being in state care during childhood. This young person has low educational attainment, no history of paid work, and has support needs linked to anxiety and depression.

- **Vignette 4:** A documented migrant household containing a couple and children that has been in the country for under one year and has become homeless because they lost tied accommodation (housing that was part of their employment) when they recently lost their jobs.

- **Vignette 5:** A single man in his thirties with a criminal history who will be homeless when he leaves prison.

Table 5.4 summarises the responses of the experts. The Finnish expert's view was that all households represented in the vignettes would be able to access social housing; by contrast, the Belgian (Flanders) respondent reported that none of the vignette households would be able to access social housing. Most countries were described by the expert respondents as having barriers to social housing for at least some of the vignette households. Access to social housing for the migrant household vignette was entirely dependent on legal status in all 13 countries; social housing was unavailable unless the migrants had refugee status or had become a citizen of the country. In other respects, the vignettes tended to re-emphasize the barriers to social housing that had been identified in earlier parts of the questionnaire.

Barriers to social housing for homeless households with the characteristics described in the vignettes were found to be unrelated to welfare regime type, unrelated to the relative size of social housing stock, and not to correspond to the level of strategic response to homelessness in the country. Barriers were also not related to relative welfare spending in the different countries. Table 5.4 reinforces the key messages of Chapter 4, which emphasised the frequent disconnection between social housing policy, social housing provision, homelessness strategies, and policies and welfare regime type; this key finding is expressed here in terms of the same broad barriers to social housing that exist for most of the vignettes in most of the countries.

A detailed table describing the responses to the vignette questions is provided in **Appendix 2.**

Table 5.4: Experts' views on probable access to social housing for the vignette homeless households

Country	Welfare regime	Social housing stock	Homeless strategy grouping	Relative welfare spending*	Type of homeless household (vignettes)				
					High need rough sleeper (1)	Young woman lone parent (2)	Young woman with history of care (3)	Documented migrant household (4)	Lone man with criminal history (5)
Belgium/Flanders	Corporatist	7%	2	120%	High barriers	High barriers	High barriers	High barriers	High barriers
Spain	Mediterranean	1%	2	88%	High barriers	High barriers	High barriers	High barriers	High barriers
Portugal	Mediterranean	15%	3	73%	High barriers	High barriers	High barriers	High barriers	High barriers
Germany	Corporatist	5%	2	123%	High barriers	Some barriers	High barriers	High barriers	High barriers
Poland	Conservative Post-Socialist	12%	2	41%	High barriers	Some barriers	High barriers	High barriers	High barriers
Sweden	Social Democratic	17%	3	130%	High barriers	Some barriers	Some barriers	High barriers	High barriers
Ireland	Liberal	15%	1	121%	High barriers	Some barriers	Some barriers	High barriers	High barriers
United Kingdom	Liberal	18%	1	111%	High barriers	Some barriers	Some barriers	High barriers	High barriers
Bulgaria	Conservative Post-Socialist	3%	4	26%	High barriers	High barriers	High barriers	Some barriers	Some barriers
Netherlands	Corporatist	32%	1	140%	High barriers	Some barriers	Some barriers	Some barriers	Some barriers
France	Corporatist	16%	1	116%	High barriers	Some barriers	Some barriers	Some barriers	Some barriers
Czech Republic	Conservative Post-Socialist	3%	4	59%	High barriers	Some barriers	Some barriers	Some barriers	Some barriers
Finland	Social Democratic	16%	3	117%	No barriers	No barriers	Some barriers	Some barriers	Some barriers

Source: Questionnaire responses and EUROSTAT. *Expressed as a percentage of the per capita average spending on social protection across all 27 member states, calculated using the purchasing power standard; 2009 data were the most up-to-date available at the time of writing.

5.2.2 Barriers to access across the 13 countries

Table 5.5 summarises the findings of the research on barriers to social housing for homeless people. One of the main messages of the research is again illustrated here. There were multiple barriers to social housing for homeless people that occurred frequently across countries with different levels of social housing supply, different definitions of social housing and homelessness, different strategic responses to homelessness, and different welfare regimes. Although some previous research has asserted that the nature and extent of homelessness may be related to welfare regimes, [48] specific barriers to social housing for homeless people were *not* found to be consistently associated with particular welfare regimes.

