Homelessness Research in Europe

Festschrift for Bill Edgar and Joe Doherty

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Content

Preface

Homelessness and Housing Exclusion in Europe: Challenges and Opportunities for Research and Policy

The European Parliament recently passed a Written Declaration "calling for an ambitious EU homelessness strategy and support to Member States in their efforts towards ending homelessness" (FEANTSA, December 21, 2010). The Written Declaration comes on the heels of a consensus conference on homelessness held in Brussels, in which researchers from the European Observatory (some featured in this volume) made the moral *and* empirical case for urgent and strategic action by all member countries of the EU. This leadership has proven to be critically influential as the European Commission moves forward with its antipoverty goals for 2020. This timely volume will help bring further momentum to this cause, by framing much of what has been learned, and many of the important questions yet to be addressed in this highly complex, multinational context.

Among researchers and policymakers, the overall direction for homelessness policy – expanding access to stable and affordable housing, with appropriate supports – seems now to be a consensus opinion. Beyond that, the details necessary for a coherent pan-European homelessness strategy will require substantial new knowledge development. As illustrated by the chapters in this volume, researchers are engaged in the challenging work of operationalizing the homelessness problem and establishing evidence-based practices that can be scaled up in a multinational, and "multi-sociopolitical" environment. While daunting, much progress has been made.

Determining exactly how to define homelessness is a crucial first step for understanding the problem, and since its publication in 2005 the European Typology on Homelessness and Housing Exclusion (ETHOS) has offered researchers in Europe (and abroad) a thoroughly well conceptualized definition of homelessness and residential instability. In this regard, the ETHOS statement is a major achievement, and a critical starting point for comparative research and policy analysis. Nonetheless, countries have not yet fully aligned their definitions of homelessness and housing exclusion, and partly as a result, measuring the scope and extent of homelessness in Europe still remains a significant obstacle. As Volker Busch-Geertsema notes in his chapter, measurement efforts have proceeded particularly slowly when considering roofless and houseless persons, the most vulnerable categories of persons in the ETHOS typology and the groups that are most commonly agreed upon across countries as being homeless. Busch-Geertsema observes that a number of countries have made important progress in enumeration both through survey methods and administrative data. Yet major gaps remain for establishing an EU estimate. Many countries still need to work with researchers to establish regular and ongoing measurement procedures, either based upon household surveys, administrative data or service-based methods. Such periodic and reliable estimates will be essential to setting goals for reducing homelessness and for monitoring progress towards achieving them. This remains a stubborn challenge, despite the achievement of the ETHOS typology, and is likely to become a high priority as the new European Parliament's commitment to Member States' strategies moves forward.

Beyond the importance of addressing issues of definition and measurement, understanding the implications for research and policy across the various social welfare regimes within Europe presents another challenging task. Indeed, the nature of homelessness and housing exclusion, as well as responses to these problems, can only be fairly understood in the contexts of the varying social policy frameworks that have evolved within the member countries of the EU. Here, Eoin O'Sullivan offers an expanded and more nuanced version of Esping-Anderson's classic typology of the different philosophies and orientations of European welfare regimes. The existence of such international diversity provides a natural laboratory for examining which social welfare models, and which strategies in particular are best suited to responding to homelessness, either from a preventive or remedial vantage point. Rigorous empirical tests of these relationships has not yet been possible, owing to limited cross-national population data, as noted by Busch-Geertsema. Detailed case studies (Stephens and Fitzpatrick, 2007) have thus been required, suggesting among other findings, that prevention of homelessness is strongest in social democratic regimes, and the weakest in Mediterranean countries and some eastern European transition nations.

However, O'Sullivan cautions that the institutional mediation of broad policy approaches at a local level are critical to understanding how differences in social welfare regimes are ultimately translated. Moreover, the "moving target" nature of contemporary policy shifts, as EU member states grapple with immigration and other social changes wrought by EU integration, globalization, and the economic crisis, have rendered tentative some presumed conclusions based on classical typologies. For example, Nora Teller's chapter here calls attention to the growing number of people in Europe facing situations of housing vulnerability due to shifting dynamics in housing and labour markets, as well as the diminishing role of states in housing provision. O'Sullivan also observes recent changes in immigration and incarceration policies that are skewing more to a US model than to traditional

European approaches. Thus, the adaptation of the Esping-Anderson framework to homelessness here opens further an area ripe for future research, both of a qualitative and quantitative nature, and from which much is yet to be learned.

Antonio Tosi suggests that such future research on homelessness in Europe would be well served by adopting a theoretical framework that places homelessness interventions squarely within the broader context of poverty. Tosi argues that adopting such a perspective carries the potential to resolve some of the shortcomings of policies that embrace exclusively either a structural or individual explanation for homelessness. From this perspective, homelessness is perhaps more appropriately viewed not simply as a deprivation of housing or inadequate access to economic or social resources, but rather as an individual incapacity to make use of resources to resolve a situation of housing instability, even when those resources may be available. As Tosi notes, the risk in operating from this perspective is that it may unnecessarily pathologize those experiencing housing instability. However, Tosi argues for combining structural and individual perspectives through housing and support policies that target different types of homelessness (temporary, long-term) with customized interventions (prevention, supported housing) that are flexible and effective at engaging individuals "where they are." This conceptual framework may well help to establish an integrative perspective for intervention research in the EU, mixing both structural and individual components.

From such an intervention perspective, the diversity of prevailing welfare and housing regimes also provides researchers with an opportunity to explore how various advocacy and program strategies can be translated into different social, political and cultural contexts. This volume includes several valuable chapters that explore the merits and drawbacks of such strategies. Isobel Anderson attempts to answer the long-standing question of what is the appropriate role of both housing and additional services in confronting homelessness and housing exclusion. Anderson asserts that the provision of housing must ultimately be seen as the primary solution to homelessness, and that, while distinct from their housing needs, the additional health and social service needs of individuals need to be addressed as well. Though it appears that various countries are generally moving in this direction, little research has compared how countries manage the roles of housing and services. Research in this area will be key to informing evidence-based practices, as it remains unclear how closely linked housing and services should be, or *can* be given the different bases by which they are funded and regulated in most countries.

In their chapter, Suzanne Fitzpatrick and Beth Watts examine the potential viability and effectiveness of rights-based advocacy approaches to homelessness. In weighing the benefits and limitations of such approaches, the critical issue is untangling exactly what such rights (if obtained) ultimately confer on those persons who assert them. In this regard, Fitzpatrick and Watts point out that advocacy interventions that aim to obtain a right to housing for all homeless persons will only be successful to the extent that such a right is legally enforceable. Yet, in cases where a right to housing is enforced by the judicial system, there are potential drawbacks; such a situation risks placing important policy decisions in the hands of courts rather than in those of elected governments. In countries where such a right is not enforceable in court, a rights-based framework can still be used by these countries legislatively, and by the EU, to strengthen responses to homelessness. The recent Written Declaration serves to reinforce this point, citing homelessness as a violation of fundamental human rights, and demanding that Member States take concrete action to achieve progress. How various countries translate this mandate, how advocacy groups will vary in trying to make these claims operational, and to what effect, will require continuing monitoring and analysis, as presaged by the authors here.

Additional chapters ask whether there are particular interventions that should be targeted at special sub-populations of persons facing homelessness and housing exclusion. Taken together, these chapters suggest that an argument can be made for approaching homelessness as a problem that affects a set of distinct sub-groups and consequently, for tailoring solutions according to each group's respective needs.

Deborah Quilgars describes the importance of research that has outlined a number of pathways that may lead youth into homelessness as they transition into adulthood (e.g. being forced to leave family before securing independent housing, exiting care of the child welfare system). However, there is less clarity regarding other important issues around youth homelessness. For example, differences between countries as to what constitutes the upper age boundary of youth, complicates efforts to estimate the prevalence of youth homelessness. Nonetheless, there is consensus that homeless youth have unique housing needs that require interventions tailored to their situations. Here, promising initial evidence on innovative approaches to youth homelessness is reported from the UK and Ireland. This preliminary research highlights just how much there is to be gained from testing these and other strategies in additional countries.

Like homeless youth, homeless women have distinct housing needs that have not been fully illuminated by previous research. Indeed, as Isabella Baptista observes, the fact that relatively few women are found among rough sleepers and those in emergency accommodations means that homelessness among women is more likely to remain hidden and that consequently, the housing needs of homeless women may be overlooked. While much remains to be learned about the dynamics of homelessness among women, researchers have been paying increasing attention to homeless women in recent years. This research, summarized here, has proved valuable in the development of innovative service delivery models for homeless women that have been implemented in Germany and other countries.

Whereas there is important descriptive research pointing to the potential effectiveness of different strategies for addressing homelessness among youth and women, there is very little information about the housing needs of homeless migrants in Europe. This is noteworthy, as homelessness among migrants poses new challenges for European countries in the context of the expansions in EU membership that have occurred over the past decade. Nicholas Pleace's presentation of a typology of migrant homelessness is particularly useful in this regard. Pleace provides a framework for understanding the housing needs of different migrant groups, and suggests potential avenues to address the housing needs of these groups. However, Pleace acknowledges that fashioning effective responses to migrant homelessness is a vexing challenge as any strategy to do so must out of necessity breach the domain of national and supra-national immigration policies.

Without a doubt, the development of interventions that are effective at meeting the housing needs of particular sub-populations of persons experiencing homelessness and housing exclusion represents an important task. However, broader strategies at the national level are equally important so as to create and maintain a focus on larger scale efforts to reduce homelessness. In this respect, the leadership of FEANTSA has been critical in getting countries to articulate national strategies to end homelessness, even before the recent mandates under the Written Declaration. In their chapter, Lars Benjaminsen and Evelyn Dyb compare a number of these national strategies and note how they represent a departure from past *ad hoc* approaches to homelessness, which were more narrowly focused and less coordinated. The ideals and content of these national strategies is encouraging in that they largely espouse a desire to end homelessness by embracing evidenced-based interventions that emphasize the provision of permanent housing as the key to solving homelessness. These goals are important, and set the stage for numerical targets that can be used to measure meaningful progress towards ending homelessness. This point again underscores the need for countries to engage in regular and periodic data collection efforts.

The creation of national strategies as well as the valuable body of research on homelessness covered by the chapters in this volume demonstrates that meaningful strides have been made in the domains of both policy and research towards ending homelessness and housing exclusion in the EU. The crucial role of the European

Observatory on Homelessness in these developments has been particularly noteworthy. The Observatory is a well respected voice in the international discourse about homelessness. This volume is the latest instalment to their valuable and continuously improving body of research. Moving forward, the policy and research advances represented here will continue to be of great benefit to all member countries, and indeed to the international research and policy community overall.

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Editorial

The purpose of this edited collection is twofold. First, to provide an opportunity to reflect on the research output of the European Observatory over the past 20 years; second, to pay tribute to our colleagues Bill Edgar and Joe Doherty for their immense contribution to the Observatory over the past decade.

The European Observatory on Homelessness was established in 1991 and since then has published some 36 trans-national reports on dimensions of homelessness in Europe. Since 2007, the Observatory has focused on producing an annual themed European Journal of Homelessness[1] and organizing an annual research conference. The various transnational reports and journal editions have covered topics from homeless youth, to immigration and homelessness through to developing a conceptual framework for collating data on homeless people in Europe. When reviewing the scale and range of research topics covered by the Observatory over the past 20 years, the current co-coordinators of the Observatory became increasingly conscious that it would be opportune to reflect on the existing research output[2], by providing a state of the art review of the key domains of homelessness covered by the Observatory. This reflection would also identify gaps in the research and form a solid basis for future research in the domains under review.

In 1998/9, Bill Edgar and Joe Doherty took on the role of co-coordinators of the Observatory.[3] The already considerable output of the Observatory accelerated from this period onwards. From their appointment as coordinators in 1999, Bill and Joe edited 5 books, each of which provided comprehensive trans-national analysis of Services for Homeless People; Support and Housing in Europe; Women and Homelessness in Europe; Access to Housing and Immigration and Homelessness in Europe. With Henk Meert, they produced a series of reports on homelessness and the changing role of the state in Europe; the changing profiles of homeless people and the changing role of service provision for homeless people in Europe. Reviews of homelessness research and policies were also produced alongside the first

1 From 2011, the Journal will be produced twice a year.

2 A full list of publications from the Observatory can be found at http://eohw.horus.be/code/EN/pg.asp?Page=1111

3 They were ably assisted by Amy Mina-Coull for the first three years of their co-ordinating role and then by the late lamented Henk Meert, who died suddenly in 2006. For a tribute to Henk, see Doherty, J. and Edgar, B. (2008) *In my Caravan, I feel like Superman: Essays in Honour of Henk Meert, 1963-2006*. Brussels: Feantsa.

detailed accounts of how differing member states defined and measured homelessness. The reviews of statistics on homelessness led to the development of the conceptual model of defining and measuring homelessness known as ETHOS, which is increasingly being adopted in EU member states and as far away as New Zealand.

The contributors to this book are either past or present members of the Observatory or have had a close working relationship with the Observatory. They are therefore not only experts in the area of homelessness they are contributing on, but worked in collaboration with Bill and Joe at various levels.

In the first chapter, Volker Busch-Geertsema, who joined the Observatory in 1995 and is currently the co-ordinator of the Observatory outlines the very substantial progress that has been made at EU level on defining homelessness. Chapter 2, written by Isobel Anderson, who represented the UK on the Observatory for many years, adopts a dynamic, process approach to reviewing the evidence base on the effectiveness of services that support pathways out of homelessness. In chapter 3, Eoin O'Sullivan who joined the Observatory in 1992, sets out how we might conceptualise the shifting boundaries of inclusion and exclusion for particular marginalised populations and how these boundaries shape the extent and nature of homelessness. Increasing attention has been given to aspects of housing exclusion in housing research over the past decade and in chapter 4, Nora Teller, one of the newer members of the Observatory, outlines recent research that suggest that it is the interplay of welfare, housing and labour markets that decisively impacts on housing exclusion, and it does so in varying ways in different European countries. Suzanne Fitzpatrick (another former UK representative on the Observatory), and Beth Watts, argue in chapter 5, that while rights-based approaches are intuitively appealing, promising radical solutions to complex issues of housing need and social exclusion, we need to draw out questions about what precisely we mean by rights-based approaches, and query whether rights-based approaches deliver the things we expect them to in practice?

Chapter 6, by Lars Benjaminsen, a long-standing member of the Observatory, and Evelyn Dyb who represented Norway on the Observatory, reviews research literature on national homelessness strategies which have emerged in the advanced welfare regimes of northern and western Europe and in a few countries in southern and eastern Europe. Migrant homelessness has become increasingly visible in some parts of the EU in recent years and in chapter 7, Nicholas Pleace, one of the editors of the European Journal of Homelessness, highlights recent data on people sleeping rough. These data show that economic migrants from the Central and Eastern EU are living on the streets and in emergency shelters in increasing numbers in the Western EU. In chapter 8, Isabel Baptista, who joined the Observatory in 2000, outlines the relative paucity of European research on women's homelessness. The chapter provides a critical review of the research undertaken since 2001, focusing on the continuities and consistencies found regarding the previous findings and exploring the developments brought about by the new research produced. In 1998, research by the European Observatory on Homelessness suggested that youth homelessness may be considered as a faltered or interrupted transition to adulthood and in chapter 9, Deborah Quilgars, a member of the editorial team of the European Journal of Homelessness, reviews the progress that has been made in understanding youth homelessness in the last twelve years. It finds that frameworks of analysis have developed further, particularly through a focus on pathways into homelessness, although more attention is still required on how structural factors affect young people's housing chances across Europe.

In the final two chapters of the book, we asked a service provider and one of the most experienced researchers on homelessness in Europe to provide their reflections on the state of research into homelessness in Europe. We invited Andre Gachet, a member of the Executive Council and vice president of Feantsa, to give the perspective of a service practitioner on the use and importance of research on homelessness. The chapter observes that while researchers and practitioners do not necessarily use the same vocabulary, research allows us to take a more complex approach to economic or institutional factors, which the diverse mix of "homeless" people militates against addressing in general terms. In the context of the oft-times chaotic nature of service provision, the chapter concludes that research provides a solid look at the inequalities and structural barriers that dominate progress in social inclusion. In chapter 11, Antonio Tosi, who was a member of the Observatory from the beginning in 1991 until 2007, reflects on 20 years of research on homelessness and the various strands that have influenced our understanding of homelessness. Antonio provides a challenging and provocative overview of research on homelessness and argues that the theoretical potential of capabilities theory can offer much to understanding homelessness, but it still waits to be appreciated and systematically exploited in research on homelessness.

We trust that this volume serves our objectives of (1) providing a robust base to assess future research priorities on homelessness in Europe, and (2) as a tribute to Bill Edgar and Joe Doherty who helped ensure that a rigorous and policy relevant research culture was fostered within the Observatory. Researchers, service practitioners and policy makers in Europe and indeed further afield, concerned with how best to understand and measure homelessness, and the means by which to address the fundamental exclusion that is homelessness, have all benefited enormously from the personal and academic qualities that Bill and Joe brought to their work with the Observatory. Those of us who worked with, or interacted with Bill and Joe over the last decade or so, found their collegiality and friendship an enriching experience and hope that the resonance and robustness of their research will be reflected in the policy choices that are made in local, national and transnational domains.

Defining and Measuring Homelessness

Volker Busch-Geertsema

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› **Abstract_** *Substantial progress has been made at EU level on defining homelessness. The European Typology on Homelessness and Housing Exclusion (ETHOS) is widely accepted in almost all European countries (and beyond) as a useful conceptual framework and almost everywhere definitions at national level (though often not identical with ETHOS) are discussed in relation to this typology. The development and some of the remaining controversial issues concerning ETHOS and a reduced version of it are discussed in this chapter. Furthermore essential reasons and different approaches to measure homelessness are presented. It is argued that a single number will not be enough to understand homelessness and monitor progress in tackling it. More research and more work to improve information on homelessness at national levels will be needed before we can achieve comparable numbers at EU level.*

› **Keywords_** *Data, definition, ETHOS-typology, homelessness, housing exclusion, indicators, measurement*

Introduction

When Dragana Avromov, the research coordinator of the European Observatory on Homelessness in the mid-1990s, worked out a first estimate of the extent of homelessness in the European Union, she found a curious mix of sources of information in the twelve EU member states at that time. For Germany and the Netherlands, the projections were based on a statistical model using some empirical survey data. Numbers from the population census were used for France. The Irish data derived from an official assessment of homelessness. UK data related to the numbers of households accepted as homeless under the respective legislation. Italian numbers where deducted from a poverty survey and the population census. The turnover of users of shelters for homeless people in one year was reported from Belgium and Spain, with day counts of service users from Denmark and Luxembourg. The numbers for Greece and Portugal were estimates based on researchers' 'field experience'. Avramov did her best to 'make preliminary estimates by adjusting the available data in accordance with a number of hypotheses based on research findings' (1995, p.87).

While it was obviously difficult to achieve any comparability of the groups of homeless people included or excluded from the data provided for the different countries and while she had to acknowledge that the validity and coverage of the data varied to a great extent, Avramov at least tried to find a way of making point-in-time and annual prevalence numbers compatible with each other.[1] Using a turnover rate, which had been worked out in a survey on the extent of homelessness in West Germany (Busch-Geertsema and Ruhstrat, 1994), she adjusted the other data:

> When data from a one-day census were available I adjusted them according to an estimated turn-over rate to give an indication of the number of people who had passed through shelters or benefited from rehousing over the course of one year; and vice versa, when only data on the number of clients over the course of one year were available they were adjusted according to the turn-over rate to give a cross sectional figure. (Avramov, 2002, p. 5)

In retrospect, she saw this as a rather problematic approach:

> The methodological shortcoming of the estimate lies in the fact that it was based on the turn-over rate established for West Germany. It is generally known that turn-over rates may be quite different from country to country and even from one region to another, but I had no research resources to measure them and no primary research was under way in any of the EU countries. (2002, p.5)

Nevertheless, Avramov´s estimate of a total number of 2.7 million homeless people, adjusted to the enlarged EU-15[2] in 1996, and including all persons 'who rotate between friends and relatives, furnished rooms rented on a short term basis and services for homeless people' (Avramov, 1996), survived for a long time as the only available number of the quantitative extent of homelessness in Europe. Indeed, no new figure has been produced, despite fifteen years of research and debates about the definition of homelessness and adequate methods of providing a more up-to-date estimate of the extent of homelessness and housing exclusion in the EU, which has meanwhile expanded to comprise twenty-seven countries.

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1 In earlier Observatory reports, point-in-time numbers and annual prevalence data (mainly based on estimates) for different countries had been added to reach a European estimate, see Daly 1993 and 1994.

2 The fifteen member states of the EU prior to 2004: Austria, Belgium, Denmark, Finland, France, Germany, Greece, Ireland, Italy, Luxembourg, Netherlands, Portugal, Spain, Sweden and the United Kingdom.

Has there been any progress in defining and measuring homelessness in all these years? Are we nearer to a common understanding of homelessness and housing exclusion? Do we know more about the quantitative dimensions of the problem and the profile of homeless people, at least at a national level, in the EU member states? What are the open questions and challenges to be taken up by further research and action? This chapter tries to answer these questions. It analyses the developments concerning the definition of homelessness, and then presents the achievements made in developing measurement approaches and a common understanding of which types of data are needed for tackling homelessness (certainly more than one national and European number). The chapter ends with a discussion of the possible directions for further research and advanced development of policies.

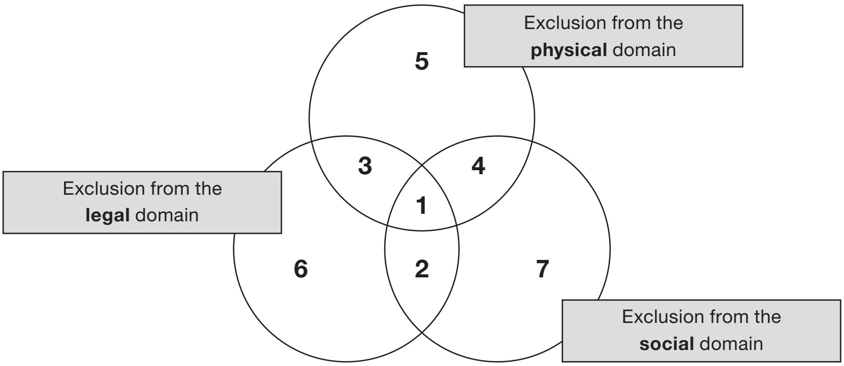
The Definition of Homelessness

There can be no doubt that much progress has been achieved in creating a European definition of homelessness and housing exclusion. The European Typology on Homelessness and Housing Exclusion (ETHOS), adopted and advocated by FEANTSA, was developed as part of the work of the European Observatory on Homelessness, under the coordination of Joe Doherty, Bill Edgar and Henk Meert. Edgar and Meert deserve special credit for elaborating the logic basis and advancing the conceptional framework. FEANTSA members and especially the data collection working group of FEANTSA were actively involved in the development of ETHOS. ETHOS is widely accepted and frequently quoted in almost all European countries and was selected as the most adequate conceptional framework for a new definition of homelessness in New Zealand (Statistics New Zealand, 2009).

Not all European governments (if they care at all about any ‘official’ definition of homelessness) agree on all categories and accept all the different groups mentioned in ETHOS as being part of the homeless population. But almost everywhere, national definitions are set in relation to ETHOS and it can be clarified which of the subgroups mentioned in ETHOS are included in homelessness definitions at the national level and which are not. This is a great advantage when it comes to comparing numbers from different countries for different subgroups and is a very good basis for any attempts towards further harmonisation.[3]

While the approach to conceptionalising homelessness on a continuum, with sleeping rough at one extreme and living in insecure accommodation at the other, was formulated in the first report of the Observatory (Daly, 1992), it took quite some years to arrive at a more differentiated typology and a convincing conceptional framework. In their first review of statistics on homelessness in Europe, Edgar *et al*. (2002) mention four broad categories: rooflessness, houselessness, living in insecure accommodation and living in inadequate accommodation. Their second review (Edgar *et al*., 2003, p.4) introduced the 'three domains which constitute a home' and from which homeless people are excluded to different degrees as the conceptional framework. These were further refined in the third review, which was also the first to seek to collect data for the different subgroups of the new typology (Edgar *et al*., 2004, p.5): 'Having a home can be understood as: Having an adequate dwelling (or space) over which a person and his/her family can exercise exclusive possession (physical domain); being able to maintain privacy and enjoy relations (social domain) and having a legal title to occupation (legal domain).' See Figure 1.1.

Figure 1.1: The domains of homelessness and housing exclusion



Source: Edgar *et al*., 2004

3 For a comprehensive discussion of other approaches to define homelessness on the European level, including the INSEE study for Eurostat (Brousse, 2004) and the recommendations of the UNECE/Conference of European Statisticians for the Europe-wide census (UNECE and Eurostat, 2006), see Edgar *et al*. (2007, ch.3, pp.43ff). The authors also discuss a number of non-European approaches (from Australia, Canada and the US). For detailed discussions of definitions of homelessness and studies of homelessness based on long-term and point-in-time data, see also the papers produced in the EU-funded network CUHP (Constructing Understanding of the Homeless Population) and available at: www.cuhp.org.

Table 1.1: Seven theoretical categories of homelessness

Conceptual category	Operational categories		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 (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

Source: Edgar *et al*., 2004.

As shown in Table 1.1, seven theoretical categories of homelessness and housing exclusion have been identified. While 'rooflessness' usually involves exclusion of all three domains (physical, legal and social), 'houselessness' is characterised by exclusion from the legal domain and the social domain. Both situations are clearly defined as homelessness, while people living in insecure and/or inadequate housing and/or in social isolation might also be affected by exclusion from one or two domains, but their situation is classified under 'housing exclusion' rather than 'homelessness'.

On the basis of this conceptional understanding and to try to grasp the varying practices in different EU countries, the ETHOS typology was developed, which relates, in its most recent version, thirteen different operational categories and twenty-four different living situations to the four conceptional categories: roofless, houseless, insecure housing and inadequate housing.[4] See Table 1.2.

4 Apart from documenting progress concerning the measurement of homelessness in different EU countries and reporting on the latest available data, the forth and fifth reviews of statistics (Edgar and Meert, 2005, 2006) focused on developing and refining the ETHOS definition and considering the measurement issues involved in greater detail.

Table 1.2 ETHOS – European typology on homelessness and housing exclusion

Conceptual category	Operational category		Living situation	
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 3.2 3.3	Homeless hostel Temporary accommodation Transitional supported accommodation
	4	People in a women's shelter	4.1	Women's shelter accommodation
	5	People in accommodation for immigrants	5.1 5.2	Temporary accommodation, reception centres Migrant workers' accommodation
	6	People due to be released from institutions	6.1 6.2 6.3	Penal institutions Medical institutions Children's institutions/homes
	7	People receiving longer-term support (due to homelessness)	7.1 7.2	Residential care for older homeless people Supported accommodation for formerly homeless persons
INSECURE	8	People living in insecure accommodation	8.1 8.2 8.3	Temporarily with family/friends No legal (sub)tenancy Illegal occupation of land
	9	People living under threat of eviction	9.1 9.2	Legal orders enforced (rented) Repossession orders (owned)
	10	People living under threat of violence	10.1	Police recorded incidents
INADEQUATE	11	People living in temporary/ non-conventional structures	11.1 11.2 11.3	Mobile homes Non-conventional building 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

Source: Edgar, 2009, p.73.

The ETHOS typology provides an extremely useful reference frame and underlines that rooflessness, the category that is least controversial and receiving the greatest attention from the media and the general public, is only the 'tip of the iceberg' making visible a much wider phenomenon. There is a broad consensus that the term 'homelessness' covers more living situations than being without a roof over one's head. However, most definitions of homelessness at national level include either more or (more often) less categories than listed in the houseless category of ETHOS.

Edgar *et al*. (2004, p.5) note that some countries (e.g. Austria, Germany and Luxembourg) make a distinction between those who are homeless at a point in time, those imminently threatened with homelessness and those housed under unacceptable conditions. In this context there might be different opinions as to whether people imminently threatened with homelessness should be classified as 'homeless'. Should people due to be released from institutions with no home to go to be defined as actually homeless[5] or should they be classified as such only from the date of their release? The same question can be asked for people under threat of eviction or violence. In New Zealand, but also in Germany and a number of other European countries, the persons concerned are excluded from the definition of actual homelessness 'until they have moved into one of the homeless living situations' (Statistics New Zealand, 2009, p.12). While this might be controversial, there is a broad consensus that it is useful to have more information about these subgroups as the provision of support to them before they actually become homeless is essential for effective prevention.

Another controversial category concerns people receiving longer term support (due to homelessness). In some countries whether they are 'counted in' as homeless might depend on the type of tenancy rights they have. Some see this type of provision as part of the solution rather than the problem and opt against including this group in a definition of homelessness.

Provision for women in refuges for victims of domestic violence is an integral part of services for homeless persons in some countries (e.g. the Netherlands), while it is rather strictly separated in others (e.g. Germany).

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5 This is the case in a number of countries for people who are between four weeks and two months away from release from prison, see Dyb (2009a), Socialstyrelsen (2006), Benjaminsen and Christensen (2007), Edgar *et al*. (2007). About the difficulties of getting reliable data from prison authorities, see Dyb (2009b) and Wygnańska (2009). Especially in some eastern European countries it has been emphasised that persons due to be released from children's institutions/homes have to be included in the definition of homelessness and there was criticism that they were not included in 'ETHOS light' (see below).

In a number of European countries there is also a separation of temporary accommodation for immigrants or some groups of immigrants (as refugees) and governments do not agree to subsume these groups under 'homelessness', although the persons living there face the same (or even a much stricter) exclusion from the legal and social domains constituting a home.

But there are also living situations that are subsumed under 'insecure housing' or 'inadequate housing' in the ETHOS typology, while they are categorised as 'homeless' or 'houseless' in national definitions and surveys. This is particularly true for people temporarily sharing with friends or relatives (living situation 8.1 in ETHOS) and for persons living in mobile homes (11.1), non-conventional buildings (11.2) and temporary structures (11.3). This was an important reason for including these situations in a harmonised definition of homelessness, which was developed for a desk-based study on behalf of the European Commission on the measurement of homelessness at EU level (Edgar *et al.*, 2007) and which has become known as 'ETHOS light' (see Table 1.3). The harmonised definition builds to a great extent on the ETHOS definition, but most of the categories of inadequate and insecure housing are not included because it was seen as more feasible and easier to reach an agreement by focusing on the roofless and houseless categories for a harmonised definition of homelessness and adding some of the others because they are accepted as constituting homelessness in quite a number of European countries. The statistical authorities in New Zealand have followed this approach to some extent and have added 'people living in improvised shelters', 'people staying in camping grounds/motor camps' and 'people sharing accommodation with someone else's household' to their definition of homelessness (Statistics New Zealand, 2009, p.14).

'ETHOS light' had to be compatible with the recommendations of European statisticians for the 2010/2011 censuses of population and housing (UNECE and Eurostat, 2006). This was the main reason why a maximum stay of one year was introduced for defining people living in accommodation for the homeless as 'homeless'. The UNECE/Eurostat (1996) definition of 'homelessness' related to roofless people (primary homelessness) and so-called 'secondary homelessness', defined as including 'persons with no place of usual residence, who move frequently between various types of accommodation (including dwellings, shelters, institutions for the homeless or other living quarters)' (p.109). Persons who have lived in the same place 'for a continuous period of at least twelve months before Census Day' or have moved to a place 'with the intention of staying there for at least one year' are considered as 'usual residents' at this place (p.35). However, it may be rightly criticised that somebody staying in 'temporary' accommodation for homeless people, in a homeless hostel or in a women's shelter should lose his or her status as homeless after living there for more than 365 days.

Table 1.3 Harmonised definition of homelessness relevant to *Measurement of Homelessness at European Union Level* study, 'ETHOS light'

Operational category		Living situation		Definition
1	People living rough	1	Public space/external space	Living in the streets or public spaces without a shelter that can be defined as living quarters
2	People in emergency accommodation	2	Overnight shelters	People with no place of usual residence who move frequently between various types of accommodation
3	People living in accommodation for the homeless	3	Homeless hostels	Where the period of stay is less than one year[6]
		4	Temporary accommodation	
		5	Transitional supported accommodation	
		6	Women's shelter or refuge accommodation	
4	People living in institutions	7	Health care institutions	Stay longer than needed due to lack of housing
		8	Penal institutions	No housing available prior to release
5	People living in non-conventional dwellings due to lack of housing	9	Mobile homes	Where the accommodation is used due to a lack of housing and is not the person's usual place of residence
		10	Non-conventional buildings	
		11	Temporary structures	
6	Homeless people living temporarily in conventional housing with family and friends (due to lack of housing)	12	Conventional housing, but not the person's usual place of residence	Where the accommodation is used due to a lack of housing and is not the person's usual place of residence

Source: Edgar *et al*., 2007, p.66.

It will be an issue for future debates to consider whether some of the categories currently classified as insecure or inadequate housing in the ETHOS definition should be instead subsumed under homelessness, as has been done in 'ETHOS light'.

Concerning wider issues of housing exclusion and housing deprivation, it should be mentioned that a consensus was reached in the Indicators Sub-Group of the Social Protection Committee in 2009 about two commonly agreed EU indicators on overcrowding and on a 'housing cost overburden rate'. See European Commission (2009) for details, and Eurostat (2009) for first results.

Much progress has been made in creating a common basis for defining homelessness in Europe. The ETHOS definition has been widely accepted as a common conceptional and operational framework to which definitions at national level are

6 The period of one year is chosen to allow consistency with UNECE/Eurostat (2006) census recommendations.

related, but not (yet?) fully adjusted. It is an excellent instrument for comparing national data on homelessness covering different subgroups and has the potential to increase harmonisation of national definitions of homelessness. Nevertheless, we are still some important steps away from achieving an accepted European-wide definition of homelessness that would be the basis for measuring the number of people affected across Europe in the same way in all member states.

Measuring Homelessness

How many homeless people are there? The issue of the quantitative extent of homelessness is often controversial and hotly debated at local, regional and national levels. There is a tendency for those responsible for policies and the funding of services to underestimate the extent in order to minimise public responsibilities and to keep the problem they are expected to deal with manageable. On the other hand, pressure groups tend to overestimate the number of homeless people in order to increase their political relevance and the resources made available to them.

Why do we want to count homeless people? Do we really need to know the numbers? Do we really need to know the number of homeless people in Europe? Avramov (1999, p.159) has, quite emphatically, answered as follows:

> In order to reach an agreement that it is unacceptable that people become homeless in the richest countries in the world we do not need to count the homeless. In order to reach an agreement that homeless people are not meritorious enough to share the wealth created by others we do not need to know their numbers. In both cases an ideological stand may suffice. Ideologies do not need figures; services do. We may not need figures to construct policies. We need figures to implement policies and monitor their efficacy.

The important point here is that one single number will not be enough to understand homelessness and to develop and monitor adequate policies to tackle it. If we take the different life situations of homeless people, we want to have not only a single indicator on the number of people experiencing such a situation at a given point in time or during a given period, but also indicators on how many people are becoming homeless and how many manage to end an episode of homelessness (the ‘input’ and the ‘output’ of the homelessness system).

At the very least it is important to develop measures that provide not just the number and profile of homeless people at a given point in time (the stock figure) but also the number of people who have become homeless, or ceased to be homeless, over a given time period (the flow figure, which can be divided into 'inflow' and 'outflow') and the number of people who have experienced homelessness at some point during a given time period (e.g. one year or five years or their entire life, the prevalence figure) (see also Fitzpatrick *et al*., 2009; Edgar *et al*., 2007).

As stated in the introduction to this chapter, we cannot assume that annual prevalence numbers can easily be deducted from point-in-time numbers and vice versa by using the same turnover figure for all European countries. Metraux *et al*. (2001) have shown that the prevalence of homelessness varied greatly among nine different US jurisdictions. Individual jurisdictions had annual rates of sheltered homelessness ranging from 0.1 to 2.1 per cent of their overall population and the annual population size in shelters and transitional housing was 2.5 to 10.2 times greater than the size at a given point in time. Research is needed to learn more about such relations in different European countries before any serious attempt can be made to reach an overall estimate of the number of homeless people in Europe or to compare annual prevalence numbers of one country with point-in-time figures in another one.

As Edgar *et al*. (2007) emphasised, homelessness strategies should have a number of different aims – and more and more European governments have developed such comprehensive homelessness strategies, [7] setting concrete targets in fields of action such as:

- Prevention of homelessness.
- Tackling the causes of homelessness.
- Reducing the level of homelessness.
- Reducing the negative effects on homeless people and their families.
- Ensuring that formerly homeless people can sustain permanent independent housing.

  To implement policy objectives that aim to prevent homelessness and reduce its impact on vulnerable households requires information that reflects the reality of the process of homelessness and housing exclusion. Thus hidden homelessness should be visible to policy makers and service providers. This means having an understanding and measurement of homelessness which includes the situation of people who live in insecure housing, are forced to move constantly between inadequate housing situations and those who are forced to live in housing which is unfit for habitation by commonly accepted norms. If policy intends to ensure that no person should have to sleep rough then information is needed to monitor the number of rough sleepers, the number of clients of homeless services and the

[7] For recent accounts of all existing homeless strategies in EU member states, see Edgar (2009) and Benjaminsen and Dyb, Chapter 6 in this volume.

> number of accommodation places available. Where policies aim to ensure that fewer people should become homeless, information is needed to monitor accurately the total number of homeless households, the number living in temporary or insecure / inadequate housing and the number who are potentially homeless or are threatened with homelessness. If the policy objective is to prevent homelessness then it is important also to have information on the number of people vulnerable to eviction and the number of people about to leave an institution who do not have a home. The prevention of homelessness also requires the provision of sustainable permanent accommodation for formerly homeless people. This requires information on the number of homeless people who gain access to supported accommodation. (Edgar *et al*., 2007, pp.11-12)

Much discussed and needed, but often poorly developed, are outcome measures that may prove the effects of service provision on clients while they stay in contact with these services but also, and sometimes even more importantly, some time after they have stopped using the services. Often it is rather difficult and challenging to track former service clients, but this is the only way to learn more about the long-term effects of service provision. Again, more research and better instruments are needed to advance the measurement of service outcomes.

In the field of research on poverty and unemployment, the relevance of time and of the duration of experiencing such forms of exclusion have been fully acknowledged. In the field of homelessness research and measurement, more attention should be directed to this important issue. A number of US studies found that the share of long-term homeless persons among the homeless population is usually overestimated by the frequent focus on cross-sectional studies and point-in-time surveys. Biographical studies on 'homeless careers' or 'pathways through homelessness' distinguish between those leading to only a relatively short single episode of homelessness (short-term homelessness), those involving several episodes of homelessness (episodic homelessness) and those where homelessness has been experienced without interruption for years (long-term or chronic homelessness) (see, for example, May, 2000). US research (e.g. Culhane and Metraux, 2008) has found that the long-term category is the smallest group of users of homeless services in the US but nevertheless accounts for an extraordinarily high proportion of shelter capacities over the course of a year.

Although more in-depth research on the dynamics of homelessness in Europe is needed, there are clear indications that long-term homeless people are a minority among service-provider clients in Europe as well. Data from Germany, for example, show that only 11 per cent of all users of NGO services for homeless persons used these services for more than one year; 47 per cent used them for less than one month (BAG W, 2009). However, caution is needed when interpreting these data because short-term users of one service might use other services instead and therefore not using a specific service for homeless persons cannot be equated with not being homeless.

How can we measure homelessness? A variety of approaches to measuring homelessness have been used in different EU countries. EU-funded research has taken stock of these practices and the French INSEE study (Brousse, 2004) and a more recent study at EU level (Edgar *et al*., 2007) provide a good overview of the available range of approaches. The most up-to-date overview for individual countries is available from the national statements produced by twenty European countries in the framework of the MPHASIS project.[8]

Table 1.4: Summary of the main approaches adopted to collect data on homelessness and housing exclusion

Approach	Method	Focus
Surveys (counts)	National counts	ETHOS categories 1,2(3) homeless people Point-in-time (stock)
	Capital city counts	
	Local authority surveys (national / regional)	
Registers	Municipal (client-based)	Homeless services Social welfare services Profile data Prevalence, flow (stock)
	Service provider	
	NGO (client-based)	
Census (market surveys)	Census 2011	All ETHOS categories Point-in-time (stock) Infrequent
	Housing market surveys	
	Housing needs assessments	
	Homeless surveys	

Source: Edgar, 2009, p.28.

8 Available at www.trp.dundee.ac.uk/research/mphasis/ and summarised in Edgar (2009). MPHASIS stands for 'Mutual Progress on Homelessness through Advancing and Strengthening Information Systems' and was a follow-up project to the study on measuring homelessness at EU level (Edgar *et al*., 2007), financed by the European Commission under the PROGRESS programme and carried through from December 2007 to December 2009. The project aimed to improve monitoring of homelessness and of homelessness policies in the twenty participating EU countries in a coordinated manner and on the basis of the recommendations of the earlier study. On the impact of the European Commission using the Open Method of Coordination for advancing the measurement of homelessness in Europe, see Spinnewijn (2009).

Surveys have been carried out in recent years in a large number of EU member states to learn more about the extent and structure of homelessness at national, regional and/or local levels. Perhaps most advanced regarding the production of a total number of homeless persons in the country and measuring trends over the years are the Scandinavian countries. Finland can already look back on a long tradition of producing a national estimate of the number of homeless persons each year. The annual surveys on homelessness in Finland, being part of a wider housing market survey, began as early as 1986 and national estimates – based on municipal information – have been published every year since (see Kärkkäinen, 1999; Taino and Fredriksson, 2009). Using another approach, Norway, Sweden and Denmark carried out national surveys on homelessness during the last decade that even allow for direct comparison between the three countries (see Bejaminsen and Dyb, 2008; see also the chapter of the same authors in this volume). In Sweden and Denmark, two or three such surveys have been carried out already and allow – with some caveats in Sweden because of changes in the definitions – analysis of trends in the development of homelessness at the national level.[9]

The lack of a possibility for more continuous monitoring is one of the shortcomings of the two very comprehensive[10] and similar interview surveys (on a rather narrowly defined target group) carried out in France in 2001 (see INSEE, 2009, for results in English) and in Spain in 2005 (INE, 2005). Since the Spanish national survey on homeless persons in 2005 only some street counts in some of the principal municipalities (e.g. Madrid and Barcelona; see Cabrera *et al*., 2008) and two further surveys on the clients of homelessness services in 2006 and 2008 have been carried out (INE, 2007, 2008). The French National Statistical Institute is planning a similar interview survey for 2012. In addition, a study of the institutions for persons in social difficulty (a social establishment survey) has taken place every four years since 1997, and in 2006 a census of homeless people was carried out and is due to be repeated every five years in French municipalities of more than 10000 inhabitants, and by rotation in smaller municipalities.

One-off national counts of people sleeping rough or in overnight hostels have also been carried out in Italy (2001) and in Portugal (2005). In Ireland, more continuous monitoring of homeless service users has been facilitated by repeated surveys in Dublin (the results being published by the Homeless Agency as 'Counted In' in 1992, 2002, 2005 and 2008). Annual surveys can be found in the Austrian region of Salzburg as well as, for example, in the Hungarian capital, Budapest. Continuous monitoring of certain subgroups of the homeless population, while not giving a full

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9 For detailed descriptions of the surveys, see Benjaminsen and Christensen (2007) for Denmark, Dyb and Johannessen (2009) for Norway and Socialstyrelsen (2006) for Sweden.

10 The INSEE questionnaire for the 2001 survey included more than 900 variables.

picture of the extent of homelessness in a country or region, at least allows analysis of trends for the subgroups covered, as is the case, for example, with the data on homelessness acceptances under the English homelessness legislation and with the annual survey on persons in municipal temporary accommodation in North Rhine-Westphalia, Germany (see Busch-Geertsema and Fitzpatrick, 2008).

Municipal counts of people sleeping rough or in overnight hostels can be found in quite a number of countries, for example in Austria, Belgium, England, Germany (Munich and Hamburg), Hungary (Budapest), Ireland (Dublin), the Netherlands (Amsterdam, The Hague, Rotterdam and Utrecht), Portugal (Lisbon) and Spain (Barcelona and Madrid). However, to get a national or even a European picture of the extent of rough sleepers still remains quite difficult. As Edgar (2009, p.69) concludes:

> … it is an irony that the categories of homelessness in which there is total consensus (rough sleeping and living in emergency homeless hostels) are the categories in which it is most difficult to obtain consistent and up-to-date information in a comparable format. It has been clear from the data available… that in many countries only partial information is available for these categories. In most countries, this lack of information is due to the fact that available information is not collated; though it also reflects weaknesses in data collection on this most basic indicator of homelessness.

Client register data from service providers are particularly helpful in improving our profiles of homeless persons using these services and our knowledge of recent profile changes. Several studies have recommended making better use of these data and adjusting data recording to a harmonised set of core variables to allow for transnational comparisons (see Edgar *et al*., 2007; Busch-Geertsema and Edgar, 2009).

The 2011 census should provide information on the number of homeless people. But whether census authorities are able to provide reliable information on the extent of homelessness (or certain subgroups of homeless persons) in their country will depend not only on the methods of covering homeless persons in their counts, but also on the way of preparing the data so that homeless persons are still identifiable and are not mixed in with other groups living in special types of accommodation or collective living situations.

A number of governance and implementation issues concerning data collection are discussed at length in several recent European publications (Edgar *et al*., 2007; Edgar, 2009; Frazer and Marlier, 2009). These emphasise the importance of:

- Political commitment at national level.
- Clarification of responsibilities among government departments.
- Involvement and cooperation of all key stakeholders (including municipalities and NGOs).
- Clarification of data protection issues and prevention of double counting.

It is important that there is transparency in the purpose of data collection and that feedback is provided to data producers, thereby also contributing to improvements in the quality of information.

Future Directions for Research and Policy

Recent research has provided a good overview of possible methods and made a lot of valuable recommendations on how to measure homelessness. The ETHOS typology has been used already in a number of countries to adjust or refine national definitions of homelessness and to increase comparability between countries, though some subgroups are covered much more often than others and there remain important differences in detail.

But still only a minority of EU countries have developed a more comprehensive homelessness information strategy (which cannot build on a single data source only, but must use a package of relevant data sources) and we are still quite some steps away from having comparable numbers at the national level, let alone a total number of homeless persons in Europe. At the EU level, further progress can be facilitated by organising transnational exchange and cooperation and by making it an obligation for member states to report regularly on national levels of homelessness, with the general aim of preventing and reducing homelessness as far as possible.

A specific and relatively cost-effective approach to the production of comparable information about the prevalence of homelessness in different European countries, but possibly also in other parts of the developed world, would be the inclusion of a standardised set of (retrospective) questions on experiences of homelessness in national (and European) household surveys. Although the results would not provide information on the most recent developments, they would be a great source of consistently measured and comparable information on the overall prevalence of homelessness in the population (assuming questions are formulated in an intelligent and consistent way).

Better use of client record data of homeless services would tell us more about the changing profile of the homeless population. By using the set of harmonised core variables, European comparisons will be facilitated. Harmonised indicators on the outcomes of services for homeless persons should also be developed.

There is a need to improve the common understanding of important issues such as long-term homelessness (what time span?), youth homelessness (which age limit: 18, 21 or 25 years?) and repeat homelessness. In light of the shortcomings of cross-sectional surveys, more robust information is required on the duration of homelessness and on the distribution of transitional, episodic and long-term homelessness among those affected.

Given the growing concern about homeless migrants, especially in western Europe, information on the migration background of homeless persons should be improved and targeted research on these groups is necessary.

Targeted research is also needed to improve our knowledge of homeless persons sharing with friends and relatives (often called ‘hidden homelessness’).

As prevention is the best and least expensive way of reducing homelessness – and as better measures are needed in most EU countries to prevent the discharge of persons from prisons, hospitals and child-care or other types of institution into homelessness – there is a need for better information sources on persons soon to be released from such institutions who have no home to go to.

Finally, we need targeted studies to measure the costs of homelessness and the benefits of specific interventions.

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Services for Homeless People in Europe: Supporting Pathways out of Homelessness?

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Abstract_ *This chapter adopts a dynamic, process approach to reviewing the evidence base on the effectiveness of services for homeless people in supporting pathways out of homelessness. The review considers the range of services which might be required, how they are provided and the evidence on effectiveness of different approaches. Key gaps in the research evidence base include the integration of services to maximise income/employability; better documentation of the impact of the empowerment of homeless people in service development; more robust evaluation of service outcomes; and improved understanding of the impact of partnership and inter-professional working. Despite these gaps, research evidence indicates significant progress in the provision of inclusive services for homeless people in the last 20 years, progress which may be at risk in the anticipated climate of austerity across many EU countries from 2010.*

Keywords_ *Homelessness pathways, services, support, housing*

Introduction

This chapter aims to review research on services for homeless people in Europe, including housing support services. The topic has received considerable attention in the research programme of the European Observatory on Homelessness (EOH). The evidence base for the period 1990-2000 was reviewed in two books (Edgar, Doherty and Mina-Coull, 1999 and 2000) entitled *Services for Homeless People* and *Support and Housing in Europe: Tackling Social Exclusion in the European Union*. These volumes drew on national overviews of the, then, 15 EU member states, as well as the wider prior literature. During the period 2003-2006, a working group of Observatory researchers from a selection of EU countries reported annually on aspects of the changing role of services for homeless people. Since 2007, the core research output of EOH has been the *European Journal of Homelessness*, containing articles by researchers from within, and outside of the Observatory. With annual themes of *Quality and Standards in Homelessness Services; Effectiveness of Policies and Services for Homelessness*, and *Governance and Homelessness,* the topic of services for homeless people continued to be well-covered during 2007-2009.

The review draws largely upon the above body of evidence and some recent key international reviews to establish the broad pattern of findings from the current evidence base. The topic is extremely complex and there are particular challenges in analysing service provision across a number of welfare policy domains (including housing) and the immense variation across EU countries in terms of both the development of homelessness services and the scale, quantity and rigour of national and cross-national research. The conceptual approach of examining the processes by which services support pathways out of homelessness was found to be valuable for structuring the analysis.

The chapter begins by considering what services homeless people may need and why. The main body of the chapter appraises what is known from the current research evidence base in terms of: what services are delivered; how they are delivered (governance and funding); and the effectiveness of different approaches to service provision (particularly in terms of supporting pathways out of homelessness). Gaps in the research evidence base and requirements for future research and evaluation are then discussed prior to drawing overall conclusions on progress and future prospects.

What Services Might Homeless People Require?

Definitions and meanings of homelessness are considered by Busch-Geertsema in the first chapter of this volume. FEANTSA and the EOH developed the ETHOS typology of homelessness, identifying 13 operational categories, living situations and generic definitions of homelessness, across four core categories of rooflessness, houselessness, insecure housing and inadequate housing (Edgar and Meert, 2005; Edgar, 2009). Acknowledging that the risk or experience of homelessness would be very different across these categories, services directed at improving people's housing circumstances could prove valuable in all situations. Edgar (2009, p16) relates homelessness to exclusion from the physical, social and legal domains of housing, but does not incorporate the economic domain in terms of financial resources to access housing, a link which subsequently emerges as a gap in other research. Further, it is equally important to conceptualise definitions of being housed in terms of appropriate physical shelter along with minimum standards to facilitate wider participation in society, such as:

- Reasonable choice (dwelling and neighbourhood)
- Reasonable standards (size, type, condition)
- Affordable costs (rent or rent allowance do not preclude employment)
- Reasonable security of tenure (medium to long term)
- Reasonable support services (independent living and participation in civic society)
- Reasonable living income (employment or state support).

This (the author's) conceptualisation is similar to that of Article 11 of the United Nations International Covenant on Economic, Social and Cultural Rights (ICESCR, 1966, cited in Kenna, 2005).

While homelessness can be a 'state' of lacking housing and other necessities, it is not an unchanging or permanent state. Dynamic approaches to understanding pathways into and through homelessness have been advocated by Anderson and Tulloch (2000), Anderson and Christian (2003) and Clapham (2003, 2005). A pathways approach recognises that housing and household circumstances change over the life course and that economic and social circumstances may constrain or enable access to a suitable home, or indeed enforce loss of a home.

Explanations of homelessness often utilise the notions of structure and agency (Neale, 1997). Ratcliffe (2004, p7) referred to the 'familiar sociological terrain of the structure-agency dualism', broadly attributed to Giddens (1984), whose 'structuration theory' emphasised the two-way interaction between actors and the wider social structures. Ratcliffe interpreted structure as encompassing those features of society which constitute a context for constraint or enablement (institutions, organisations, forces of social regulation, laws, custom and practice). Agency referred to meaningful social action of an individual or collective nature and is considered to be multi-layered and multi-dimensional (Ratcliffe, 2004). Structure and agency aid analysis of service provision for homeless people, in the sense of constraints and choices in accessing accommodation and support services required for inclusive participation in ordinary life. There are structural constraints on what services are provided, by whom, and for whom; and the agency of individuals is reflected in their use of available services.

This review begins with the premise that services for homeless people should be focused on the needs of potential service users (rather than on organisational goals of potential service providers) and that they should contribute to supporting pathways out of homelessness (rather than merely making homelessness more bearable). The services required by someone facing homelessness will reflect the extent/depth of their housing/homelessness crisis; the resources they have/lack to resolve it; and any combination of other needs of the person/households, besides the need for housing. For those without basic accommodation the provision of food, clothing, bathing and laundry facilities may be valuable. Resolving the housing crisis may require advice on how to negotiate access to accommodation and guidance on options available. Non-housing needs may require health services (physical, mental, addictions); social care services (though domiciliary care services are usually provided to 'a home'); lighter Housing Support/Independent Living services; income maximisation (benefits) and employability services; and social networking/support services. Homelessness prevention services have increasingly developed in the post-2000 period (Pawson, 2007). Prevention was initially conceptualised as avoiding repeat homelessness through supporting residential sustainability (Pawson and Munro, 2010), but in an inclusive pathways model homelessness prevention through risk assessment and early intervention would be the first service available.

While it is relatively straightforward to identify a range of possible services, needs assessment and service delivery is by no means straightforward. Individuals may have highly complex combinations of housing and other needs and a wide range of agencies may be involved in service provision. Consequently, issues of co-ordination and inter-professional working are likely to be crucial to service effectiveness. Moreover, the homeless person needs to have some awareness as to how their needs might be assessed and met. This key interaction of structure and agency raises the question of co-ordinated needs assessment as a service and Edgar *et al* (1999) found that the detailed assessment of support needs of homeless people was generally underdeveloped across Europe.

Typologies of service provision have been developed through research linked to the EOH (Edgar *et al,* 1999, Edgar, 2009, and Busch-Geertsema *et al*, 2010) as indicated in Figures 1 and 2. Figure 1 shows a conceptual framework for comparative analysis which distinguished between emergency, transitional and long-term approaches to service provision. The model was useful in trying to summarise approaches across fifteen countries, but did not fully capture the diversity and complexity of potential responses to homelessness as reflected in the detailed national case studies in Edgar *et al* (1999).

Figure 2.1: Conceptualisation of accommodation and services for homeless people, c. 1999

Approach	Accommodation	Services
Emergency/Crisis	Traditional night shelters Hostels for special groups	Advice/reception Emergency facilities Soup kitchens and clothes stores Medical facilities
Transitional/Support	Transitional housing Supported Housing	Social Support
Permanent/Integration	Ordinary Housing	Training/employability

Adapted from Edgar *et al* 1999, p56.

Edgar *et al's* (2000) review of housing and 'support', defined support as organised personal or social support which aimed to help people to live independently in the community (p9). Three broad types of support were identified (housing and domestic support; counselling and skills; and personal and health care support) and it was acknowledged that needs would vary according to life course stage and life experience. Edgar *et al* (2000) distinguished between 'support in housing' (where support could be flexibly delivered to accommodation) and designated supported accommodation (where there was usually a contractual relationship between accommodation and support, p10). In the remainder of this review, 'support' is viewed as an element of service provision to help people get by in accommodation. Wolf and Edgar (2007) noted that classifications of services and support continued to distinguish between accommodation and non-accommodation services; and between emergency and resettlement services and some services were available to both housed and homeless people (e.g. addiction/mental health services). Busch-Geertsema *et al* (2010) provided an updated typology of services either directed to homeless people or used by homeless and housed persons (Figure 2) and Edgar (2009) also provided operational examples of service provision in national contexts and further mapping of accommodation and service provision situations.

Figure 2.2: Typology of services for homeless people and those in immediate risk of homelessness

Service Type	Example
Prevention services for households in immediate risk of homelessness	*services offering mediation in cases of domestic conflicts, assumption of rent arrears etc.*
Emergency accommodation for roofless persons	*emergency shelters*
Temporary accommodation for houseless persons	*temporary hostels, supported or transitional housing, shelters for victims of domestic violence*
Non-residential services for homeless and formerly homeless persons	*outreach services, day centres, advice services, health services, mobile food services, education, training and employment services, floating support for ex-homeless persons in permanent housing*
Accommodation for other client groups that may be used by homeless people	*hotels, bed and breakfast, specialist support and residential care services for people with alcohol, drug or mental health problems*
Mainstream services for the general population that may be used by homeless people	*advice services, municipal services, health and social care services, welfare payment services*
Specialist support services for other client groups that may be used by homeless people	*psychiatric counselling services, drug detoxification facilities, services for former offenders, services for vulnerable young people*

Source: Busch-Geertsema *et al* (2010, p44, adapted and amended from Edgar, 2009, p. 17).

This section has shown how the evolving research evidence base has shaped conceptualisations and models of the provision of a wide range of accommodation and services for homeless people. The following section examines service delivery in more detail, prior to the assessment of effectiveness in supporting pathways out of homelessness.

Delivering Homelessness Services

The funding and delivery of homelessness services reflects a combination of structural factors (e.g. approaches to overall welfare provision) and the agency of both service users and individual actors in the service provision community. The concept of 'governance' has been widely referred to in analyses of the changing welfare state to describe new ways of steering service provision and to capture increasingly complex structures of interaction between public and non-government stakeholders. This section draws on Benjaminsen *et al's* (2009) use of 'governance' in a broad sense of how homelessness services are delivered in different countries and by whom. Separate chapters in this volume analyse the research evidence on national level strategies and broader welfare regimes on approaches to homelessness.

Who provides homelessness services?

Edgar *et al* (1999) identified a Europe-wide recognition of the need to tackle homelessness, and an increased role for the NGO (Non-Government Organisation) sector rather than the state for service delivery (though in countries like Greece, state funding was new). Changes in governance across Europe which influenced service provision included: decentralisation/regional autonomy; an enabling rather than providing role for local authorities; and contractual reliance on NGOs to provide services. Service providers required both capital and revenue finance and this came from a combination of state, private and charitable/church funding (Edgar *et al*, 1999). Organisational structures had to adapt to changing financial pressures, such as demonstrating effectiveness to funders and developing performance management frameworks with revenue funding particularly fragile (compared to capital).

Alongside the above broad international trends, Edgar *et al* (2003) identified some distinct national characteristics across five countries. Austria was characterised by bottom-up development and regional diversity but with a strong umbrella organisation. In Finland a strong role for municipalities also resulted in diversity while in Greece a lack of resources meant only fragmented service development. Portugal had experienced a shift away from church-based services and gradual growth in state involvement while the UK had seen a shift from a strongly housing-led approach to a more integrated approach embracing the provision of support services. Fitzpatrick and Stephens (2007) identified national funding streams for homelessness in seven of nine EU countries studied. In most cases, municipalities were enablers, but in Germany, Sweden, England and Hungary they were also direct providers of services for homeless persons. Only in France and the Netherlands was direct service provision negligible, while in Spain and the Czech Republic, municipalities had no major role as either providers or enablers.

Olson and Nordfelt (2008) analysed how variation in Swedish municipal approaches impacted on services for homeless people. The social democratic system was strongly connected to employment and earned income and homelessness services were the responsibility of local authorities under the Social Services Act (2001), rather than a national entitlement through National Insurance. This resulted in a 'secondary' housing sector providing a range of transitional accommodation through municipalities. The role of non-profit NGOs was described as a 'tertiary' system for those who fell through the safety net of the first two and once excluded, it could be very difficult to re-enter the secondary and main housing sectors.

Homelessness emerged as a social issue in the 1990s in Central European countries, but policy responses were generally slow to develop (Hradecký, 2008; Filipović-Hrast *et al,* 2009). While a non-profit sector emerged, impact was variable across countries. Filipović-Hrast *et al* (2009) found that the majority of homelessness services were delivered by NGOs in Hungary while they played more of a complementary role to public service providers in Slovenia. In both Slovenia and Hungary, a more integrated and complex approach to providing homelessness services was evolving although this had not yet developed into formal homelessness strategies in either country.

NGOs providing services for homeless people are generally non-profit organisations (charities), rather than commercial (for profit) providers. Both faith-based and secular NGOs are active in homelessness service provision with distinctions between the two approaches narrowing in some countries (Johnson and Fitzpatrick, 2009). Private sector provision is more common simply as a source of housing for those moving out of homelessness. Identifying mechanisms to increase private sector provision in the 1990s, Edgar *et al* (1999, p77) noted that 'the provision of guaranteed rentals or the absorption of the risks of housing management may be an effective means of ensuring the provision of accommodation for homeless people – especially those who required support to sustain a tenancy'. Temporary accommodation in the form of hotels or bed and breakfasts also represents a form of commercial service provision.

Homelessness services: funding, regulation and competition

Key funding issues identified by Edgar *et al* (2000) included the difficulty of distinguishing between housing costs and support costs and coordination between purchaser and provider agencies. Edgar *et al* (2003) also identified the state as increasingly a purchaser of services through competitive contracts with standards ensured through regulation. Despite growth in voluntary sector provision, organisational stability could be affected by reliance on a range of funding sources, an overall lack of resources, and the short-term nature of funding. Post-2004 funding remained limited in the Czech Republic (Hradecký, 2008) while the EU's EQUAL initiative was utilised to develop service provision in Poland (Wygnańska, 2008). In Slovenia and Hungary, financial dependence on public resources also limited the activities of NGOs (Filipović-Hrast *et al,* 2009).

Wolf and Edgar (2007) concluded that most homelessness services remained the responsibility of the central state or local government and procurement rules drove improvement in quality of services. However, the danger of generalising across countries was highlighted by Dyb and Loison's (2007) comparison of Norway and France as competition in welfare was not a core concept in either country. The governance of homelessness appears to remain influenced by a combination of social policy goals as well as business-oriented approaches to service delivery, embracing the state and NGO sectors more than the private sector (with the exception of private rented housing/landlords). However, this review has not uncovered any comprehensive data on the funding of homelessness services across the EU.

Access to mainstream services: the example of health care

Health care services are perhaps the most universal of services which those who are homeless should, arguably, be able to access on the same basis as the housed population and the health care needs of homeless people have been extensively documented (Pleace and Quilgars, 2004; Pleace, 2008). Indeed a review of evidence on health and homelessness could merit a complete chapter in this volume. Although state involvement in health care was more common across EU countries than for many other welfare services, Anderson *et al* (2006) identified public, private and mixed models for health care provision. Drawing on the examples of Austria, Denmark, Estonia, Greece, the Netherlands, Portugal and the UK, the study identified structural and agency barriers to homeless people's access to health services in all models. Policy responses to overcoming barriers included enhanced access to mainstream services, provision of alternative health services and improvements in access to specialist services. Such policy responses were more developed where homelessness itself was perceived as a priority for policy, including wider provision of housing and support. However, Anderson *et al* (2006) found a lack of evaluative evidence on the effectiveness of such policy initiatives and problems of poor health and exclusion from services persisted to some extent in all countries.

Service co-ordination and interprofessional working

The complexity of resolving homelessness has long necessitated co-ordination across housing providers, social services and health services; and between public authorities and NGOs and Edgar *et al* (2000, pp128-9) identified three possible models for co-ordinated provision: single-agency (providing housing and support services); two-agency (housing provider and support provider); and partnership (managing agency and a number of housing and service providers). Actual provision in different countries tended to reflect tenure patterns, the role of the voluntary sector, contracting arrangements and legislative structures.

Inter-agency working to improve services for homeless people was found to be a relatively recent development in a Scottish study (Kennedy *et al* 2002). Outside of the housing-led UK framework, the social work profession emerged as core to homelessness service provision (Edgar *et al*, 2003). A review of progress in Austria, Greece, Netherlands, Portugal and the UK (Anderson *et al,* 2005) suggested that service co-ordination was more common at local government planning level than at service delivery level. Co-ordination or interprofessional working was particularly required in circumstances where, for example: specialist services may not be available or accessible; where complex/multiple problems fell outside of the scope of individual services; or practices such as discharge from institutions left people vulnerable to homelessness (Anderson *et al,* 2005 pp6-7). However, different service providers could have different approaches to inter-agency working and the study questioned whether strategic objectives were running ahead of conceptual models for evaluation of interagency working.

Approaches to interagency working also reflected national approaches to homelessness (FEANTSA, 2004). Only in the Netherlands and the UK was interagency working significant and this reflected 'top down' policy drivers from central government (Anderson *et al*, 2005). In Greece and Portugal, interagency working was driven more by EU policy and Austria remained distinctive as its federal nature resulted in diverse approaches in different regions. Interagency working was more likely to occur where it was a condition of funding and change could impact on the sustainability of partnerships. Difficulties for homelessness services in collaborating with other sectors were identified due to unequal relations in terms of staffing, professionalism and resources. More recently, Slovenia and Hungary were also identified as seeking to address homelessness through integrated, cross-sector cooperation (Filipović-Hrast *et al,* 2009).

Available evidence suggests gradual development of partnership working in the provision of homelessness services. However, in a field where there is detailed evidence on the complexity of the potential combinations of both service user needs and service provider structures and expertise, the lack of evaluative evidence on interprofessional and partnership working remains a key gap in understanding how services might better support pathways out of homelessness.

The Effectiveness of Homelessness Services

In applying a pathways approach to reviewing research evidence, this section will focus on what is known about the effectiveness of homelessness services in supporting people to move out of homelessness. It looks at current approaches to intervention before considering the emerging fields of homelessness prevention, service user empowerment, outcome evaluation and quality standards.

Approaches to intervention

Reflecting the complexity of meeting both housing needs and other health, care and support needs, a substantial focus for research has been the relative effectiveness of different approaches to providing housing and support. Edgar *et al* (1999) reviewed staged models of resettlement, some of which involved homeless people moving through different types of accommodation with different levels of support (staircase models). Constructed largely as a linear process, such models allowed for moves forward/backward or up/down, but clients did not generally have full tenancy rights until they ‘achieved’ a move to a regular tenancy. This staged model was criticised as being too prescriptive in terms of assuming all individuals needed to make that type of transition (pp103-105). However, supported housing was still viewed as critical to successful resettlement (Edgar *et al*, 1999) recognising the importance of the overall ethos of a service as well as the model of housing and support.

Edgar *et al* (2000) found low levels of provision of supported housing across the EU, largely concentrated in large urban areas. They also noted that access may be linked to an applicant’s potential to move towards more independent living (as perceived by service gatekeepers), rather than their needs. Edgar *et al*, (2000, p165) concluded that while there was a positive role for supported housing there remained a need to address clarity of objectives, the restrictive nature of referral and allocation regulations, and the limitations imposed by some forms of funding and management. Better monitoring and evaluation of outcomes was also required, as well as an adequate supply of ordinary housing for people to move on to.

In their review of youth homelessness, Quilgars *et al* (2008) concluded that some transitional housing could be appropriate for younger people if tailored to their specific needs and with appropriate provision for moving on. However adult hostels have been criticised in terms of restrictions to physical, social and legal space. Busch-Geertsema and Sahlin (2007) argued that ‘basic temporary accommodation has often been legitimised by the sheer need of desperate people for physical shelter’ (p72) citing examples of new/large scale hostels in Madrid and Paris (p73) and questioning why the provision of ‘low threshold/high tolerance’ accommodation was often of a low standard. The examples of Germany and Finland demonstrated success in reducing homelessness among families showing it was possible to almost eliminate the need for temporary accommodation (Busch-Geertsema and Sahlin, 2007) and in Scotland, Glasgow City Council closed all large-scale hostels, resettling residents in ordinary housing in the community, with support (Fitzpatrick *et al*, 2010).

Busch-Geertsema and Sahlin (2007, pp85-87) identified five situations where hostels might still be required:

1. Emergency accommodation for homelessness in a crisis
2. Where clients had a preference for a protected environment
3. For high tolerance accommodation (e.g. wet hostels) which people considered their home
4. For refuges for those fleeing violence in emergencies
5. For vulnerable young people still developing independent living skills.

In these circumstances, minimum requirements for privacy, space to socialise, protection from evictions, service standards, user involvement and public scrutiny should be fulfilled. Similarly, Fitzpatrick and Wygnańska (2007, p62) highlighted the need to pay more attention to the following elements of hostel provision:

- Staff treating residents with respect
- Ensuring residents felt safe (e.g. from bullying)
- Regulations not being unreasonable
- Reasonable protection from summary eviction
- Hostel resident involvement in management
- Effective resettlement from hostels and sustainability of follow on/mainstream accommodation
- Monitoring standards in hostels and resident satisfaction.

As forms of temporary supported accommodation have been criticised as ineffective in supporting exits from homelessness the 'Housing First' approach developed in New York by the Pathways Agency has emerged as a potentially more effective model (Pleace, 2008; Tsemberis, 2010). Housing First focused on placing homeless people with addictions/other complex needs directly into permanent housing (emphasising consumer choice in housing) and separating housing from any prior requirement for treatment or lifestyle change. Support interventions were focused on harm reduction, and were open-ended and multi-disciplinary. Evaluation showed encouraging outcomes for tenancy sustainment and that the programme was cost effective, though evidence on the effectiveness of reducing mental health or addiction problems was less clear. Culhane (2008) cited evidence that support in ordinary housing was better value than shelter provision in the US, but the large-scale shelters from which quantitative data was collected are not typical of service provision in Europe. Atherton and McNaughton Nicholls (2008) also examined the US Housing First model concluding that while national and local contexts were important for transfer to Europe, available evidence pointed strongly to the capacity of homeless people with complex needs to maintain an ordinary tenancy, with appropriate support as needed.

Benjaminsen *et al* (2009) identified the impact of the Housing First approach across the UK and the Nordic countries, demonstrating the exchange of knowledge through international networks. Individual governments interpreted Housing First in differing ways, but with a clear emphasis on outcomes such as reducing the use of temporary accommodation, reducing stays in shelters, providing long-term or permanent accommodation and providing individualised services and support.

Tainio and Fredriksson (2009) expanded on how Finland was moving towards early provision of suitable accommodation, accompanied by appropriate tailored support services and access to mainstream health and welfare services. More detailed analysis of successful Housing First solutions was needed and the Finnish programme to reduce long-term homelessness (running to 2011) could provide useful evidence. Johnsen and Teixeira (2010) also reviewed international research on linear/staged and Housing First approaches, including research from North America, Australia and Japan. They concluded that linear approaches were still dominant in the UK (for single adults with complex needs) but that no major paradigm shift would be needed to adopt Housing First (indeed, it is 'the norm' for families with children who are protected by the legal safety net).

The debates around Housing First raise the question as to whether a 'pathways' approach to understanding homelessness suggests an extended linear model, but this is not the case. The pathways approach adopted here is focused on supporting routes out of homelessness and would suggest that an effective pathway would be as short as reasonably possible, taking account of the needs and preferences of homeless individuals and households. Figure 3 suggests that the maximum number of stages in a supported pathway out of homelessness need only be three, two might be more appropriate and the minimum could be just one (equating to 'Housing First'). Services to support these accommodation pathways could be integrated into all stages in a dynamic approach focused on moving from homelessness to having a home. Johnsen and Teixeira (2010) also concluded that transitional housing and Housing First are not mutually exclusive approaches and some 'staircase' models are effectively more like an 'elevator' enabling short-cuts to ordinary housing. The more substantive question remains around how individual clients choose, or are steered into, different models of provision.

Figure 2.3: Possible pathways out of homelessness

Homelessness state	Intervention 1	Intervention 2	Intervention 3
Roofless/ Houseless/ Threatened with homelessness	Emergency accommodation	Transitional accommodation	Settled accommodation
Roofless/ Houseless/ Threatened with homelessness	Emergency accommodation	Settled accommodation	
Roofless/ Houseless/ Threatened with homelessness	Transitional accommodation	Settled accommodation	
Roofless/ Houseless/ Threatened with homelessness	Settled accommodation		
Comprehensive needs assessment and development of services / support package.	**Service/ support delivery**	**Service/ support delivery**	**Service/ support delivery**

Source: author.

Homelessness prevention

Preventing homelessness could include an even broader range of advice and support services: to help people access social and privately rented housing; to help sustain tenancies and prevent eviction; and family/relationship mediation services. Evidence from both Germany and England has suggested successful implementation of homelessness prevention contributed to overall reductions in homelessness (Busch-Geertsema and Fitzpatrick, 2008). An emerging focus on prevention was also evident in the emphasis on reducing the number of evictions in the English, Norwegian and Swedish national homelessness strategies (Benjaminsen *et al,* 2009). Homelessness prevention services could usefully be delivered at all stages in Figure 3, with the aim of intervening as early as possible. Assessment of the US Housing First approach does not so far appear to have highlighted that it remains a responsive, rather than a preventive approach. While Housing First may be an effective pathway out of homelessness, EU countries may well wish to give equal or greater priority to developing much earlier interventions to prevent homelessness in the first place.

Empowering service users to move out of homelessness

The empowerment of homeless households in choosing their pathways out of homelessness (both accommodation and support services) is a crucial point of interaction between structural constraints/opportunities and the positive/constructive agency of individuals to influence effective solutions to homelessness. Edgar *et al* (1999) suggested that individual-focused services should apply to accommodation, approaches to working with clients, and inter-agency co-ordination. However, case study national reports did not identify any significant redistribution of power from service providers to service users (Edgar *et al*, 1999). Edgar *et al* (2000) also concluded that the service user perspective in supported housing had been neglected and argued that empowerment should be a key principle underpinning housing, support and service provision to enable greater choice and control for clients. The empowerment of homelessness service users remains underdeveloped in Europe although evidence of increasing user involvement can be found in Denmark, France, Hungary, the Netherlands and the UK (Busch-Geertsema *et al*, 2010). However, it should also be noted that the ability of homelessness service users to defend their interests is often inhibited by the transitional nature of homelessness in addition to a lack of resources, continuity and stability (Anker 2009).

Evaluating effectiveness outcomes

A pathways approach to service evaluation would suggest indicators of effectiveness would reflect success in clients moving out of homelessness (rather than organisationally-oriented indicators). Research from outwith the EU raises both lessons and challenges for evaluating outcomes. The USA appears to have better developed quantitative data bases on homelessness and the effectiveness of interventions (Culhane, 2008) sometimes integrated with, for example, mental health services. However, recording systems were better in some parts of the US than others and there could be legal and ethical issues in terms of managing data bases with a large amount of personal information. Flatau and Zaretzky's (2008) economic approach to effectiveness evaluated: relative improvements in outcomes for participants; the difference in cost between one programme and an alternative; and the overall effectiveness in terms of costs and outcomes. They recognised methodological and ethical issues including practical constraints on implementing Randomised Control Trials (RCT) in the field of homelessness. Their analysis justified intervention programmes on the basis of delivering positive outcomes for funds invested and savings on other programme areas (such as health, justice etc). While acknowledging client rights and moral duties to alleviate homelessness, Flatau and Zaretzky (2008) concluded that robust quantitative evaluations and RCT could be implemented with respect to homelessness programmes, although in practice this was still mainly confined to the US. The balance between developing RCT approaches the ethics of respecting client rights, as well as meeting client needs could usefully be explored further in the European context.

Service quality and standards

In line with the pathways out of homelessness approach adopted for this review, Wolf and Edgar (2007, p28) argued that the overall benefit of homelessness services should be understood as an improved quality of life of clients. They suggested that service regulation could lead to formalisation of standards and quality measurement (p21). However, many EU countries had no national standards for services and in some cases standards were developed at regional or local level (p22). Scotland was noted as one country with a system of national inspection of homelessness services and the setting of Dutch standards in 2007 indicated how recent such developments were. Assessing outcomes and the perspective of service users remained complex and neglected and it remained necessary to look at longer-term methods of ensuring that services were delivering what customers needed (Wolf and Edgar, 2007).

Fitzpatrick, and Wygnańska (2007, p42) considered three types of standards for comparing hostel provision in the UK and Poland:

- Benchmarking: descriptive standards which clarified the content and nature of a service
- Normative: standards aimed at 'levelling up' services and improving the experience and outcome for service users.
- Actual: standards implemented in practice.

Comparing very different approaches in the UK and Poland, some general improvement in standards was evident. Although Norway had introduced quality agreements to hostels (Dyb and Loison, 2007), in most European countries residents still tended to have few rights of legal occupancy, remaining vulnerable to eviction. Fitzpatrick and Wygnańska (2007) concluded that there was evidence of levelling up of actual and normative standards *within* both the UK and Poland but not *between* the countries. However, they suggested it should be feasible to develop transparent EU-wide benchmark standards (outcome focused and informed by service user perspectives) to allow for more consistent comparison.

Services for Homeless People: What More Do We Need to Know?

While the European-level research review may mask particular strengths in the evidence base of individual countries, a number of gaps in our knowledge of the effectiveness of services for homeless people have emerged. Analysis of the economic position and financial resources of homeless people has not been integrated into the evidence base on needs and service provision. This would include poverty analysis, income generation/maximisation, employability services and social security and welfare benefits. The 2010 volume of the *European Journal of Homelessness* will address the links between poverty and homelessness and may go some way to reducing this gap.

Overall evaluation of service outcomes are not yet adequate, especially for international comparisons and better documentation and analysis of service user voice and empowerment is required. There is very limited evaluative evidence of the co-ordination of needs assessment or partnership and inter-professional working. Apart from general references to the role of social workers in some countries and housing professionals/housing support workers in others, relatively little is known about who works with homeless people in terms of the level and field of training and qualifications. We do not have a completely clear picture of how services for homeless people are funded across the EU (for example the proportions of funding through state, charitable or private sector sources) and detailed funding arrangements, which are of course subject to change.

Research reviewed, including EOH outputs, has tended to focus on acute aspects of homelessness, especially single adults with high support needs. While services may require to be targeted at those in greatest need, it is also important to interpret research within the broader context of housing need, including those who experience homelessness but just need housing and adequate income. Research on homelessness prevention is required as part of the next phase in homelessness policy and strategy, further moving to a strategic, proactive, early intervention approach rather than a responsive approach. This would necessitate studies of the potential for much earlier intervention to avoid homelessness events.

A substantive proportion of the research literature reviewed here takes the form of reviews, suggesting a requirement for new empirical projects (especially transnational studies). While research gaps can be identified from the current evidence base, there may also be a large amount of valuable evidence from practice which is not documented in a way which can feed into reviews of policy and practice. Careful consideration needs to be given to appropriate methods for future research. In Fitzpatrick and Wygnańska's (2007) comparison of hostels in the UK and Poland, the existence of a much greater body of research evidence in one country demonstrated the constraints of the comparative method within the EU. Recognising different institutional contexts in Germany and England, Busch-Geertsema and Fitzpatrick (2008) also cautioned against over simplistic comparisons and policy transfer.

Johnsen and Teixeira (2010) make the important point that not only is the evidence base on service effectiveness limited, but that evaluation cannot keep up with changes in practice. This is likely to continue to be the case unless evaluation becomes a regulatory or legal requirement. Even where forms of monitoring and evaluation are linked to service funding, this does not necessarily provide robust comparative research evidence. Effective research and evaluation requires resources which are rarely under the control of potential researchers. The European Union and national governments have influence over research agendas and independent funding agencies will also have their sets of priorities. While the research community has opportunities to influence research agendas, there may remain a gap between ideal and realistic research approaches and programmes. The challenge of realising research ambitions and co-ordinating programmes within and across countries in a way that provides meaningful findings for service users and providers remains substantial.

Conclusion

A strength of the European Observatory on Homelessness has been its ‘home’ within the European Federation of national homelessness NGOs. This has ensured both research and researchers have been linked to the service-providing sectors, while bi-/multi-lingual researchers and translation resources facilitated the development of a comparative approach. This structure aided balance in international comparisons across member countries and sought to proactively nurture awareness of homelessness and build research capacity in those countries which did not have strongly developed frameworks for homelessness service provision or research. However, the output indicates an emphasis on review, rather than on substantial new empirical research.

EU member countries remain at differing stages in terms of the development of research, policy and practice on service provision for homeless people and drawing EU-wide conclusions risks over-generalisation and loss of in-country detail. Nevertheless, a few key trends have emerged: consensus on understanding the causes and complexity of homelessness; the complexity of changing governance; and perhaps most importantly, the emerging consensus around the delivery of support services in ordinary housing. As Busch-Geertsema and Sahlin (2007, p67) argued ‘an organised provision of mainstream housing, let with security of tenure and coupled with support when requested by residents is the only working solution to homelessness’.

The recognition of the wider support needs associated with homelessness was invaluable in delivering resources and services to a group who had been excluded from appropriate provision. But the emerging emphasis on ordinary housing and homelessness prevention in the post-2000 period seems to rightly re-state the fundamental requirement for secure housing, with the delivery of support services as required, as core to supporting people’s pathways out of homelessness. This is not a straightforward recommendation for the Housing First approach. It is a call for a balanced, dynamic approach to assessing and meeting the specific needs of individual people facing homelessness. A range of appropriate service providers need to facilitate coordinated access to appropriate housing *and* delivery of appropriate health and social care services as required for those with different needs. 'Housing and Support Together' may not be as catchy a phrase as 'Housing First' but it may be a more sophisticated overall strategy. Homelessness services also need to embrace comprehensive assessment of the needs and preferences of clients. Better use can be made of client experience to enhance service delivery for those at risk of, experiencing, and moving out of, homelessness.

Despite the emergence of ambitious national level strategies in the post-2000 period, homelessness has not yet been eradicated and there remains a need to provide services to help those in a housing crisis access stable housing. While a substantial proportion of those who do not have an adequate home have other health and social care needs, this also applies to those who are adequately housed. EU nations need to continue to distinguish both housing and support needs and to deliver joined-up housing and support solutions, without conflating the two in a simplistic way. There remains a need to provide non-housing services for homeless people because their state of homelessness contributes to exclusion from regular health and social care services available to those in stable housing. Inclusive welfare could address this by improving the access of homeless people to mainstream health and social care services rather than by perpetuating exclusionary specialist provision. The regulation of quality and standards of provision for both transitional accommodation and for the delivery of health and social care services to those in vulnerable housing circumstances could contribute to more inclusive outcomes.

The period 1990-2010 saw significant progress in understanding and tackling homelessness, with a growing research evidence base to support developing policy and practice. The crisis of neoliberalism which engulfed much of Europe in 2008 and precipitated severe austerity programmes in many EU states may test the prior emerging consensus to its limits. In the year when the EU consensus conference on homelessness seeks to take forward the agenda on ending homelessness, the need to protect achievements to date on providing housing and support services to prevent and alleviate homelessness may become the most critical task for research and practice. If neoliberal structures overwhelm the agency of vulnerable individuals and service providers, the outcome could well be more protracted and damaging pathways through homelessness in a less inclusive, more divided, Europe.

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Welfare States and Homelessness[1]

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Abstract_ *While welfare spending has not, on average, decreased across the EU over the past decade, mechanisms to restrict access to welfare services, particularly for those without full citizenship, have increased. A key research question that arises is how we conceptualise the shifting boundaries of inclusion and exclusion for particular marginalised populations and how these boundaries shape the extent and nature of homelessness. Within extensive, encompassing welfare regimes, homelessness appears to be the fate of only a minority, but for those people who are homeless, policies and practices are restrictive. Less generous welfare states tend to have higher rates of homelessness, albeit that many who experience homelessness exit relatively quickly.*

Keywords_ *Welfare Regimes, homelessness, migration, citizenship*

Introduction

This chapter reviews recent scholarship on welfare regimes, particularly research arguing that different welfare regimes shape the scale and pattern of homelessness. Furthermore, the chapter explores the interaction of welfare regimes, migration regimes and penal regimes on the basis that the mechanisms of social inclusion co-exist and oftentimes reinforce mechanisms of social exclusion. Welfare regimes may be encompassing and involve high levels of social expenditure, but if they exclude certain categories of individuals by virtue of their legal status, then the benefits conferred are of limited value. Other formal instruments of social exclusion tend to be located within the criminal justice system and range from excluding individuals from particular places and spaces to excluding individuals from participation in society through incarceration in penal institutions.

1 I am grateful to Eoin Healy, Virpi Timonen, Tony McCashin and Nicholas Pleace for helpful comments on this paper.

These three areas of policy intervention – welfare, migration and punitiveness – dovetail in the realm of the regulation of public space, which will be explored in the final section of the chapter.