Table 5.5 provides an overview of access to social housing through the use of a range of summary indicators. These include the extent to which priority access to social housing exists for people with support needs (including homeless people) and barriers to homeless people with histories of nuisance behaviour, rent arrears or criminality. The table also includes an indicator of whether or not a policy imperative to avoid negative area effects in social housing acted as a barrier to social housing for homeless people. A summary of the experts' views on whether the vignette households would be able to access social housing in their countries is also employed. In addition, issues with service coordination and overall social housing supply are noted.

What is apparent from Table 5.5 is that significant barriers for homeless people accessing social housing exist in societies with relatively extensive social housing sectors, highly developed welfare regimes and specific strategies designed to tackle homelessness. This finding is important because social housing represents a major source of adequate and affordable housing in several of these countries, and even marginal increases in access to social housing could make a significant difference to homelessness levels.

A lack of adequate social housing is a major issue in some countries, and in societies like Bulgaria, the Czech Republic and Spain, the very low level of available social housing places a significant constraint on the extent to which improvements in access could lead to reductions in homelessness. This is not to suggest that improved service coordination, strategic planning involving homelessness and social housing services, and improved access to social housing would not prove valuable to some degree, but there is simply more social housing available in some countries than in others.

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[48] Meert, H. (2005) op cit.

Table 5.5: Barriers to social housing for homeless people across the 13 countries

Country	Regime	Social housing stock	Match with FEANTSA definition of social housing	Match with ETHOS definition of homelessness	Homeless strategy grouping	Relative welfare spending*	High support needs	History of nuisance arrears or criminality	Negative area effects	Summary of likely barriers to vignette households	Service Coordi-nation	Insufficient social housing supply
Belgium/ Flanders	Corporatist	7%	High	High	2	120%	HB	HB	HB	HB	HB	HB
Sweden	Social Democratic	17%	Low	High	3	130%	HB	HB	HB	HB	HB	HB
Germany	Corporatist	5%	High	High	2	123%	HB	SB	HB	HB	HB	HB
Portugal	Mediterranean	15%	High	Low	3	73%	HB	HB	NB	HB	HB	HB
Ireland	Liberal	15%	High	High	1	121%	NB	HB	HB	HB	HB	HB
United Kingdom	Liberal	18%	High	High	1	111%	NB	HB	HB	HB	HB	HB
Netherlands	Corporatist	32%	High	High	1	140%	NB	HB	HB	SB	HB	HB
France	Corporatist	16%	High	Low	1	116%	NB	HB	HB	SB	HB	HB
Finland	Social Democratic	16%	High	High	3	117%	NB	HB	HB	SB	HB	HB
Poland**	Conservative Post-Socialist	12%	Low	High	2	41%	NB	HB	NB	HB	HB	HB
Spain	Mediterranean	1%	High	Low	2	88%	NB	NB	NB	HB	HB	HB
Bulgaria	Conservative Post-Socialist	3%	Low	Low	4	26%	NB	NB	NB	HB	HB	HB
Czech Republic	Conservative Post-Socialist	3%	Low	Low	4	59%	NB	SB	NB	SB	HB	HB

HB: high barriers – NB: no barriers – SB: some barriers

Source: Questionnaire responses and EUROSTAT. *Expressed as a percentage of the per capita average spending on social protection across all 27 member states, calculated using the purchasing power standard; 2009 data were the most up-to-date available at the time of writing. **There was ongoing debate within Poland around how homelessness should be defined.

6. Recommendations

This final chapter presents some recommendations for improving access to social housing for homeless people. A number of challenges need to be acknowledged when considering the need to increase the role of social housing in tackling homelessness. This research identified six main issues that constricted access to social housing for homeless people.

• The low availability of suitable social housing relative to general housing need in the countries surveyed. Social housing was not always viewed positively by policy-makers and there had been sustained reductions in social housing investment in several countries.

• The expectation that social housing fulfil multiple roles, such as meeting general housing need and facilitating urban regeneration, created competing needs for social housing.

• Allocation systems for social housing did not prioritise some forms of homelessness and sometimes did not prioritise any form of homelessness, concentrating instead on other forms of housing need. Social housing providers also avoided housing certain groups to which homeless people sometimes belonged, including people with a history of rent arrears or nuisance behaviour, people with a criminal record, and people with support needs.