That a relationship existed between the nature and extent of homelessness and the configuration and extent of welfare services was an implicit theme of the early work of the European Observatory on Homelessness. For example, in the second report of the Observatory it was argued that 'the supply and demand for a range of housing and the prevalence of and responses to economic, social and other problems are the key factors determining the extent of homelessness within and across nations' (Daly, 1993, pp.5–6). In the late 1990s more explicit attempts were made to situate and understand homelessness in the context of vibrant debates on welfare regimes in Europe. These debates, which were in large part stimulated by the work of Esping-Andersen (1990), argued for the existence of three distinct worlds of welfare capitalism. Edgar *et al*. (1999), drawing on the work of both Esping-Andersen and Daly (1995), argued that homelessness was an extreme form of social exclusion generated by the failure of housing and welfare regimes to provide adequate services. However, they went on to note that responses to homelessness were 'specific to particular countries and regions' (p.24).

The observation that responses to homelessness vary by welfare regime was, in large part, the basis for a series of research reports on the changing role of the state in relation to homelessness, in the context of the burgeoning research literature on welfare regimes (Arts and Gelissen, 2002, 2010). These reports (Doherty *et al*., 2004, 2005, 2006) were part of the suite of research themes adopted by the Observatory during the 2000s. The first two reports looked specifically at the role of the state in housing policy and welfare delivery, with the third exploring the role of the state in regulating public space. The material from the first two reports was reworked as a special edition of the *European Journal of Housing Policy,* entitled 'Housing the Homeless: The Changing Role of the State' (Doherty, 2004), which also included some additional contributions from outside the Observatory. In his introduction, Doherty argued (p.259):

> The message of these papers is that the housing regimes of Europe embedded in national welfare states demonstrate much continuity; all have undergone change, but the state remains a key player. Of necessity the focus of these papers has been on the role of the state in the provision of social housing and homelessness. An examination of the role of the state in maintaining, regulating and determining the direction of the private housing market through interest rate manipulation, through tax breaks, and other interventions and subsidies would

> almost certainly reinforce the message. For all the hyping of the market, neoliberalism and globalization, the state remains a key actor in the housing system as it does in many other economic, social and political arenas of Europe.

Since the publication of the special edition of the journal, welfare expenditure across EU member states has remained constant, and in some cases grown, (Glenn, 2009). Obinger and Wagschal (2010, p.335), in their review of social expenditure in OECD member states, show that, with the exception of Ireland and the Netherlands, public social spending grew between 1980 and 2005 and that ‘the increase of almost five percentage points of GDP on average suggests anything but a race to the bottom’.

Welfare Regimes in Europe

The instruments of social inclusion that make up the welfare state and the scale and coverage of welfare provision are not uniform across the EU. In recognition of the varieties of welfare evident across the EU, observers have identified welfare clusters/regimes or different ‘families of nations’. These ideal-types are shaped both by the history and politics of countries and by modern observations of their social organisation. The welfare state of a country is not simply the sum of all its social policies, rather it is a reflection of the historical relation between the state, religion, class and the economy. As such, welfare states are very diverse, owing their differences to cultural, historical and political variations. The existing institutional organisation of the welfare state plays a major role in determining the national pathways of a country because of its importance in social relations and class coalitions (Arts and Gelissen, 2002, p.140).

By examining the variations in social rights, welfare state stratification and the different arrangements between the three possible providers of care (i.e. the state, the market and the family), Esping-Andersen (1990, 1999) determined three different clusters of welfare capitalism based on the degree of decommodification and stratification.[2] Esping-Andersen (1990) argued that welfare states are clustered about three separate ideal-types: the liberal, the social democratic and the corporatist. The most important historical factors in the formation of these clusters are the nature of class mobilisation within a country, the class political action structures and the historical organisation of the institutions of the state.

[2] The neglect of the family as a source of care in the *Three Worlds of Welfare Capitalism* (1990) was rectified in Esping-Andersen’s later work on the *Social Foundations of Postindustrial Economies* (1999).

Since the publication of the *Three Worlds of Welfare Capitalism* in 1990, scholars have debated the existence of additional welfare regimes. These debates centred first on the positioning of certain countries in the typology devised by Esping-Andersen; and second on how to incorporate the new central and eastern EU member states into the typology. For the purposes of this chapter, we can identify six welfare regimes in the EU:

- The *social democratic regime*, which assigns the welfare state a substantial redistributive role. A high level of employment flexibility is combined with high security in the form of generous social welfare and unemployment benefits to guarantee adequate economic resources independent of market or familial reliance. For example, Sweden, Finland, Norway, Denmark.
- The *corporatist regime* involves less emphasis on redistribution and views welfare primarily as a mediator of group-based mutual aid and risk pooling, with rights to earning-related benefits depending on participation in the labour market. For example, Germany, Austria, France.
- The *liberal regime* acknowledges the primacy of the market and confines the state to a residual welfare role, social benefits typically being subject to a means test and targeted on those failing in the market. For example, the UK, Ireland.
- The *southern European or Mediterranean regime* is distinguished by the crucial role of family support systems. Labour market policies are poorly developed and selective. The benefit system is uneven and minimalist in nature and lacks a guaranteed minimum income provision. For example, Spain, Portugal, Greece, Italy.
- The *conservative post-socialist regime* consists of the central European countries with mostly transfer-oriented labour market measures and a moderate degree of employment protection. For example, Czech Republic, Slovenia, Hungary.
- The *liberal post-socialist* cluster comprises the Baltic countries, which are characterised by a more flexible labour market, with employers, particularly in the private sector, unwilling to abide by legal regulation of the market. For example, Latvia, Estonia, Lithuania.

(Whelan and Maître, 2010, p.93; see also Draxler and Van Vliet, 2010, for a broadly similar analysis)

While debates will undoubtedly continue on the location of individual countries within the welfare regime typology and the appropriate methodology and data sources to generate the categories (see, for example, Ahlquist and Breuing, 2009), for the purposes of this chapter, the clustering outlined above provides a sufficiently robust typology to explore the central question of what impact different welfare regimes have on the nature and extent of homelessness.

Homelessness, Housing and Welfare Regimes

Researchers have long debated the relationship between housing and the welfare state (for a review of these debates, see Malpass, 2008; Stephens *et al*., 2010). Malpass (2008) argues that the housing system has its own dynamics, rooted in market mechanisms, and that housing policy should be understood as essentially supportive of the market. Malpass contends that 'housing has facilitated a restructuring of welfare, but has not driven the process' (p.16). Bengtsson *et al*. (2006) take a similar view in their comprehensive study of the diversity of housing systems in five Nordic welfare regimes. The diversity of housing systems in the Nordic states ranges from the largely homeowner countries (Finland, Norway and Iceland) to Denmark and Sweden with substantial public and private rental sectors. These housing systems have developed along different patterns resulting in a diversity of systems that have no parallels in their welfare state arrangements. If housing is a crucial determinant in ending homelessness, the nature of the housing tenure system, particularly the rental system, is of considerable importance and it is clear, particularly for the social democratic regimes, that rental systems cannot be 'read' from the regime type. As well as variation between welfare regimes, previous analysis suggests that there is considerable variation within each regime.

For Stephens and Fitzpatrick (2007) the significance of different configurations of welfare on homelessness, while acknowledging that data on homelessness across different welfare regimes are not directly comparable, is that:

> The nature, as well as the scale, of homelessness is also likely to be related to welfare regimes, and their (contingent) interaction with housing systems. Welfare regimes that produce high levels of poverty and inequality not only produce high levels of homelessness, but the resulting homeless population is made up predominantly of households facing access and affordability problems, rather than particular personal needs arising, for example, from alcohol or drug dependency, or mental illness. Conversely, those countries whose welfare regimes produce low levels of poverty and inequality tend to have lower levels of homelessness, while a greater proportion of their homeless populations tend to have individual support needs, such as those related to addiction or mental illness (pp.209–10).

Stephens and Fitzpatrick (2007, p.208) further argue that the 'housing system can produce powerfully decommodifying influences, and these may run counter to influence the welfare regime. The provision of housing subsidies targeted on lower income households, such as housing allowances, and the availability of social rented housing will also reduce the level of homelessness.' The appropriate targeting of social housing seems the more important factor here than the stock of social housing.

While it is not possible to test the relationship between welfare regimes, housing policies[3] and levels of homelessness rigorously across all EU member states due to data deficiencies in the dependant variable (see Chapter 1), recent research using a series of country case studies concluded:

> Welfare regimes were clearly relevant to outcomes for homeless people – the strongest mainstream protection to those at risk of homelessness was offered in the social democratic/hybrid regimes we studied (Sweden and the Netherlands), and the weakest protection was to be found in the Mediterranean regime (Portugal) and even more so, in the transition regime (Hungary). (Stephens *et al*., 2010, p.257)

However, these broad macro patterns may conceal considerable change at local levels. For example, Benjaminsen and Busch-Geertsema (2009) have shown the potential of labour market reforms in Denmark and Germany to exacerbate homelessness, and Hansen Lofstrand (2010) has highlighted that a range of local influences may shape homelessness policies in Sweden, not simply the overarching structure of the welfare regime. The impact of local influences in the context of two contrasting welfare regimes was explored by Von Mahs (2005). In comparing the results of ethnographic research in Berlin to existing quantitative research from Los Angeles, Von Mahs demonstrated that, while quantitative research is particularly useful in identifying the relative significance of specific facilitators of or barriers to exit from homelessness, such research fails to reveal how specific factors intersect to determine outcomes and durations. Alternatively, the ethnographic research approach in Berlin allowed for a more nuanced understanding of such interactions showing that exit chances and outcomes are ultimately dependent on homeless people's life course trajectories and the distinct characteristics they entail and how they interact differently with the institutional and structural context of local homelessness. The author concluded that to be more effective, social policy must take homeless people's life-course-specific problems, needs and expectations into account *irrespective* of the underlying welfare regime.

In recent years the EU member states with liberal and social democratic welfare regimes have all published homelessness strategies, as well as one member of the southern regime, Portugal (Benjaminsen *et al*., 2009; Baptista, 2009). These strategies are not mere reflections of the dominant welfare ethos of the individual countries, but rather reflect different configurations in housing provision, criminal

3 In the case of housing policy, Fahey and Norris (2010, p.480) make a persuasive argument that 'the role of the state in housing is so multiple and varied that neither its extent nor its distributive impact is open to any kind of quantification that would allow us to say confidently how great it is at time or place or whether it has grown or declined over time'.

justice systems, addictions policy and core–periphery relations. In their review of homeless strategies in liberal and social democratic welfare regimes, Benjaminsen *et al*. (2009, pp.45–46) concluded:

> A focus on general housing policies and a rights-based approach in terms of the statutory definition of homelessness and the corresponding interventions seem to be predominant in the liberal regimes, whereas a focus on the most marginal groups and extending social services and interventions for these groups is most characteristic of the strategies in the social democratic regimes. However, there are also clear elements of convergence as a housing-first-dominated approach has come into focus across the different types of welfare state, and prevention and targeted, individualised and tailor-made interventions are key objectives in developing national homeless policies.

Thus, in addition to the need for more robust data to allow us to explore macro-level relationships between welfare regimes and homelessness, we need nuanced analyses of how the provision of welfare is delivered to specific groups at the point where responsibility is located. For example, Sweden is often heralded as the exemplar of a statist, universalistic welfare provider. Yet, we find that services for homeless people in Sweden, particularly emergency services, are provided by traditional Christian charitable providers and for-profit agencies (Olsson and Nordfeldt, 2008; Hansen Lofstrand, 2010).

The instances cited above do not necessarily invalidate broader hypotheses about the relationship between welfare regimes and homelessness, but rather are reminders that caution needs to be shown in demonstrating how broader welfare policies are operationalised, filtered and interpreted by 'street level bureaucracies'. As Deverteuil and Wilton (2009, p.464) argue:

> The lack of a coherent, agreed-upon welfare settlement cautions us against any totalizing accounts of welfare state restructuring that fail to appreciate the necessarily path-dependent, contingent nature of processes operating at local, regional and national scales, interacting with and emerging through inherited institutional landscapes. As such, welfare state restructuring rarely imposes itself without some unevenness and contingency, as each locale (and agency) filters broader tendencies through its own pre-existing 'institutional layers' and regulatory pressures.

Thus, it can be argued that our knowledge of the relationship between welfare regimes and homelessness, in terms of promoting social inclusionary policies, remains relatively limited, but largely confirms that more inclusive welfare regimes have a greater range of protections for those who are at risk or are actually homeless than those with flimsier safety nets. However, individual country case studies remain the primary mode of analysis in the absence of robust comparable data across the EU, which restricts our ability to test a range of hypotheses on the relationship between welfare regimes and homelessness. Furthermore, given that the delivery of homelessness services in a large number of member states is the responsibility of local or regional authorities, it is important to understand how such services are delivered, and the degree to which they meet expectations given the overall tenor of the welfare regime.

At a macro level, welfare states may have broadly identifiable traits that allow for their classification as encompassing or restrictive, as universalistic or selective, or as inclusionary or exclusionary. However, the relative generosity of cash transfers or the scale of service provision within countries does not necessarily tell us much about the ideological tenor of particular interventions. For example, in relation to alcohol consumption, the social democratic welfare regimes tend to adopt abstinence or temperance-based policies rather than harm-reduction-oriented policies, particularly in relation to problematic use (Peele, 2010; Marlatt and Witkiewitz, 2010). Not surprisingly, and best exemplified in the Swedish staircase model of housing provision, treatment for alcohol and other substance misuse is required before independent accommodation is provided. Although increasing adherence to housing first models are articulated by policy makers, deep-rooted cultural assumptions in relation to addiction may limit the ability of policy makers to develop successful evidence-based programmes. Furthermore, generous welfare regimes are based, both fiscally and ethically, on the assumption that citizens are in employment, and for those who are not, a range of activation policies are in place.

Welfare Capitalism and Social Exclusion

Rose (2000) points to a series of strategic control mechanisms and technologies that aim to regulate conduct by placing individuals in 'circuits of inclusion' and by acting on social pathologies through 'circuits of exclusion'. Inclusion is achieved through the use of circuits of security, which are expressed in institutions, conventions and associated rights. Prime examples of such inclusionary circuits are nationality, citizenship and welfare services. Conversely, exclusion is achieved through circuits of insecurity, which are expressed in individual liabilities and responsibilities and under the guises of risk management technologies. The circuits of inclusion are also designed and formalised in such a way as to allow for the easy policing of their entry points, for example the requirement for a permanent address and specific identity documents to access services. The three concepts of circuits of inclusion, exclusion and the policing of entry points can be adapted to describe the use of welfare states, the criminal justice system and migration in the governing of marginality in the welfare regimes of Europe.

In recent years it has been suggested that migrants are a growing part of the homeless population of Europe, particularly in the rough sleeper population (see Chapter 7). As noted in the introduction to this chapter, welfare regimes incorporate inclusionary and exclusionary dimensions. Building upon Esping-Andersen's welfare regime typology, several theorists have attempted to demonstrate the importance of welfare systems to the outcomes for migrants. As Sainsbury puts it, 'Of primary interest is the inclusiveness of the regime and who are included' (2006, p.230). The inclusionary/exclusionary dimension can consist of conventions governing the possibility of becoming a citizen, of acquiring residence and work permits and documents and of participation in economic, cultural and political life. It is possible to complement the factors used in Esping-Andersen's typology with the regulation of immigrants' inclusion and exclusion and the knock-on effects on their social rights (Sainsbury, 2006).

The second dimension that needs to be considered concerns selective differences in the awarding of social rights based on the different status of immigrants. This is important because of the frequent conception of the identity of migrants as a single group and the tendency to focus on one group while giving little reflection to implications for others with different 'immigration status'. Sainsbury (2006, p.230) identifies 'labour migrants or economic immigrants, refugees and asylum seekers or political immigrants, family members, ethnic "citizens", and undocumented immigrants'. Each category has varying social rights, and while some (e.g. refugees and ethnic citizens) may indeed have full access to social rights and the benefits of the welfare state, others (e.g. asylum seekers and the undocumented) are often without any claims to entitlements of any sort. This can 'create a hierarchical differentiation of immigrants' social rights, and the pattern of stratification is quite different from the stratifying effects conceptualized in the welfare regime typology' (p.230). Drawing on Esping-Andersen's work, Sainsbury formulated the classification shown in Table 3.1, according to her research on the United States, Germany and Sweden.

Table 3.1: Welfare and Migration Regimes

Country	Welfare regime	Immigration policy regime
United States	Liberal	Inclusive
	Rights based on need	Rights based on land of birth (*iussoli*)
Germany	Conservative	Exclusionary
	Rights based on work	Rights based on lineage (*iussanguinis*)
Sweden	Social democratic	Inclusive
	Rights based on citizenship	Rights based on residence (*iusdomicilii*)

Source: Sainsbury, 2006, p.231.

The liberalising of certain aspects of policy in Europe, particularly in relation to equality, means that there is an institutional push towards 'better' integration, away from assimilation policies and towards promoting individual rights, citizenship laws, cultural diversity and anti-discrimination policies (Joppke, 2007). On the other hand, Castles and Schierup (2010, p.290) argue that 'EU policies also increasingly parallel those of the United States in terms of the propagation of temporary worker schemes, the criminalization of undocumented immigration, the securitization of migration, and the dismantling of formerly humanistic norms and practices concerning asylum.'

One core institution of exclusion that has long been associated with regulating homeless people is the prison (Beier and Ocobock, 2008). The rate of incarceration per 100 000 population varies considerably by welfare regime with the social democratic regimes having the lowest levels and the post-socialist welfare regimes the highest, particularly the post-socialist liberal regimes (Walmsley, 2009). However, the liberal and social democratic regimes have the highest flow, rather than stock, of prisoners, which implies that a considerable number of individuals receive comparatively short sentences. Short- and long-term incarcerations are likely to produce particular outcomes; indeed, short sentences may contribute more to homelessness by disrupting accommodation and employment, but not putting in place adequate reintegrative policies. Downes and Hansen (2006), in a comparative analysis of the relationship between welfare spending and rates of incarceration, argue that those countries spending a higher proportion of their GDP on welfare have lower imprisonment rates, a relationship that has grown stronger over the previous two decades. Similarly, Lappi-Seppälä (2009) has argued that amongst the most powerful predictors of moderation in penal policy and practices are strong welfare states. Dyb (2009), in one of the few comprehensive studies of the link between homelessness and incarceration in an EU context, describes imprisonment as a major gateway to homelessness. In her study of prisoners in Norway, she highlights that while one-third of the inmates surveyed were homeless when they entered prison, two-thirds were homeless when they were released, which demonstrates that 'the rate of homelessness increases during the sentence' (p.821).

One of the most cited scholars working at the interface between welfare, migration and the criminal justice system in Europe is Loic Wacquant. He argues that 'Managing immigration with the penal wing of the state transmutes bureaucratic violations into criminal acts and fosters the selective police targeting and differential treatment by the courts that amplify initial differences between natives and aliens in the composition and incidence of offending' (2005, p.41). He also contends that these policies force 'foreigners to live in a submerged world in the shadow of legality, setting off a fatal dialectic of criminality and criminalization that becomes self-sustaining, with the added pressing demands of the journalistic and political field for dramatic displays of the state's capacity to tame this insidious threat to national cohesion and European integrity' (p.44).

Wacquant argues that European penal practices will in some ways follow US penal practices, where the total incarceration rate is 754 per 100 000 population in 2008, but the rate for black males in state and federal prisons is 3 161 per 100 000 population compared with a rate of 487 for white males. Wacquant suggests that Europe is likely to adopt a similar attitude towards foreigners and quasi-foreigners and so embrace a neo-liberal penal policy to manage the lower end of the labour market: 'urban inequality and marginality and those populations deemed to be dangerous' (2005, p.32), but, as Melossi (2008) points out, not under conditions of mass imprisonment, which has resulted in their disproportionate presence in the prisons of Europe. Recent data seems to support this analysis, with De Giorgi (2010, p.155) highlighting that the:

> … average immigrant incarceration rate of 433/100,00 across Europe (again not counting countries of recent admission) means that foreigners are imprisoned on average 6.2 times more often than EU citizens, with some countries (e.g. Italy, the Netherlands, Portugal and Greece) incarcerating immigrants up to 10 times more often than nationals: an over representation even higher than that of African Americans in the US prison system.

Lacey (2008) has argued that the integration of outsiders may indeed be extremely difficult for coordinated market economies. The issue becomes one of access, as countries with services of education and welfare assistance in place, as required to maintain a high-skilled and competitive workforce and economy, are ideal for insiders but difficult places to enter from the outside. Indeed, it may even be the case that economies with stronger welfare systems are more exclusive to outsiders than the open economies of more liberal countries such as the UK. Problematically, simply by being an immigrant, one is faced with a more criminogenic lifestyle through unlawful entry and residence but also through targeting by the police and differential treatment by the courts (Wacquant, 2005, pp.35–6). Such heavy-handed treatment of immigrants results in them being pushed ever further into 'clandestinity and illegality' (Wacquant, 2005, p.41).

Welfare and Public Space

Across the EU in recent years, at either the national or the city level, attempts have been made to regulate behaviour in public space, particularly begging, sleeping rough and the consumption of alcohol (see Belina, 2007; Eick, 2003; Meert *et al*., 2006).[4] These initiatives have generated considerable debate, which it is not the intention of this chapter to review (see Johnsen and Fitzpatrick, 2010; DeVerteuil *et al*., 2009; Huey, 2009), but rather the purpose here is to understand how these initiatives have been presented and how they relate to the previous sections.

The view that the regulation of public space – through ordinances that prohibited certain forms of behaviour – constituted an attack on homeless people largely originated in the US (Mitchell, 2003). In Europe, the debate has centred not only on homeless users of public space and semi-public areas such as shopping centres and railway stations (Bonnet, 2009; Doherty *et al*., 2008), but also on migrants, particularly Roma (Adriaenssens and Hendrickx, 2010; Tosi, 2007). One strand of the debate suggests that regulating public space punishes, criminalises or excludes the homeless (Doherty *et al*., 2006), another that in fact it may actually protect the homeless (Huey, 2010). These debates question the boundaries of welfare in the area of homelessness.

The regulation of public space, the restriction of certain forms of activity such as begging and rough sleeping and the pervasive eye of CCTV can and have been interpreted as instances of 'coercive care' and protection for homeless people, albeit that they may be 'high risk strategies'. They can therefore be viewed as instances of circuits of inclusion, as much as circuits of exclusion. The exclusion of certain migrants from the fundamental welfare services that characterise welfare regimes also results in us thinking anew about the boundaries of welfare. It must also be seen in the context of the restructuring of urban environments where previously marginal sites of land or property become, or have the potential to become, gentrified and attractive to the swarms of conference and convention goers that cities increasingly strive to attract. Homelessness (and homeless people) is not, in the abstract, perceived as a threat to order, in most cases it invokes a compassionate response, rather, as Wardhaugh (1996, p.706) argues:

4 There is nothing particularly new in the regulation of begging; cycles of regulation can be observed with different rationales justified at different periods. In recent debates, the regulation of begging is justified in terms of reducing public disorder and preventing antisocial behaviour (see Baker, 2009, for a detailed overview of the justifications put forward for the regulation of begging).

> Homelessness is perceived as dangerous because (and only if) it is visible in public spaces. It is this visibility that represents a threat to the security and sense of place enjoyed by settled citizens. Thus, it is not marginality *per se* that is dangerous: rather, it is the visible presence of marginal people within prime space that represents a threat to a sense of public order and orderliness.

In many cases, the exclusion of migrants from systems of social protection has resulted in their greater visibility in public spaces (because they are either sleeping rough or engaging in survivalist tactics such as begging). Whilst responses to homelessness may still be framed primarily in terms of inclusion, the increasingly hostile response to migrants, and particularly Roma, engaging in economic survivalist strategies has contributed to the recasting of our understanding of the intersection between coercion and care in the delivery of welfare. It is also evident that in addition to micro-level targeting of individuals engaged in street activity, area bans are becoming more widespread, with whole areas closed off to such groups. In addition to these explicit bans, more implicit bans are evident in terms of restricted access to housing for the homeless, ex-prisoners and migrants on the basis that their low socio-economic status precludes entry, and (in some instances) their support needs and behaviour could be viewed as a risk to community cohesion by local authorities, or blocked on a more informal basis by middle-class concerns.

Conclusion

Since the European Observatory first began to grapple with the question of the relationship between different configurations of welfare provision and homelessness, new issues and concerns have arisen. In the context of an enlarged EU, a greater range of welfare regimes is evident and the implications of these configurations of welfare on homelessness are not entirely clear. In addition, migration flows have highlighted the country-specific nature of welfare provision and the difficulties for those without appropriate status to access these welfare services and their banishment through imprisonment. Evidence of increasing numbers of 'non-nationals' sleeping rough in a number of EU member states is emerging, but it is not clear to what degree this reflects lack of access to mainstream welfare services (Mostowska, 2009). New forms of regulation of public space are emotively contested, prompting new questions on how welfare is to be understood. These matters add further layers of complexity to already contested issues.

While the qualitative evidence from country case studies suggests that welfare regimes generate particular patterns of homelessness, it remains problematic to test this formally in the absence of detailed, robust and comparable data on homelessness. However, country case studies allow for the gradual development of theory on the relationship between welfare regimes and homelessness and it would be constructive to build on the methodology devised by Stephens *et al*. (2010) to incorporate a greater range of countries.

While welfare spending has not, on average, decreased across the EU over the past decade, mechanisms to restrict access to welfare services, particularly for those without full citizenship, have increased. A key research question that arises is how we conceptualise the shifting boundaries of inclusion and exclusion for particular marginalised populations and how these boundaries shape the extent and nature of homelessness. It is also notable that we have little information as to whether the gendered nature of welfare regimes may generate particular patterns of homelessness.

Within extensive, encompassing welfare regimes, homelessness appears to be the fate of only a minority, but for those people who are homeless, policies and practices are restrictive. In the case of Sweden, relegation to a secondary and inferior housing market faces those who fail to meet the targets of abstinence and to conform with other social norms, particularly those of employment. Less generous welfare states tend to have higher rates of homelessness, albeit that many who experience homelessness exit relatively quickly.

Our understanding of the relationship between homelessness and conservative post-socialist, liberal post-socialist and southern welfare regimes remains limited. This in part reflects the relatively limited social scientific research on dimensions of homelessness in these welfare regimes, the lack of robust comprehensive data on homelessness and, until recently, the somewhat unsettled nature of these regime types. Exploring variations in the nature and extent of homelessness across the six regime types identified above has the potential to allow for a quasi-experimental analysis of the performance of these models in preventing and inclusively responding to homelessness.

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Housing and Homelessness

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Abstract_ *Increasing attention has been given to aspects of housing exclusion in housing research over the past decade. The discussions have been strongly focused on marginalisation processes relating to urban policies, on housing affordability and on the changing role of states in welfare and housing provision. Recent findings show that it is the interplay of welfare, housing and labour markets that decisively impacts on housing exclusion, and it does so in varying ways in different European countries. Since the publication of Access to Housing (a transnational report of the European Observatory on Homelessness; Edgar* **et al.**, *2002), the European Union has enlarged to comprise twenty-seven member states and there has also been considerable volatility in the housing markets of Europe. Tardy state engagement in interventions targeted at the most vulnerable households has contributed to increased housing vulnerability. This chapter is dedicated to a review of recent housing research, specifically research relating to exclusion and homelessness. It summarises the findings of the Observatory's 2002 report and briefly recontextualises those findings in the current EU housing situation. It reviews research questions included in the report and in later English-language publications in the European area. It elaborates on processes relating to homelessness provision and concludes by pointing to recent research developments at EU level and drawing up questions for future research.*

Keywords_ *Housing, welfare states, homelessness, comparative housing policy*

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Introduction: The Observatory Publication

Access to Housing, Homelessness and Vulnerability in Europe by Bill Edgar, Joe Doherty and Henk Meert, a 2002 joint publication of the Policy Press, the Joint Centre for Scottish Housing Research and FEANTSA, was one of the first monographs on homelessness to cover most of the European area. It offers an extensive review of the issues that steered the public discourse around the beginning of the twenty-first century, and delivers a synthesised analysis of European trends in homelessness and housing policy developments.

Research outcomes in 2002 were almost exclusively dominated by UK-related topics and, moreover, there were just few attempts to develop theories on the serious shortcomings of theoretically founded linking of housing policy issues and homelessness. The report took account of both limitations: it drew attention to EU-wide policy developments at national and supranational levels, and discussed increasing housing vulnerability using Karl Polanyi's theoretical framework of pathways of economic integration, which is translated into pathways to housing: market, redistribution and reciprocity (p.33).

Edgar *et al*. claimed that housing vulnerability was increasing due to serious deregulation of the housing market and the withdrawal of states from direct housing provision. They saw housing provision as providing the most effective way of handling homelessness, and claimed that the lack of state responsibility in this area was generating increasing housing vulnerability. They also observed tenure changes towards more homeownership (as an outcome of homeownership promotion policies, urban rehabilitation policies and privatisation of social housing), which posed an increased burden on marginalised households who faced either accessing the ever less accessible social housing market or taking out housing loans despite insecure income conditions. More recent research, however, has shown that there are other underlying processes. For example, welfare, labour market and housing policies are in continuous interaction and simultaneously influence the choices and strategies of households and thus housing vulnerability (Stephens *et al*., 2010).

The 2002 report reviewed the housing policy context of increasing housing vulnerability at community, national and EU levels and, applying Polanyi's theoretical framework, concluded that market mechanisms dominate the paths of access to housing. Hence, households with few marketable resources struggle to cope without profound public interventions and are increasingly vulnerable to marginalisation and housing exclusion. Edgar *et al*. also referred to changes to each of the integration mechanisms (e.g. the governance structures of state redistribution). This is a very important message as it reaffirms the need to extend Polanyi's theoretical framework: we should not exclusively focus on shifting integration mechanisms; modification of the inner logic and mechanisms of the integration patterns should also be explored – not only in time, but also among countries (see also Hegedüs *et al*., 2010).

Recent Changes in the Housing Sector in the European Area

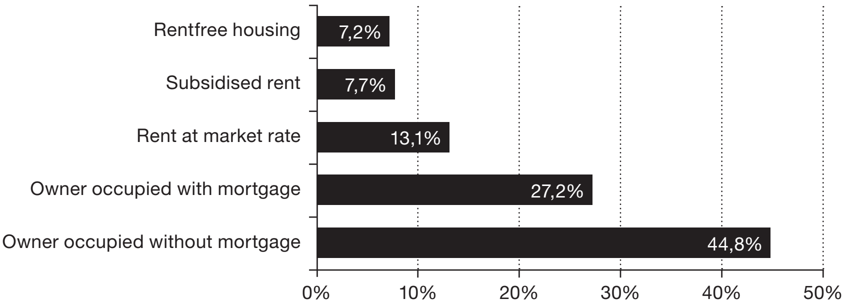
Since 2002 there have been major changes in the housing sector in the European area. First, the EU now covers a large and heterogeneous geographic area. Before the 2004 enlargement it comprised 385 million people living in fifteen member states, this increased to 464 million people in 2004 and reached approximately 494 million people across the twenty-seven member states following the accession of Bulgaria and Romania in 2007. This expansion has brought increased social diversity within the EU population and, accordingly, a variety of housing in terms of quality, price, etc. The form and content of housing policies and social policies relating to housing affordability, and the nature and composition of excluded groups, are also diverse, with no clear development trends. Demographic transformation and migration from non-EU countries also seem to be influential processes (Eurostat, 2010).

Migration is important: the higher fertility of migrants ensures natural population growth and labour migration is essential to stabilise a shrinking workforce. Migration policies have broadly been applied, for example in Germany in the 1970s and 1980s, to ensure labour market activity levels and have contributed to stabilising demographic trends. Fertility tends to be higher in countries experiencing immigration. Nevertheless, in approximately five decades the net migration level will no longer outweigh natural decline (Eurostat, 2010). First-generation migrants comprise about 6.2 per cent of the total population (Eurostat, 2010) and, according to estimates, their life chances and even the chances of second-generation migrants are considerably worse than those of natives (Safi, 2010). Many migrants rely on informal housing arrangements (Bosch-Meda, 2010) and participate in the informal labour market.

With the accession of the former socialist super-homeownership countries, more than 70 per cent of all households in the EU today live in a home that they own, and one-quarter of all households are mortgage-holders. Across Europe, urban housing comprises more rentals than rural housing. Households with a mortgage are less exposed to poverty risk (i.e. households living under the poverty line; 12.2 per cent as opposed to their share of 27 per cent). However, the risk of poverty has been on the rise among those in the bottom income range. Also, the full consequences of the 2008 economic crisis in terms of mortgage defaults and affordability issues remain to be seen.

According to the most recent EU data, most households at risk of poverty are living in dwellings with subsidised rents. In countries with considerable public housing stock this might suggest that public housing sectors contain most of the vulnerable households. However, especially in the southern, central and eastern European countries, with constrained stock, it is essentially the private rental and also the lower end of the ownership sector that houses the poorest households.

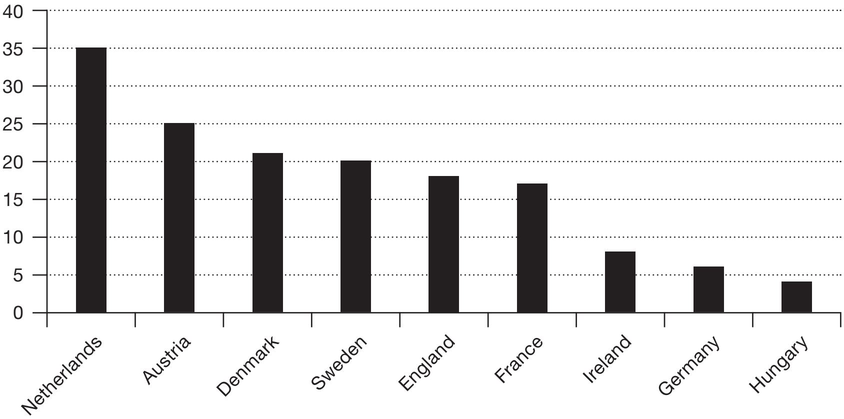
Figure 4.1: Tenure Structure in the European Union as % of total housing stock, 2007



Source: Eurostat, 2010, based on 2007 EU-SILC data.

The share of the social housing sectors has been shrinking throughout Europe, with diverse speed-ups in selected countries, increasingly exposing the whole housing system to market mechanisms. In the Nordic countries and the Netherlands, changes in governance of the social housing sector increased the marketisation of the operation of housing associations (and cooperatives). In effect, this has also brought about changes to the role of states.

Figure 4.2: Share of Social Rentals of the Total Housing Stock in Selected EU Countries, around 2007



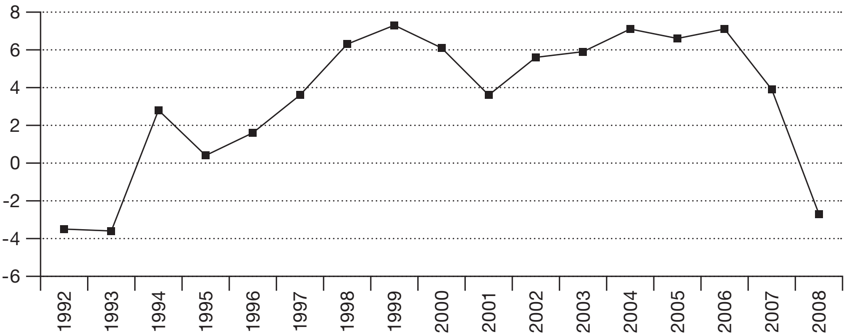
Source: Whitehead and Scanlon, 2007.

A recent EU-level study has shown that:

> The general condition of the housing market is a major driver of structural homelessness, and access to mainstream affordable housing for vulnerable groups is a major concern even in countries with the strongest welfare protection. This is especially the case in pressurised regions and where social housing providers are not obliged to prioritise those in greatest need. (Stephens *et al*., 2010, p.xxxvii)

The European area has seen ups and downs in house prices, for example prices generally rose between 2001 and 2006 and then fell with the onset of the economic and financial crisis in 2008 (see Figure 4.3).

Figure 4.3: Average house price development (%) in 13 European countries*, 1992–2008. Previous year=0.



* Selected European OECD countries: Belgium, Denmark, Finland, France, Germany, Ireland, Italy, the Netherlands, Norway, Spain, Sweden, Switzerland and the UK

Source: OECD database.

It is claimed that house prices in Europe and the United States rose 'sharply from the mid-1990s to 2006 and 2007' and that the:

> … current house price cycle differed from past experiences in three respects: In most OECD countries, the increases in recent years have pushed house prices above previous peaks. Second, the duration of the run-up has been longer than in past episodes of large price increases. And third, this house price cycle has been disconnected from the business cycle. (Christophe André cited in Wagner, 2008, p. 127)

The scale of house price change differed across European countries: Spain, the UK and eastern Europe witnessed a greater increase than, for example, Austria or Germany, which even reported a slight decrease in the period from 1997 to 2007 (ECB, 2009). Overall, there has been a sharp decline since the credit crunch and the macro-economic decline reached the European area in the second half of 2008.

It is a commonplace that house price developments impact housing affordability, and that diminishing affordability increases the risks of people losing their home. At the same time, decreasing house prices curtail household wealth and raise the share of mortgage or household debt in a household's portfolio, which might also contribute to increasing risks of vulnerability. Besides the fact that highly pressurised housing markets tend to generate more homelessness (Fitzpatrick *et al*., 2000), there is no clear-cut evidence of development directions in homelessness in times of fluctuation as the demand, supply, quality, changes to social stratification are equally 'independent variables' of house price development and homelessness, etc. (O'Flaherty, 1995). Also, there is no reliable data to trace such developments, as put forward many times in research outcomes (e.g. this was one of the messages of the recent MPHASIS project).

Drivers of Housing Exclusion in the European Context

Despite the different context, Edgar *et al*.'s 2002 report was able to point at quite similar trends or drivers of housing exclusion: the outcomes of EU-level mainstreamed policies of urban restructuring, the changing role of states (and the increasing role of the market) in housing provision, and housing finance market developments. These findings are discussed here in the light of later research findings.

Urban regeneration policies

Edgar *et al*. (2002) claimed that EU-level promotion of mixed neighbourhoods in the framework of urban regeneration programmes was constraining the presence of income-poor inhabitants in gentrifying urban areas, and augmenting the exclusion of the most vulnerable, among them the homeless. Only the UK and France are committed to including the right to housing as a basic social and economic right in their national or regional legislation. The EU, which has only a limited role in housing policy due to its primarily regulatory role in housing finance issues, has been very weak in promoting housing rights issues (Bolt *et al*., 2010). Housing policy is largely left to national authorities, and the EU has been applying the Open Method of Coordination only to enhance the development of housing policy tools, targeted mainly at the most vulnerable. Recent criticisms of the effects of mixed neighbourhood programmes, inclusive planning and integrated area-based programmes reflect similar concerns to those projected in the 2002 report.

The spatial outcomes of social housing policy related to urban rehabilitation programmes have exacerbated housing exclusion. With the shrinking of the stock (e.g. via privatisation), the remaining social housing is both marginalised and spatially concentrated. Urban rehabilitation policies employ a variety of interventions to reduce the concentration of poor and/or ethnic groups and achieve a social mix.

Research on the effects of aiming for mixed neighbourhoods is regularly published, including a 2010 special issue of *Housing Studies*. Here, Bolt *et al*. (2010) note that segregated urban areas have been long depicted in negative terms, thus, numerous initiatives have sought to stimulate a better mix of residents. They find that all such programmes in Europe have failed to end segregation, and also identify some negative social consequences such as the break-up of communities and constraints on housing choice. Forced moving is one aspect of this process that prevents the most vulnerable people from maintaining their home in a rehabilitated area. The authors explore the outcomes of urban area-based rehabilitation programmes in several countries, placing them in an historical context. They show that although policy design has improved since the 1970s, there are still processes that remain out of the reach of programmes, and challenge the policy goals of renewal programmes. Most country reports claim that programmes – depending also on the poverty level of their target groups – assist in moving up, but achieve no substantial improvement of mix and integration of marginalised groups.

The gentrification of urban inner-city areas has been intensifying as rehabilitation projects are completed in cities across Europe. It is also true, however, that non-mixed poverty neighbourhoods face intensified segregation and very little can be undertaken to halt their decline and the reproduction of poverty. Thus, even without clear empirical evidence of the social benefits of urban mixing, from the standpoint of all vulnerable households concerned in the given neighbourhood, urban mix is a desired long-term goal in order to enhance social cohesion throughout Europe (see also Ponce, 2010). Furthermore, it must be combined with increased housing options for marginalised groups in areas without concentrated poverty.

The changing role of states

Edgar *et al*. (2002) also argued that the increasing role of the market and the decreasing role of the state in direct housing provision was leading to the commodification of housing and the increased importance of (labour) income in access to and sustaining housing: as it goes hand in hand with the 'growing exclusion of the most vulnerable and marginalized group[s] from the labour market and consequently from access to housing', there is 'eviction of the weakest players in the urban housing markets' (p.48).[2]

2 Some further forms of housing exclusion have gained attention since the 2002 report, for example phenomena in specific housing sectors such as high-rise housing estates (partly fuelled by the discussions around the Paris and Grenoble riots). In parallel, housing and mobility problems have been the subject of European discussions as the EU has been spending more and more to bridge the gap between the better-off regions and the new members states via its cohesion policies.

Edgar *et al*. observed that not only the increasing dominance of the market, but also the changes in (state) governance structures relating to housing policy, were limiting access to decent and affordable housing.[3] They noted that the 'role of the state has shifted from a concern with redistribution of resources to a focus on regulation and risk management' (p.51). Besides decentralisation, the emerging enabling role of the state and a move to non-governmental institutional solutions (with a reduction in the social housing stock in general), the decreasing political priority given to social housing manifests in deregulation.

Indirect subsidies have been increasingly replaced by demand-side subsidies (e.g. housing allowance schemes) that seek to relieve the poorest households of the burden of high housing costs and falling into arrears. Despite these efforts, Edgar *et al*. highlighted the substantial increase in legal cases for evictions and the threat of homelessness for those who are on the margins or are in special demographic situations (e.g. single-parent households) or leave the labour market (p.69). Also, the state's diminishing influence on housing allocation, and landlords' attitudes to risk management and disinclination to lodge 'problematic' households, were preventing the most vulnerable from accessing rental housing.