• Barriers to social housing existed that were closely linked to how homeless people were perceived, particularly a view that homeless people would be 'difficult' tenants with high housing management costs.

• Tensions in some countries between a housing policy imperative for social housing providers to house poorer households (including some homeless people) and an urban policy concern with avoiding spatial concentrations of poverty.

• A lack of policy coordination between different agencies that can restrict access to social housing for homeless people.

It would be too simplistic to suggest that there is a need to provide much more social housing in the EU. Resources are finite and are coming under ever-increasing constraint in the current recession. Developing new social housing has, in many cases, not been a policy priority of governments for some time. Social housing is, in itself, often now viewed as a policy problem, and claims are being taken very seriously in many EU member states that it creates spatial concentrations of

poverty and associated social problems, and distorts the proper operation of free housing markets. Social housing continues to be built and some forms of social housing are still expanding, but it is generally the case that new large-scale development of social housing is unlikely in many countries.

Social housing still represents a major housing resource in the European Union. While the availability and quality of social housing varies very considerably, it is often the largest single source of affordable, adequate housing. In those societies with a significant social housing stock, even a slight increase in allocation of social housing to homeless people would make a significant difference in tackling homelessness.

The answers to increasing the role of social housing in responding to homelessness centre on a combination of reassurance, education and sanctions. Reassurance could be provided through helping social housing providers to become more engaged with homelessness. For example, ensuring that a support service package is in place when a homeless person with high support needs seeks social housing would help to minimise any housing management concerns that a social housing provider might have.

Education centres on exploring the extent to which social housing providers are turning down applications and referrals from homeless households based on *assumptions* about the characteristics of those homeless households. In particular, it is important to de-couple the popular cultural and mass media imagery of homelessness as always involving people with high support needs and challenging behaviour, and allow social housing providers to see that there is much homelessness among people without particular support needs and who do not represent particular housing management challenges.

The presence of a minority of homeless people with high support needs must, however, be acknowledged, and it would be unreasonable to expect social housing providers to house chronically homeless people without appropriate support being available. Innovations in service delivery, including Housing First and Housing Led models, are showing that even homeless people with high support needs can be housed in ordinary homes with the right support package in place. Greater coordination between social housing providers and providers of Housing First and similar services would enable social housing to play a greater role in tackling chronic forms of homelessness.

Sanctions may also have a role in encouraging social housing providers to house homeless people. This is partially dependent on how social housing is defined in each country and the priorities of the social housing allocation systems. However, if social housing has no developed role in responding to the most acute forms of housing need, including homelessness, the role of social housing in wider society

and the reasons for subsidising it do need to be questioned. If social housing providers are becoming very focused on employed households without support needs, for example, questions exist as to why those housing needs cannot be met by the free market. Questioning what social housing is for, if that housing is not focused to some extent on the most vulnerable groups in the most acute forms of housing need, can be important in helping to focus social housing provision on homeless people and people in housing exclusion.

The role of social housing in relation to homelessness becomes all the more important in a context in which homelessness persists across the European Union. There is also evidence of housing exclusion among many groups and a consensus that the free market is not delivering sufficient affordable and adequate housing for many of Europe's citizens. While there are those that believe that this is linked to the distortion of housing markets by social housing, such perspectives tend to ignore policy history, in that social housing was often developed in the first instance precisely because the free market was not delivering enough adequate and affordable homes. Many people, including many homeless people, but also those on lower incomes, do not have the financial resources to seek adequate housing in the free market; for these groups, social housing may often still offer the best housing solution.

Social housing providers cannot refocus entirely on homelessness, because social housing often has an important role in meeting other forms of housing need, and within wider urban and social policy. It is often a challenge for social housing providers to meet competing housing needs, and social housing cannot carry the full weight of tackling homelessness; alongside improving access to social housing, increased use of homelessness prevention services and innovations in Housing First and Housing Led must also be pursued.