These findings also feature in later research, but in a more complex and systematic context: labour market, welfare arrangements and housing systems are of equal importance in understanding exclusion. The attempts to trace the paths of their interrelatedness can be analysed – despite its controversies relating to housing – in the frame of the welfare regime paradigm. It was also around the beginning of the 2000s that the commodification paradigm was more broadly discussed due to the increasing interest in placing housing systems into Esping-Andersen's typology of the three worlds of capitalism[4] (Esping-Andersen, 1990, 1999). Edgar *et al*. made reference to this discourse, but did not elaborate on the possible impacts of structural factors such as labour market changes on housing exclusion. Later research demonstrates some of the possible reasons: housing was not part of the original welfare regime theory because housing commodity is both a consumption good and a capital good.

3 At this point the authors diverted from Polanyi's theoretical framework as they observed restructuring of the internal logics of the redistributive integration mechanism.

4 The original typology is based on three dimensions: decommodification, stratification and institutional mix of service provision. The three basic types of welfare regime (liberal, social democratic and conservative/corporatist) were supplemented by the Mediterranean (Ferrera, 1996), and later by adding (a version of) the post-socialist regime (Deacon, 2000) types, as the combination of the three dimensions turned out to be different in the given countries. A further development of the paradigm is discussed in detail in Chapter 3 of this book.

Although various methodologies were developed to dissolve this paradox (e.g. Hoekstra, 2005), most of the typologies based on housing policy were not easily compatible with the modified welfare regime classifications. Hulse (2003) found major differences in housing allowance policies among countries (US, New Zealand, Australia and Canada) that belonged to the same type of welfare regime. Kemp (2007) arrived at a similar conclusion based on a different set of countries. Some claim that the 'original' classification is vague. For example, O'Sullivan (2004) finds that the Irish system should not be classified as a 'liberal' welfare regime because of the exceptional role of the family and the Catholic Church in different welfare areas.

Findings of inconsistencies among different welfare systems have been reshaping the discourse (e.g. Kasza, 2002), feeding into the confutation of the widespread finding about the 'withdrawal' of states from either of the provision branches. The influence of the state on housing through a variety of public policies (not only housing policy) has been manifest. One of the most influential paradigms – put forward by Peck and Tickell (2002) – attached to the neoliberal concept of the state is the 'rolling back' and then 'rolling out' of states, which has been broadly discussed and criticised, but also applied to national and local public service delivery (e.g. homelessness services analyses by, among others, Doherty, 2004; Busch-Geertsema, 2004; Blanc, 2004; May *et al*., 2005; Graefe, 2005; Dodsona, 2006). Similarly, other authors feed into the convergence and divergence debate in housing policy development (e.g. Lowe and Tsenkova, 2003; Hegedüs *et al*., 2010), discussing both the common and the distinctive elements of housing systems. The argument common to the above elaborations is that the withdrawal of the state might have seemed apparent at the end of the 1980s, but policy developments since then highlight both rolling back and rolling out not only among but also within countries, sometimes resulting in a strong state presence (e.g. in housing assistance or housing provision schemes and the delivery of other welfare services).

Overall, there seem to be indirect and complex links between welfare arrangements and housing exclusion:

> … welfare regimes impact profoundly on the causes and nature of homelessness… However, the relationship between homelessness and labour market change is complex, and seems direct only in those countries (Hungary and Portugal) and amongst those groups (immigrants) which have the least welfare protection. Even in these cases, it is long-term labour market marginality and precariousness, very often associated with reliance on the informal economy, which is generally more important rather than sudden labour market shocks. In those countries, and for those groups, with better welfare protection, it seems that

> sustained poverty and/or unemployment contribute to homelessness not so much in direct, material ways, but rather in longer-term, more indirect ways via exerting negative social pressures on family units. (Stephens *et al*., 2010, p.267)

This highlights the need for further research to determine the conditions required for an effective welfare system (in terms of income benefits or housing allowances) to fill in or replace most of the direct housing provision arrangements.

Housing finance market developments

Edgar *et al*. (2002) observed that as increasing competition in the housing finance market made housing loan products accessible for poorer households, a considerable group of people would be increasingly exposed to risks due to their vulnerability on the labour market (i.e. the loss of stable income would prevent them from repaying housing loans). These findings have been confirmed many times (e.g. Doling and Elsinga, 2006). On the other hand, the promotion of subprime mortgage products made homeownership (and thus increased household wealth) a possibility for the lower middle class, which contributed to the growth of overall wealth levels in many countries.

In terms of its effects for affordable housing provision, Scanlon *et al*. (2008, p.110) point out:

> … mortgage markets have been liberalized in many western European countries over the last 20 years as part of the more general globalization of finance markets: restrictions on the use and terms of loans have been lessened, and a wider range of financial institutions is now permitted to offer mortgages. An important goal of deregulation was to improve the efficiency of the system by opening up the market to new providers and increasing competition amongst lenders, thereby lowering costs to consumers.

However, providing risky loans to poorer and vulnerable households increases their chances of losing their home, as already stated in the 2002 report. Moreover, boosting mortgage markets may give a false impression of the increasing participation of the most vulnerable groups in the housing market. These groups might be for the most part affected by the increased private rental market that may emerge through over-investment in housing, which hence may become a more affordable (but still not secure) rental option. Edgar *et al*. (2002) claimed that the ‘risky tenants’ are not welcome in the private rental sector either, leaving excluded households open to more discrimination and neglect; this results in bifurcation of the private rental sector (see also Toussaint and Elsinga, 2007). Edgar *et al*. appealed for greater state involvement in housing provision, claiming that the private market had proved inefficient and could not ‘replace’ the functions of the state in providing access to housing for marginalised households. Nevertheless, the channelling of vacant private rentals into homeless provision has gained greater importance in many European countries.

Increasing mortgage markets contribute to rising house prices. The resulting changes in affordability are especially relevant for understanding shifting housing vulnerability. Recent research reaffirms that 'an important consequence of the increase in house prices was the growing inequality "between those who have and those who have not". The wealth position of first-time buyers (intergenerational inequality) and tenants worsened, and gave more incentives to take loans and buy houses, even if home purchase was risky' (Hegedüs *et al*., 2010, p.36). European data show that 'the affordability of housing also causes dissatisfaction among most Europeans' and that there is a strong feeling that the situation has worsened in almost all countries (Eurostat, 2010, p.9).

At the same time, on the macro level, in accordance with the EU's Lisbon Agenda, it is claimed that the economic effects of the housing sector mark employment, output, investment, financial systems and household consumption. Doling (2005), among others, concludes that in countries with strong housing investment, the main drivers are low interest rates and improved economic growth (Ball, 2005), and this is especially relevant in the early period of an economic upswing (see also OECD, 1995). Consequently, there is an EU-wide justification of housing policies that promote the marketisation of housing as this contributes to economic growth and boosts European competitiveness. The diversity of housing policies across the EU shows that countries have not followed a common path, and the effects are achieved under quite diversified institutional, political and economic conditions. Nevertheless, facilitation through government homeownership policies (and funds) may contribute to reduced options for anti-exclusion policies; thus, unavoidably distorting the chances of achieving housing inclusion.

Fitzpatrick and Stephens (2007), in their review of the effects of the shrinkage of social housing sectors in the EU and the options for housing provision (and solutions) for the homeless, support the 2002 report's concerns: weakening welfare states have lower levels of affordable (social) housing provision and higher levels of homelessness. As well as the capacity of the stock, the governance of access and prioritisation are decisive elements in this causal relationship. Exclusion of the poorest means that homeless people are normally not let into the mainstream social housing sector.

Processes Relating to Homeless Provision and Alternative Housing Solutions

The withdrawal of states from direct housing provision was one of the key concerns formulated in the 2002 report – this much debated phenomenon has since been shown to be best viewed as a transformation of tools. Edgar *et al*. made a brief reference to the options for and effects of preventive strategies, as well as the logic of housing first or alternative and integrated solutions in service provision – many of these initiatives had been launched around the year of publication and have since been analysed in greater detail.

A special type of homeless provision – supported housing – demonstrates the extent to which governance structures change differently across Europe. The level of de-institutionalisation in homelessness provision is higher in, for example, the Nordic countries and Germany, but the framework of provision is centrally defined. In other countries such as France and Belgium, there is more local coordination between agencies in social and housing service delivery, but also there is great variety among local solutions and hence in access to housing by the population in need. The third group, which is represented mainly by southern European countries, is characterised by limited de-institutionalisation and a strong reliance on family (and informal) provision of support.

Besides individual factors, such as life course events and transitions, Edgar *et al*. included changes in the socio-demographic make-up of European society among the causes of housing vulnerability. They referred to a 'second demographic transition' that negatively impacted households who could not keep up with the pace of change, who lack social and economic stability or who experience housing vulnerability as a consequence of social stigma (p.84).

Edgar *et al*. observed that migrant populations often rely on informal channels to housing such as 'rent-free' accommodation, illegal settlements, poor housing quality rentals to family, etc. These informal channels gain special importance under constrained state and ineffective private market operations. It is this kind of (formal or informal) social tie that fabricates cohesive societies and strong communities. Reciprocity is a key element of cohesiveness, the importance of which is also acknowledged by the EU in its pursuit of social inclusion as a goal to counteract the further fragmentation of society. Emerging informal settlements, the primary targets of informal migration, are typical examples of taking up newcomers for the sake of reciprocal support (p.90). Nevertheless, such pathways should not be romanticised: the informal segments of housing markets may be clearly characterised by financial transactions based on pure market principles (p.93). Also, upward mobility is often not an option from such housing arrangements.

Recent research shows that reciprocity as a form of integration has been interiorised for urban rehabilitation projects (Goetz, 2010), as these should be based on both constructing and deconstructing elements of personal and social connections. The idea is that the disruption of social ties might also have beneficial effects: bridging ties are fostered rather than binding ties (Granovetter, 1973), and that social capital increases among those displaced households who leave segregated neighbourhoods for new environments that are 'richer' in terms of relationships and resources. But also, severing ties with the community increases insecurity and living in an alien neighbourhood with no family or friends weakens households' potential to cope with difficulties in their lives.

It can also be a challenge to maintain one's position in a rehabilitated neighbourhood: rising rents and unaffordable housing prices push out poor residents. Often the desired social mix is achieved via investment in private housing in a primarily social housing neighbourhood, which again hinders access for the poorest people to affordable housing. It is seldom the case that homeless people are pulled out from rundown neighbourhoods via low-cost housing programmes or with the help of rental subsidies, thus, homeless people rarely benefit from such housing programmes (Busch-Geertsema, 2007), and housing exclusion is only partially addressed as only selected households' housing mobility is made possible.

There are several alternative ways of ensuring access to affordable housing through planning and urban development policies (i.e. inclusionary zoning, see Bosch, 2009). Guarantee schemes, microlending, specific allocation schemes to social housing are just some of the methods applied throughout the world, confirming the room for such interventions (Council of Europe, 2008).

To conclude, in 2002 it was already clear that the European Social Agenda had put housing vulnerability into the broader context of labour market exclusion, poverty and overheated housing markets, a statement that has been confirmed by much recent research (see, among others, Stephens *et al*., 2010). The policy impact is there – at least at the planning level: the EU has promoted preventing risks of social exclusion by mobilising a variety of relevant actors and by intervening in the abovementioned sectors; to date, with little success.

Further Research Developments

The past eight years have witnessed a substantial development in homelessness research and a rise in political and public awareness of homelessness-related issues. FEANTSA has published reviews of current questions, policies and tools in *Pathways into and out of Homelessness* (2008a), and an assessment of models and practices from across Europe in the quarterly FEANSTA magazine *Homeless in Europe* with the title *Housing and Homelessness* (winter 2008b). Housing rights issues have gained extraordinary importance, and the EU has given special attention to homelessness and housing exclusion issues since 2005 in its 5th and 6th Framework and other coordinated research programmes.[5]

Much recent housing research has dealt extensively with the same issues that Edgar *et al*. found relevant for understanding increasing housing vulnerability and homelessness in Europe in 2002. These include the role of housing (construction) in the economy and the marketisation of housing provision, housing price developments and changes in mortgage markets. Also, the possible effects of urban regeneration policies have been comprehensively analysed in scientific literature since then.

One of the more recent areas of research attention is the quality dimension of services of general social interest – among them social housing – and the policy implications of such quality frameworks. The question is whether there is an applicable quality framework in social housing service provision that sufficiently enforces basic principles of service provision (e.g. access to adequate housing for those in need, dignity and safety) and ensures sustainability of the sector. The contribution of this applied research to understanding the mechanisms of housing exclusion and the inclusionary role of social housing can be quite substantial: it examines legally enforceable policy documents and reviews the resulting developments in the (mostly significantly shrinking) social housing sector of EU countries, with the purpose of mapping the options for improving the loosely regulated EU-level framework.[6] This development suggests that there is an increased policy interest in institutionalised answers to housing exclusion and inclusion.

5 Such research programmes concern demographic change – changing housing consumption patterns (also construction models) in life cycle models and immigration issues (DEMHOW); changes in welfare policies (i.e. EU is on the road to asset-based welfare – increasing vulnerability for those without housing assets: OSIS); new forms of housing exclusion (URBAN, RESTATE); and the mutual effects of welfare policies and housing policies on housing exclusion (IMPACT, COOP, EXCLUSION).

6 The mentioned research has been sponsored by the European Commission and covers twenty-two EU member states. The research is entitled “Study on Social Services of General Interest”.

Another related area of research that has been gaining more importance in recent years concerns models of the eastern European housing systems and the changes that resulted in – with a few exceptions – highly residualised social housing sectors and increased housing vulnerability for those whose rentals were denationalised or restituted, i.e. given back to the former owners. With drastic economic and political change, and the restructuring of the former social welfare system, all central and eastern European countries report increased housing exclusion. Each of the countries is seeking to provide services to prevent and tackle the previously unknown phenomena of (street) homelessness (Stephens *et al*., 2010).

Future Research Topics

As new topics and methodological approaches enrich housing exclusion research, the potential list of further research subjects has grown steadily. There are plenty of unexplored areas where research could bring us closer to understanding the relations of homelessness, housing exclusion and housing policies.

Despite the fact that there is no clear trend regarding changes to the role of the state in housing policy, there is great potential to explore the ways of restricting state engagement in direct housing provision versus alternatives, and to determine the quantifiable effects of such policy changes on homelessness and housing exclusion. Such studies would require a new methodological approach into housing and homeless provision research.[7]

Applied research has so far delivered little comparable evidence on how housing affordability projects and programmes work out for homeless people leaving institutionalised care or the street. Furthermore, there is little information on how these initiatives can be embedded into broader urban rehabilitation agendas. Critics seldom uncover mechanisms that work. The broad area of urban mix and its mechanisms also deserves further attention.

The current economic and financial crisis has increased awareness about the 'losers' in the widening homeownership market and their vulnerability due to affordability issues. What are their strategies? Are these strategies tied to possible 'housing regimes'? Exploring these links would deepen our understanding of the reproduction of housing vulnerability and exclusion in the EU.

Housing exclusion in the newer EU member states has to be placed higher on the research agenda. Systematic exploration of ongoing processes and governance changes is also very much needed.

7 Research proposal submitted by the Verwey Yonker Institute on measuring the efficiency of local welfare service delivery and its contribution to combating homelessness.

Knowledge of the interplay of welfare arrangements and housing and labour market policies is vital to an understanding of the mechanisms of housing exclusion. There is no clear evidence of what policies 'work' and of what conditions are necessary for policies to succeed. What roles can be taken by welfare providers to replace direct housing provision for the most vulnerable in society? What economic conditions are required to balance these three policy areas? Are there new models arising to provide preferential access to housing for homeless people in addition to or instead of traditional social housing? To what extent can providers (such as social rental agencies in Germany, Belgium or the US) counter the access barriers for homeless people with complex needs for whom housing first approaches have been praised as effective? What is the scope for housing finance instruments for marginalised households, etc.? These are all outstanding questions for future research.

Conclusion

Housing vulnerability has been on the rise for many households in Europe during recent decades. The marketisation of housing provision, the withdrawal of states from direct housing provision, the decreasing stock of social housing and changes to the labour market have all contributed to this process. A rethinking of the role of the state and of the potential for an EU housing policy seem to be urgently needed. The central question concerns the desired combination of tools relating to specific target groups that will be most effective in lessening housing exclusion. Housing exclusion research thus has to broaden its interest to include the interrelatedness of welfare, housing and labour market policies.

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‘The Right to Housing’ for Homeless People

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Abstract_ *FEANTSA has a longstanding commitment to ‘a rights-based’ approach to tackling homelessness, and this commitment is shared by many working in the homelessness field. Rights-based approaches are intuitively appealing, promising radical solutions to complex issues of housing need and social exclusion. But what precisely do we mean by rights-based approaches, and do they deliver the things we expect them to in practice? This chapter considers the relevance of the centuries-old debate about the existence or otherwise of the ‘natural rights’ of human beings, before moving on to consider the applicability of universal ‘human rights’ in the housing and homelessness field. Within the national realm, ‘programmatic’ citizenship rights, as well as positive legal rights that are ‘enforceable’ by individual citizens in domestic courts, are critically scrutinised with respect to their efficacy in tackling homelessness. The chapter concludes that, while the notion of rights as ‘absolute’ can sometimes tend to close down debate, it is crucial to maintain a critical perspective on rights discourses within the homelessness field on both philosophical and pragmatic grounds.*

Keywords_ *Citizenship, deontology, enforceable rights, homelessness, human rights, legal rights, legal positivism, natural law, natural rights, rights to housing, social rights, utilitarianism*

Introduction

The European Federation of National Organisations Working with the Homeless (FEANTSA) has a longstanding commitment to 'a rights-based approach to tackling homelessness' (FEANTSA, 2008, p.1). In furtherance of this commitment it has set up an Expert Group on Housing Rights, organised conferences, provided a database of relevant international case law and initiated international judicial proceedings. Most recently, FEANTSA supported the establishment of 'Housing Rights Watch', described as 'a European network of… associations, lawyers and academics from different countries, who are committed to promoting the right to housing to all' (Housing Rights Watch, 2010, p.1).

A crucial contribution to this rights-based work was made by Kenna in *Housing Rights and Human Rights*, published by FEANTSA in 2005. Kenna's book, examines the development and status of housing rights across Europe and internationally, and positions the right to housing as a basic human right, with homelessness defined as the absence or denial of those housing rights. Kenna argues that housing policy is being squeezed by neo-liberal policy agendas that seek to reduce the public sphere and emphasise the role of the market in allocating resources, and contends that housing rights provide a potential counterweight to these trends, offering policy makers a different marker of success, and empowering homeless people and their advocates by providing them with a right of action. However, rights enforcement is often weak and, according to Kenna, those committed to helping homeless people need to focus efforts on ensuring that 'the human rights obligations accepted by States at international level are vindicated at national, regional and local level' (2005, p.29). Available enforcement mechanisms must be utilised and improved; new remedies for human rights violations must be developed; and existing international, regional and national frameworks should be brought into line with each other.

Kenna's book provides a clear articulation of a specific human-rights-focused perspective on tackling homelessness, but a much looser notion of 'rights-based approaches' tends to prevail in the homelessness field and enjoys widespread support. This is understandable: such rights-based approaches are intuitively appealing, promising radical solutions to complex issues of housing need and social exclusion that offer to empower disadvantaged social groups and overcome the stigma of discretionary welfare assistance (O'Sullivan, 2008). However, beneath this ostensible appeal lie fundamental conceptual and empirical questions: what precisely do we mean by rights-based approaches and do they deliver the things we expect them to in practice? 'Rights' can be moral or legal, abstract or specific, enforceable or unenforceable, national or international. The following critique of the concept of 'rights-based approaches' in the homelessness field attempts to take account of this diversity of meaning when exploring the philosophical foundations of 'rights' discourses and their practical application to housing and homelessness.

We begin by considering the relevance of the centuries-old debate about the existence or otherwise of the natural rights of human beings, before moving on to consider the applicability of human rights – which can in many ways be seen as the modern cousin of natural rights – to the housing and homelessness field. The practical and philosophical objections to either of these sorts of moral rights in attempting to address substantive social needs such as housing are considered, and also the defences to such criticisms. Moving from the international or 'universal' realm, we then look at rights discourses in the national or domestic realm. Here it is necessary to consider citizenship rights that are programmatic in nature, as well as positive legal rights that are enforceable by individual citizens in domestic courts. Again the merits and demerits of these forms of rights are considered with respect to tackling homelessness.

The Universal Realm: Natural and Human Rights

Natural law and natural rights

Natural or doctrinal rights refer to a set of universal, inalienable rights held by all human beings (Norman, 1998; Dean, 2002). This conception of rights began to emerge as part of the Western Enlightenment during the seventeenth and eighteenth centuries, building on the ideas of classical philosophers such as John Locke (1690). Bills of Rights in England (1689), America (1789) and France (1789) reflected for the first time an understanding that individuals were the bearers of rights. This liberal tradition conceives of rights as fundamental, bestowed by God or another theological source or by some understanding of the nature of humanity. Natural rights have largely been concerned with people's civil and political rights rather than their social rights to substantive welfare entitlements. Nevertheless, as early as 1791 Thomas Paine argued that 'poor relief' under the Poor Law ought to be replaced with a 'right to relief' (Dean, 2010).

The jurisprudential roots of natural rights are to be found in the natural law tradition, which holds that 'what naturally is, ought to be' (Finch, 1979, p.29). In other words, the law of nature should be used as a standard against which one can measure the validity or rightness of manmade law. Over the centuries, legal theorists have sought to derive this law of nature variously from universal nature, divine nature and human nature. The philosophical roots of natural rights lie in the Immanuel Kant-inspired (Kantian) school of 'deontological' moral philosophy. According to this deontological style of ethics, an action is deemed morally right or wrong on the basis of the natural or ‘universalisable’ duties people owe to each other, in line with the ‘categorical imperative’ to always do one’s duty regardless of the consequences. A rights-based approach is most often interpreted as deontological because rights can be seen as rules or ‘side constraints’ (Dworkin, 1977) that (ethically) limit the actions that can be taken against individuals in order to pursue collective goals.

Deontological ethics are normally understood in contradistinction to consequentialist moral theories. Consequentialism dictates that morally ‘good’ actions are those that tend to bring about ‘valuable states of affairs’ (Williams, 1995). The most influential strand of consequentialist ethics – utilitarianism – supports actions that maximise the sum total of societal ‘welfare’, popularly referred to as the ‘greatest happiness of the greatest number’ (Norman, 1998). Strongly associated with the utilitarians, and especially with Jeremy Bentham (1789), is the jurisprudential tradition of legal positivism, which firmly rejects natural law and natural rights and insists instead on a strict separation between the ‘Is’ (manmade, positive law) and the ‘Ought’ (value judgements on that law). Legal positivist and utilitarian thinkers have highlighted the reactionary implications of the ‘absolutist’ natural law doctrine and the way in which its speculative character leaves it open to abuse:

> … natural law is at the disposal of everyone. The ideology does not exist that cannot be defended by an appeal to natural law. (Ross, 1974, p.261)

However, utilitarianism is also open to some obvious objections, not least its disregard for the distribution of well-being, and for failing to respect people (in Kant’s famous formulation) as ends and not means. These weaknesses go a long way to explaining the continuing appeal of deontological – and specifically human rights-based – philosophical approaches in the modern era.

The emergence of human rights

Although natural law and natural rights have now largely been discredited as a basis for rights discourses (Turner, 1993), human rights are in many ways their modern successor. Human rights most often find their expression in international instruments, many of which encompass social rights, including rights to housing. For example, Article 25 of the United Nations Universal Declaration of Human Rights (1948) asserts:

> Everyone has the right to a standard of living adequate for the health and wellbeing of himself and his family, including food, clothing, housing and medical care and necessary social services.

While this resolution is not formally binding, it is considered a key part of international customary law and has provided the principal foundation for subsequent debate on universal human rights. Other international instruments do impose obligations on ratifying states, binding in international law, which are relevant to the right to housing.

These include the UN International Covenant on Economic, Social and Cultural Rights (1966) and, at European level, the Charter of Fundamental Rights (European Union) (2000) and the European Social Charter (Council of Europe) (1961, revised in 1996) (see Kenna, 2005, for a detailed discussion of these instruments).

Perhaps of greatest practical consequence for our present purposes is Article 31 of the Revised European Social Charter (1996). Article 31 obliges contracting states to take measures designed to promote access to housing of an adequate standard, to prevent and reduce homelessness with a view to its gradual elimination and to make housing affordable to all. Crucially, a mechanism for collective complaints was introduced under this charter, which FEANTSA has successfully used, for example to establish that France violated the right to housing for all, particularly with respect to the most vulnerable members of the community (Kenna and Uhry, 2008).

According to human rights advocates, every human being ought to have access to the rights specified in these international instruments, including the right to housing, and nation states, as well as international human rights organisations, ought to ensure their delivery. Human rights then – like natural rights – can be understood as moral statements about human beings.

The limits of human rights

Three key critiques of human rights, and their applicability in the housing and homelessness field, are considered here.

First, and most fundamentally, intrinsic to the notion of human rights is the idea that they are self-evident, inalienable and non-negotiable: ‘absolute’ in other words. But are the rights declared by the architects of international and European human rights instruments – particularly social rights such as the right to housing – any less politically contested than other claims about how material resources should be distributed in society? One could argue that labelling such claims as moral ‘rights’ is a mere rhetorical device intended to shut down debate by investing one’s own particular political priorities with a ‘protected’ status; after all, as Dworkin (1977) put it, ‘rights are trumps’. But if one dispenses with theological or other natural law justifications for human rights, then what is the foundation of their protected status? Many human rights supporters argue that they are not anchored in a pre-social natural order or in divine reason, but rather are socially constructed and inter-subjective, rooted in a broad normative consensus about the things that all human beings are morally entitled to in order to attain a basic standard of living and to participate in society (Dean, 2010). But the idea that such a consensus exists at a global level is, at the very least, highly arguable (Finch, 1979; Miller, 1999; Lukes, 2008).

In many ways this debate boils down to the fundamental challenges inherent in justifying universal moral norms in a 'post-metaphysical age' (Lukes, 2008, p.117). Lukes (2008) sets himself the ambitious goal of defending just such a contemporary objective morality, commencing this task by posing the question:

> Can one identify components of wellbeing that are present within any life that goes well rather than badly: conditions of human flourishing? (p.129).

His answer is to look not to utilitarian or Kantian ethics, but rather to the Aristotelian-inspired 'capabilities approach' (Sen, 1992), which seeks to minimise inequalities in the 'positive freedom' that people enjoy to achieve 'valuable functionings' in key aspects of their lives. Lukes' particular interest is in Martha Nussbaum's (2000) development of this approach into a list of ten 'central human capabilities', comprising: life; bodily health; bodily integrity; senses, imagination and thought; emotions; practical reason; affiliation; other species; play; and control over one's environment. Several of these capabilities are highly relevant to housing and homelessness, especially bodily health, bodily integrity and control over one's environment (McNaughton Nicholls, 2010). Nussbaum claims that this list of capabilities derives from:

> … an intuitively powerful idea of truly human functioning that has roots in many different traditions and is independent of any particular metaphysical or religious view. (2000, p.101).

She has since argued that the list gives an account of 'core human entitlements that should be respected and implemented by governments of all nations' (Nussbaum, 2006, p.70). In a similar vein, Norman (1998) argues that a derivative concept of rights can be based on the satisfaction of basic human needs, as there are rational and objective ways of determining what these needs are. At an even more basic level, Turner (1993) argues that, in the absence of natural law, the philosophical foundations of human rights can most effectively be defended via an appeal to the universal nature of human frailty, particularly the frailty of the body.

Such arguments are intuitively appealing, based as they are on the common-sense premise that people have a right to what they need, albeit that positivists might argue that they illegitimately derive an 'Ought' (a value statement) from an 'Is' (a factual statement). However, even if it is accepted that the Is/Ought gap can be bridged by statements about human need, McLachlin (1998) gives good reasons for resisting any simple equation of needs and rights: there are many things we need that cannot be provided to us as of right. Ignatieff (1984), for example, argues that love, belonging, dignity and respect are all things that we need, but they cannot be provided within a formal framework of rights.

The second common critique of human rights concerns their lack of enforceability within current institutional contexts. Scruton (2006, pp. 20–21) powerfully articulates this objection:

> Rights do not come into existence merely because they are declared. They come into existence because they can be enforced. They can be enforced only where there is a rule of law… Outside the nation state those conditions have never arisen in modern times… When embedded in the law of nation states, therefore, rights become realities; when declared by transnational committees they remain in the realm of dreams – or, if you prefer Bentham's expression 'nonsense on stilts'.

Clearly anchored in the legal positivist tradition, Scruton's position is reminiscent of the longstanding jurisprudential argument about whether international law is in fact 'really' law at all (Hart, 1961; Finch, 1979).

Arguing from a very different perspective, Arendt (1973), writing after two world wars had killed and displaced millions of people, exposed the limits and 'hopeless idealism' (p.269) of the human rights discourse, and in particular:

> … the discrepancy between the efforts of well-meaning idealists who stubbornly insist on regarding as "inalienable" those human rights, which are enjoyed only by citizens of the most prosperous and civilised countries, and the situation of the rightless themselves' (p.279).

In his interpretation of Arendt's position, Isaac (2002, p.509) makes the telling point that:

> … those very rights long considered universal and attached, as it were, to individuals by virtue of their very humanity, require for their existence institutional supports that are utterly contingent and by no means universal.

Kenna (2005), writing specifically about housing rights, is somewhat sympathetic to these critiques of the human rights discourse, but focuses on the ways in which this gap could be narrowed through better systems of international governance and accountability in order to realise enforceable human rights beyond the boundaries of the nation state (see above).

However, if such an exercise were to bear fruit, this would bring us to the third key objection to human rights approaches to tackling social issues such as homelessness. The 'rights' expressed in international instruments are, inevitably, broad and abstract in nature rather than detailed, delimited and contextualised. If such abstract rights were in fact to be rendered routinely enforceable via courts (international or domestic) this would amount to a major transfer of policy-making power from the political to the legal sphere. Particularly in the case of social rights such as the right to housing, the granting of wide-ranging policy discretion to the courts implies judges determining the allocation of scarce resources in situations where 'hard choices' have to be made between a range of needy and/or deserving cases (see also King, 2003). The term 'over-socialisation' has been used to describe the situation whereby courts are inappropriately used to decide policy issues (Dean, 2002) and sensitivity to this point lies behind the classic international law distinction between obligations of 'means' and obligations of 'results' with respect to social rights such as housing (Hammarberg, 2008). Aside from the obvious constitutional concerns about judges rather than (one would hope democratically elected) politicians setting broad policy aims and priorities, it would be unwise for those of a progressive political bent to assume that the judiciary is always apt to be on their side (Griffiths, 1991).

In spite of these weaknesses, human rights discourses retain a key strength. As Arendt's work shows, the concept of human rights highlights the needs and distress of 'rightless' people, including refugees and other displaced populations who do not benefit from the advantages of citizenship and the legal protection of a nation state (see below). Furthermore, it is irresponsible, as Isaac (2002) argues, simply to deconstruct and expose the weaknesses of the human rights discourse without proposing alternative, superior ways of pursuing social justice, or at least humanitarian goals, on a global basis (Miller, 1999). So, for all their philosophical and practical limitations, human rights may be considered a 'useful fiction', justified, perhaps ironically, on the consequentialist basis that they do more good than harm, especially in countries where democratic traditions and the protection of minorities remains weak or underdeveloped.

The National Realm: Citizenship, Programmatic and Legal Rights

Citizenship and social rights

Our discussion thus far has focused on rights, and particularly housing rights, at the international level. But there are also relevant rights discourses at the national level: in fact, the concept of citizenship rights pre-dates that of human rights by some considerable margin (Dean, 2010).

The classic account of the development of 'social' citizenship rights in the post-war era is by T. H. Marshall (1949), albeit that his evolutionary account (part empirical, part normative) is heavily influenced by the specific UK experience (Turner, 1993). In contemporary debate, social rights – as opposed to civil or political rights – have been defined as substantive entitlements to goods or services owed to individuals by the state (Dean, 2002). The decommodification of goods and services such as education, health care and a basic income, so that individuals have access to these items independently of their participation in the labour market, is central to welfare regime theory (Esping-Andersen, 1990).

Housing has famously been described as the ‘wobbly pillar of the welfare state’ (Torgersen, 1987) because it is still provided predominantly through market mechanisms in most developed economies (Bengtsson, 2001). Nonetheless, there has been a great deal of debate in recent years about a ‘right to housing’ in a variety of national contexts, although what is meant by such a right is often far from clear (Bengtsson, 2001).

Programmatic and legal rights to housing

A key distinction must be drawn between legal or positive rights to housing on the one hand, and programmatic rights on the other. Legal rights are enforceable via domestic court systems at the behest of individual citizens, whereas a programmatic approach ‘binds the State and public authorities only to the development and implementation of social policies, rather than to the legal protection of individuals’ (Kenna and Uhry, 2006, p.1).

Programmatic rights are thus important in so far as they ‘express goals which political actors… agree to pursue’ (Mabbett, 2005, p.98). In this vein, Bengtsson (2001, p.255) describes the right to housing as a ‘political marker of concern’, arguing that rights to housing can only be understood within specific national contexts, with legalistic rights implied by selective welfare regimes, and programmatic rights (which he terms a more social concept of rights) associated with more universalistic regimes. Interestingly, Bengtsson highlights that this interpretation of the right to housing reflects Marshall’s (1949) original (but often misunderstood) conception of social rights as obligations of the state to society as a whole, rather than as claims that must be met by the state in each individual case.

It is important to note that programmatic rights to housing, although unenforceable by the individual citizen, can find legal expression, very often in constitutional provisions (Fitzpatrick and Stephens, 2007). For example, in a number of European countries, including Belgium, Finland, Portugal, Spain and Sweden, there is a ‘right’ to housing contained in the national constitution, although there are seldom legal mechanisms provided to enable homeless individuals to enforce that right. The Swedish constitution ‘includes the word “right” but this was never interpreted to mean that there was an enforceable right to housing for the individual citizen’ (Sahlin, 2005, p.15).

From a legal positivist's point of view, such rights are barely worthy of the name, as captured in the common law maxim 'no right without remedy'. Their interest would lie solely in positive rights (sometimes called black-letter rights) enforceable by individual citizens via the relevant domestic court system. Such rights are far from common in the homelessness field – in the sense of an enforceable right to accommodation for those who lack it[1] – and where they do exist are almost always limited to emergency accommodation (Fitzpatrick and Stephens, 2007). Thus, local authorities in Germany have a legally enforceable obligation (under police laws) to accommodate homeless persons who would otherwise be roofless. In Sweden there is a right to emergency shelter under social services legislation. Polish social welfare law obliges communes to offer help to homeless people, including shelter in hostels, refuges and other institutional settings. Hungarian social welfare law requires local authorities to provide accommodation in shelters for people whose 'physical well-being is at risk'. A single jurisdiction within the US – New York City – provides a legally enforceable right to accommodation for the 'truly homeless' who have absolutely nowhere else to go.

With respect to enforceable rights to permanent or settled housing for homeless people, at present these appear to be limited to the UK and France.[2] The more longstanding arrangements in the UK, first established in 1977, provide that local authorities must ensure that accommodation is made available to certain 'priority need' categories of homeless people, mainly families with children and 'vulnerable' adults (Fitzpatrick *et al.*, 2009). From the outset, the UK courts held that homeless applicants can challenge local authorities' decisions under this legislation by way of judicial review, and over the past few decades a very substantial body of administrative case law has been generated by the statutory homelessness provisions (Robson and Poustie, 1996). Homelessness applicants are also entitled to an internal review of the decision on their application, with a statutory appeal to a relevant court (on a point of law) additionally provided in England and Wales. In Scotland only, there is now the ambitious target that all 'unintentionally homeless' people will be entitled to settled housing by 2012, achieved via a gradual expansion and then abolition of the 'priority need' status. England seems to be moving in almost the opposite direction, with a very strong push towards 'homelessness prevention' in recent years and an associated sharp decline in statutory

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1 It is important to distinguish here between 'housing rights' (e.g. protection from unlawful eviction and harassment) and 'the right to housing' (for homeless people who lack accommodation) (Bengtsson, 2001; Bernard, 2008).

2 There are some other cases where the point is arguable, for example it has been posited that 'there are groups among those currently homeless in Finland for which it can be argued that they have an individual right to housing' (Helenelund, 2008, p.26). However, cases where such rights have in fact been enforced are extremely rare.

homelessness ‘acceptances’, leading to fears that certain local authorities may be engaged in unlawful gatekeeping that has denied some homeless households their statutory rights (Pawson, 2009).

A vociferous protest campaign in France resulted in emergency legislation being passed in 2007 to establish a legally enforceable right to housing (known as the DALO). From 2012 all social housing applicants who have experienced ‘an abnormally long delay’ in being allocated accommodation can apply to an administrative tribunal to demand that the state provides them with housing, and certain priority categories, including homeless people, have benefited from these rights since 2008 (Lacharme, 2008). This legislation was passed quickly in response to media pressure and there are concerns that its vagueness in key areas, as well as the complexities of the administrative framework in France, will frustrate its implementation (Loison-Leruste and Quilgars, 2009).

The limits of legal rights to housing

There are some obvious reasons why enforceable legal rights to housing may be viewed as a progressive step in addressing homelessness. First and foremost, they may be seen as a preferred alternative to what Goodin describes as ‘more odious forms of official discretion’ (1986, p.232). Those who administer welfare goods or services such as housing have power over claimants because they have an effective sanction against them (Spicker, 1984), and it can be argued that legal rights-based approaches create a counter-hierarchy of power by giving service users a ‘right of action’ against service providers (Kenna, 2005). Rights-based approaches can thus be viewed as a bottom-up form of regulation that permits service users a central voice in holding service providers to account.

A second and linked argument is that providing welfare benefits such as housing as a matter of discretion stigmatises recipients, whereas receiving them as a matter of right does not. When service users are beneficiaries rather than rights holders, there is an implied debt of gratitude as the beneficiary is unable to honour the powerful norm of reciprocity. As such, the giver gains status, and the receiver loses it (Spicker, 1984). Rights-based approaches, it is argued, overcome this problem of stigmatisation (Dwyer, 2004) and safeguard the self-respect of welfare recipients (Rawls, 1971) because they reflect their equal status as citizens rather than their unequal status as dependants (Spicker, 1984). Legal rights thus become a key instrument in supporting a ‘politics of recognition’ that affords dignity to those living in poverty and using welfare services such as housing (Lister, 2004).

But there are counter voices. Enforceable legal rights such as a right to housing may be thought to contribute to the 'juridification of welfare', such that social policy becomes 'over-legalised', frustrating its fundamental purposes (Dean, 2002, p.157). There may also be practical limitations to legal rights-based approaches, with Goodin (1986), for example, highlighting the costs and difficulties faced by service users attempting to realise those rights. According to this view, legalistic approaches are fundamentally flawed as they place the burden of responsibility for ensuring that rights are met in the wrong place, redistributing power to those people least likely to be able to use it:

> In purely rights-based systems, the rights holders alone have legal standing to complain if officials fail to do their correlative duties. It seems to be sheer folly, however, to make their getting their due contingent upon their demanding it, since we know so well that (for one reason or another) a substantial number of them will in fact not do so. (Goodin, 1986, p.255)

Moreover, enforceable legal rights may be viewed as not only inefficient but also unnecessary, with good progress on addressing homelessness seeming to have been made in a number of countries in their absence. In Ireland, for example, a legal rights-based approach was explicitly rejected in favour of a social partnership model that appears to have worked reasonably well in reducing levels of homelessness (O'Sullivan, 2008). Irish commentators argue that rights-based frameworks encourage an adversarial rather than a problem-solving approach on the part of both local authorities and advocates (O'Sullivan, 2008), directing power and resources into the hands of the legal profession and away from service provision (see also De Wispelaere and Walsh, 2007).

Bengtsson (2001) also raises doubts about the benefits of legalistic rights to housing by highlighting the distinction with the more programmatic (or social) approach found in universalistic housing and welfare systems, such as in Sweden. In these universalistic systems, he explains, 'instead of granting citizens the formal right to go to court and try to play trumps' (p.265), the state intervenes in the 'functioning of the general market in order to make it fulfil better the housing needs of all households' (p.261).

On the other hand, international evidence suggests that enforceable statutory rights frameworks, such as those pertaining in the UK, make it far more difficult for social landlords to exclude the most vulnerable households from the social rented sector, as happens in a number of European countries including Sweden (Fitzpatrick and Stephens, 2007). Moreover, Tars and Egleson (2009) argue that legal rights to housing for homeless people (particularly the very strong version of such rights found in Scotland) provide benefits not only for the direct recipients, but also for the wider population as a result of the 'psychological cushion of knowing there is a social safety net [which] is an essential component of maintaining basic human dignity' (p.213).

Finally, while there is always the danger of a naïve legalism that assumes that one can 'magic away' housing problems simply by legislating for a right to housing, one can equally argue that enforceable legal rights may be a potent force in leading positive policy change. For example, in the case of the French enforceable right to housing it has been commented that:

> enforceability of the right is no substitute for the measures needed to increase social welfare resources, regulate markets, or join up national and local policies. But we saw it as a necessary driver to ensure that the right to housing received real priority, and beneficial policy decisions. (Lacharme, 2008, p.23)

It may reasonably be concluded, to borrow a legal metaphor, that the 'jury is still out' on the relative benefits and disbenefits of legalistic rights to housing for homeless people. This is essentially an empirical question, requiring primary research that systematically compares the outcomes and experiences of homeless households in national housing systems where such rights do and do not exist.[3] Relevant research would focus not simply on legal processes and outcomes, but also on substantive experiences and outcomes from the perspective of homeless households themselves, and also, arguably, from the perspective of other households in housing need. This last point relates to persistent concerns within the UK, for example, that there is a 'moral hazard' intrinsic to the statutory homelessness framework, whereby it generates 'perverse incentives' for households to have themselves defined as homeless in order to gain priority access to social housing (see Fitzpatrick, 2008, for a detailed consideration of these perverse incentive arguments).

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3 One of the authors is engaged in doctoral research that attempts to contribute to filling this evidence gap by comparing the experiences of homeless households in the (strongly legal rights-based) Scottish system with the (non legal rights-based) Irish system.

Conclusion

This chapter has attempted to summarise the complexity of the concept of rights within the homelessness field. It has sought to demonstrate that it is perfectly possible to object to natural and/or human rights, on either philosophical or pragmatic grounds or both, but be in favour of clearly delimited legal rights to housing for homeless people. Conversely, one may be in sympathy with the discourse of moral rights, but be sceptical with respect to the 'juridification' and atomisation associated with individually enforceable legal rights. If one is promoting a rights-based approach to tackling homelessness, then it is necessary to be clear about the scope and nature of the sort of rights-based approach one is taking, as all approaches have distinctive limitations and strengths.

One overarching point to emphasise in drawing this chapter to a close is that, while the notion of rights as 'absolute' and 'trumps' can tend to close down debate, we contend that it is at least as important to maintain a critical perspective on rights discourses as it is on any other discourse in the social policy and housing fields. In particular, one must avoid the assumption that rights are a taken-for-granted good, or that, even if they do not do much good, at least they can do no harm. On the contrary, social rights that are enforceable by courts, especially those that are abstract and open-ended, can potentially undermine democratic control over public policy decisions by investing policy discretion in the hands of (unelected) judges and by limiting the room for manoeuvre of (democratically elected) governments and parliaments. Of course, in practice, it may well be the case that social rights such as the right to housing do far more good than harm when viewed from a progressive political perspective: we suspect that this is likely to be true with respect to specific, clearly articulated rights to housing for homeless people. But this is a hypothesis worthy of detailed investigation rather than an indisputable assertion calling for uncritical acceptance.

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Homelessness Strategies and Innovations

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Abstract_ *This chapter reviews research literature on national homelessness strategies. National strategies have emerged mainly in the advanced welfare regimes of northern and western Europe and in just a few countries in southern and eastern Europe. The chapter discusses how some features of the national homelessness strategies follow the lines of welfare regimes, while there is also considerable variation within welfare regimes as the interplay between housing policies and social policies differs in countries belonging to the same type of regime. A clear pattern in almost all countries and their strategies is the spread of the housing first paradigm. The chapter also discusses the results of evaluations of national strategies, focusing on issues of organisation and implementation at the local level. It identifies needs for future research where migration patterns and the impact of the financial and economic crisis raise challenges that transgress the national context. There is also a need for more comparative research at local and regional levels about the processes of implementation, organisation and social practices following the development of national strategies. Finally, there is a need for more specific knowledge about the actual nature of interventions set in place under the umbrella of the housing first paradigm, and especially for more effect studies of interventions in a European context.*

Keywords_ *National strategy; welfare regime; intervention; organisation; implementation*

Introduction

National homelessness strategies have been adopted in a number of European countries over the last decade. The European Observatory of Homelessness has analysed the formation, characteristics and implementation of these strategies in various articles and policy evaluations. The insights obtained from this work add to those set out in a growing national literature of policy evaluations. National strategies to tackle homelessness have primarily been adopted in the northern and western European countries. The more holistic approaches embedded in these strategies replace a range of narrower projects, programmes and initiatives such as the Rough Sleepers Initiative in England and Scotland (Fitzpatrick *et al*., 2005; Anderson, 2007a), the Homeless Initiative in Ireland (O'Sullivan, 2008), the City Programme in Denmark (Benjaminsen *et al*., 2007) and Project Homeless in Norway (Dyb, 2005). An holistic approach does not necessarily mean that the strategy targets all identified features and problems regarding homelessness and therefore there is a need to examine the contents of such strategies.

Some European countries, in particular the transitional countries, have not developed national homelessness strategies but have launched limited programmes. It is of interest to review the ideas and objectives of these programmes and to compare them with the more detailed strategies. Are they radically different or primarily similar? As we shall discuss, differences are identified both between strategies in northern Europe (Benjaminsen *et al*., 2009) and between programmes in transitional countries (Filipovič-Hrast *et al*., 2009).

Examination of a number of homelessness strategies (Benjaminsen *et al*., 2009; Baptista, 2009; Benjaminsen and Dyb, 2008; Anderson, 2007b) indicates a broad division between housing first and other approaches aiming to solve or alleviate the problem of homelessness. Examples of other approaches are the staircase of transition (Sahlin, 2005, 1998), housing ready models or interventions that focus on the provision of low-threshold services rather than housing. Our review suggests that developed homelessness strategies tend to advocate housing-first-based approaches and that comprehensive strategies express a 'new way of governing': moving from traditional government to governance structures involving a broad set of stakeholders.

This chapter is a review of existing research, discussions and documentation on national homelessness strategies within the European Observatory of Homelessness and beyond. The chapter first focuses on the national strategies from a welfare state perspective and then discusses the understanding of homelessness implied in the national strategies and the interventions set in place under the frameworks of the national strategies. The last section raises some issues and questions to be analysed in future research.

National Homelessness Strategies and Mature Welfare Regimes

The emergence of national homelessness strategies can generally be seen as an advanced stage of policy formation targeting socially excluded groups. Recent research has pointed to the need to understand the formation of national strategies within the context of welfare regimes and the similarities and differences between and within welfare regimes (Benjaminsen *et al*., 2009). Holistic approaches to homelessness through the forming of national strategies have primarily appeared in the relatively advanced welfare states of northern Europe. Though mainly following a longer trend of directing programme funding and activities towards particular marginal groups, the adoption of national homelessness strategies is a relatively recent phenomenon. Critiques of the often short-term sustainability of existing programme activities, increased public and political awareness of the homelessness problem and an enhanced understanding of the need for more long-term continuity in service provision have contributed to the need to establish national homelessness policy frameworks. A growing awareness of the need to address complex problems of organisation and implementation, often involving many stakeholders and different levels of government, has also contributed to the formation of national strategies.

Analysis of the formation and implementation of national strategies in mature welfare states such as the Nordic countries, the UK, Ireland and the Netherlands[1] must begin with an understanding of the complex institutional context of welfare state arrangements at both national and local levels and the existence of local intervention and allocation models in both social and housing policies.

An analysis of the similarities and differences within the Nordic countries (Benjaminsen and Dyb, 2008) was further developed in a comparative analysis by Benjaminsen *et al*. (2009) of the national strategies in the Nordic social democratic welfare states (Denmark, Finland, Norway and Sweden) and the Anglo-Saxon liberal welfare states (England, Ireland, Northern Ireland, Scotland and Wales). Collectively, these papers identify differences such as a stronger involvement and autonomy of local government in the Scandinavian countries, whereas a rights-

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1 A programme in the four largest Dutch cities – *Strategy Plan for Social Relief* (2006) – is in many ways comparable to the national strategies in other countries such as Denmark or Finland, where activities have also been targeted at larger municipalities where the majority of the national homeless population is found.

based approach in terms of the statutory definition of homelessness and the stronger involvement of NGOs is more evident in the liberal regimes. But there are also similarities, particularly in the emphasis on outcomes such as reducing the use of temporary accommodation, shortening the length of stays in shelters, providing long-term or permanent accommodation, offering individualised services and preventing homelessness primarily by reducing the number of evictions. The identified similarities across different welfare regimes very likely reflect an effective spread of knowledge through international networks.

In varying degrees the strategies incorporate a housing first approach. The general orientation towards a housing first model indicates the growing recognition of policy makers that (re)settling people, if necessary with support, is the most robust and sustainable way of ending or reducing homelessness. However, although members of the same welfare state family, a marked difference exists in approaches between Sweden and the other Nordic countries. There is some orientation towards a housing first approach in the Swedish strategy, but on a local level Sweden continues primarily to follow the staircase of transition model.

A new national strategy adopted in France in 2010 focuses not only on homelessness but also on people residing in substandard housing. The programme identifies two main principles: 'the organization of a Public Service for Accommodation and Access to Housing as well as a priority given to housing (the 'Housing First' approach)' (p.2) – emphasising both the provision of care and the priority of housing. The programme involves experimental housing first projects, but also more traditional solutions such as intermediate boarding houses aimed at individuals for whom access to ordinary housing is 'hypothetical' (p.6).

Scale and constitutional arrangements within a country affect the need for and possibility of developing a comprehensive national strategy. This is especially the case in Germany, where responsibility for social policy within the federal structure is placed mainly on the sixteen states (*Bundesländer*). Based on experiences from earlier programmes, a new action plan to prevent homelessness was adopted in the largest state of North-Rhine Westphalia in 2009 (MGEPA, 2009). The focus is mainly on providing support for model projects aimed at prevention, reintegration and integration of support systems.

A regional strategy also exists in the Netherlands. The *Strategy Plan for Social Relief* (2006), agreed by the Dutch government and the four major cities (Amsterdam, Rotterdam, the Hague and Utrecht) and lasting from 2006 to 2013, links homelessness closely to diagnoses such as drug addiction and mental health problems. There is a focus on developing targeted housing and on integrating housing and support systems. The approach may be best characterised as an integrated chain approach, but it also includes minor experimental housing first schemes. In the context of welfare regimes, Esping-Andersen (1990, pp.51–2) characterises the Netherlands as a 'borderline case' closer to the Nordic cluster than the continental states.

Summarising the findings of the various analyses of national strategies, one key conclusion is that housing first is the dominant approach in the majority of strategies and that divergence from the housing first approach does not follow any particular regime or welfare state model.

Strategies in Emerging Welfare Regimes

The formation of national homelessness strategies is almost entirely restricted to countries with a long tradition of welfare services for marginal groups. However, strategies have also emerged in a few European countries that have undergone substantial economic and social transformation over recent decades, and where social services directed at vulnerable groups are still underdeveloped. For these countries, an understanding of the changing role of the traditionally weak state in service provision for marginal groups is crucial.

Following Jessop's (2007) strategic-relational theory of the state, Baptista and O'Sullivan (2008) argue that it is problematic to understand the role of the state in general and that it must instead be understood in specific contexts. Developments must be located in their particular historical, institutional and strategic contexts. This insight probably holds not only for the relatively young welfare states but also for the advanced welfare states, as a range of evaluations of policy implementation processes underline (see below). Baptista and O'Sullivan illustrate this important point in their analysis of the role of the state in developing homelessness strategies in Portugal and Ireland, two countries that have undergone rapid economic and social transformation since the 1980s.[2] They argue:

> … in both Ireland and Portugal, there is evidence of changes in the understanding of homelessness among key stakeholders and in the development of national and local strategies. The key trend identified in both countries is that of the state taking ownership or control over homeless policy and attempting to devise reasonably coherent frameworks in which to address the issue. (2008, p.40)

In a further analysis of the Irish case, O'Sullivan (2008) demonstrates that a dramatic shift occurred in relation to homelessness services following the passing of the Homeless Persons Bill in 1983 (Harvey, 2008). He argues that an enhanced strategic focus on providing a coordinated response to homelessness, together with

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2 Portugal belongs to the group of Mediterranean welfare states and Ireland belongs to the cluster of mature liberal welfare states.

increased funding, contributed to a decrease in homelessness over the course of a decade. Similarly, in an analysis of the process of developing the Portuguese homelessness strategy, Baptista (2009, p.72) notes that the 'drafting of the first national strategy on homelessness represents a shift in the traditional role of the Portuguese state in this area'.

The political transition in eastern Europe has brought not only rapid economic and social development, but also new mechanisms of social exclusion, particularly in the domain of housing policies following the widespread privatisation of large parts of the mass housing stock. Though social programmes directed at homelessness can be observed in a growing number of countries, considerable barriers in many eastern European countries prevent the homelessness problem being placed higher on the national policy agenda, in terms of both awareness and concern about the conditions of marginal groups and systemic and financial barriers. With the exception of Portugal and Poland, the Mediterranean and eastern European countries are not at the stage of developing holistic homelessness strategies.

Wygnańska (2009) has analysed the process of developing a national homelessness strategy in Poland – a strategy that is still at the drafting stage. She concludes that significant progress in recent years can be identified as stakeholders have managed to work out useful policy-making mechanisms. She emphasises the continued need for NGOs to recognise and make use of their potential in advocacy as they play an important role in forcing governments to improve policies to benefit NGO clients. This reflects a reality where the state still takes relatively little responsibility for providing social services to marginal groups.

Attention should also be paid to homelessness intervention policies in some of the other newer EU member states, even though they have not developed overall strategies. Analysing homelessness policies in Slovenia and Hungary, Filipovič-Hrast *et al*. (2009) found that the two countries have chosen to follow quite different paths. The development programme on homeless provision in Hungary is based on the idea that reintegration of homeless people can be achieved through move-on houses, affordable housing and individual tailored support. However, the financial support from the Hungarian state is limited. Filipovič-Hrast (2008) argues that in the case of Slovenia the main characteristic is the absence of a homelessness policy, although there is a growing supply of low-threshold services. This is also largely the case in the Czech Republic (Hradecký, 2008).

Understanding Homelessness: Intervention Models and Innovations

Housing policies and social policies: understanding the complex nature of homelessness

The national homelessness strategies not only reveal similarities and differences among and within different welfare regimes, but also reflect differences in housing policies and social policies and in the underlying understanding of homelessness across the countries. Baptista (2009, p.72) argues, in her analysis of the drafting of the Portuguese strategy, that a fundamental challenge is the 'perception of homelessness as a phenomenon with complex individual components that must be tackled on a case-by-case basis' – a perception that 'does not lend itself to the notion of needing an overall national strategy'. This conclusion may probably be applied to many other countries. The understanding of homelessness as a consequence of the interplay between structural exclusion mechanisms and individual vulnerabilities is most clearly found in the homelessness strategies of the Anglo-Saxon countries such as England and Scotland. In these strategies there is an explicit focus on both alleviating shortages of affordable housing and the need for individual wraparound services (see Anderson, 2007a, for further details).

The national strategies in the Nordic countries focus mainly on individual support needs and on overcoming organisational and local barriers for providing such support. The link to general housing policies is less explicit. This may reflect the fact that housing policy has traditionally been incorporated into general welfare policy in the Nordic countries. However, research also points to considerable differences within the Scandinavian countries and indicates that such universalistic inclusionary housing policies can be rolled back (Bengtsson *et al*., 2006).

Benjaminsen and Dyb (2008) discuss how differences in housing policies and in social policies can be observed among the Nordic countries. In Sweden, the abolition of municipal housing queues in most municipalities has led to greater difficulties for obtaining first-hand permanent rental contracts and to the use of secondary contracts in the field of housing provision for the homeless (see Sahlin, 2005). Benjaminsen and Dyb compare the patterns of homelessness among the Scandinavian countries, explaining their findings in terms of variations in national strategies, housing and social policies and underlying intervention models. They argue that the small, but significantly higher, rates of homelessness in medium-sized Swedish cities, compared with Danish and Norwegian cities, is a consequence of the more widespread use of the staircase model and the secondary housing market in Sweden than in Denmark and Norway, which to a larger extent follow a housing first approach.

As more and more countries complete the policy cycles of typically three to five years, more data from detailed evaluations becomes available. An important lesson is that the structural barriers for alleviating homelessness are often not adequately addressed or are too large in scale to be impacted by the strategic initiatives. In a detailed evaluation of the implementation of the Scottish national strategy, Anderson (2007b) concludes that progress on achieving the goals set out in the strategy was constrained by an overall lack of sufficient affordable, secure, good quality housing and support, despite proposals to increase the use of the private rental sector to alleviate the shortage. Equally, in their evaluation of the Norwegian strategy, Dyb *et al*. (2008) point to mixed results in realising strategic goals. A survey of municipalities shows that the shortage of housing is perceived as the most important barrier to achieving these strategic goals.

Interventions and innovations

The various analyses of the national strategies to date show that the housing first approach has had a considerable influence on the framing of interventions and innovations. A fundamental principle of the housing first approach is the importance of establishing a secure and permanent housing solution early in the course of an intervention and at the same time attaching the social and psychological supports necessary for the individual to stay housed and to uphold and maintain daily activities. A considerable body of randomised controlled trials, almost solely from the United States, document the effects of early housing interventions and individual social support (see Nelson and Aubry, 2007; Coldwell and Bendner, 2007).

Content analysis of the various national strategies shows that most of the documents bear a clear imprint of the housing first approach. As mentioned above, Benjaminsen *et al*. (2009), in their comparison of national strategies in the Nordic and Anglo-Saxon countries, conclude that there are considerable similarities in methods and approaches and that a common thread is the adoption of the housing first approach. The various strategy documents generally reveal a considerable common influence, indicative of the spread of knowledge about effective interventions through international networks such as within the Open Method of Coordination in the EU. This often follows a longer trend in these countries of developing more targeted interventions in response to criticism that earlier programmes were not sufficiently directed at meeting the specific support needs of homeless people.

Different intervention models are identified in the literature. In the evaluation of the Norwegian strategy, Dyb (2005), following the earlier workings of Sahlin (1998) and Harvey (1998), distinguishes between the normalisation model, the tiered model and the staircase model. The normalisation model is a variant of the housing first approach as normalisation refers to the housing situation of the individual and there is an emphasis on an early stabilisation of the housing situation, preferably in ordinary housing with intermediate or permanent support and services in accordance with individual needs. The tiered model has two phases with a period in transitional housing between, for instance, a stay in a hostel and independent housing. The staircase model (Sahlin, 2005) follows the opposite logic to the housing first model as the individual has to demonstrate the ability to live independently first by progressing through a series of steps on a housing ladder, most often with advancement attached to success in substance use treatment, etc.

As mentioned above, for structural reasons the staircase model is particularly predominant in Sweden. However, the influence of the housing first approach is clearly seen in the Swedish national strategy, with its ambition of turning interventions away from the staircase model and towards a housing first model by improving entry into the ordinary housing market. Early criticism from Swedish research of the staircase approach had considerable impact on the reorientation of the Norwegian strategy, in the early formation stage, away from the staircase approach towards housing first. An important result from the Norwegian evaluation is the positive experience with housing-first-based interventions (Dyb, 2005; Ytrehus *et al.*, 2008). Also within the Nordic sphere, Tainio and Fredriksson (2009) analyse the Finnish homelessness strategy and observe how the staircase model has been predominant in the provision for long-term homeless people in Finland but that the recently established programme to reduce long-term homelessness aims at extending housing first principles to homeless people with high levels of support needs.

Housing first has been adopted as the overall principle of the Danish strategy. Knowledge from international literature on effect studies, particularly the methods of critical time intervention, case management and assertive community treatment (ACT), has been used to determine methods for providing social support in housing. The strategy argues that interventions should be targeted with reference to the heterogeneous support needs of homeless people. Some individuals need support primarily in a transition phase between a stay in a homeless hostel and independent housing, and critical time intervention in the form of a case manager for a period of nine months is the primary support for this group. Others need more permanent individual support from a case manager. Both the methods of critical time intervention and case management assume that the individual can make use of existing treatment systems such as psychiatric services and substance abuse treatment, but needs help to maintain continuous contact with treatment facilities and also needs social support in everyday life. In contrast, ACT teams provide treatments, for instance psychological and substance use counselling, through a floating support team and are aimed at individuals with very complex problems who cannot utilise other treatment and support facilities.

Organisation and implementation

The creation of homelessness strategies may be interpreted as a shift from traditional ways of governing to a governance model where the state primarily steers rather than rows. Common conceptions of governance identify the decline of the state in the steering process, however, Pierre (2000) sees the change as a reorientation of the state and of the state's ability to adapt to external changes. Although the concept of governance has a variety of interpretations, it may roughly be described as involving a range of public and private stakeholders in policy shaping and implementation.

The national strategies reflect the different institutional set-ups across the various countries. One important issue is the division of responsibilities among different stakeholders such as central government, local government and NGOs. While the importance of local government responsibility is emphasised in all countries, the role of NGOs varies considerably. Benjaminsen *et al*. (2009) show how the role of NGOs is emphasised in the strategies in Anglo-Saxon countries, whereas the key players in the Scandinavian countries are mainly the municipalities, reflecting general differences in the underlying welfare state model. An example is the Danish strategy, where new interventions are negotiated directly and bilaterally by the central government and each municipality involved in the strategy, and are generally anchored within the existing, relatively extensive, Social Assistance Act, which already specifies a range of (municipal) interventions such as homeless shelters, supported housing, social support in own housing, social drop-in cafés, social contact persons and social substance use treatment.

One might expect to find a large number of civil organisations involved in the strategy process in Portugal, however, the majority of the stakeholders involved in setting up the strategy were public entities. An overview provided by Baptista (2009, p.63) shows the participation of very few private stakeholders (just 5 out of 22), with some higher representation in the core group. Baptista further emphasises that representation of private homeless service providers was not fully ensured in the process.

Filipovič-Hrast *et al*. (2009), discussing governance arrangements in implementing homelessness policy in Slovenia and Hungary, find significant differences between the two countries, which they ascribe to variations in the development of welfare services in general: 'Slovenia still follows a classic welfarism strategy path, where the public sector plays the main role in reducing social inequalities, while the third sector, whose role is small and largely complementary, bridges the gap. The system is governed hierarchically by public authorities, which finance public as well as third sector organisation' (p.118). A specific feature in both countries is the close and even symbiotic relations between the authorities and the NGOs, an organisational structure frequently referred to as quangos[3]. The transition in Hungary led to strong decentralisation and the authors find that the welfare system is governed in a way that allows third sector organisations to participate in policy making. However, there are stronger connections between NGOs and the authorities in Hungary than one finds in the mature capitalist welfare states.

The organisational challenges for improving services and housing provision for the homeless are reflected not only in the overall responsibilities of stakeholders, but also in the barriers faced by service providers in their daily work. In most of the national strategies there is a focus on strengthening coordination and integration across services. Even in the Nordic countries, where municipalities are the main service providers, there are considerable internal organisational challenges to delivering services to homeless people whose complex support needs often require the cooperation of multiple services – not only housing and social support but also psychiatric and substance use treatment – and homeless people often face difficulties in utilising existing services.

Measurement

A measure of the effectiveness of homelessness interventions on an aggregate level is the number of homeless persons before and after the implementation of a strategy or programme. Strategies tend to have specific objectives, such as reducing the number of evictions, ending rough sleeping, reducing the use of shelters or temporary accommodation (see Benjaminsen *et al*., 2009, tables). The extent of homelessness before and after a strategy period is one indicator of the degree of success or failure of the intervention methods, organisational arrangements, division of responsibilities and funding schemes, particularly if the measurement specifies different situations of homelessness (number of people sleeping rough, using hostels, etc.). However, as emphasised in the evaluation of the Norwegian strategy, which ended at the onset of the current financial and economic crisis, structural changes have to be taken into account when assessing the results (Dyb *et al*., 2008). In this way, monitoring the outcomes of the national strategies raises the need to explain why the ambitious goals set out in the strategy are often not met when the strategy period comes to an end.

In some countries, progress in measurement preceded the formation of national strategies; whereas in others, the adoption of national strategies has facilitated progress in measurement (see Chapter 1). In the Scandinavian countries, the results of national counts informed the later formulating of national strategies, as

3 Various definitions: quasi non-governmental organisation, quasi-autonomous non-governmental organisation, quasi-autonomous national government organisation.

knowledge of the extent and characteristics of homelessness was obtained on a national scale and homelessness was often given an 'official' and operational definition for the first time.

The national strategies of some countries involve a specific focus on the measurement of the effectiveness of intervention methods. In the UK, a comprehensive client registration system, with measures of outcomes, interventions and client characteristics, has been developed as part of the Supporting People programme. In the Danish strategy, outcome measurement takes place on two levels. On the aggregate level the development of the strategy's four goals (reduce rough sleeping, young people should not need to stay in a shelter, reduce long-term stays in shelters, and prevent homelessness upon institutional release) is measured through biannual national homelessness counts, combined with data from the national client registration system on homeless hostels. Targets on each outcome have been set at the municipal level. Outcomes of interventions are measured on an individual level, with the aim of testing how methods such as critical time intervention, case management and ACT teams work in a Danish context.

Agenda for Future Research

This review of the research literature on the formation and implementation of national homelessness strategies shows that comprehensive knowledge already exists about the content and priorities in the strategies. Differences in content reflect variations in the underlying welfare regimes and housing and social policies, but considerable variation also exists within welfare regimes. Similarities mainly exist in the types of intervention and the visible influence of the housing first paradigm. This research takes the nation state as the primary unit of analysis, or makes cross-country comparisons. However, as other chapters of this volume suggest, new groups of homeless people related to changing migration patterns across Europe may pose challenges to developing future homelessness strategies in a national framework.

The national focus is also challenged by changing modes of governance that involve an increased regionalisation and decentralisation of responsibilities. Evaluations of national strategies already show the considerable focus on issues of implementation at the local level (e.g. Dyb *et al*., 2008). A comparative analysis across municipalities and cities of policies and their implementation may provide greater insight into the challenges of developing and implementing policies at the local level.

There is also a need for research on the effects of interventions. The focus on 'what works' has been incorporated into the frameworks of most national strategies, however, with a considerable variation in measurement of outcomes. So far the effects of interventions have mainly been tested systematically in the US. Obtaining more evidence on the effects of specific types of interventions in a European context would contribute to further policy development in the field of homelessness.

Homelessness transgressing the boundaries of the national welfare state

Inclusion of the central and eastern European countries in the EU has increased labour migration from these countries to western and northern Europe. Not all migrants are successful in finding work or sustaining employment, and some lose their employment for various reasons. There is very little knowledge about the connections between internal labour migration in the EU, social marginalisation and the consequences with respect to homelessness and housing conditions. Findings from an ongoing research project in Oslo show that the homeless persons among Polish migrants have little or no knowledge of the welfare system in Norway. The study further indicates that Polish migrants are excluded from low-threshold homelessness services, even if they are literally homeless (Mostowska, 2010). There is every reason to assume that exclusion from such services applies to other homeless migrant groups as well.

Migrants who are without legal employment or who are unemployed may find themselves in a precarious situation and, if not already homeless, may be at risk of experiencing homelessness. Their rights when out of work are not clear. They represent a challenge to the western and northern European welfare states. There is a need for more knowledge about homelessness among migrant workers, the profile of homelessness and experiences of migrant homeless people, as well as knowledge about how it is dealt with by host countries. What is the role of the welfare state in dealing with these new homeless groups? Are such groups included in homelessness strategies or other intervention programmes? Can any attempts to find solutions be identified at EU level? Is there a need to develop a European strategy against homelessness and what would the preconditions for such an ambition be?

The migration issue and the current financial and economic crisis show how structural conditions also affect homelessness and housing exclusion and operate on a level transgressing the boundaries of the nation state. The countries most affected are those with less developed homelessness policies and often with narrow definitions of homelessness, mirroring the 'classic vagrant', as described by Arapoglou (2004) in the case of Greece. Are these countries less likely than before the onset of the crisis to develop comprehensive schemes and strategies to alleviate homelessness and housing exclusion? Or will the crisis push forward more holistic approaches to homelessness?

Comparative research on local homelessness strategies and their implementation

Most of the countries that have adopted national strategies require local authorities to develop local homelessness strategies or plans on how to improve services and access to housing at the local level. The responsibilities given to local government also involve including local stakeholders, whether these are NGOs or municipal services. Success or failure in meeting goals set at the national level will be determined by the complex interplay of responsibilities, resources, organisation and social practices at the local level, including the structural context of the availability of affordable housing.

In the light of previous research on national strategies, we point to the need for analysis at the local level, with a comparative focus. Much can be learned by comparing across countries how municipalities, cities and even metropolitan districts (such as in the case of Oslo) tackle the challenges of reaching the goals set out in national strategies and putting new policies into practice. A further important question that needs to be addressed is how the provision of housing is managed locally. The issue of housing provision is not always sufficiently addressed in the national strategies. What allocation schemes exist locally to provide permanent housing for the homeless? How are the often conflicting goals of local housing policies met (e.g. securing social mix in socially challenged neighbourhoods and providing housing for marginal groups)? (see Busch-Geertsema, 2007) Do the national strategies provide new opportunities for municipalities to address the housing needs of the homeless?

Another issue concerns the provision of specialised housing for homeless people with special care needs. How is the provision of specialised housing governed by national legislation? Does a scope for discretion in social work and variation in resources create differences among municipalities in service levels? How is specialised supported accommodation provided at the local level? Is floating support given in individual housing or does the supply of supported accommodation rely on category housing with attached services involved?

Also, the issue of organising complex interventions is a local challenge. How are problems of coordination among different service providers and institutional systems – social services, health services, criminal services, housing authorities, etc. – tackled locally? Do the national strategies provide new initiatives for handling such issues? Are new requirements set in the case of people leaving institutions such as hostels, hospitals or prisons? Are services for the homeless integrated into mainstream social services or are there parallel support systems?

Does the extent of municipal responsibilities make a difference? How do the national strategies deal with such issues – and what lessons can be learned from comparative research at the local level?

Knowledge of the effects of interventions in a European context: can national strategies pave the way?

The content of the national homelessness strategies indicates the considerable influence of the housing first approach on the development of interventions. In the international research literature a substantial body of randomised effect studies points to the effectiveness of providing permanent housing solutions with the necessary social support. Almost all such randomised trials have been conducted in the US. A substantial challenge is to obtain more evidence-based knowledge on the effects of such interventions in a European context and in the often different welfare environments in European countries compared with the US.

There is a need to examine more critically the types of intervention that are established under the national strategies. Do interventions always follow the housing first principle? What are the relevant criteria for a housing intervention to follow the housing first principle? Are there housing interventions labelled as housing first that do not really fulfil such criteria? How is the ambition to establish early permanent housing solutions tackled for those who are not able to live in ordinary housing? And how is this group identified? Are the pitfalls of the staircase approach actually avoided? And following the perspective on local implementation processes, are there modes of practice in service provision and the administration of services that pose barriers to implementing the housing first principle?

Given the challenge of identifying what types of intervention there actually are, there is a general need for more documentation of outcomes, not only at the aggregate level but also at the individual level. Such documentation of interventions and their outcomes is a central element of some strategies, most notably in the UK and Denmark, and should provide more knowledge on the effectiveness of particular intervention methods at the level of the individual. The documentation of outcomes within the European strategies takes the form of before and after measurement of individuals in the course of receiving the interventions prescribed in the strategies. Selection effects on individuals are taken into consideration by registering characteristics such as substance abuse, mental illness and other individual vulnerabilities, but randomised studies are not (yet) the plan of any programme.

A remaining challenge is to advance to the next step on the ladder of evidence, from before and after measurements to performing a control for selection effects through randomised studies, as this gives the strongest evidence of whether the effect is actually due to the intervention or whether other factors such as heterogeneity among intervention groups or cream-skimming (i.e. an intervention scheme or service choosing the 'most suitable client') can explain some of the effect. If evidence shows that particular interventions are effective in bringing individuals out of homelessness, then such evidence is a powerful argument for providing these interventions to homeless people. Such studies have been conducted for many years in the US and there is a need to carry out such research in Europe.

There can be considerable barriers to conducting randomised effect studies. Relatively specified interventions are already in place in national legislation in some countries and random assignment to interventions can run against the principle of needs-based assignment. A way of ensuring that no homeless individual is assigned to 'no treatment' due to an experiment is to make sure that such experiments focus on testing two or more interventions about which there are expectations of a positive effect (e.g. case management and ACT).

The most obvious barrier to such randomised experiments is that they are expensive to conduct as they involve the costs of research and of providing the interventions to be tested. Furthermore, any effect study involves a wide range of practical challenges. The relatively comprehensive framework of the national strategies could potentially facilitate such experiments. In this way we argue not only for more research on various aspects of national homelessness strategies but also that research on effects of interventions should be part of the national strategy programmes.

Conclusion

This review of research on national strategies shows that similarities and differences have already been identified. An important explanatory condition is the national welfare state context, but research has also shown that the relationship between the type of welfare state, the characteristics of national strategies and the contextual explanatory factors is not a simple one. Analysis of the complex relations among structural factors, housing systems and social services provision must be sensitive to national variations not only between but also within particular welfare regimes, as research on the Scandinavian countries clearly suggests. Also, the formation of strategies in a few southern and eastern European countries shows how analysis must take specific factors into account, including an understanding of transformations in the role of the state in the provision of welfare services, in particular for marginal groups.

The spread of the housing first paradigm is evident in almost all national strategies. The challenge remains to gain more knowledge of the actual characteristics of the interventions facilitated by the strategies. Are the ambitions of providing early permanent housing interventions along with individually tailored support actually met or is housing first merely a fashionable label? Strategies with comprehensive measurement components should provide much-needed insight into the effects of different intervention methods in the European context.

Comparative analyses focusing on local processes of service provision and on the challenges of implementation and organisation may provide new insights into the complex relationship between welfare regimes, housing systems and social service provision (e.g. the role of local authorities). Important developments on a European scale, such as migration patterns and the financial and economic crisis, also call for attention in research on how phenomena that transgress the boundaries of the nation state, and that have potentially severe consequences for the homeless, are dealt with at national and European levels.

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Immigration and Homelessness

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Abstract_ *Migrant homelessness has become increasingly visible in some parts of the EU in recent years and was the subject of a European conference in 2002, with FEANTSA publishing a research review on the issue by Edgar* **et al** *in 2004. Since the 2004 review, evidence of undocumented migrants among people living rough throughout Europe has mounted. In the West of the EU, recent data on people living rough show what appear to be quite high numbers of economic migrants from the Central and Eastern EU living on the streets and in emergency shelters. Housing exclusion and homelessness also appear to remain prevalent among Roma groups. This chapter reviews the evidence on the extent and nature of this problem, finding that there are still significant shortfalls in the available data, but arguing that it nevertheless possible to produce a broad typology of migrant homelessness in the EU.*

Keywords_ *Migrant, immigrant, undocumented, economic migrant*

Introduction

A European Conference on Immigration and Homelessness, hosted by FEANTSA and BAG Wohnungslosenhilfe, took place at the beginning of November 2002. The conference had been arranged in the light of mounting evidence of an over-representation of some migrant groups among homeless people (Daly, 1996). In 2004 an important book by Bill Edgar, Joe Doherty and Henk Meert, entitled *Immigration and Homelessness in Europe*, reviewed the state of knowledge on the issue in the EU-15[1] for the first time. The review drew on a series of national reports that had been commissioned by FEANTSA (Anderson, 2002; Busch-Geertsema, 2002; FEANTSA, 2002).

Failed asylum seekers and other undocumented migrants were appearing at increasing rates among roofless people and in low-threshold homelessness services. People who had been accepted as refugees and who were awaiting asylum assessments were also appearing in homeless populations (Edgar *et al*., 2004). In 1998, 37 per cent of the people using Austrian homelessness shelters and 11 per cent of the people using German homelessness services were reported as foreign (FEANTSA, 2002). There was growing evidence of a distinct Europe-wide social problem of migrant homelessness, particularly within major urban areas (Daly, 1996; Anderson, 2002; FEANTSA, 2002; Edgar *et al*., 2004; Harrison *et al*., 2005).

Some specific ethnic and cultural groups who were not recent migrants also appeared to experience homelessness at a disproportionate rate. These included Roma people in much of the EU-15 (Harrison *et al*., 2005; Stephens *et al*., 2010) and British citizens with a Black African or Black Caribbean ethnic origin in the UK (Anderson, 2002). People with specific ethnic backgrounds were also disproportionately concentrated in some of most deprived areas, living in housing exclusion, in major cities throughout the EU-15 (Harrison *et al*., 2005).

Writing in 2004, Edgar *et al*. concluded that a combination of relative disadvantage in labour markets, and thus in housing markets, coupled with encountering prejudice and outright racism, created the situation in which housing exclusion and homelessness became more likely for some immigrant groups. If a homeless migrant found it difficult to access the welfare system due to language or cultural barriers, or was an asylum seeker or an undocumented migrant explicitly barred from accessing welfare payments or social housing, the risk of homelessness became still greater.

[1] The fifteen member states of the EU prior to enlargement in 2004: Austria, Belgium, Denmark, Finland, France, Germany, Greece, Ireland, Italy, Luxembourg, the Netherlands, Portugal, Spain, Sweden and the United Kingdom.

A key finding was that the capacity of EU member states to counteract racial and cultural prejudice in housing systems was dependent on wider housing policy. A country like the UK or France, with relatively extensive social housing, could directly influence the administration of a key part of affordable housing supply and attempt to prevent prejudice and inequality. However, most housing in the EU is accessed through owner occupied and private rental markets. Governments could not control housing markets, they could only aim to ensure that general equality legislation was applied to those markets (Edgar *et al*., 2004; see also Harrison *et al*., 2005).

Work on migrant homelessness, including that by FEANTSA (2002) and Edgar *et al*. (2004), reveals that available data are often extremely poor. It is difficult to be precise about what sorts of numbers are involved or what the characteristics of migrant homeless people are. Some British-led research reported anecdotal evidence of what was referred to as 'diversity within difference', i.e. migrant homelessness might actually exist in several distinct forms (Anderson, 2002; Harrison *et al*., 2005).

This chapter seeks to update and critically assess FEANTSA's work on migrant homelessness. It reviews the current evidence base and moves on to attempt to produce a typology of migrant homelessness in the EU. The importance of variations in how migrant groups are defined and how this relates to an attempt to produce a typology is then discussed. An overview of the questions surrounding the balance between immigration controls and humane responses precedes a discussion of areas in which more research would be productive.

The Evidence Base

Research on migrant homelessness has faced problems because of data limitations. Many studies have not been well resourced, which means that there has been quite widespread dependence on restricted qualitative samples (Järvinen, 2003; Robinson *et al*., 2007; Huszar *et al*., 2010). This has limited some studies in that they tend to report largely on one city and, in several cases, on homelessness within one migrant group. While there are practical advantages to commissioning a series of 'country reports' from national experts for comparative research across several member states, the quality of these reports can also vary according to the data available in each country (Busch-Geertsema, 2002; Edgar, 2004; Edgar *et al*., 2004).

It is not always possible to interrogate existing data to look for specific patterns. Sometimes this is because the data are primarily administrative and sometimes because only a few questions are asked. In 2007, Paris could not be precise about how many homeless undocumented migrants were in the emergency accommodation beds in the city, estimating that the figure was some 30 per cent of the total. A separate exercise suggested as many as 50 per cent of the 2 000 people sleeping rough in Parisian parks were from eastern Europe and the Ukraine (Horréard, 2007). London sounded more precise about homeless east European nationals in the city in 2006, reporting 15 per cent of 4 365 low-threshold homelessness service contacts were with this group. However, the data were restricted to service 'contacts' rather than an attempt to count individuals (Briheim-Crookall, 2006). Neither city had a complete picture of what was happening.

The problems in understanding migrant homelessness extend beyond simple data quality. Writing in 2010, Fonseca *et al*. note that comparative EU-level quantitative research is equally hampered by varying definitions of what a 'migrant' is, by the practical difficulties of controlling for the huge diversity within migrant populations and, not least, by the tendency of undocumented migrants to conceal themselves for fear of repatriation. They report that the Czech Republic estimates that its last census undercounted foreign nationals by 60 per cent. Further, the replacement of census surveys with register-based censuses (using administrative data) in countries such as Austria, Belgium, Germany and Sweden was in their view likely to increase the risk of this population being undercounted. The definitional problem with migrant homelessness can be the same as with the various European definitions of homelessness, in that what is measured, and indeed whether it is measured at all, varies between countries (Edgar, 2009).

Towards a New Typology of Migrant Homelessness?

Since the original work by FEANTSA and Edgar *et al*. (2004) the EU has expanded to include another twelve member states. New concerns have developed about the movement of migrant workers from the eastern countries of the EU among the north-western and Scandinavian member states. This concern centres on the possible additional strain that A-10[2] economic migrants might place on affordable housing supply and welfare services (Robinson and Reeve, 2006; Robinson *et al*., 2007; Czischke *et al*., 2007; Garapitch, 2008; Robinson, 2010; Stephens *et al*., 2010). Concerns that undocumented migrants, failed asylum seekers and some refugee groups may be present among homeless people have continued. In addition, evidence persists that certain ethnic and cultural minorities who are not recent migrants are over-represented among homeless people.

Three broad concerns may be identified at EU level in respect of migrant homelessness (Philips, 2006, 2009; Horréard, 2007; Huszar *et al*., 2010; Stephens *et al*., 2010):

- A growing representation of A-10 citizens in the homeless populations of EU-15 member states, particularly people living rough and houseless people using emergency and low-threshold[3] homelessness services.
- Evidence of the presence of refugees, asylum seekers and undocumented migrants among homeless people, again centred on people living rough and using emergency and low-threshold homelessness services.
- Ethnic and cultural minorities who appear to be at a disproportionate risk of homelessness but who are not recent migrants.[4]

Table 7.1 summarises an attempt at a broad typology of migrant homelessness.

2 The 2004 A-8 accession states: Czech Republic, Estonia, Hungary, Latvia, Lithuania, Poland, Slovakia and Slovenia, plus the 2007 accession states, Bulgaria and Romania.

3 A low-threshold service asks no or few questions of those seeking to use it and is open to anyone. Such services tend to be basic.

4 There are debates as to whether this should be regarded as a ‘migrant’ homelessness issue at all, or whether it is homelessness among EU citizens arising in part from systemic disadvantage linked to racism and cultural prejudice. These questions are considered below.

Table 7.1: Attempted broad typology of the different forms of migrant homelessness

Group affected	Possible characteristics	Possible causation
People seeking asylum and refugees	May have support needs linked to their experiences May have little or no knowledge of the country they have applied for refugee status in, including having no knowledge of the language or culture Educational attainment and capacity to secure work may vary May lack any financial resources	Primarily linked to the level of support provided by the state. Where this is inadequate (e.g. because access to welfare services is deliberately limited), homelessness will tend to occur and this group will appear among the users of low-threshold homelessness services May be prevented from taking up legal paid work
Failed asylum seekers and undocumented migrants	Likely to share many of the characteristics of refugees and asylum seekers, including lacking language skills	The response of a state will generally be to seek to repatriate people in this group if they can be located. Access to welfare services, social housing and even some low-threshold homelessness services may be prohibited May be prevented from taking up legal paid work
Women and children from outside the EU who lose their immigration status when escaping domestic violence from a violent man	The support needs that can exist among women and children escaping domestic violence can exist alongside disadvantages centred on not speaking the national language and not understanding the national culture or welfare service systems	There is some limited evidence that women will sometimes use migration as an opportunity to escape domestic violence The extent to which homelessness occurs will depend on service responses Some countries will actively seek to expel this group if they lose refugee status or conditional citizenship
A-10 economic migrants who have become homeless in EU-15 member states	Most A-10 economic migrants secure work and accommodation and do not experience homelessness in EU-15 countries Those who do experience homelessness may have characteristics that parallel those of the local population of homeless people. This population appears to be over-represented among users of low-threshold homelessness services, although evidence is patchy	As with other migrant groups, the extent to which they can access welfare systems and homelessness services is crucial. Many services in EU-15 states are not accessible to this group or are only accessible after they have been in paid work for some time Little or no access to welfare and housing services. Some countries (e.g. Ireland and the UK) attempt to repatriate A-10 economic migrants who have become homeless rather than providing welfare or housing services

Group affected	Possible characteristics	Possible causation
Ethnic and cultural minorities who appear to be at a disproportionate risk of homelessness but who are not recent migrants	This group is problematic to define because of variations in how a 'migrant' is defined across different member states. A foreign-born individual who is a 'citizen' in one member state will be defined as a 'migrant' in another The children of migrants are also regarded as 'foreign' in member states that define citizenship by ethnicity and culture rather than place of birth Some member states define this issue as homelessness among ethnic minority citizens and not as migrant homelessness	Definition of 'migrant' and associated entitlement to services in different member states Racism hampering access to welfare systems, labour markets and affordable housing Immigration and urban planning policies that regard spatial concentrations of ethnic and cultural minorities as a destabilising influence on society and may restrict access to some affordable housing

Asylum seekers and refugees

UNHCR-sponsored research in Budapest reported that homelessness among Somali refugees was linked to poor service access (Huszar *et al*., 2010). In the most developed welfare regimes, formal systems to avoid homelessness among asylum seekers should be in place, although, as is the case in the UK and Germany, those arrangements may offer only very restricted support. Someone who has refugee status should have access to the entire range of supports available to citizens. As noted elsewhere, the level of support available to refugees across the EU will vary according to general levels of welfare and homelessness service provision and also the extent to which welfare systems are contribution-based (i.e. some benefits are linked to duration of paid work) (Edgar *et al*., 2004; Sainsbury, 2006; Stephens *et al*., 2010).