Consideration does need to be given to the use of the private rented sector as a means to tackle homelessness, as there is evidence that it can be used effectively.[49] However, private rental markets are unlikely to provide enough adequate and affordable housing to tackle homelessness on their own. One reason for this is that the private rented housing submarkets that are actually accessible to homeless people (i.e. affordable and provided by private rented sector landlords who are willing to house homeless people) are often significantly smaller than the total private rented market.[50] Owner occupation will also continue to be unaffordable to many households across the European Union. This means that if homelessness is to be significantly reduced there will need to be a bigger role for social housing.

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49 http://www.homeless.org.uk/private-rented-sector

50 Rugg, J. and Rhodes, D. (2008) *The Private Rented Sector: Its Contribution and Potential* York: Centre for Housing Policy.

Recommendations and suggestions for improving access to social housing must be country specific to some extent. However, this research has found evidence of a disconnection between social housing policy and homelessness policy, and the widespread presence of the same types of barriers to social housing for homeless people across the 13 countries. If social housing is to make an impact on homelessness, greater integration and a closer relationship between social housing policy and homelessness policy is necessary in many countries. In addition to this finding, there was widespread evidence of poor coordination between social housing, support, social care and other services at service delivery level that hampered access to social housing for homeless people in many countries.

Finally, it is again important to note that access to social housing represents one of the key resources that are available to reduce homelessness. Social housing providers can opt to take a greater role in housing homeless people with low or no support needs more or less immediately and, working with other services, can use innovative services like Housing First or Housing Led approaches to help meet the needs of chronically homeless people.

Appendix 1: National respondents

- Pascal De Decker, Sint-Lucas School of Architecture Ghent/Brussels, University College Ghent, Belgium (Flanders).

- Iskra Dandolova, University of Sofia, Bulgaria.

- Martin Lux, Academy of Sciences, Czech Republic.

- Marko Kettunen, Tampere University, Finland.

- Claire Levy-Vroelant, Université Paris 8, France.

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- Julia Wygnanska, Independent researcher, Poland.

- Isabel Baptista, CESIS, Portugal.

- Guillem Fernàndez Evangelista, ProHabitatge, Spain.

- Ingrid Sahlin, University of Gothenburg, Sweden.

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Appendix 2: Detailed responses

	Vignette 1			Vignette 2		
	A single man in his 40s with a history of sleeping rough and high support needs associated with problematic drug and alcohol use and mental health problems. This individual has not been in paid work for many years.			A homeless young mother, without support needs, with two young children who became homeless due to a relationship breakdown which meant they could no longer afford the costs of their existing housing.		
This household is likely to be able to access social housing	No BE, BG, FR, DE, IE, NL, PL, PT, ES, SE, FI	To a limited extent CZ, UK	Most likely	No SE	To a limited extent BE, BG, PL, PT, ES	Most likely CZ, FI, FR, DE, IE, NL,
Existing policies and practices facilitate access to social housing for people in this situation	None FR, PL, SE	Local / central/ public solutions BE, FI, DE, IE, NL, PT, ES, UK	NGO schemes BG, CZ, ES	None	Local / central/ public solutions BE, CZ, FI, FR, IE, NL, PL, PT, ES, SE, UK	NGO schemes BG, CZ, DE, PT, ES
Existing barriers to accessing social housing for this household	Strong BE, BG, FR, DE, IE, NL, PT, ES, SE, UK, CZ	Weak FI	None	Strong BE, BG, PT, ES	Weak CZ, FR, DE, IE, NL, PL, SE, UK	None FI
Differences in access to social housing by types of social housing provider and region/locality	Yes FR, DE, IE, NL, ES, SE, UK		No BE, BG, CZ, FI, PL, PT	Yes DE, IE, PL, PT, ES, UK		No BE, BG, CZ, FI, FR, NL, SE
Components of / reasons for barriers	BE, DE, NL, ES, SE: cooperation of social and housing sector would be needed BG, IE, PL, PT, ES: general shortage of social housing FI: regional shortage of social housing offering floating services FR, NL, PT, UK: if there is anti-social behaviour history UK: additional challenges (medical needs, etc.) need to be present			BE, ES: cooperation of social and housing sector would be needed BG, FR, DE, IE, PT, ES, SE, UK: general shortage / mismatch in composition of social housing CZ, SE: if there is anti-social behaviour history NL, UK, ES: local connection is needed PL, PT: priority if domestic violence		