Failed asylum seekers and undocumented migrants

The numbers of undocumented migrants who are homeless is uncertain. If members of this group of people make contact with homelessness services at all, it will be with low-threshold services that do not record much, or any, data about them. In France, where there is no expectation that low-threshold services should not assist undocumented migrants, there is strong evidence of an over-representation of foreign nationals, including undocumented people, within the homelessness system (Horréard, 2007; Brousse, 2009).

Spanish surveys of the users of some homelessness services suggest very sharp rises in the number of migrants using those services, reaching 63 per cent in 2008. There was evidence of this homeless population being made up of large numbers of Africans, particularly Moroccans, alongside a smaller number of A-10 migrants.

The extent to which this population was undocumented was unclear, but street counts in Barcelona and in Madrid in 2008 reported that 14 and 10 per cent respectively of people found sleeping rough were undocumented (Bosch-Meda, 2010).

Italian research based on administrative data from a health service provider focused on undocumented migrants in Milan and found extremely high reliance on friends and relatives for a place to stay, with some women with domestic jobs living with employers. Homelessness was quite unusual but was associated with lacking employment: 4 per cent of men who were unemployed were homeless, compared with under 1 per cent of employed men; it was generally very uncommon among women (Devillanova and Frattini, 2006). A small qualitative study in Italy looking at a migrant Senegalese community in Brescia also showed very high reliance on social networks as a means of securing and sustaining accommodation. The Senegalese made little or no attempt to access state or charitable services or the formal welfare system to meet their housing needs (Kaag, 2008).

There is some evidence that even low-threshold services might attempt to minimise and avoid contact from this group. In Greece, providing assistance to undocumented migrants might result in criminal prosecution for homelessness services, so it is difficult to say anything definite about possible numbers (FEANTSA, 2002; Arapoglu, 2004). In the UK, an NGO homelessness service that reported high contact rates with undocumented migrants might start to be viewed negatively by service commissioners such as municipal governments (Dumper *et al*., 2006).

Besides sometimes being barred from services or from undertaking paid work legally, both asylum seekers and undocumented migrants can face difficulties linked to racism and cultural assumptions that underpin welfare systems (Huszar *et al*., 2010; Edgar *et al*., 2004). In Denmark, there is some evidence of racist attitudes among homeless Danes towards homeless migrants (Järvinen, 2003), something that has also been reported in London among British homeless people (Pleace and Quilgars, 1996).

Even where access to low-threshold homelessness services is possible, there is nowhere in the EU where undocumented migrants can legally access the social housing sector or secure access to welfare benefits to make private sector rents affordable (FEANTSA, 2002; Edgar, 2004; Edgar *et al*., 2004). Undocumented homeless migrants are dependent on low-threshold homelessness services or on securing enough legal or illegal earned income to access either the regulated or unregulated private rented sector; they can expect no help from the state (Dörr and Faist, 1997; Harrison *et al*., 2005; Czischke *et al*., 2007; Rutter and Latorre, 2009; Robinson, 2010).

Homelessness has been described as a ‘residual’ social problem in member states with highly extensive welfare systems (Meert, 2005; see also Stephens *et al*., 2010). Being an undocumented homeless person in these societies means much, or all, of the supports provided by welfare benefits, social housing and homelessness services are not available. The ‘advantage’ of being homeless in a ‘service rich’ country disappears to some extent if someone is a homeless person who is also an undocumented migrant (FEANTSA, 2002; Edgar *et al*., 2004; Stephens *et al*., 2010).

Women and children from outside the EU who lose their immigration status when escaping domestic violence from a violent man

Evidence is highly limited in respect of this group. However, there are a sufficient number of reports from domestic violence services to suggest that immigrant women and children who lose their immigration status, as the spouse of a male refugee or legal migrant worker, are an issue (Anderson, 2002; Skich, 2008). Women and children in this group also face all the problems and issues that can confront any immigrant homeless person, such as not speaking the language. More research is needed in this field (see also Chapter 8).

Homelessness among A-10 migrant workers

EU-15 member states do not wish to pay the welfare costs of A-10 migrant workers who become homeless while within their territory (Robinson *et al*., 2007; Robinson, 2010). Several countries have responded to this issue with attempts at repatriation of A-10 migrants found among people sleeping rough and/or using low-threshold homelessness services (Bergin and Lalor, 2006; Garapitch, 2008).

Concerns that increasingly limited resources will be further stretched by homeless A-10 economic migrants are not groundless, but there is now some evidence that they may have been exaggerated. Three trends have become evident. The first is British evidence that almost all the economic migrants from the A-10 countries tend to secure and then keep paid work and that the great majority do not become homeless or make any claim on welfare systems (Pollard *et al*., 2008; Garapitch, 2008). The second evidenced trend is that, having worked in another country for a few years, sometimes with the goal of saving up money, economic migrants do quite often opt to go home (Pollard *et al*., 2008).

The third trend is that numbers may not be that great overall. Kahanec and Zimmerman (2009) report the consensus as being that between 2 and 4 per cent of the population of the A-10 may eventually move to the EU-15 at most, although they criticise the often shaky assumptions for these projections. The UK, Ireland and Sweden opened up their labour markets to A-10 migrants first and seem to have received more migrants than others in the EU-15. Yet numbers were not actually that great and flows more generally have been limited (Kahanec and

Zimmerman, 2009). There are inherent limits on the number of people who actually want to leave home, their friends, family and social supports. (Hárs *et al*., 2004; Kahanec and Zimmerman, 2009). It should, however, be noted that transition arrangements still restrict potential flows of A-10 economic migrants into some EU-15 states (Verschueren, 2010).

There is evidence that people from A-10 countries are appearing in the low-threshold homelessness services and among the roofless populations of cities such as Paris (Horréard, 2007), Barcelona and Madrid (Bosch-Meda, 2010). Low-threshold homelessness services in Dublin and in London have reported a strain on resources because they are dealing with more migrants from the eastern EU countries. They also report difficulties linked to language barriers and the fact that limited entitlements among A-10 migrants mean they cannot be referred on to other services (Bergin and Lalor, 2006; Briheim-Crookall, 2006; Binley, 2007).

This group appears to be growing more significant, but in absolute terms the numbers are not that great (i.e. there are proportionately more homeless A-10 migrants, but not large increases in overall homelessness). While there is definitely a concern, limits on the extent of both A-10 economic migration and homelessness among A-10 economic migrants do also need to be borne in mind. Whether the current economic and financial recession will cause more A-10 homelessness in the EU-15 is uncertain, flows into the EU-15 may reduce as employment opportunities constrict and those faced with homelessness may opt to return home (Stephens *et al*., 2010).

Research is finding some vulnerable, ill-prepared people from A-10 countries who are homeless and who have no social support, no knowledge of local labour markets, culture or language and who have needs such as severe mental illness and substance misuse (Garapitch, 2008). Depending on where they become homeless, such people may have restricted rights to support from welfare systems and are generally unlikely to be able to access social housing (Robinson, 2010).

However, it does appear to be the case that only a minority of economic migrants from A-10 countries are actually becoming homeless. Those economic migrants who do become homeless also share characteristics with other homeless people, in terms of support needs and negative life experiences (Binley, 2007; Garapitch, 2008). More research in this area is needed to confirm this apparent pattern.

Many economic migrants to the major cities of the EU are, of course, relatively speaking, very wealthy individuals. While homelessness may arise among A-10 migrants, it is worth also bearing in mind that migration of executives and their families may be significant in helping to create the extraordinarily expensive housing markets that exist in major EU cities. London, for example, has an entire housing market of very high-cost rental housing for the staff of global corporations, including, for example, a specific sub-market for Japanese executives (White and Hurdley, 2003). Just as urban gentrification can restrict affordable housing in globally prominent European cities, so might the presence of significant numbers of highly affluent economic migrants seeking high status housing.

Ethnic and cultural minorities who appear to be at a disproportionate risk of homelessness but who are not recent migrants

The extent to which recently arrived people can integrate into a society is also influenced by how attuned they are to that society, its language and cultural norms. The *Aussiedler* (ethnic Germans granted full citizenship despite being new migrants) were quickly integrated because of their entitlements to secure paid work, housing and welfare services, but also because they often spoke German and had shared cultural norms (Busch-Geertsema, 2002; Sainsbury, 2006). Equally, despite large numbers of Latin American migrants, Spanish research does not report disproportionate numbers of this group among homeless people, suggesting that shared language and culture might help lessen risks of homelessness (Bosch-Meda, 2010). Some researchers have linked a review of *Aussiedler* policy in Germany to a falling level of cultural similarity between more recently admitted *Aussiedler* groups and German-born citizens (Sainsbury, 2006).

More generally, research tentatively suggests that duration of residence sometimes brings about an acclimatisation that reduces the risk of homelessness. Experience of homelessness among migrant groups in Spain falls as their length of residence increases and their degree of economic and social integration increases (Bosch-Meda, 2010). Some ethnic minorities in the UK, particularly people of Indian origin, are highly economically and socially integrated with the general population and appear unlikely to become homeless (Burrows, 1997; Robinson, 2010).

There is great diversity among the migrant and ethnic and cultural minority groups that are resident in the EU (Fonseca *et al*., 2010; Kahanec and Zimmerman, 2009). The over-representation of Roma people among the homeless population in parts of Italy is a distinct issue, as is the over-representation of British citizens with African or Caribbean ethnic origins in the UK. Limited evidence of an over-representation of long-resident ethnic Russians in the homeless populations of some of the Baltic states is another example of an ethnicity-related homelessness problem that exists in a specific context (FEANTSA, 2009).

Even widely reported issues, such as the systematic disadvantage of Roma people across the EU, do not exist to the same extent or manner in different member states (Cahn and Guild, 2008; FRA, 2009). While there are commonalities in the experience of ethnic and cultural minorities at increased risk of homelessness in a broad sense (i.e. social and economic exclusion, which is in turn linked to structural and individual racism), the nature of the problem is not uniform across member states (Harrison *et al.*, 2005).

Varying Definitions of 'Migrant' and Implications for the Attempted Typology of Migrant Homelessness

Definitions are fundamentally important in understanding migrant homelessness in the EU because they govern the degree to which migrant groups can receive state-funded assistance. Denmark, for example, defines migrants as people who are not native born; thus, 'migrant' homelessness can occur at any point during their lives, even if they live most of those lives in Denmark (Järvinen, 2003).

In Germany, citizenship is based in part on ethnic and cultural origin and more than three million foreign-born ethnic Germans, *Aussiedler*, have been accepted as citizens (Busch-Geertsema, 2002). Until recently, the *Aussiedler* had a very different experience from those without German heritage and from groups such as asylum seekers and undocumented migrants whose rights to housing are restricted (Busch-Geertsema, 2002; Sainsbury, 2006). If neither parent has a residence permit or is a German citizen, it is possible to be born in Germany but to not have German citizenship. In contrast, the UK's statutory homelessness system is inaccessible to British-born people who have not been resident in the country for a sustained period, however, anyone born in Britain is automatically a citizen and would be eligible for assistance.

These distinctions can have fundamental implications. Both Germany and the UK are prepared to provide only basic accommodation to asylum seekers, prohibit access to most welfare benefits and actively seek to expel, rather than assist, any undocumented homeless person (Busch-Geertsema, 2002; Sainsbury, 2006; Stephens *et al.*, 2010). Ireland and the UK also seek to repatriate any A-10 economic migrants found among homeless people rather than to assist them (Bergin and Lalor, 2006; Garapitch, 2008; Verschueren, 2010). However, a country such as the UK enforces anti-discrimination legislation against its own citizens with ethnic minority backgrounds with some vigour, particularly in respect of social housing (Harrison *et al.*, 2005). Edgar *et al.* (2004) reported a tension in the EU-15 between seeking greater equity for ethnic minority citizens and simultaneously seeking to expel many migrant groups.

Penninx (2007), writing about the impact of immigration on housing and homelessness in the small Finnish city of Turku, neatly summarises the definitional ambiguities that can arise in respect of migrant homelessness. The migrant population of Turku is 4.2 per cent if migrants are defined as 'non-Finnish' in origin, but this rises to 6 per cent if people of 'non-Finnish' ethnic groups are used to define this group. If language is used as the criteria, the figure rises to 11 per cent because Turku contains a significant minority of people whose first language is Swedish, although almost all of these are Finnish citizens. If people who speak neither Finnish nor Swedish as a first language are defined as immigrants, the figure drops to 5.6 per cent.

Sainsbury, writing in 2006 about migrant groups' access to welfare systems in the US, Germany and Sweden, describes outcomes for migrants as being linked to the interplay between welfare regimes and immigration regimes. Welfare systems respond to homelessness differently and responses are in turn influenced by immigration regimes. A highly developed welfare state that might provide excellent supports to homeless people who are its own citizens may provide little help to an undocumented migrant, A-10 economic migrant or an asylum seeker because of strict immigration policy. Adopting this logic, the outcomes for homeless migrants depend both on welfare regimes and on immigration regimes (see also Daly, 1996; Edgar *et al*., 2004; Stephens *et al*., 2010).

This chapter does not presume to attempt a universally applicable definition of migrant homelessness because that would be incompatible with the reality of diverse immigration regimes in the EU (Sainsbury, 2006; Fonseca *et al*., 2010). What is important to bear in mind in relation to the typology presented in Table 7.1, and in particular in relation to ethnic and cultural groups that are not recent migrants, is the interplay between immigration regimes, welfare regimes and homelessness services at national level. This means that while Table 7.1 provides an overview at EU level it will sometimes not be directly applicable to specific member states.

Balancing Immigration Control with Humane and Ethical Responses to Migrant Homelessness

Responses to homelessness among economic migrants from the A-10 countries and undocumented migrants in context

This section of the chapter is focused on homelessness among A-10 economic migrants and undocumented migrants. These forms of migration are viewed with increasing hostility by significant parts of the EU population, by the Far Right in EU politics and by sections of the mass media (Edgar, 2004). Threats are perceived to national identity, to culture and to the well-being and economic prosperity of the indigenous population (Philmore and Goodson, 2006; Pollard *et al*., 2008).

UK research has argued that British politicians are unwilling to tackle the popular conviction that these forms of migration are a threat for fear of losing mass support (Rutter and Latorre, 2009; Robinson, 2010). Research in Italy has reported similar findings in respect of political attitudes to migrant African populations (Kaag, 2008). Arapoglu (2004) claims that politicians blame street homelessness in Athens on 'immigrants' and that this is used to conceal the extent of homelessness directly affecting Greek citizens.

Homelessness among fellow citizens is also frequently seen as an 'external' problem. Even though research often finds evidence that local homelessness is mainly being experienced by local people, the belief that homeless people are 'outsiders' can be widespread (Lindquist *et al*., 1999; Cloke *et al*., 2001).

Homelessness among A-10 economic migrants and undocumented migrants is, in a populist sense, doubly 'deviant' because it comprises alien people in an alien state. Debate based simply on evidence becomes instantly problematic when dealing with a subject as ideologically and politically charged as migrant homelessness.

There are of course major practical barriers to dealing with these forms of homelessness. Even the most prosperous EU member states cannot afford to effectively import social problems. Irish and British homelessness service providers have been reported arguing that immigration services and A-10 states should facilitate repatriation of these groups of homeless people where practical (Bergin and Lalor, 2006; Briheim-Crookall, 2006; Binley, 2007; Stephens *et al*., 2010). It has also been argued that it is not practical to expect a generous welfare-led response to these forms of homelessness because that would simply not be tolerated by the mainstream European mass media and politicians (Edgar, 2004; Dwyer, 2005).

This suggests that a two-tier strategy of necessary emergency assistance coupled with humane systems of repatriation is probably the best approach that is practical. However, undocumented and A-10 migrants who become homeless may often face unequal treatment and receive less support than indigenous citizens.

Refugee and asylum seeker homelessness

Refugee and asylum seeker homelessness is another matter because countries are concerned to appear humane. The numbers involved are also small. Germany, the Netherlands, France and the UK received 114 380 applications for asylum in 2009, many of those would not be granted refugee status. The 2009 asylum applications in these countries were equivalent to 0.05 per cent of their collective population of some 221 million people (UNHCR, 2010). It is also the case, although the evidence is not very robust, that only some refugees are actually at heightened risk of homelessness (Robinson and Reeve, 2006).

Homelessness among ethnic and cultural minorities who are not recent migrants

This is not a simple policy area. What is discrimination and racism against ethnic and cultural minority citizens in one country is discrimination against migrants, who by definition have more limited rights, in another country.

Several member states regard spatial concentrations of some ethnic and cultural minorities as potentially damaging to social cohesion. At first the concern was that spatial separation would bring social and economic isolation and disadvantage because it highlighted difference; later the concern extended to domestic security in respect of Muslim populations (Philips, 2006, 2009; Robinson, 2010). This is despite questions about the extent to which ethnic minorities actually choose to live in spatial concentrations, or just pool in areas where housing is most affordable (Philips, 2009) and evidence that these forms of spatial concentration, where self-selected, may have beneficial effects (Busch-Geertsema, 2002; Robinson, 2010).

While a concentration of Muslim people in Bradford in northern England is seen as a potentially divisive social problem (Robinson, 2005), a concentration of Polish people and Polish-run businesses in a London borough is not (Garapitch, 2008). However benign the intent, a subsection of the population is being treated differently from other citizens. This is part of what Harrison *et al*. (2005) argue is a 'hierarchy of inclusion' in EU housing systems more generally, which is linked to the perceived degree of difference with local populations.

The presence of disproportionately high numbers of specific ethnic and cultural groups of EU citizens in homeless populations may well be indicative of ongoing exclusion on a number of levels (Stephens *et al*., 2010; Cahn and Guild, 2008; FRA, 2009). As Edgar *et al*. argued in 2004, the state must enforce equal opportunities and anti-discrimination legislation in respect of housing and labour markets (see also Harrison *et al*., 2005; Stephens *et al*., 2010) and there are arguments to be made about whether urban policy towards some ethnic minorities should be distinct (Busch-Geertsema, 2002; Robinson, 2010).

Areas for Additional Research

It must be ensured that refugees have access to the same protections and supports as are available to the general population. However, the evidence base on the extent of refugee homelessness is limited. Some refugees have extensive personal resources (such as command of relevant languages, familiarity with cultural and professional qualifications) that may reduce the risk of their becoming homeless, whereas others will be far more vulnerable. More information about the actual extent of refugee homelessness is needed. British research found evidence of an over-representation in the statutory homelessness system of former refugees who had become British citizens (Pleace *et al*., 2008); if this is occurring elsewhere, it is a concern.

EU-wide monitoring or surveys need to be undertaken to understand the extent, nature and implications of migrant homelessness. More data are needed, particularly to ensure that the scale and nature of undocumented migrant and A-10 economic migrant homelessness is properly understood. As Fonseca *et al*. (2010) argue, EU, UN and OECD calls for common data on migration have been ignored by national governments for too long. This is not the call from social scientific researchers in universities for better data, it is a general plea for better data because there is very little knowledge of what is actually happening in many respects, a problem that all too often still extends to homelessness itself (Edgar, 2009).

Finally, the balance between migration control and proper service responses to undocumented migrants and homelessness among A-10 economic migrants needs to be systematically researched. Practical, integrated responses that are as humane as possible while maintaining and supporting immigration regimes need to be developed and evaluated if undocumented and A-10 migrant homelessness is to be tackled. Clearly there is an argument for emergency services to stop groups such as undocumented migrants sleeping on the street and for the authorities to ensure that these individuals are healthy before taking a decision about their future. Homelessness services for migrants that provide support, help an individual to stabilise but which, when deemed necessary, facilitate repatriation must be contemplated. These questions are not just practical, they are also political and moral, and require independent, neutral and robust assessment if the most effective and the most humane service responses are to be pursued.

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Women and Homelessness

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Abstract_ *There has been a relative paucity of European research on women's homelessness since the European Observatory on Homelessness promoted the first overall study on the subject in 2001. This chapter provides a critical review of the research undertaken since then, focusing on the continuities and consistencies found regarding the previous findings and exploring the developments brought about by the new research produced. Given the almost total absence of comparative European research on women's homelessness, the literature review is based on available national studies on the theme. Beginning with the potential impact of recent developments in defining and measuring homelessness in Europe on the (in)visibility of female homelessness, the chapter examines the complexity of the hidden nature of women's homelessness, the material and immaterial challenges and constraints faced by homeless families and the response strategies they adopt, the experiences of homeless women as service users and their interactions with the welfare system and its actors, as well as the importance of developing sound theoretical frameworks for understanding women's homelessness. Finally it identifies the major gaps that persist in the research into this area and explores some key questions for the development of the research and policy agenda.*

Keywords_ *Women; homelessness; research review; Europe*

Introduction

The first overall picture of women's homelessness in Europe – its nature, trends and causes – was published in 2001. *Women and Homelessness in Europe – Pathways, Services and Experiences*, edited by Bill Edgar and Joe Doherty, brought together the results of the research carried out by FEANTSA's European Observatory on Homelessness on the specific topic of women and homelessness. This work presented and discussed contextually relevant dimensions and trends for the understanding of women's homelessness in Europe. It also contained several country-oriented chapters on three broad topics: the scale and composition of women's homelessness; the level and appropriateness of service provision for homeless women; and women's experiences of homelessness and of homeless services.

Following Edgar and Doherty's dedicated volume on women and homelessness in Europe, the Observatory re-addressed this subject, albeit briefly, in three reports on homelessness research in the EU (Doherty *et al*., 2002; Doherty, 2003; Doherty *et al*., 2004). These publications focused on existing available research across countries on a number of themes, including specific vulnerable groups, one of which was women, and the impact of policies and service provision targeting homeless women.

This chapter critically reviews research undertaken across Europe on women and homelessness since 2001.[1] By that time, a considerable gap in gender-specific research on the subject of homelessness had been widely recognised (Novac *et al*., 1996; Jones, 1999; Edgar and Doherty, 2001) and increasing, although disparate, evidence of a rising number of homeless women had been reported in several EU countries (Cabrera, 2001; Jones, 1999; Mina-Coull and Tartinville, 2001; Pels, 2001). However, one of the most striking features of research on women's homelessness in Europe is the relative paucity of it.

In spite of the multiplicity of national contexts and realities among EU member states, Edgar and Doherty identified 'an intriguing consistency':

> First, all the national reports indicate that the typical form of homelessness among women is 'hidden' homelessness. Second, while the evidence drawn from each country demonstrates that rooflessness remains a predominantly male problem, up to a fifth of the street homeless and around a third of all homeless people are women. Third, data from homeless service provider records indicate that over recent years, in most countries, women represent an increasing proportion of users. Fourth, and perhaps most significantly, there is

[1] Literature published in English, French and Portuguese has been included. significant international work has also been reviewed where little European research was found.

> an observable change in the composition of the female homelessness population reflected in increases in younger women and in women from ethnic minority groups or immigrant backgrounds. (2001, p.231)

The 2001 report directly addressed and explored the nature of women's vulnerability to homelessness and the factors underlying their exposure to the risk of homelessness. The authors noted that the socio-demographic and economic transformations taking place across Europe seemed to be producing opposite outcomes for women: either encouraging female emancipation and autonomy (e.g. the changing role of the family and the increased entry of women into the labour market) or increasing their exposure to the risk of homelessness (e.g. the growing number of female-headed households, the feminisation of poverty, the increased participation in part-time/low-wage jobs and the reduced availability of affordable housing).

This chapter will explore the extent to which the 'intriguing consistencies' identified in 2001 remain relevant in the light of more recent research evidence. Given the lack of comparative research at the European level on these specific topics, the chapter will focus on national evidence produced since 2001. It considers the potential impact of developments in defining and measuring homelessness in the EU on the visibility of homelessness among women in Europe. It then discusses the importance of developing a structural understanding of women's homelessness and the apparent move to 'lighter' forms of addressing those structural dimensions in the post-2001 research literature.

The issue of the hidden nature of homelessness among women is the focus of sections on gender and the relative risk of homelessness and on gender performances. The first presents some research showing how women's risk of ending up in more extreme forms of homelessness can be lessened by the way welfare systems work and interact with homeless women. The second draws on studies in which the issue of women's hidden homelessness is explained by unveiling specific survival responses (or performances) that are modelled by dominant social gender perceptions.

The chapter moves on to consider recent inputs from the theoretical debate and to discuss the importance of developing consistent theoretical frameworks in order to increase our understanding of homelessness, encompassing both the diversity of women's experiences of homelessness and the underlying social structures. The section on parenting and homelessness presents recent research developments on the issue of homeless families. The studies reviewed address the challenging living conditions of these families, the strategies they adopt to preserve their parental identity and the impact of specific assistance programmes and social work practices. The new research outcomes presented in the section on service provision directly address Edgar and Doherty's questions about whether services for homeless people across Europe have managed to improve their effectiveness and appropriateness regarding the needs of homeless women and whether we are moving towards more gender-sensitive programmes and services. Finally, the chapter identifies the major gaps still persisting in our knowledge of women's homelessness and indicates possible 'new roads' for the future research and policy agenda in this specific field.

Definitions and Measurement of Women's Homelessness

According to some authors (e.g. Watson, 2000), the analysis of women's homelessness demands an unveiling of the interconnections between three 'inseparable layers': visibility/invisibility, estimated significance of the problem and its definition. If homelessness is defined as rough sleeping, or as single homelessness, then women's homelessness becomes invisible. Therefore it is not counted and is underestimated. In many European countries the adoption – officially or not – of a restricted definition of homelessness (Bruto da Costa and Baptista, 2001) has contributed to this situation. The latest European review of statistics on homelessness (Edgar, 2009) reveals that the categories of homelessness in which there is total consensus are rough sleeping and living in emergency homeless hostels, which suggests that women's experiences of homelessness may continue to be overlooked.

Although outside the scope of the present chapter, it is important to acknowledge recent developments on the definition and measurement of homelessness in the EU (see Chapter 1). In fact, the development of ETHOS – European Typology on Homelessness and Housing Exclusion (Edgar *et al.*, 2004) – may contribute to a more comprehensive awareness of specific homelessness and housing exclusion situations that have been reported as particularly affecting homeless women or women exposed to the risk of homelessness (e.g. women living in refuges, temporarily living with family/friends and/or living under the threat of violence). The fact that many countries across Europe are referring to ETHOS in their efforts to develop a national definition of homelessness (Busch-Geertsema, 2010) may represent important progress in improving the visibility of some gendered forms of homelessness. A recent report on homelessness in Dublin (Homeless Agency, 2008) directly refers to ETHOS, both by reporting on the homelessness categories 'counted in' (rooflessness and houselessness) and by announcing the launch of future research on the housing exclusion categories 'left out' (insecure and inadequate housing). If in the former situations women's experiences of domestic violence gain an increased visibility, in the latter the possibility of actually estimating the significance of those situations where women are temporarily staying with family and friends continues to be postponed.

Whatever definition of homelessness is adopted at the national level, it is important to recall that the prevalence of hidden forms of homelessness among homeless women in most European countries was already one of the strong messages in Edgar and Doherty's 2001 book. Women may be hidden because they try to avoid the increased risks of being on the streets or in specific shelters; because they have managed to secure alternative housing solutions (doubling up, sharing with family or friends); or because they, and their children, are seen as the 'fragile' family elements and therefore are concealed by welfare systems reactive to this condition. As a result, such women are statistically invisible in most existing data systems on homelessness throughout Europe.

From Structural Explanations towards Structural Contextualisation

> Homeless women have to date received relatively little attention, probably because they are far less likely than men to be in this position. But this of course begs the question of why this should be. Most homeless people are recruited from the poorest sections of the population; yet these are the categories in which women are the most numerous. So why do women form only a small minority among the homeless, and why are they less likely than men to end up in the street after losing their home? (Marpsat, 2008, p.147)

The relationship between the feminisation of poverty and homelessness among women was one of the key messages in Edgar and Doherty's 2001 report. Evidence collected across all member states (Cabrera, 2001; Enders-Dragässer, 2001; de Feijter, 2001) identified poverty as one of the structural factors undermining the capacity of women to establish and maintain independent homes, thus directly contributing to an increased vulnerability to homelessness.

Reeve *et al*. (2007), in their 'journey' through homeless women's 'landscapes and careers' in England, recognise the importance of women's encounters with structural forces such as poverty, the housing market and the labour market, which exert a strong impact on the landscapes where women live, 'exercise choice and make decisions' (p.3).

A study on family homelessness in England – drawing on evidence collected on families and 16 and 17 year olds accepted as statutory homeless – points out that the immediate causes of statutory homelessness (e.g. disintegration of social relationships, housing pressures) 'lend some support to arguments for a 'structural' understanding of family homelessness, insofar as eviction or being threatened with eviction was more commonly reported as a reason for applying as homeless in the areas of highest housing stress' (Pleace *et al*., 2008, p.29).

Watson (2000) draws attention to some major 'shifts in the gendered nature' of homelessness: the changing social climate brought about by the increasing expectations of equality among women and their search for financial and personal independence; the decline of the nuclear family and the increase in single-person households; increasing longevity with particular impact on the rising numbers of older women living into their eighties and nineties; changing migration patterns; and shifts in welfare responsibilities and access to housing markets.

According to several authors (Edgar and Doherty, 2001; Watson, 2000; Shinn, 2007), such socio-economic and demographic transformations brought increased risks of vulnerability, which are particularly challenging to women and female-headed households. Despite women's rising educational levels and their progressive entry into the labour market, female employment patterns across Europe are characterised by persistent high levels of gender segregation, low pay and unemployment. According to recent EU figures, the increased convergence of male and female employment rates since 2000 has been accompanied by relative inertia in terms of the gender pay gap and of the occupational and sectoral gender segregation across the twenty-seven member states. Between 2005 and 2008 there was a steady, and even slightly increasing, trend registered in those figures.[2]

Moreover, the reduced commitment to welfare in many EU countries and the particular configurations and operation of welfare policies at the national and local levels have placed particular challenges on women's (and female-headed households') resources and their ability to manage the risks of homelessness. As Edgar and Doherty observed in 2001:

> The capacity of women to form and maintain an autonomous household has been shown to be dependent on their economic status, their family status and also on the extent to which social protection systems support their housing needs. Within the context where housing market changes are re-establishing a closer link between a household's economic circumstances and their housing situation, the economic status of female-headed households has become a critical factor in their vulnerability to homelessness. (p.43)

Shinn (2007), drawing on a comparative international analysis of papers on homelessness, discusses the association between rates and composition of homelessness, inequality levels, social policies and underlying social and cultural beliefs. Social policies, she argues, can shape the composition of the homeless population in each country. She compares the vulnerable situation of women and children in Europe with their counterparts in the United States and concludes that although their situation 'in Europe may be more fragile than that of men, this fact is counter-

2 Data available at: http://ec.europa.eu/social/main.jsp?catId=477&langId=en.

balanced by more amenities', which are less available in the US. This finding is linked to the fact that the US devotes a significant minor share of social spending to families, compared with the situation in western Europe.

Few would argue against the need to contextualise explanations of women's homelessness within a sound understanding of the complex interactions between different levels of structural, relationship and personal factors. However, the absence of comparative European research on women's homelessness since Edgar and Doherty's 2001 study makes it hard to pinpoint any significant progress in the identification of relevant structural trends that might help promote the wider understanding of women's situations and trajectories in comparative perspective. Nevertheless, it must be acknowledged that much of the post-2001 literature reviewed (focusing on national realities) explicitly refers to most of the above-mentioned societal changes as important contextual elements for the interpretation of women's homelessness experiences (Reeve *et al*., 2007; Löfstrand, 2005; Join-Lambert, 2009; Enders-Dragässer, 2010).

Gender and the Relative Risk of Different Types of Homelessness

The recognition that hidden forms of homelessness are prevalent among homeless women led to an increasing number of studies unveiling the hidden nature of women's homelessness (Jones, 1999; Watson, 2000; Reeve *et al*., 2006; Reeve *et al*., 2007; Enders-Dragässer, 2010) and highlighting women's experiences in the 'home-to-homelessness continuum' (Watson and Austerberry, 1986).

Recent research on women's homelessness provides an interesting portrait of homeless women's encounters with different risks and 'constructions' of homelessness, and with service provision practices and welfare systems' operating modes. 'Given that gender is constructed in a host of ways in this society, combating women's homelessness requires flexibility and innovative approaches. It also requires change on a diversity of shifting terrains, from the provision of housing to the construction of meanings and dominant images.' (Watson, 2000, p.169)

Marpsat (2008) questions the apparent relative 'advantage' of women regarding the risk of homelessness – understood as rough sleeping or houselessness – and argues that there is a balance between the advantages (e.g. higher degrees of welfare protection and informal support) and the difficulties (e.g. greater exposure to enduring unbearable home situations such as domestic violence, higher risk of severe financial hardship when without a job) faced by homeless women. Women and men in Western countries, she argues, are distributed differently along a continuum of different types of situation (e.g. housing market, labour market), 'which they invest with different meanings' (p.173).

Brousse (2009), drawing on the results of the large national INSEE 2001 survey on the homeless population in France, argues that homeless women are better accommodated than men, which can be partly explained by the presence of accompanying children:

> Homeless women accompanied by children, or one in two, are directed towards accommodation modes more compatible with family life: three quarters are housed in bed-sits or flats and a quarter in shelters where they can stay during the day if they wish. However, even childless women enjoy much better accommodation conditions than men: twice as many are accommodated in housing and three times as many in night-only shelters. (p.35)

In the UK context, Fitzpatrick (2005, p.8) argues that 'women are more likely than men to approach local authorities and housing associations when they find themselves homeless, and to be treated more sympathetically by these agencies than their male counterparts'. However, some studies have shown (Reeve *et al*., 2007) that accessing service-led accommodation does not mean that women engage in a sustained trajectory out of homelessness, as they often circulate between this type of accommodation and different hidden situations.

More important than the discussion of who – among the homeless population – is more or less visible is the ability to develop a critical understanding of the reasons why gender and some gendered factors affect either homeless men or women in different ways. As discussed below, the contribution of the critical realist theoretical approach presented by Fitzpatrick (2005) may provide useful explanations without undermining the pertinence of established theories or assumptions about homelessness, namely that 'male oppression of women could still be one of a number of social structures with a "tendency" to cause homelessness, even if men predominated in the homeless population' (p.9).

But hidden homelessness among women may also result from complex interactions between power structures (e.g. patriarchal relationships and assumptions) and individual agency through the adoption of women's specific survival responses to 'visible' homelessness. Fichtner's (2010) study on male homelessness in Germany shows how men also construct gender through patterns of interpretation that connect social structure to individual behaviour. Based on interviews with homeless men conducted in different cities in Germany, the author concludes that 'images of men' – understood as patterns of interpretation of masculinity – and 'other patterns of action and interpretation… co-determine the activities in and barriers to overcoming the situation of homelessness or urgent housing need of the men concerned' (p.11).

From Gender Invisibility to Gender Performances

Women's position in society and the dominant societal perceptions of gender seem to play a role in either increasing or buffering the risk of homelessness among women and in shaping its hidden dimensions. Two studies (Huey and Berndt, 2008; May *et al*., 2007) have explored the survival strategies that women employ to cope with the particularly insecure and dangerous conditions of street homelessness.

In their research on the relationship between space and victimisation among homeless women living on the streets in five different cities – Edinburgh, San Francisco, Vancouver, Montreal and Ottawa – Huey and Berndt (2008) explore the strategic gendered dimensions involved in the different ways women perceive and use the public space in order to protect themselves. The authors examined ethnographic material collected in three of the cities and conducted a set of interviews with both women and service providers, directly focusing on gendered survival strategies employed by women living on the streets. They identify four main types of gendered performance: the femininity simulacrum, the masculinity simulacrum, genderlessness and passing. By interpreting dominant social gender constructs, homeless women reinvent performative strategies of self-protection, which they envisage as the most adequate to the objective and symbolic characteristics of the space they inhabit.

> The final performance strategy identified, 'passing', is one whereby a woman who self-identifies as heterosexual retains elements of their gendered identity but attempt to pass themselves off as lesbians when approached by men… The strategy of passing may be performed in combination with either the masculine simulacrum (presenting as 'butch') or with genderlessness (attempting to present as ambiguous). (p.190)

May *et al*. (2007) question the consequences of the growing attention given to hidden forms of female homelessness as regards the danger of ignoring – once again but for different reasons – the experiences of street homeless women and their needs. The authors discuss the dominant perception of street homelessness as a male preserve and explore the reasons behind the invisibility of women's homelessness. The disruptive and threatening way in which the female body irrupts in the established public/private boundaries, the awareness of strongly male-dominated spaces, the activation of strategies to avoid the specific difficulties and dangers arising from rough sleeping are some of the issues discussed by the authors. Drawing on Wardaugh's (1999) and Watson's (1999) conceptual frameworks on the use of the body as a gendered tool to address the street space and to build alternative gendered homeless identities, May *et al*. identify four different groups of women, which they conceptualise as composing alternative 'cartographies' of homelessness:

> … we attempt to make better sense of these women's experiences by distinguishing between four main groups: those who distanced themselves from recognised spaces of homelessness and from a 'homeless' identity; those existing… in the shadows of a street homelessness scene; those whose presence on the streets marked them as obviously and visibly 'homeless'; and those who, though sharing the spaces of the homeless city with other visibly homeless people, were understood by neither the housed public nor homeless service providers as 'homeless' at all but marked with a quite different identity. (p.11)

The way the authors anchor their analysis of street homeless women's identities to the spaces and places they live in is an interesting and innovative contribution to the discussion around the visibility/invisibility of homelessness among women. They also draw policy-relevant lessons from this type of approach, namely by stressing the importance of recognising that 'the most effective response is likely to be one that works with rather than denies the very different identities articulated by different homeless women' (p.25).

From Individual Agency to Policy Implications: Inputs from the Theoretical Debate

New approaches regarding the phenomenon of hidden homelessness may be read in terms of the debate around the potential of alternative theoretical perspectives for understanding homelessness (Neale, 1997; Fitzpatrick, 2005). Doherty (2001) briefly explored the disputes between essentialist and anti-essentialist perspectives when conceptualising homelessness among women and the dangers of a fundamentalist approach:

> While it is important that we are sensitive to context and recognise heterogeneity among women, it is also important, as Neale (1997) reminds us, that we do not lose sight of women's 'shared gender experiences'. An anti-essentialist viewpoint in neglecting the commonality of women's position and experiences in male-dominated societies is in danger of descending into a 'formless relativism' where research becomes immersed in specifics, producing empathetic accounts, but losing sight of the wider agenda and, indeed, of dispensing entirely with the idea of improvement and progress in the condition of women. (p.18)

Recognising the lack of 'rigorous and comprehensive theoretical analysis of homelessness', Neale (1997) draws upon a range of theoretical approaches (e.g. feminism, poststructuralism, postmodernism, critical theory) and explores their specific interpretative potential in informing our understanding of homelessness and particularly the beneficial changes they may bring to the development of policies and practices in this field.

Sharing Neale's concern on the need to develop more rigorous frameworks for developing our understanding of homelessness, Fitzpatrick (2005) engages in a critical analysis of prevailing explanations of homelessness and existing theoretical frameworks. The specific aim is to 'illustrate how a (complex) critical realist approach could enable account to be taken of the full range of potential causal factors in homelessness – and their necessary and contingent inter-relationships – while avoiding making any one level "logically prior" to all others' (p.15).

Although neither Neale's nor Fitzpatrick's analysis was directly focused on the issue of women's homelessness, they provide an interesting conceptual framework for the analysis of the research presented above on the invisibility of women's homelessness. Looking, for instance, at the methodological implications of a critical realist approach to research on homelessness, the studies conducted by May *et al*. (2007) and by Huey and Berndt (2008) seek to uncover hidden aspects of the social reality of homeless women, identifying relevant theoretical frameworks of analysis, but also clearly 'proposing a focus on "what works, for whom, in what circumstances" ' (Fitzpatrick, 2005, p.11).

> For women like Julie and Sharon, for example, the need was for a space set apart from the main sites of homelessness and from an obvious 'homeless' identity in which they could work on rebuilding a sense of themselves and plan for their future. But the kind of environment provided by Gateway would hardly be appropriate for Theresa or Jules – whose sense of identity and self esteem were intimately bound up with their position in Bristol's street homeless scene. (May *et al*., 2007, p.25)

That hidden homelessness was a typical manifestation of homelessness for women had clearly been established by Edgar and Doherty (2001), drawing on both national evidence collected through the national reports produced for the European Observatory on Homelessness and on existing European and other international literature. Progress made since then shows us that hidden homelessness indeed remains a typical manifestation of female homelessness (Löfstrand, 2005; Reeve *et al*., 2006; Marpsat, 2008; Join-Lambert, 2009), but a new understanding of the diversity and complexity of these hidden forms has become possible by exploring relevant cultural and social dimensions adequately framed by more comprehensive theoretical approaches to homelessness, paving the way for more rigorous and realistic evaluations of intervention practices and policies.

Parenting and Homelessness: Challenging Responsibilities, Challenged Identities

Although not directly addressing the issue of parenting and homelessness as a specific topic, Edgar (2001) pointed out the importance of recognising the heterogeneity of homelessness among women, which may have led to acknowledging different perspectives or interpretations (particularly at a time when there was growing awareness of the increase of new homelessness situations) such as the rise in the number of young homeless women and immigrant women. 'It may point to the need for greater awareness of the impact of structural changes on women – for example, the increase in single-person households and the *changing role or capacity of the family resulting in changing living circumstances*' (p.45, my emphasis).

More recent research (Löfstrand, 2005; Thierry, 2008) has focused precisely on the experiences of families with children, from the perspective of the challenges parents face and how these affect their identity as mothers or fathers. Thierry (2008) discusses the situation of women living with their children in homeless hostels (CHRS)[3] in France, focusing on the consequences of their housing and living conditions in an environment where social relationships with the workers are marked by their condition as 'vulnerable and assisted mothers'. Women were interviewed in a number of the CHRS. Extreme poverty, domestic violence, family breakdown and lack of social support were some of the factors identified in the pre-institutionalisation stage of these women's trajectories. Although the women interviewed expressed different perceptions of their entrance into the hostel, related either to their experiences (e.g. violence) or to the length of their stay, Thierry notes several threats to their parenting role and identity. Living in a space with rules they cannot control, with forbidden or limited social interactions and where they are confronted by other educational patterns and practices contributes to the building up of a self-perceived low-value social image and social status with worrying consequences on their parental identity.

> Certaines mères s'inquiètent de la répercussion de ce statut dévalorisé sur l'image parentale donnée à leurs enfants. Elles craignent en particulier un manque de respect de la part de ces derniers, qui mettrait à mal leur autorité si la situation venait à perdurer. (Thierry, 2008, p.9)

Faced with these constraints, women develop different strategies to protect and preserve their parental identity. These include creating 'protection spaces' within the collective institutional space, which may be translated into the physical protection of private spaces within the hostel, or intentionally selecting the 'legitimate' educational supports.

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3 Centres d'hébergement et de réinsertion sociale.

Exploring the different ways that mothers (and fathers) experience these transition periods in hostels, their self-image, the anchoring elements of their parental identity, and the strategies they develop to preserve their parental role and identity may represent an important contribution to a more adequate response to homeless parents' needs during such complex life-changing events.

Pleace *et al*. (2008), in their study of family homelessness in England, report positive impacts on families accepted as homeless regarding the assistance they receive under the homelessness legislation, which resulted in 'a substantial overall net improvement' in their quality of life:

> The findings of this study could be viewed as largely a 'good news' story with regards to families accepted as homeless. These families appeared in the main not to be extremely vulnerable, but rather were generally low income households who found themselves unable to secure alternative housing when they were confronted with a crisis such as relationship breakdown or eviction which caused them to lose their settled accommodation. The provision of statutory homelessness assistance seemed to have secured a substantial overall net improvement in the quality of life for both adults and children in these families. (p.36)

Taking a different approach, Löfstrand's (2005) paper entitled 'Making Men into Fathers – or Fathers into Men? Gendered Homelessness Policies in Sweden' presents an interesting reflection on the interconnecting images of homelessness, gender and parenthood and how they have influenced social work practices in Sweden. The author discusses the transition of the discourse of the 'negligent father' into the 'equal father' and then into the 'abusive man' in Sweden and argues that there are two incompatible discourses on men: the equal father and the violent man. The vulnerable condition of homeless fathers makes them particularly 'adjustable' to the latter category as they interact with the different actors within the Swedish social public system. Here, too, the issue of the parental role – this time the father's role – and of parental identities seems to be at stake:

> Men with children registered as clients at the social welfare office are generally assumed not to be responsible and care-giving fathers. According to professional helpers, to encourage men to become caring fathers is generally difficult, and presupposes extra time and energy on behalf of the social worker… When it comes to men in general encouraging men as fathers is thought of as a good thing, while the goal seems to be totally different when it comes to homeless men. (p.5)

Within a context of a society where equality between men and women has gained a central place and where the politics of fatherhood have promoted men as (equal) fathers, Löfstrand notes that social work practices to address homelessness seem to erase these social images and to rebuild new differences with direct consequences on parenting among homeless men (and women): 'While the Swedish politics of fatherhood has… made men into fathers, in the local homelessness work fathers are made into (single) men. The gender-neutral categories of "homeless" and "homeless addicts" cannot be combined with the category "father", which is an explicitly gendered category' (p.13).

Although it has not been possible to identify any other references in European[4] research on the topic of parenting and homelessness, extensive research has been undertaken in the US (Barrow and Laborde, 2008; Cosgrove and Flynn, 2005; Friedman, 2000). Paquette and Bassuk (2009) note the increasing concerns about the fast-rising number of families threatened by homelessness as a result of the current financial and economic crisis.

Women's Homelessness and Service Provision

Edgar and Doherty (2001) found evidence in many countries of important changes in the composition of homelessness among women (e.g. the growing numbers of young women and immigrant women who were increasingly being reported as service users). By then, evidence had already been collected questioning the effectiveness and appropriateness of homelessness service provision regarding the needs of homeless women. Less clear was the understanding of the reasons behind these changing trends and how these women were experiencing the reality of using the services.

CRISIS promoted several pieces of research in the UK focusing precisely on the experiences and trajectories of homeless women and on their relationship with the services. A 1999 report entitled *Out of Sight, out of Mind?* (Jones, 1999) provided a descriptive account of homeless women's experiences based on in-depth interviews and focus groups. It highlighted their housing histories and reasons for being homeless. Following this report, CRISIS commissioned the Centre for Regional Economic and Social Research to investigate women's experiences and trajectories; two reports were published.

In the first report, *Homeless Women: Still Being Failed yet Striving to Survive* (Reeve *et al*., 2006), the authors explore a wide range of issues. Although the hidden nature of women's homelessness is once again highlighted, the prevalence of rough sleeping among the women interviewed arises as a very common experience in the

4 Research written in English, French or Portuguese.

early stages of homelessness, which, according to the authors, reflects both a lack of other options and a limited knowledge regarding available support. Negative experiences of approaching services and barriers to services were reported:

> Many respondents were unaware of the outcome of their application… some [were] being 'turned away at the door' or deterred by front-line staff from making an application… The fragmentation of services emerged as a key barrier preventing respondents from receiving the assistance they required… Few services were capable of addressing the multiplicity of needs… (pp.5–6)

The second report (Reeve *et al*., 2007) focused on exploring the trajectories of women through homelessness. The authors plotted and analysed the biographies of twenty-nine women by mapping each woman's housing and homelessness trajectories, significant experiences and engagement with services. The women's homelessness journeys disclose some interesting and important elements that may constitute key messages for the improvement of the provision of services for homeless women. These findings directly address the three main stages of service provision on which Edgar and Doherty (2001) called for further research: prevention, alleviation and resettlement.

> We have seen in this report that as women move through their homelessness journey they frequently fall through the net, failing to access appropriate accommodation and failing to access the support they require. They find themselves in situations and places of danger at times when adequate intervention may have kept them safe. We have also seen that engaging with services, or accessing temporary accommodation, is rarely the end of the story. (Reeve *et al*., 2007, p.44)

The research also identifies critical points or transitions in some of the women's homelessness trajectories that may be crucial in terms of intervention, namely transition into independence, transition into first tenancy or exit from prison. In the context of the pertinence of the critical realist theoretical framework for the understanding of homelessness (Fitzpatrick, 2007), as discussed above, the biographical analysis undertaken reveals both the strength of the structural and institutional forces that women encounter and the diverse strategies they use to cope with their difficult living conditions and to interact with others, which results in particular choices and actions and subsequently influences the way women are perceived and treated in those interactions.

Rosengren (2003), in an ethnographic study of homeless women in Sweden and their relationship with drugs, also explores the coping mechanisms adopted by women in their interactions with the service system and the multiple constraints and 'brutality' of the housing services in addressing their specific needs.

Enders-Dragässer (2010) argues that in Germany the growing acknowledgement of homeless women as a specific target group with specific needs has brought about considerable progress and innovation in the provision of support services for homeless women. Further and sustainable improvements, she concludes, will only be possible if the gender debate initiated over three decades ago evolves into an actual gender mainstreaming in all fields of social work.

Still in the arena of practitioner–client relationships, Juhila (2009) analysed social workers' records in one organisation in order to identify the existence and use of different interpretative repertoires in their daily work with homeless women. Drawing on Edley's (2001), concept that 'interpretative repertoires are "relatively coherent ways of talking about objects and events in the world" Edley's (2001, p.198)' (Juhila, 2009, p.3) and that taking up one or other type of repertoire is governed by culturally available resources, Juhila identified six different interpretative repertoires: repertoire of care, repertoire of assessment, repertoire of control, repertoire of therapy, repertoire of service provision and repertoire of fellowship. Some of the most interesting results of this study seem to address directly one of the concerns voiced by Edgar and Doherty (2001) regarding the need for improved dissemination of best practice in the area of service provision:

> Care assessment, control, therapy, service provision and fellowship are all well-known professional categorizations of social welfare work. In many cases, however, they have been approached as mutually exclusive, so that fellowship, for example, is incompatible with control, or service provision with caring… This study, however, shows that in the organization studied, the set-up is not an 'either-or', but a 'both-and' one… One possible explanation for the 'both and' set-up is that the quantitatively most frequent repertoire – that of caring – is the carrying principle of daily work, and this is the one that ultimately enables the adoption of the other repertoires. (Juhila, 2009, pp.14–15)

Overall, these different pieces of research reveal that Edgar and Doherty's 2001 identification of the lack of appropriate and gender-sensitive programmes and services to meet the needs of homeless women still holds true. Recent research, involving more detailed and in-depth analyses of women's experiences and trajectories, has revealed some hidden mechanisms and some critical issues within the relationship between homeless women and their experience of services in a European context.

Bridging the Gaps and Moving towards Policy Improvements

Research has addressed some of the gaps identified in the Observatory's 2001 study on women and homelessness, but other gaps remain. Although there has been an increased focus on homeless women's trajectories and pathways through homelessness, the exploration of the reasons for the increasing proportion of specific groups – young women and immigrant women – has not been addressed. Neither has any progress been observed on determining the scale of women's homelessness in Europe.

The links between domestic violence and homelessness have been identified in the wider literature on homelessness. The research review for this chapter found only one specific study aimed at exploring the impact of prevention-centred homelessness policy responses to domestic violence (Netto *et al.*, 2009). The authors assess the effectiveness of sanctuary schemes in the UK, [5] recognising positive outcomes but also challenging emerging shifts from state to individual responsibility.

Domestic violence is, nevertheless, an important common feature in many women's trajectories and landscapes. FEANTSA's (2007) policy statement on homelessness and domestic violence provides a European overview of some common needs of women fleeing domestic violence and the adequacy (or not) of services available to them. Thus, domestic violence – as a recurrent pattern implicated in homeless women's pathways – should be further explored. Novac (2006) summarises the 'current knowledge about the relationship between family violence and homelessness' (p.ii) in Canada, given the significant research evidence of the high prevalence of family violence in homelessness trajectories. This literature review, along with the findings in Edgar and Doherty's study (2001), highlights the importance of engaging in specific, focused research on this interconnection within the European context. In most European countries domestic violence and homelessness services are developed and funded separately, which may explain the persistence of this research gap, and specifically the invisibility of domestic violence data within homelessness statistics (Edgar, 2009).

Another potential future direction for European research on women and homelessness would be the development of studies on family homelessness more broadly, in order to explore possible emerging trends, to identify the scale of the problem and to further unveil the challenges and coping strategies undertaken in the relationship between families and the services, particularly at a time when the financial and economic crisis seems to be producing new excluded groups.

5 Sanctuary schemes aim to enable victims of domestic violence to remain in their own accommodation if they choose to do so, and if so to ensure their safety.

The dissemination of positive experiences in the relationship between homeless women and the services would also be welcomed. Few examples have been found, but their contribution to the improvement of practices and policies is as important as the identification of constraints and obstacles.

Comparative research on women and homelessness remains another important gap. Increased efforts should be directed towards the promotion of comparative studies that could increase our knowledge and understanding of common (and specific) trends, patterns and experiences of women's homelessness in a wider European context. The adoption (or at least the acknowledgement) of a common European Typology on Homelessness and Housing Exclusion (ETHOS) should pave the way for comparative explorations of the realities lying behind some of the ETHOS categories and living situations for homeless women.

Conclusion

This review of the research produced on women and homelessness in Europe since 2001 has shown that many of the conclusions reached in the Observatory's 2001 research remain valid today, although they have been invested in or (re)interpreted in different ways, either restating or challenging previous perspectives on women's homelessness, or directly addressing (partially) some of the gaps identified in 2001.

The explanatory frameworks for women's homelessness and its gendered nature, based on the identification of major trends and structural forces, which had been given particular importance in the research reviewed by Edgar and Doherty (2001), have now been addressed differently. Rather than taking these dimensions further, the post-2001 research reviewed here mainly acknowledges their importance as contextually relevant frameworks for the specific approaches developed on women's homelessness. The fact that most of the recent research has adopted a qualitative perspective may be one of the reasons for this different utilisation and exploration of major structural explanations.

On the other hand, recent research on women's homelessness provides an interesting and particularly useful approach to the 'construction of homelessness', its practices, socially perceived images and discourses, and offers important insights on policies and practices. Research produced on hidden homelessness and on the gendered interactions and perceptions of homeless women on their living spaces, landscapes and trajectories has increased our understanding of the complex interactions between power structures and individual agency.

This review has also shown how the development of more rigorous frameworks for understanding homelessness may be a powerful tool for interpreting the ways in which some of the new approaches to women's homelessness explore the relevant culturally and socially gendered dimensions of the experiences and pathways to homelessness among women.

Furthermore – and although less developed in Europe than elsewhere – the changing living circumstances faced by homeless families have been explored in a few European countries. The research produced on parenting and homelessness has shown the importance of identifying the constraints and strategies that homeless women (and men) face in the exercise of their parental roles and in the building up of their parental identities. At the same time, organisational practices and policies have been questioned in the context of the construction of social and institutional discourses on gender and homelessness.

The move to more qualitative research and the increasing focus on pathways through homelessness are apparent in the research reviewed regarding women's homelessness and service provision. Recent research has enabled a better identification of the recurring life events and circumstances implicated in pathways into homelessness and the needs and experiences of female service users has gained increasing visibility. While there is still a lack of appropriate gender-sensitive programmes and services for homeless women, as reported by Edgar and Doherty (2001), it has been possible to identify examples of original outcomes arising from the adoption of innovative methodological approaches.

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Youth Homelessness

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Abstract_ *In 1998, research by the European Observatory on Homelessness suggested that youth homelessness may be considered as a faltered or interrupted transition to adulthood. Whilst there was little evidence that youth homelessness was growing across Europe, information on the extent and nature of homelessness was patchy, responses appeared underdeveloped and specialist services for homeless young people were relatively uncommon. This chapter reviews the progress that has been made in understanding youth homelessness in the last twelve years. It finds that frameworks of analysis have developed further, particularly through a focus on pathways into homelessness, although more attention is still required on how structural factors affect young people's housing chances across Europe. It also finds that different definitions of youth homelessness continue to be used across Europe, making comparisons difficult, and that data on the extent of homelessness amongst young people, with the exception of some North/Western European countries, remains poor. Twelve years on, information is now available on a greater range of preventative and responsive interventions but effectiveness studies remain rare.*

Keywords_ *Young people; youth; leaving home; transition to adulthood; prevention; homelessness; housing and support.*

Introduction

> Youth homelessness is the outcome of a process of failed transitions (Avramov, 1998, p106)

Virtually all young people are expected to make a transition from childhood, and a state of dependence on their parents or carers, to adulthood and independence. This process involves a number of inter-linked transitions, the three main ones arguably being from full-time education to employment (the school-to- work transition), the family of origin to new partnerships and families (the domestic transition), and from living with parents to their own independent housing (the housing transition) (Coles, 1995). In 1998 the first publication by the European Observatory on Homelessness to focus explicitly on young people (Avramov, 1998[1]) suggested that youth homelessness may be conceptualised as a faltered or interrupted transition where vulnerable young people are unable to find, afford and/or maintain independent accommodation particularly when having to leave the parental home early or leaving state care. In this way, they are unable to achieve a satisfactory housing transition. This is likely to be affected by, and impact on, other critical transitions including finding and sustaining employment and family formation.

The Observatory focus on youth homelessness in 1998 was decided upon following a number of reports of increasing numbers of young people utilising shelters for homeless people in a couple of European countries, most particularly France and the United Kingdom. Whilst resources were not available to undertake primary research across Europe, the edited collection was the first attempt to provide a picture of homelessness among young people in the EU15 countries. Observatory correspondents provided an overview of youth homelessness in their country utilising key literature and any available data sets on homelessness. The edited collection explored a number of key dimensions of youth homelessness, including: the extent of youth homelessness; explanatory factors for youth homelessness; responses by statutory bodies and available services, and provided some examples of emergency services.

Since then, no specific work has been undertaken on youth homelessness by the Observatory, although the Observatory research reports (Doherty *et al*, 2002; Edgar *et al*, 2003a; Doherty *et al*, 2004) and policy overviews (Edgar *et al*, 2003b; Edgar *et al*, 2004; Edgar, 2005; Mandic, 2005) included some information on young people alongside other vulnerable groups. In addition, more recently, FEANTSA produced an overview of emerging trends on child homelessness in Europe (FEANTSA, 2007).

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1 The publication consisted of a number of detailed overview chapters by Avramov, with country case study sections by individual authors. In this chapter, the publication is referred to as an edited collection.

This chapter reviews the Avramov (1998) edited collection and updates our knowledge on youth homelessness by discussing the research undertaken in this area over the last twelve years[2]. Firstly, the chapter examines definitions of youth homelessness. Secondly, the chapter reviews the limited evidence on what we know about the scale of youth homelessness. The chapter then moves onto consider explanations for youth homelessness. Fourthly, the nature of responses to youth homelessness, and their effectiveness, is considered in detail. The chapter ends by identifying research gaps in this area.

Defining Youth Homelessness

In Avramov (1998), the authors did not attempt to apply a uniform definition of youth homelessness across Europe, rather examining country specific situations. Firstly, it was clear that the situation of children and young adults of varying ages were being examined. Some Observatory correspondents (for example, in Germany and Austria) examined homelessness affecting children between the ages of 14 and 18 as well as young adults aged 18 to 25 or 27. In other countries, the age range extended into the early 30s (for example, Italy and Greece). The different age ranges under study reflected the differing policy and practice frameworks in operation across Europe. It also reflected cultural specific norms, in particular it is well known that young people from Southern Europe leave home at a later age than those in Northern Europe (for example, see Iacovou, 2002).

Similarly, in terms of definitions of homelessness, the Avramov (1998) edited collection focused broadly on the position of marginalised young people at risk of, as well as those experiencing, homelessness. The contributors to the publication were interested in considering the position of young people who were sleeping rough as well as using hostels or living temporarily in unsuitable accommodation or sharing arrangements. Further, homelessness was considered as one aspect of wider social exclusion. The study found evidence of a concern about the position of young people in society more generally across Europe, particularly 'troubled youth', rather than youth homelessness specifically. For example, in France, there was a perception that there were more young people travelling around as a lifestyle choice. In Italy, the marginalisation of youth was also perceived as a significant issue, however housing exclusion was rarely a key aspect of this. In some countries, specific concerns were prominent, for example drug abuse amongst young people (Greece), young people in care (Ireland) and young immigrants (the Netherlands, Spain). Overall, it was clear that 'youth homelessness' was not a concept widely discussed across Europe.

2 Please note this is limited to publications in English.

Developments since 1998

There is still no one agreed definition of youth homelessness utilised across Europe. This is unsurprising given the lack of a definition of both 'youth' and 'homelessness' more generally. Youth is best understood as a life phase that, whilst influenced by biological processes, is largely determined by social and cultural processes which will differ over time and place. Youth occurs at the intersection between childhood and adulthood and stretches over a number of years as people navigate a series of transitions. The European Commission (2001) selected the period between ages 15 and 25 as representing youth for their White Paper, *New Impetus for Youth*. Similarly, EUROSTAT collects data on young people between 15 and 24 years of age.

In terms of the upper end of the age scale, it should be noted that empirical evidence suggests that youth transitions are becoming more extended. Data indicates that young people are staying with their parents until an older age and delaying forming independent households (Smith, 2009). A European network, Up2Youth, under the EC Sixth Framework Programme, compared welfare policies, education and training systems and labour markets across the EU 27 countries (Walther *et al*, 2009) and concluded that the life-course of young people is now fragmented and attaining adulthood has become more difficult over time. There may therefore be an argument for extending the age range upwards in any definition of youth homelessness.

It is also important to distinguish between youth and 'child' homelessness. The latter is usually defined as affecting people under the age of 18 (FEANTSA, 2007). This reflects the United Nations Convention on the Rights of the Child[3] where national governments should protect children (defined as under the age of 18 unless majority is attained earlier) including ensuring a standard of living adequate for the child's physical, mental, spiritual, moral and social development 'in accordance with national conditions and within their means' and 'particularly with regard to nutrition, clothing and housing' (Article 27; 3). Child homelessness has been defined as including both 'children in homeless families' and 'unaccompanied adolescents experiencing homelessness' (FEANTSA, 2007). Generally, youth homelessness is understood to include this second category, but not the first. The second category has been further defined into four sub-categories (FEANTSA, 2007):

3 http://www.unicef.org/crc/

- homeless adolescents – young people who are homeless for a period of time who may sleep rough, stay with friends or in hostels. Some countries refer to 'street youths' or 'street children' where children sleep out and/or spend considerable time on the streets during the day[4];
- runaways – young people who run away from home and experience temporary or episodic homelessness;
- unaccompanied minors – asylum seeking young people under the age of 18 arriving in a country with no parent or main carer;
- children leaving institutions – children leaving state care institutions and foster care; also other institutions such as youth custody facilities.

It is important that any definition of youth homelessness encompasses ETHOS' categories of insecure and inadequate housing as well as the roofless and houseless categories (see Busch-Geertsema, this volume; Edgar, 2009). In the last decade, a number of studies have confirmed the high prevalence of hidden homelessness amongst young people, that is where people are living, usually temporarily, in the homes of friends and families (for example, see the Danish survey of homelessness, Benjaminsen & Christensen, 2007). Other studies have shown that young people often 'sofa surf' between various friends and relatives until they outstay their welcome, at which point they begin to access formal provision like homeless hostels (Quilgars *et al*, 2008). These studies suggest that hidden homelessness might be a particularly dominant type of homelessness experienced by young people.

The Extent of Youth Homelessness

The Observatory edited colletcion (Avramov, 1998) concluded that youth homelessness did not appear to be a significant issue in most countries (Austria, Belgium, Denmark, Finland, Luxembourg, Greece, Italy, Portugal, Spain). However, the lack of data available to measure youth homelessness meant that it was difficult to know whether this was indeed the case. Further, the extent of the problem may have reflected the lack of provision for young homeless people (see Responses to Youth Homelessness below). In particular, few young people appeared to be sleeping rough, utilising night shelters or other temporary accommodation for homeless people. Exceptions to these accounts included the United Kingdom and France,

4 In most countries, children will receive priority attention due to their age so these issues should not be widespread but it is evident that some young people under the age of 18 are still affected by homelessness, including rough sleeping. Recently, the European Parliament (2007) adopted a report on children's rights which included a reference to ending child homelessness (p.21, para.108).

and possibly Germany and the Netherlands. However, it is likely that some young people are reluctant to access adult homeless provision and therefore youth homelessness might have been underestimated. It was acknowledged that some young people were staying in the parental home for longer than necessary due to low incomes and a lack of housing options (Greece, Spain, Portugal, Italy).

In 1998, there appeared to be no clear trend at the European level towards an increase in youth homelessness. However, there was some acknowledgment that there may be a trend towards greater vulnerability to homelessness in some countries (Austria, Finland, Portugal), though in other cases previous growth may have been halted (Demark, Luxembourg). In some cases, the media appeared to be reporting greater numbers of homeless young people than the evidence supported (for example, 'street children' in Germany).

Developments since 1998

No reliable estimate of youth homelessness across Europe is available. Despite considerable progress in the measurement of homelessness in recent years (see Busch-Geertsema, this volume; and MPHASIS project[5]) definitional and measurement issues means that this is a huge task: as outlined above, countries tend to use different age groups and categories of homelessness and the hidden homeless are notoriously difficult to count. The FEANTSA Observatory on Homelessness has produced statistics on homelessness in Europe over the last decade, utilising the ETHOS categories, however have not attempted to measure youth homelessness. Young people are of course contained in most of the key categories, for example, people utilising night shelters, homeless hostels or sleeping rough but it is not routinely known what proportion they represent. In 2006 the statistics were revised (Edgar and Meert, 2006) and a new category was added for young people leaving children's institutions/ homes with no accommodation arranged, although the difficulties in measurement were recognised. In 2009 (Edgar), it was only possible to obtain information from four countries on this figure (the Czech Republic (20 000 children), Hungary (4 102), Ireland (262) and England (980)).

5 http://www.trp.dundee.ac.uk/research/mphasis/index.html

Data on the extent of youth homelessness has not been systematically analysed on a European wide level. Few specific studies have been undertaken specifically on the scale of youth homelessness, with available information mainly arising from general homelessness surveys which include an age profile of the population. Better data tends to exist on the proportion of the homeless young people within the wider homelessness population rather than absolute numbers/ proportion of young people affected by homelessness, but even here different definitions and methods used make comparisons problematic. Many studies have primarily focused on people sleeping rough and those utilising emergency shelters or other hostels (ETHOS categories 1-3), with only a few also including estimates of the hidden homeless (for example, category 8 of ETHOS, staying with friends and relatives) where young people are likely to be over-represented. It should also be pointed out that many surveys have focused on those utilising accommodation services for single people, meaning that young people with children (particularly women) are likely to be under-represented (or absent) in the data.

With these caveats in mind, Table 1 provides some examples of data on the number of young people, and the proportion that they represent in the homeless population in a number of countries. For example, the Danish national count of homeless persons in 2009 found that 13 per cent of homeless people were between 18 and 24 (and 23% between 18-29) (Benjaminsen, 2009). A similar proportion (14%) was under 25 in the 2004 homeless census in Prague, Czech Republic (Debski, 2010). One of the highest proportions of youth within the homelessness population was found in Spain with 30% of people in the Survey of Homeless Persons in 2005 being aged between 18 and 29 years (EPSH- Personas 2005; own analysis). The French INSEE 2001 survey of users of accommodation and hot meal distribution services also found that more than a third of people utilising aid services for homeless people were aged between 18 and 29, compared with a quarter of the whole population (Join-Lambert, 2009).

Table 9.1: Extent of youth homelessness in selected European countries

	Study/ method	Definition	Data
Czech Republic	Census of homeless people, 2004, Prague	Visible homeless and people in shelters	14% were under 25 (439 out of 3096 persons)
Denmark	National count of homeless persons, 2009 (one week)	People without dwelling or room (owned or rented), living in temporary accommodation, informal arrangements or sleeping rough	13% of homeless people were aged 18 to 24 (23%, 18-29)
France	INSEE Survey of users of accommodation and hot meal distribution services, 2001	People who had spent previous night in a shelter, on the street or in a makeshift shelter	More than a third of people were aged 18 to 29
Ireland	Department of Health and Children/ Health Service Executive statistics	Number of children who have left home with no accommodation to go to (known to services)	234 children (under age of 18) were identified as homeless in 2008
Netherlands	Information from municipalities to Dutch Audit Court	Counts of young homeless people known to services, estimates of street homeless and hidden homeless	6090 young people aged 16-25
Poland	Census of homeless persons, Pomeranian Province, 2009	Not stated, includes people sleeping rough	2838 people included 220 children (up to age 18). 8% of adults were under the age of 30
Spain	Survey of Homeless Persons, 2005 (EPSH – Personas)	Not stated, but includes sleeping rough and shelters	30% of 21900 people counted were aged 18 to 29 (82% male; 18% female)
UK	Independent study, analysis of available national statistics on youth homelessness	Young people accepted as homeless under UK homelessness legislation; those utilising specialist services for (formerly) homeless young people; those sleeping rough	75000 young people (aged 16-24) experienced homelessness in over 12 months (2006/7)

Sources: Benjaminsen (2009); Debski (2010); EPSH- Personas 2005 (http://www.ine.es/jaxi/menu.do?type=pcaxis&path=/t25/p454/e02/a2005/&file=pcaxis; own analysis); Join-Lambert, 2009; Muhic Disdarevic & Sloufova (2009); Quilgars *et al* (2008); Smith (2009);

Data on the trends of youth homelessness over time appears to be only available in a few countries. In particular, a recent review of youth homelessness in the UK estimated that about 75 000 young people (aged 16-24) had experienced homelessness in 2006/7 (Quilgars *et al*, 2008). This contrasted with a previous inquiry into youth homelessness (Evans, 1996) which had estimated a much higher number (about 250 000) young people experiencing homelessness in 1995, however the two estimates were not directly comparable as the latter included hidden homeless populations and utilised different data sources. Where time series data was available (mainly for young people accepted as homeless by local authorities under specific homelessness legislation), a reduction in youth homelessness was observed from a height of 68 000 young people accepted as homeless by local authorities in 2003/4 to 43 000 in 2006/7. The main reason for the recent reduction was considered to be the introduction of a preventative agenda which attempts to assist young people before they present to their local municipality as homeless (Quilgars *et al*, 2008).

In Ireland, the Department of Health and Children, and more recently the Health Service Executive, have collated information on the number of children, that is, under eighteen years of age (of whom they are aware) who have left home as well as the reasons for their homelessness. The most recent data available suggest that, nationally, 234 children were identified as homeless in 2008. A total of 774 children were identified as homeless in 1999 suggesting a substantial decline in the number of children presenting as homeless over the past decade. This reduction is likely to have been, at least partly, a result of activities following the publication of a youth homelessness strategy (Department of Health and Children, 2001) which emphasised the development of both preventative services and responsive services on a multi-agency basis for those under the age of 18 in Ireland.

In some countries (for example, Spain and Denmark), repeat surveys of homelessness make some comparisons of the number and proportion of young people experiencing homelessness possible in individual countries. However, overall the lack of data makes it impossible to identify whether youth homelessness has been increasing or decreasing over time across Europe.

Explanations for Youth Homelessness

The 1998 Observatory edited collection on youth homelessness focussed on the key risk factors for young people that might make them unable to address their housing and support needs. Risks of youth homelessness were identified at three levels: macro (changes in social protection, economic conditions and social values); meso (increasing stress on families and informal networks), and; micro (reflecting types of individual characteristics and behaviour of young people).

Whilst the authors highlighted the extended youth transitions that young people were facing across Europe, they were careful to point out that the majority of young people who postpone leaving home are not socially marginalised. Nonetheless, latent or hidden homelessness was seen to be increasing. The context of youth transitions was still seen as an important framework within which to understand youth homelessness with young people at greatest risk of homelessness where their passage to independence was abruptly or violently ended when they had to leave home.

Some groups were seen as being at much greater risk of homelessness, and social exclusion, than others. This included young people in or leaving state care at a relatively young age, young people living in families characterised by high levels of conflict and few relational or financial resources, as well as children in homeless families. Young homeless people were also seen as likely to have multiple problems, for example drug misuse, poor educational attainment and so on. The edited collection highlighted that the process of marginalisation that leads to youth homelessness may have begun many years earlier with young people running away from home, truanting and getting into trouble.

The collection concluded that risk factors for homelessness did not vary substantially between countries. However, the systems of family and state support did differ considerably, impacting on young people's coping mechanisms. Generally, the availability of comprehensive social protection was considered to protect most young people from homelessness in many countries (Austria, Belgium, Denmark, Finland, Luxembourg, the Netherlands, Sweden). In other countries, strong family networks were most likely to provide a social buffer against housing exclusion (Greece, Italy, Spain, Portugal), where young people were generally expected to live with parents into their late 20s or even 30s.

Developments since 1998

Research over the last decade would suggest that youth transitions remain an important framework for analysis. Recent Observatory work (Edgar, 2009) has highlighted the importance of a life course approach to understanding social processes including homelessness. Within this approach, key periods of life including childhood and adolescence can influence present and future positions, roles and rights in society.

More specifically, the concept of housing or homelessness 'pathways' has been developed over the last decade (see for example, Anderson and Tulloch, 2000; Fitzpatrick, 2000; MacKenzie and Chamberlain, 2003; Clapham, 2005; Mallet *et al*, 2010). Australian researchers, Chamberlain and MacKenzie, identified a distinct 'youth' pathway into homelessness where young people are forced to leave their family prior to securing an independent home, and suggested that one of three key pathways to adult homelessness was the transition from youth to adult homelessness. UK research (Ford *et al,* 2002) also explored pathways into housing for young people, identifying that young homeless people were most likely to experience a 'chaotic pathway' characterised by an absence of planning, limited family support and substantial constraints on access to housing.

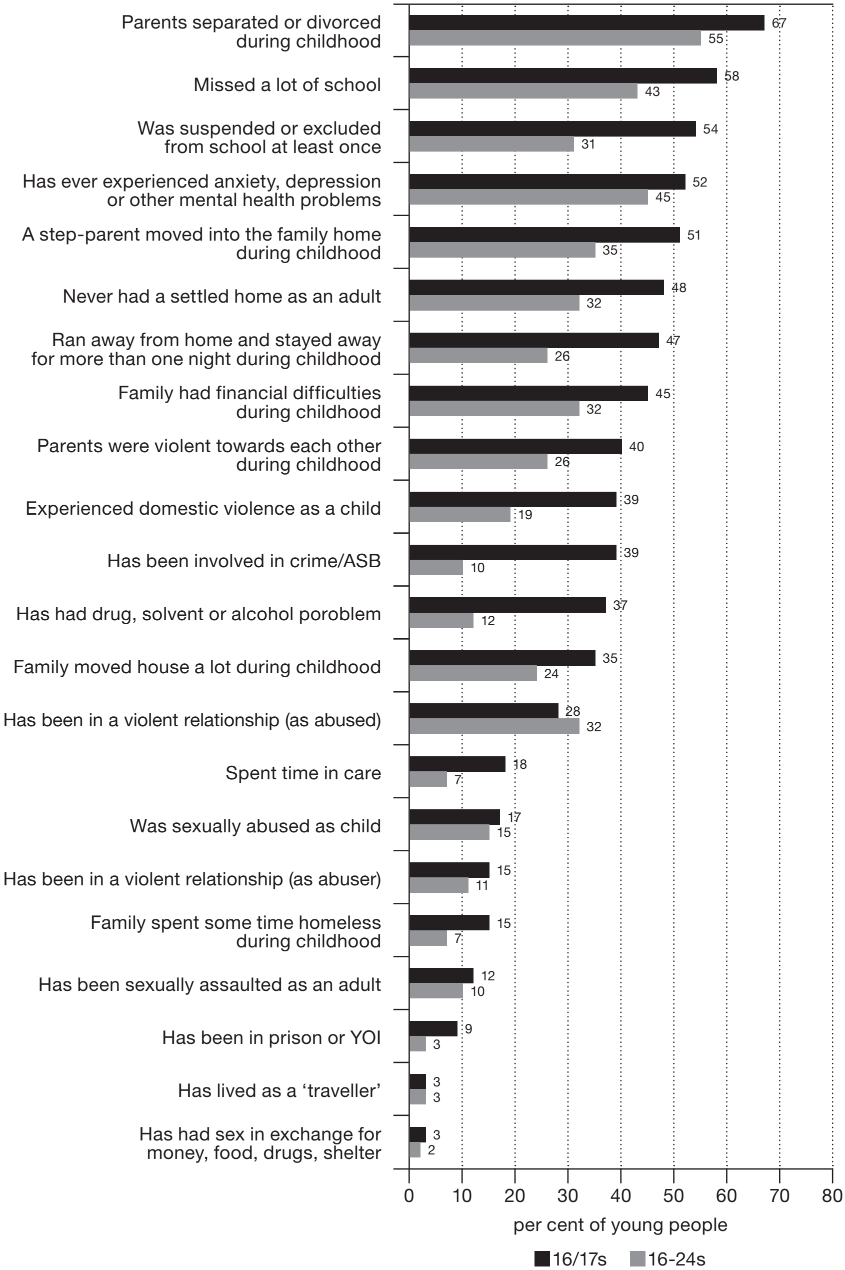
Detailed qualitative work has been used to examine both pathways into and out of homelessness in Ireland (Mayock and O'Sullivan, 2007; Mayock *et al*, 2008). Three main pathways into homelessness for young people were identified: a care history; household instability and family conflict; and negative peer associations and 'problem' behaviour. A further three pathways through homelessness were defined: an independent exit (mainly back to family); dependent exits (into housing and care settings), and; continued homelessness.

Other theoretical frameworks have also been utilised to examine youth homelessness. One of the aims of the ongoing European research project, Combating Social Exclusion among Young Homeless People (CSEYHP) (Smith, 2009), is to develop the concepts of risk and social exclusion in relation to the experience of young homeless people. Social exclusion/ inclusion is now a well established concept at the European level. In addition, risk theory predicts that, in an increasingly globalised world, governments will reduce expenditure on welfare areas, expecting individuals instead to plan and take responsibility for their own personal biographies. Young people may be one group who struggle disproportionately under these new arrangements. Other studies (for example, Green *et al* (2000)) have also stressed the concept of risk as being particularly useful in analysing youth cultures and transitions.

Some groups of young people still appear to be at heightened risk of homelessness compared to other groups. Young people leaving care remain a key group amongst homeless youth in Ireland (Mayock *et al*, 2008), although some reduced risk has been reported in the UK following changes to child care legislation (Quilgars *et al*, 2008). Young migrants, including unaccompanied minors, also appear to be disproportionately represented in some countries – this is particularly prominent in Spain where 77% of young people found homeless in the 2005 Survey of Homeless Persons were foreign (EPSH- Personas 2005; own analysis). In the CSEYHP project (Smith, 2009), the Czech Republic reported three groups of young people at risk of homelessness: young people in care, unaccompanied minors, and those with a criminal record. Portugal also reported that young ethnic minorities from Portuguese former colonies, as well as other countries, were at particular risk of homelessness. In the Netherlands, young people with poor educational attainment and/or were victims or abuse and violence were particularly at risk.

In the UK, a recent survey of 16 and 17 year olds and families accepted by local authorities as homeless identified a very high level of vulnerability amongst 16 and 17 year olds (Pleace *et al*, 2008, reported in Quilgars *et al*, 2008). Figure 1 shows, for example, that 58% of 16 and 17 year olds missed a lot of school, 52% had experienced depression, anxiety or other mental health problems, and 47% ran away from home at least once during childhood. Figure 1 also shows the past experiences of the heads of homeless families aged between 16 and 24 (Quilgars *et al*, 2008): here, quite high levels of vulnerability were found on some indicators like parent separation and missing school but generally vulnerability was less than for 16 and 17 years old on most indicators, and quite different on some including substance misuse problems and involvement in crime.

Figure 9.1: Past experiences of young homeless people accepted under homelessness legislation in England



Source: Quilgars *et al*, 2008 p44 utilising data collected for Pleace *et al*, 2008. Base: 789 (16-24s), 350 (16/17s). More than one response possible. Many questions were self-completion questions.

Less research has been undertaken on the specific nature of structural barriers to accessing and sustaining suitable housing for young people. Employment opportunities and vocational skills are likely to be key here, especially given that the average employment rate across EU27 of those aged 15 to 24 is only 37% (OECD data reported in Smith, 2009). Recently, Benjaminsen and Busch-Geertsema (2009) have argued that it is probable that labour market reforms in Denmark and Germany have had unintended consequences on the position of socially vulnerable young people, increasing their likelihood of becoming homeless as their likelihood of finding affordable housing is decreased due to reduced benefits. Reduced social benefits for people under the age of 25 were introduced in 1996 in Denmark, whilst those aged under 25 in Germany can only have housing costs covered for an independent home if they are found to have special needs that means they are unable to live with their parents. Further, sanctions for young people under new benefit rules are harsher than for other groups.

Other research has demonstrated that young people are generally at greater risk-of-poverty [6] compared to other groups – 20% of young adults aged between 16 and 24 were at risk-of poverty within the EU27 in 2007, compared to 17% across the population (Eurostat, 2010). Variations between countries have also been observed: analysis of the European Community Household Panel (ECHP) data found that poverty rates[7] among 20-24 year olds ranged from 8% in Austria to 30% in Finland amongst the 15 pre-enlargement countries between 1994 and 2001 (Iacovou and Aassve, 2007). Lower income levels will obviously influence young people's ability to access housing markets. Both of these studies also demonstrated that higher youth poverty rates are usually associated with countries which have earlier ages of leaving the parental home – young people are more likely to experience poverty when they are (attempting to) live independently than when they are still living in the family home. A survey of young people (aged 15-30) in the EU (Gallup Organisation, 2007) found that 44% believed that young adults remained living with their parents as they could not afford to move out, whilst 28% thought that people stayed put due to a lack of affordable housing.

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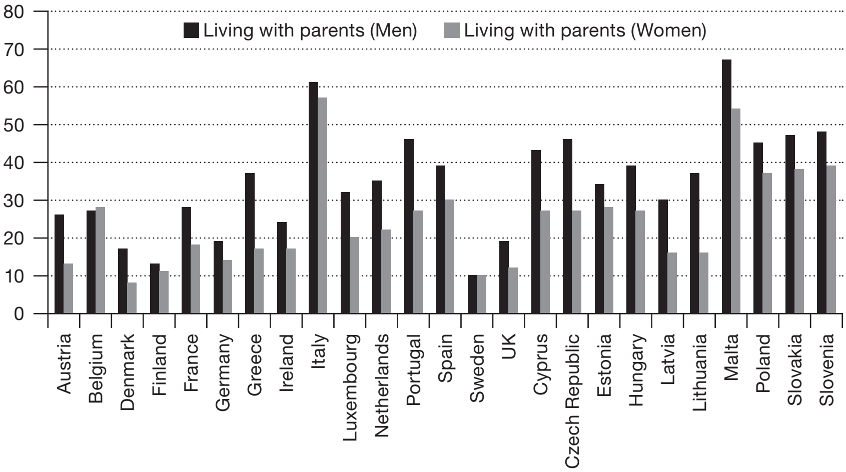
6 Proportion of people who live in a household where individuals, on average, are under the threshold of 60% of median equivalised income after social transfers.

7 Using a definition of relative poverty: where person lives in a household where after tax income, adjusted for household size, is less than 60% of median income in the country in which he or she lives.