BE=Belgium (Flanders); BG=Bulgaria, CZ=Czech Republic, FI=Finland, FR=France, DE=Germany, IE=Ireland, NL= Netherlands, PL= Poland, PT= Portugal, ES=Spain, SE= Sweden, UK=United Kingdom

	Vignette 3 A homeless young woman with a history of being in state care during childhood. This young person has low educational attainment, no history of paid work, and has support needs linked to anxiety and depression.			Vignette 4 A documented migrant household consisting of a couple with children that has been in the country for under one year and has become homeless because they lost tied accommodation (housing that was part of their employment) when they recently lost their jobs		
This household is likely to be able to access social housing	No BG, DE, ES	To a limited extent BE, IE, PT, SE	Most likely CZ, FI, FR, NL, PL, UK	No IE, PT, SE	To a limited extent BE, BG, DE, PL, ES, UK	Most likely CZ, FI, FR, NL
Existing policies and practices facilitate access to social housing for people in this situation	None	Local / central/ public solutions BE, FI, FR, IE, NL, PL, PT, ES, SE, UK	NGO schemes BG, CZ, DE, PT, ES	None BE, IE	Local / central/ public solutions BG, CZ, FI, FR, DE, NL, PL, ES, UK	NGO schemes PT, SE, ES
Existing barriers to accessing social housing for this household	Strong BE, BG, DE, PL, PT, ES	Weak CZ, FI, FR, IE, NL, SE, UK	None	Strong BE, DE, IE, PL, PT, ES, SE, UK	Weak BG, CZ, FI, FR, NL	None
Differences in access to social housing by types of social housing provider and region/locality	Yes FR, DE, NL, PL, PT, ES, SE, UK		No BE, BG, CZ, FI, IE	Yes FR, DE, PL, PT, ES, SE, UK		No BE, BG, CZ, FI, IE, NL
Components of / reasons for barriers	BE, ES: cooperation of social and housing sector would be needed BG, DE, NL, PL, PT, ES, SE, UK: general shortage of social housing FI, FR, UK: if there is anti-social behaviour history/severe medical needs DE, UK: young people are not a priority PL, UK: local connection needed			BG, DE, NL, PL, PT, ES, UK, BE: general shortage /mismatch in composition of social housing FI: if there is ASB history DE, UK: prejudice SE: selection based on 'good' housing history UK: local connection needed (non-documented migrants have no access in any of the countries)		

	Vignette 5 A single man in his thirties with a criminal history who will be homeless when he leaves prison		
This household is likely to be able to access social housing	No BE, DE, PT, SE, ES	To a limited extent CZ, FI, IE, PL	Most likely BG, FR, NL, UK
Existing policies and practices facilitate access to social housing for people in this situation	None BG, PL, PT, SE	Local / central / public solutions BE, CZ, FR, IE, NL, UK	NGO schemes FI, DE, ES,
Existing barriers to accessing social housing for this household	Strong BE, CZ, DE, IE, PL, PT, SE, UK, ES	Weak BG, FI, FR, NL	None
Differences in access to social housing by types of social housing provider and region/locality	Yes FR, PL, PT, ES, UK		No BE, BG, CZ, FI, IE, NL, SE
Components of / reasons for barriers	BG, PL, ES: general shortage of social housing CZ, FI, ES, BE: local connection is needed FI: if there is anti-social behaviour history FR, IE, UK: depends on criminal act DE, PL, SE: generally no priority NL: short stay in detention complicates coordination PT: cooperation of criminal justice and homeless sector is missing		

Social Housing Allocation and Homelessness

This report is the first in a new series of the European Observatory of Homelessness (EOH) that explores pan-European issues in homelessness through the use of a questionnaire sent to a group of national experts. The report looks at the relationship between social housing and homelessness in 13 EU member states, examining how different strategic roles for social housing and varying allocation policies impact on the extent to which social housing is used to tackle homelessness. The report identifies the ways in which social housing can provide a housing solution for some groups of homeless people, while often playing little or no role in addressing the housing needs of other groups of homeless people. The research also looks at how the differing levels, forms and functions of social housing influence the relationship of the tenure towards homelessness. The report makes recommendations as to how social housing providers can take a more active role in helping to end homelessness.

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