Recent exploratory analysis across 24 member states utilising the European Quality of Life Survey 2003 (Mandic, 2008) explored different structural factors[8] influencing patterns of leaving home by young people under 35 years of age. Figure 2 shows the very different proportions of young people under the age of 35 living with their parents across Europe. Further, three clusters of countries were found: the north-western (Austria, Belgium, the Czech Republic, Denmark, Finland, France, Germany, the Netherlands, Sweden and the UK), where young people leave home at the youngest age and have the best opportunities to access independent housing; south-western (Cyprus, Greece, Hungary, Ireland, Italy, Luxembourg, Portugal, Slovenia and Spain), characterised by the latest leaving of home, less favourable opportunities but high family support, and; north-eastern countries (Estonia, Latvia, Lithuania, Poland and Slovakia), where there was late, though not extremely late, home-leaving, very unfavourable opportunities for independent living and low family support. A number of limitations of this analysis were noted, however an important finding was that new members states appeared in two of the clusters, suggesting that all new members states cannot be presumed to be different to older members nor always similar to each other.

Figure 9.2: Percentage of young men and women (aged 18-34) living with parents in Europe.



Source: Figures from Mandic (2008) using the European Quality of Life Survey, 2003. Own chart.

8 Variables were selected to represent the key structural determinants of leaving home including demographics, housing, employment, welfare states and support from family.

Responses to Youth Homelessness

Reflecting most European countries' emphasis on the problem of 'youth', in 1998 policy and practice responses appeared to be directed largely to issues that tended to be linked to youth policy rather than homelessness itself, such as school exclusions, anti-social behaviour, drugs and crime (Avramov, 1998). Social policy areas such as education, employment, health and welfare, alongside housing and homelessness policy, were therefore important in understanding responses. For example, the adequacy of the system of care for children who are not able to live with their parents was key to whether this risk group became homeless, for example Busch-Geertsema (1998) explained that the failure of youth welfare services had contributed to homelessness amongst juveniles.

The Observatory edited collection demonstrated that young homeless people were likely to have multiple problems and therefore concluded that, 'it is only an integrated approach and a well-targeted but co-ordinated chain of complementary services which can address effectively and efficiently the needs of troubled and homeless young people' (p339). In general, standard systems of welfare provision were not seen as sufficient to address crisis situations for these very vulnerable young people. Two key points were made. Firstly, it was suggested that there was a need to review the role of youth welfare institutions and how they could better address early social exclusion, potentially preventing later youth homelessness. Secondly, targeted measures were also needed to address the needs of young homeless people. Specific types of accommodation and care for young homeless people should be expanded.

Developments since 1998

No comprehensive reviews of responses to youth homelessness in Europe have been undertaken over the last decade. However, from the available country specific publications and policy overviews produced by the Observatory, it appears that some European countries have developed a range of responses to address youth homelessness to a greater extent than other countries. For example, as mentioned earlier, Ireland introduced a Youth Homelessness Strategy in 2001, which required every health board to develop a two-year strategic plan, following consultation with relevant voluntary and statutory bodies, to address youth homelessness. The strategy defined twelve key objectives in relation to preventative measures, responsive services and planning and administrative support. Similarly, an extensive range of provision has been developed in the last fifteen years in the UK with 21 different models of accommodation and support being identified in one study (Humphreys *et al*, 2007). Types of provision include foyers[9], specialist emergency accommoda-

9 http://www.foyer.net

tion for young people, supported accommodation, floating support and supported lodgings. Other countries have instigated more modest plans. For example, the Spanish National Plan for Social Inclusion 2003-2005 included the development of special programmes for young people (Edgar *et al,* 2004). Recent information suggests that there is very little specialist accommodation for young homeless people available in Portugal (Casanova and Menezes, 2009).

There appears very little research on the effectiveness of transitional housing options for young homeless people. A recent systematic review of the international evidence of interventions (Altena *et al*, 2010) found only eleven quantitative studies that met pre-established quality criteria[10] and none of these had been undertaken in Europe (nine of the eleven were US studies, one Canadian and one South Korean). This study was unable to provide firm conclusions about the effectiveness of interventions due to the lack of studies and heterogeneity of the interventions. Interventions based on cognitive-behavioural approaches were found to be the most convincing with positive results found particularly on psychological measures (Slesnick *et al*, 2007; 2008; Hyun *et al*, 2005). Some positive findings were also found for other types of interventions including supportive housing (improvements in self-reported health, lower levels of substance abuse) (Kisely *et al*, 2008); independent living programmes (some positive outcomes in employment and living status) (Upshur, 1986); and a peer-based intervention (positive impact on attitudes and knowledge of drug-use) (Fors and Jarvis, 1995).

There is some evidence of problems associated with long stays in homelessness provision, for example in UK and Ireland some young people have become ‘stuck’ in homelessness projects, with longer lengths of time spent homeless leading to increased risks, more enduring social problems and greater difficulties in exiting homelessness (Pillinger, 2007; Quilgars *et al*, 2008). This research would suggest that the Danish national homelessness strategy, 2009-2012, which states that young people should be offered alternative solutions to homeless hostels is likely to prove beneficial (see Hansen, 2010).

Improvements to inter-agency working between different municipality services for young people have also been reported in some areas. For example, in the Netherlands, a national policy framework has been developed to link services provided at the county/municipality level for homeless youth to regular youth welfare work at the local level (Edgar *et al,* 2003).

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10 This included quasi-experimental studies, uncontrolled pre-post tests as well as randomised and controlled trials. Descriptive studies were excluded.

Prevention has also been a developing theme of responses to youth homelessness in the last decade. Smith (2009) has distinguished between early intervention services and prevention initiatives, with the former being defined as those available to a person whilst still living in the parental or care home, and the latter as those services that are provided at the point that someone is facing imminent homelessness. Using this definition, early intervention services tend to have a longer time perspective and are more likely to be provided by mainstream services such as education, children's services etc, whereas prevention services are often provided by housing and homelessness agencies. In the CSEYHP four nation study (Smith, 2009), early intervention and prevention services were much more extensively developed in the UK and the Netherlands compared to Portugal and the Czech Republic, although there was still considerable room for improvement in all countries. For example, in the Netherlands there is an extensive based youth service (with an aim to develop Family and Youth Centres across the country by 2011), and attention has been placed on preventing school exclusions, debts and evictions. In the UK, there have been several innovative voluntary sector early intervention projects, the development of the Connexions service[11] for 13-19 year olds, and a range of prevention projects including mediation services, rent deposit schemes and tenancy sustainment services. Legislation and services for care leavers have also been improved in the last ten years (Quilgars *et al*, 2008).

Remaining Research Gaps

More than a decade has passed since the publication of the Observatory edited collection on youth homelessness. At that time, there was a lack of information on the extent and nature of youth homelessness in Europe. Since then, some studies have been undertaken and knowledge has improved. The framework of the transition to adulthood remains helpful, but has now been supplemented by an understanding of pathways into homelessness. The concepts of risk and social exclusion have also been usefully developed. However, different definitions of youth homelessness continue to be used across Europe. This is one area that might benefit from closer attention in the future given the different causes and impacts of homelessness on a young person compared to an older homeless person. A useful way forward for comparative analysis might be the development of a separate young person's ETHOS categorisation. In addition, the heterogeneity of young people's situation more generally needs greater recognition, in

[11] The Connexions service aims to offer a full range of information and advice to young people (including careers advice and guidance) aged between 13 and 19 to help them make decisions and choices in their life.

particular research must address the needs of single young people and young families (and recognise that young people are likely to move between different statuses), and also be sensitive to gender differences.

Whilst the key routes into homelessness for young people are relatively well understood at a conceptual level, there has been a lack of research into the differential impact of welfare regimes on the extent and nature of homelessness amongst young people. Following the recent study carried out by Stephens *et al* (2010), this could be a fruitful exercise where the respective roles of housing, labour markets and wider welfare policies could be evaluated in terms of their role in increasing the risk of, as well as potentially protecting young people from, homelessness. In terms of understanding the causation of youth homelessness, research in this area would need to place a particular emphasis on early interventions via youth welfare structures, most centrally state care arrangements for children unable to live with their parent/s as well as broader youth welfare institutions. Joint working and the role of integrated services should also be prioritised in this area given the evidence of the vulnerability of young homeless people and their need for assistance in many areas of their lives. In addition, research could also usefully be undertaken to compare the varying legal and social norms with respect to parental responsibility for young adults – to what extent, if at all, could different frameworks be transferred to other countries? Within this, what are the expectations of young people of accessing independent housing vis-a-vis living with their parents?

To date, most youth homelessness studies have been undertaken at the individual country level, with only one comparative project which focussed on four countries (Smith *et al*, 2010). More European comparative projects are undoubtedly required. However, more national level research is also required in most countries in Europe on this subject. Most countries are unable to estimate the extent of youth homelessness, and data on the nature and impact of youth homelessness, including how often it leads to adult homelessness, is highly limited. It might be possible for some of this work to be undertaken as part of a review of national (or regional) homelessness strategies.

Finally, there remains a lack of high quality evidence on the effectiveness of responses to youth homelessness. The limited evidence seems to suggest that long stays in homeless provision, across age groups, impacts negatively on people's ability to resettle into mainstream society as people become institutionalised and possibly deskilled in everyday tasks such as cooking and budgeting. Yet, many models designed to address youth homelessness offer supportive and usually shared environments for young people where they may be encouraged to remain for one or two years to learn life-skills before independent living. This potentially introduces a tension into policy formation designed to address youth homelessness. Might some forms of specialised supportive environments be useful for younger age groups but similar environments de-skill and de-motivate older young people who have already lived independently? Does it depend on the type of provision? Might Housing First models be most suitable for young people or might they set young people up to fail? As part of any examination of responses to youth homelessness, more attention also needs to be placed on both developing and evaluating services designed to prevent youth homelessness. Can services such as family mediation assist families, or are the issues much more structural in nature in terms of better supporting low income families in poor housing situations? Some of these questions will only be answered by higher quality research in this area, particularly longitudinal work that can track young people over time into adulthood. At the same time, arguably, housing and homelessness issues need to gain a greater priority within European youth initiatives such as the European Youth Pact[12], alongside established priority areas such as education and employment.

12 The European Youth Pact was adopted by the European Council in March 2005 as one of the instruments for achieving the revised Lisbon objectives, promoting growth and more and better jobs. The Pact has three strands: employment and social integration; education, training and mobility, and; reconciling work and family life. http://ec.europa.eu/youth/archive/policies/youthpact_en.html.

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A Service Provider's Perspective on Research on Homelessness

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Introduction

Homelessness is a particular state of deprivation where having to cope with a disconnected here-and-now often makes it hard to contemplate the future. We study homelessness because of the complex realities that give rise to it and because it is considered unacceptable that the right to adequate housing is not met. This is also why homelessness galvanises various stakeholders engaged in the promotion of social cohesion. These stakeholders work in their specific spheres but are linked together, despite an occasional clash of agendas, out of a shared responsibility to improve the quality of social and political responses to an issue that touches individual poverty and the ability of organized societies to deal with it. As researchers and practitioners, we do not speak for those affected by homelessness and inadequate housing, yet we are witnesses to our time in this particular sphere. It is in that spirit that I have sketched out these few remarks for this look back over 20 years of the Observatory.

FEANTSA has a large and varied membership, so while I cannot lay any claim to reflect a consensus view, everyone should be able to find some small area of common concerns, be it arising out of what the research tells us or from what we want the researchers to tell us.

The work we do in our different organisations falls within various areas of expertise ranging from initial contact and support to accommodation and housing, with in between a whole range of initiatives that will get named only when they have gone beyond the experimental. What we do is largely dependent on the commitment of public authorities and the means they give – or do not give – us to act. It also depends on galvanising public opinion that gives or takes away from our work some or all of its legitimacy. What we do is also shaped by the inventiveness of the voluntary community, which is constantly challenged by the problems in the lives of the men and women with, for and alongside whom we work.

The daily round may create a feeling of losing control; the problems and difficulties faced by the most vulnerable of our fellows demand complex, individualized responses that need to be developed within, and sometimes outside of, established frameworks. Yet, these responses are not just about the personal approach; they are set within local or national circumstances, are subject to and partake of processes that are themselves triggered by the effects of policy choices and the crises besetting our societies.

That is why research is needed. A reading of the different contributions collected here clearly shows the link that exists between us. It also shows the limits that circumscribe our knowledge today, which must be transcended tomorrow. It prompts a better formulation of the questions brought to light by our accumulated perceptions and understandings.

And finally, we need research to go beyond the boundaries that may be imposed on us by what we do. Circumstances conspire to create off-limits areas that academic study helps to lay bare, and that is something we need.

Two decades on, a broad account can be given of what we know with the confidence that what we are talking about is knowledge in the making. The scientific approach to a changing and forever evolving reality demands humility and tenacity in equal measure. The risk is ever-present of being disproved by an unexpected change, a historical momentum, political transition or just an isolated event with far-reaching ramifications. At the same time, research maps out what the future has in store; it is talking today about and for tomorrow.

Having established what diversity the Observatory's research and work enshrines through the accumulated insights, the legitimacy of the approach cannot go unmentioned and must perhaps even be brought centre stage: while housing and accommodation still remain on the fringes of EU responsibility, the Observatory's work shows the need for some form of common approach which not only does not disregard local practicalities and features but actually looks at how they fit together in the common social space.

The history of the Observatory is also our collective history of interaction through the sharing of knowledge, action and scrutiny of the effectiveness or otherwise of policies. As I see it, a few important things spring to mind in three areas: one is the gains from strengthening the common approach; another is the insights given into issues that still require further study; and finally, the future prospects opened up by the work done.

The Gains from Strengthening the Common Approach

The first chapter of this book discusses the process of definition, highlighting how essential it is to talk about the same realities in the same terms, so we can advance both knowledge and the capability to act. This is in fact a key issue of consistency. In our pluralist Europe, which has also changed radically in recent decades and is still doing so, the variety of situations as well as the approaches and resources allocated to knowledge are unavoidable facts that shape an initial brief for research. As has been said before, research has to face the issue of shared interpretation before it can begin to generate shared knowledge. Differing expectations always make it difficult to go forward with a quantified approach that everyone can live with. The public authorities may want to reduce the scale of the problem while at the same time playing up the measurable outcomes. Activists may be tempted to exaggerate problems. Developing a quantified approach is especially difficult if there is no prior agreement regarding the subject-matter we are seeking to investigate.

The first thing therefore was to define a subject-matter of research that is relevant in today's Europe. Homelessness, inadequate housing, exclusion from and by housing – who is affected? What situations are we talking about? The creation of a common definition was a crucial step forward. ETHOS (as outlined in the first chapter of this book) is now recognized and used by many actors and institutions. At informal meetings of housing ministers that I have had an opportunity to attend and also Commission and Council of Europe body meetings, it acts as the – if not shared, at least shareable – standard.

The premise had to be that having a home – whether self-contained accommodation or a chosen place to live – met three cumulative criteria: a physical space that meets identified needs, a social space, and a space enjoying security under the law. The definition of the criteria for a home was necessary to categorise housing as inadequate as inadequate housing is defined by a variance between actual living conditions and these criteria. The ETHOS typology ranging from homelessness and rough sleeping to forms of temporary or insecure accommodation is therefore based on a definition of adequate housing from which the definition of the various forms of inadequate housing stem. It falls to field workers to make use of this work, which is the product of research and can be turned directly into action. Knowledge is universally recognized as the crucial basis for initiating action.

There is a difference of views on how temporary a state homelessness is, as well as who is at risk of homelessness and who is inadequately housed. These differences will determine how much focus is put on certain categories experiencing particular issues (abused women, refugees, etc.). After difficulties caused by the conceptual approach between rooflessness and inadequate housing, the discussions at the December 2010 consensus conference settled on the idea of describing both rooflessness and inadequate housing by the term “homelessness” since the concept of “home” enshrines the ideas of privacy, security, and hence one’s relation to others and the social environment.

That is a major contribution the research has made. It now enables a unified approach, and increases the prospects for sharing knowledge and mapping out common lines of work both locally and between EU countries and EU institutions. In so doing, it opens up prospects for prevention (including identifying the causes of housing exclusion), reducing the burden of homelessness and the toll it takes on individuals. Finally, it enables the essential move into housing to be accounted for and measured.

A second major advance lies in the legal approach to the housing issue. By linking housing rights with the right to housing, research has promoted and accelerated new insights and put a focus on the link between human rights and the right to housing. This issue is discussed in detail in the chapter by Fitzpatrick and Watts. The historical comparative study of changes between often culturally distinct legal systems has provided the widely differing European approaches with the basis to construct a coherent approach to link the human right to have a home and the substantive right to the guaranteed exercise of that right. In this way, the research has given substance to something often instinctively felt in daily individual and concerted action.

The context of international law and a number of national laws has moved on. We are now able to use tools that allow us to try and enforce human rights that have become justiciable against states and public authorities for the implementation of social policies, because we have gone from non-binding provisions of international law to Article 31 of the 1996 Revised Social Charter, which introduced the collective complaints mechanism. Developments in case law around the European Court of Human Rights have also enabled us to refer to and draw on European law in local actions where fundamental rights are at stake.

FEANTSA’s commitment to collective complaints is evidence of this development in our relationship to the law. The use of “legal rights” is a full part of the fight against housing exclusion, and was to be instrumental in clarifying the terms of the debate between “beneficiaries” and “entitlees” in social protection mechanisms. Much still remains to be done, but the work started offers the means for it. The creation and commitment of the Expert Group on Housing Rights was behind the compiling of a database and the setting-up of the Housing Rights Watch – a European network of voluntary agencies, lawyers and academics that ensures the continuity of efforts. The relationship between research and local and international fieldwork is another practical and effective development we can be proud of. Here again, interaction cannot do without commitment by front-line workers who may need to re-appraise positions which fail to give full weight to commitments legally provided for.

Insights into Issues Requiring Further Study

Evidence of a strong interaction between social protection systems, housing policies and the labour market has gradually emerged from findings of the decisive impacts such structures and policies have on housing exclusion. Research findings have also pointed to changes needed in different countries. This theme is explored in the chapters on welfare states and homelessness and on housing and homelessness. "Housing first" is now an approach found in most national strategies, as outlined in the chapter on homeless strategies and innovations, but expressed in different ways. These differences, not to say divergences, are also found among the stakeholders in the fight against housing exclusion.

This commonality is interesting in that it fosters local debate and forces a rethinking of the forms of intervention. The second chapter of this book evaluates the development of services for homeless people across Europe. Research holds a significant place in the process of big change under way. Its primary task is to provide information regarding the diversity of approaches and clarify the issues through evaluations: the differences in approach do not just reflect specific strategies, but are also the outward sign of housing policies and social policies that stem from particular understandings in each country of the reality of homelessness and inadequate housing.

"Research on national strategies has shown the similarities and differences. Is "housing first" a meaningful policy or just a buzzword?"

The "housing first" approach can also prompt serious concerns among front-line actors because of the growing influence it has on policy frameworks in contexts affected by the economic crisis and the swingeing measures taken by States. The broad statements of principle that accompany its implementation come up against market-dominated realities and sometimes the questioning of what have become traditional and secure practices especially in service provision. The model's relevance emerges only out of a discussion on what is understood by the homelessness experience, and in particular it compels clarification of the link between individual vulnerabilities and the failings of the welfare system. The final thing to come out of this discussion is the very big challenge presented by service coordination and the interplay between stakeholders, which is necessary to make policies against housing exclusion work. The explanatory example shows that this is not just wishful thinking, but a necessity in which everyone's place is yet to be made clear.

Future Prospects Opened up by the Work Done: Changing Contexts

A reading of the different chapters that report on how the research has moved on affords interesting insights into the challenges ahead, and a crosscutting view of the complexity, diversity but also the similarities of the European reality The research validates our efforts to stay connected with one another and highlights that although we may fear we are alone in facing obstacles which are difficult to overcome we can find direction and guidance from the work of others. We need these assessments and findings that sustain and play into our commitments. Furthermore, research showing how the housing sector is being eroded (through state withdrawal from the direct production of mass accessible housing and the resulting decline in the social housing stock at a time of commodification of production) prompts an urgent rethinking of the role of states and the role that the EU should exercise in housing policy.

Poverty

The link between homelessness and poverty has become clearer from the analyses done in recent years, not least through looking at the structural dimension as opposed to the individual approach, but with other considerations factored in. Analysing poverty as a process enables a link to be made between homelessness and a set of factors that create different forms of poverty. It is a position that involves developing research around the slow deterioration in social welfare provision designed to deliver prevention and support, which on the grounds of rationalizing expenditure is producing growing insecurity, and contributing to a progressively growing vulnerability to poverty.

This reflection on the permanency or otherwise of conditions of poverty and especially the multiple nature of poverty, which cannot be seen either as a permanent condition or as a single reality, chimes with the concerns of the European institutions (Parliament, Commission and Council). It comes at a particular time – that of a global economic crisis which has challenged the methods of intervention.

The Observatory has to some extent already paved the way, not least through the specific studies done over the years around the exclusion of women and young people. In the chapter on women's issues, the most important message is that on the link between women's homelessness and poverty. This finding shows the practical importance of the financial side of support for finding and staying in housing.

The research reveals the complexity of young people's relation to housing through a variety of approaches on all levels of the issue (see the chapter on youth homelessness in this volume). It also points up the importance of structural factors (globalization and State withdrawal from provision), which paradoxically throw responsibility back on the individual. Young people are forced to become more proactive and have to fight to make the right to housing exercisable. Hence, the proposed review and assessment of how institutions work in terms of prevention of homelessness and care of young people, and in promoting measures targeted at young people's needs. These measures also need to factor in the poverty of young people who are also on the margins of social protection provision.

One key perception to emerge from the poverty-focused approach is that poverty is not just about having no objective means or resources, like a job or housing, but also the inability to use the resources that are available: chronic poverty is about being mired in this situation, i.e., the erosion of the ability to make use of available resources. The "poverty" approach significantly informs the debate, not least through opening it up to other analytical tools specific to research on this matter. It also prompts a reconsideration of the means used to achieve participation by those most immediately affected.

Migrants

The "housing first" concept, which is prominent in all national strategies, has helped identify the needs for future research into immigration and the impact of the financial crisis – both issues that go beyond national settings. The persistent and visible presence of migrants among those excluded from housing is an issue that must be addressed head-on at a time when the "housing first" principle forms part of most national strategies. This issue is explored in detail in the chapter on immigration and homelessness, and also in the chapter on welfare states and homelessness. There is a direct link between this issue and the exercise of fundamental rights. There is a strong inclination to limit the benefit of social protection, including in emergency situations, to nationals and foreigners whose paperwork is in order. In this context, migration is a thorny issue to address. It is set in a framework already discussed – that of the debate between "beneficiaries" and "entitlees", topped off by the daunting issue of whether it is fair to benefit from rights for which no direct contribution has been made. To this must be added the instability that typifies the situation of immigrants, who may move in and out of regular and irregular status multiple times. States have introduced various forms of increasingly temporary status, as is reflected in the Spanish and Italian regularisation procedures which require a permanent job, or the temporary permits in France, and the subsidiary "mini-asylum" protection status in Germany.

Where EU nationals are concerned, the research has yet to look at harmonization and assessment of the right of establishment relative to freedom of establishment as it can be understood since European citizenship was established (Maastricht 1992). The question migrants' raise is that of the limits to human rights and social rights, even though the issue transcends nation state borders. The consequences of migration flows between Central/Eastern and Northern/Western European countries still need to be measured. The fragile link with employment, and social marginalization, are fraught with consequences for the provision of decent housing and accommodation. Migrant women now make up an identifiable category of homelessness groups. Then, too, consideration needs to be given to what has become known as the European dimension of migration. This is an issue that will be addressed in the proposed treatment at national and European level.

It is quite devastating to note that the observations made in 2004 in "*Immigration and Homelessness in Europe"* (Bill Edgar, Joe Doherty and Henk Meert) are still valid today:

"*Legislation designed to block and control in-migration contributes to a social environment in which immigration is defined as a problem, and contributes to the widely-held conviction that immigration is to be resisted, curtailed and avoided – defined as a problem in legislation, immigrants become a problem in the real world of housing estates and job markets… "discrimination and outright violence against foreigners are encouraged by the language of illegality" (Le Voy et al. 2003, p.14)*" (Edgar *et al*. 2004: 43).

The debate may have shifted towards the search for scapegoats – as witness the French and Italian policies on the Eastern European Roma in summer 2010, although the EU is trying to bring its commitments to tackling discrimination into play – but the issue remains a live one that is gaining some momentum in the current context.

Conclusion

Rereading the major work done over the last twenty years, I have come to realise that we have made a much longer and more complete journey together than I had thought. Researchers and practitioners do not necessarily use the same vocabulary, but a sort of interplay can be seen between the positions that reflect what each can really deliver.

There is something comforting in this conclusion and in the realization that a battle is being fought with a range of means towards the same end. Research also reflects the progress made by appropriate practices. It should enable us in future to consider which way policies need to go, and to support them in a way that the public authorities we work with every day can understand. The major changes that have taken place in housing and the issues around "well-being" explored in the studies and evaluations of actions and systems loom large in our concerns. Research allows us to take a more complex approach to economic or institutional factors, which the diverse mix of "homeless" people militates against addressing in general terms. But the chaotic aspects of the current situation suggest that what is needed is a solid look at the inequalities and structural barriers that dominate progress in social inclusion.

Access to social and public housing is for many the only way to avoid or exit homelessness. But we also know that the fight against exclusion requires a different approach to the market, which is the main source of inequality between the wealthy and the poor. Granted that not everything can be legislated for, the fact remains that new forms of intervention need to come about based on sound national strategic commitments to "housing for all". Instruments for social control of the housing market need to be devised and promoted. Having observed and studied the different social welfare schemes and therefore stressed the new role of States in the sphere of homelessness, we must take our thinking forward on the crucial commitment of Europe and the forms it should take. I should like to conclude on that note. The aim here has not been to revisit everything we have done over the past 20 years, but simply to offer up a few thoughts for an anniversary, which is also a tribute to those who have made it possible.

Coping with Diversity. Reflections on Homelessness in Research in Europe

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Introduction

In the Italian version of the 2008 MPHASIS report[1], the terms "homeless" and "homelessness" in the original English version are translated – in just five lines – with four different equivalents: (a) homelessness (in English); (b) *disagio abitativo grave* (serious housing hardship); (c) *persone senza fissa dimora* (persons of no fixed abode); and (d) *persone prive di abitazione* (persons with no accommodation). The terms (b) and (d) refer to the housing conditions of the persons concerned (*disagio abitativo* is the traditional term in the housing debate) while '*persone senza (fissa) dimora'* is the term usually employed by organisations working with homeless persons. This term may be equated with roofless persons, and is generally understood to denote those persons at advanced stages of marginalisation, characterised by multiple deprivation and long-term homelessness. This mutability of definitions and terms is fairly common in debates on homelessness: evidence, after decades of advancement, that the understanding of homelessness is still uncertain. It is an understandable uncertainty, given the heterogeneity of the phenomenon and the multiple dimensions of the notion.

[1] MPHASIS (Measuring Progress on Homelessness through Advancing and Strengthening Information Systems) was a two-year project funded by the European Commission DG Employment, Social Affairs and Equal Opportunities under the PROGRESS Initiative. It ran from December 2007 to December 2009. The main objective of MPHASIS was to improve monitoring of homelessness and of homeless policies in 20 European countries in a coordinated manner.

Heterogeneity in Homelessness Research

Dealing with heterogeneity has been a constant challenge in the research both in Europe and in the United States. Divergence in research approaches to the notion of homelessness is evident in relation to two perspectives: the way in which housing dimensions (the lack of accommodation) are combined with the social dimensions of homelessness (the factors which make homelessness a situation of social exclusion); and the way the notion is extended beyond the reference to the "literally homeless". For example, Toro and Janisse (2004: 244) note that:

> Most researchers have settled [the definition issues] by studying the "literally homeless", that is, people staying in shelters for the homeless, on the streets, or in other similar settings (e.g., in abandoned buildings, in makeshift structures, or in parks). There are many other persons who are precariously housed or at imminent risk of becoming homeless. Researchers may include these figures, but will define them as a group separate from the literally homeless. Many researchers and advocates now talk about homelessness in the context of a continuum of housing that runs from the stably housed to the literally homeless, with many persons falling between these two extremes.

In reality, the question of how broad the concept of homelessness should be does not coincide with the range of housing conditions. In fact there is no consensus over how to define homelessness in housing terms. As FEANTSA (2008: 5) has observed:

> For some observers, the link between housing and homelessness is an obvious one. For others, this link is significantly subordinate to socio-economic issues such as employment, relationship breakdowns, mental health and addictions. [There are] areas of substantial agreement across Europe as well as […] areas of disagreement or difference in perception or approach.

The difficulties in defining homelessness may be found on both the defining axes. The adoption of a broad definition introduces logical problems that may weaken the consistency of the notion, as we will see. As for the relationship between housing and social dimensions, the divergent research approaches outlined earlier reveal the intrinsic complexity of homelessness that results in difficulties in marrying together these two dimensions of the homelessness issue. Definitions and descriptions have addressed this duality but have combined the two dimensions in different ways, usually privileging one over the other. The different approaches have also been expressed within a number of conflicting interpretative frameworks, making it even more difficult to reconcile housing and social dimensions.

To a large extent, the different interpretative frameworks reflect ideological divergences. Difficulties in defining homelessness are inherent in the socially constructed character and in the policy implications of the definitions. Moreover, they reflect the different academic/research traditions to which researchers refer. That is the interdisciplinary tradition of housing studies on one hand, versus the more sociologically oriented tradition of studies on poverty on the other.

The understanding of homelessness as a housing question has provided the dominant framework in research. In this chapter, I wish to focus on framing homelessness as an issue of poverty. The general debate on poverty and social exclusion has been richer, and generally perhaps more rigorous, than the debate on homelessness. This is especially the case in the formulation of concepts, which allow for the adequate treatment of the heterogeneity of the phenomena, such as the multidimensional and processual nature of poverty.

Despite the divergences, the “literally homeless” have nevertheless been at the centre of the definitions and collective representations of homelessness. They represent both an area of overlap between the various different definitions of homelessness and the extreme case of a restrictive definition. The concrete figures which represent these extreme situations – roofless, *senza dimora*, *sans domicile fixe*, etc. – have been used as illustrations in “typical” (ideal) reference material and have underpinned the interpretative and communicative assumptions on which the debate on homelessness has developed.

The focus on extreme situations occurs by combining extreme situations from the viewpoint of the lack of housing accommodation and extreme hardship from a social point of view: situations of serious social marginalisation (isolation, “disaffiliation”, etc.), which identify the homeless as “social figures” in the representations. Furthermore, the representations are most often focused on the multi-problematic / chronic aspects of homelessness, suggesting an “over pathologised” image of the homelessness (Snow *et al*. 1994), supported by “individual” approaches to homelessness (fairly popular for a time even among researchers).

Changes in perspective

During the period between the late 1980s and the start of this decade, two main changes occurred which modified the definitions and notions of homelessness, and which also modified the theoretical construction of the field. The first is the new attention paid to “structural” dimensions as opposed to an “individual” approach, with increasing emphasis on the role of factors such as housing, employment etc. The other change was towards an “extensive” approach: an extension of the notion beyond the limits of strict homelessness to include larger populations than the literally homeless. This extension has been made most often in the sense of including the various situations of housing hardship or marginal housing in homelessness or connecting them with it. These trends have converged in moving away from rooflessness or long-term homelessness as the dominant reference and from the identification of homelessness with (extreme) social marginalization. The reasons for considering borderline situations or risk situations may be justified for both theoretical reasons and because of recent changes in the composition and profiles of homeless population. On a theoretical level the extension of the notion responds to two main concerns: that of taking account of the (increasing) extension of homelessness, and that of taking factors into consideration that explain the "production" of the phenomenon (Tosi and Torri, 2005).

The idea that poverty needs to be analysed as a process – a fundamental point in the paradigm of social exclusion – provides the opportunity to connect homelessness to wider conditions of the production of poverty in its various forms. Linking homelessness to these wider conditions was made possible by notions such as risk and social vulnerability. In the new theoretical framework, the notion of social exclusion ('*désafilliation*') – even in its extreme forms – is no longer seen in relation to the individual deficits of the homeless population, but as the (extreme) outcome of the growth of social vulnerability in post-Fordist society (Castel, 1995).

Working on heterogeneity

The new trends were mainly prompted by the need to deal with the increasingly heterogeneous composition of the homeless population. Heterogeneity was already strongly perceived in the 1980s as a feature of the "new homelessness", contrasting with (the homogeneity of) traditional vagrancy. For a period, heterogeneity was dealt with in terms of "types" of population, trying to link different experiences and profiles of homelessness to different social profiles: young homeless persons, homeless women (see the work of the European Observatory on Homelessness between 2000 and 2005). This research helped to broaden the identification of homelessness so that it encompasses more than only those "extreme" situations represented by rooflessness and long-term homelessness. In some countries an important contribution came from research on homeless immigrants. In most cases homelessness among immigrants is more clearly tied to such factors as difficulty in gaining access to housing markets and insecure employment. There is a high probability of immigrants suffering housing exclusion without serious marginalisation occurring and an even higher probability of them suffering housing exclusion without those features of "personality de-structuring" suggested by the "conventional" image of the homeless. They are simply poor people without a home. This means that in many cases homelessness is temporary and that the lack of housing may be nothing more than a stage on the road to integration in a new society (Tosi, 2004). More recently, the picture of homelessness was further modified by the extension of the risk of poverty, and an increase in the material, economic component of poverty risk to new groups previously untouched by this type of risk. This means that paths to homelessness do not necessarily involve social marginalisation, “disaffiliation” from society or such extreme experiences as absent families, institutionalisation, prison, mental health difficulties, etc. supposed to be typical of homeless persons.

Pathways Through Homelessness

Both in Europe and in the USA, systematic attention to the variation in the length and number of periods of homelessness has been the most important development in dealing with the heterogeneity of homelessness. The basic idea of thinking in terms of stages and steps – in itself a traditional idea – was applied to a closer analysis of the different pathways into and through homelessness.

An important outcome, with significant policy implications, was that households move frequently into and out of homelessness, and the majority are temporarily homeless. As articulated by Koegel (2004: 224, 230-231):

> Homelessness is not a chronic condition for the majority of those referred to as ‘homeless’. Rather, it is a dynamic state that individuals enter, exit, and then often re-enter repeatedly over time […]. Substantial numbers of homeless people exit from homelessness within relatively short periods of time. [On the other hand] most of these individuals fall back into homelessness within those same time periods. Multiple cycles of exiting and re-entering [are] not unusual. [The typical pattern of homelessness] is one of residential instability, rather than constant homelessness over a long period.

This finding has challenged the understanding of homelessness – which is deeply rooted in “homeless career” interpretations – as a process which is intrinsically downwards and which has a natural regressive tendency. Also, the centrality of the roofless in the representation of homelessness is questioned. Rooflessness appears as just one of the possible outcomes. The over emphasis on rooflessness appears to be largely the outcome of research strategies with point-in-time studies which overestimate long-term and multi-problematic forms of homelessness. As it became clear that homelessness was more likely to be temporary rather than a progression towards more extreme forms of homelessness, attention started to focus “not only on routes into homelessness, but more importantly, on routes out of homelessness”. And “understanding the conditions for successful long-term exiting from homelessness came to the fore of researchers and indeed policymakers’ agendas” (O’Sullivan, 2008: 74-75). Generally the diversity of homelessness also emerges from this new line of research and attempts are generated to accommodate this diversity in new theoretical frames. A different way of defining differences is a sort of corollary, suggesting typologies such as:

chronic / long-term homelessness, temporary homelessness, recurrent homelessness; imminent homelessness, recently homeless, long-term homeless persons; formerly homeless persons etc.

Poverty studies

All these issues were fully addressed during the same period in the research on poverty. Here, the idea that many situations of poverty are temporary has long been established. The methodological strategy has been the same as in the research on homelessness: time analyses to see paths in/out of poverty, and how long poor people remained poor and which processes determine movements in or out of this condition. Moreover, poverty studies give a clear view of the theoretical, methodological, and also ideological assumptions on which the overestimation of "extreme" situations is based.

Poverty too had been perceived for a long times as a long-term condition and the idea of a natural regressive tendency characterising the processes of impoverishment in general was widespread. Later, the "new dynamic approaches" to poverty criticised both the idea that poverty is normally or frequently a stable condition and the idea that downward drift processes are in some way inherent in the dynamics of poverty. The theoretical reasons for the idea of a "rule" according to which poverty lasts a long time and takes root in the course of time were: the assumption that poverty careers are reinforced cumulatively and that they can therefore only be pushed downwards; and the failure to recognise that the poor are people capable of acting autonomously and of assuming the role of active protagonists.

The conclusion that many situations of poverty are temporary, that chronic poverty is just one of the possible paths and that the cumulative character of the exclusion process is just one of the possible dynamics of poverty has given rise to new reformulations of poverty. It has resulted in a closer examination of the factors that determine progressive falls into and the difficulties of climbing out of poverty on the one hand, and on the other hand attempts to differentiate between the types of and paths into poverty which capture the different degrees of gravity of different types of poverty such as absolute /relative poverty, multi-problem / sectoral poverty, and so forth.

Policy implications

The enlargement of the notion of homelessness and the importance attached to the structural dimensions in research on homelessness – moving away from the identification with the roofless/long-term homeless – has had considerable implications for policies. More specifically, the analysis of pathways has stimulated a number of conclusions that are of great policy relevance: firstly, that institutional and economic resources, such as income support and subsidised housing are the most important factors in determining “transition” (Koegel, 2004) or permanent exit from homelessness (O’Sullivan, 2008); but also that general services and welfare resources, rather than targeted measures, provide the best means of preventing homelessness (O’Sullivan, 2008; also see Tosi and Torri, 2005). Even if the role of other factors are recognised (e.g. Dworsky and Piliavin, 2000; Thompson *et al*. 2004), it is the emphasis on the importance of institutional and economic resources, which mainly characterises this line of research.

Institutional and economic resources are specified in different ways: formal and informal income support or subsidised housing (Shinn *et al*. 1998), welfare support in the form of financial assistance (Sosin *et al*. 1990), accessibility and availability of sustained institutional support (Koegel, 2004), availability of affordable housing (Wong, 1997). What these researchers nevertheless have in common is a critique of established policies. On the basis of their research, conventional forms of intervention have been subjected to severe criticism: e.g. transitional housing and residential treatment; some forms of individual support and residence in service intensive homeless services, intervention that aims to train individuals to reduce their risk of homelessness etc. (Busch-Geertsema and Sahlin, 2007; O’Sullivan, 2008).

Heterogeneity: Still at Issue

While these research studies focus on exits from homelessness or the prevention of a return to homelessness, the explanations relating to the effectiveness of institutional and economic resources extend at times to the broader issue of homelessness in general or of “residential instability” (see for instance Dworsky and Piliavin, 2000, Sosin *et al*. 1990). These elaborations bring a number of difficulties with them and they lead us back to historical problems of the debate on homelessness; and some of the arguments introduce a risk of a regression in the debate.

If the downsizing of the role of individual factors is to be set against a tradition (which has in any case been in decline for some time now) which for many years identified the reasons for homelessness in “individual deficits”, then there may still be some sense to the argument. The conclusions of this line of research are even more relevant if they are assessed in a policy perspective. If the popularity of case work type individual treatment or resort to transitional housing is considered to have become general blueprints that can be applied to the entire homeless population, then the policy value of this criticism – with the accent on the role of institutional and economic resources – is clear. It is to set the clear evidence of the problems of homelessness for which conventional provision is inappropriate and which would find a solution from welfare/housing provision against an established paradigm.

Having said this, conclusions regarding the importance of institutional and economic resources in assisting transitions from homelessness present problems for two reasons. The first is that to affirm the priority of institutional and economic factors in such general terms, seems to be in conflict with what we know about the heterogeneity of homelessness, and may contradict the rationale for the analysis of the time dimensions of homelessness, which has been basically a “differentiating” strategy, an attempt at establishing more policy relevant differences between homeless populations. The second is that the opposition to “individual” factors and treatment at individual level, formulated in general terms, brings up again the entire question of the “causes” of homelessness, with the risk of taking it back to the old dispute between “structuralists” and adherents of the individual vulnerabilities argument that dominated much research in the 1980s. The question of the heterogeneity of homelessness is therefore opened up again.

The relationship between structural and individual factors has been one of the most tormented in the history of the debate on homelessness. In the end a fair consensus has been achieved on at least two points: that the opposing arguments relate to two different levels of analysis, which it is important not to reify; and that the different viewpoints need to be incorporated into an “integrated perspective”. As outlined by Koegel (2004: 57):

> To explain the presence and face of homelessness […] one must consider two sets of factors: structural factors, which set the context for pervasive homelessness; and individual vulnerabilities, which earmark those people at highest risk for homelessness within tight housing and job markets.

This debate brought about new arguments and reinforced the reasons for a differentiating strategy towards understanding homelessness. If we wish to understand the diversity of the pathways into and out of homelessness, it must be admitted that to become homeless or to remain homeless, or to exit from it temporarily or permanently are all different issues, and that dealing with chronic homelessness, preventative intervention, exit reinforcement, support for “residential instability” etc. may imply considering and dealing with different sets of critical factors.

More European research is needed on this issue: we do not yet have adequate knowledge of the different pathways; specifically about the paths out of and the multiple cycles of exiting from/re-entering into homelessness. The majority of the research references cited above refer to the USA. Questions regarding pathways into and out of homelessness reveal the persistence of theoretical inconsistency in the research field: homelessness appears once again as a category which is given consistency by policy demands and inputs imposed by organisations working in the field.

If the theoretical field is to be strengthened, then the heterogeneity and multidimensionality of homelessness must be handled rigorously, starting with a serious reconsideration of the "polarisation" of the notion of homelessness and of the implications of the extension of the notion of homelessness. While as we have seen both the debate on the homeless and that on poverty offer strong arguments in favour of an extensive approach to homelessness, at the same time they illustrate the difficulties in developing this approach, and provide arguments to challenge it in favour of an extension along the housing axis.

Extensive approach

The positioning of homelessness within a housing framework involves a number of problems. The most difficult problem to resolve concerns the incorporation of conditions of inadequacy or insecurity or the risk of homelessness in a classification or interpretive framework. So we can find among the "key structural housing issues" that "can lead to homelessness" (in addition to housing affordability, the lack of availability of appropriate housing and eviction):

> the poor quality of housing – living in which can lead into homelessness or already constitute homelessness [and] overcrowded housing – which again may already constitute homelessness […] (Feantsa, 2008: 6).

This kind of extension entails questions about the notion of risk (in what circumstances does housing inadequacy give rise to homelessness?), and the reasons for including homelessness and conditions of inadequacy or insecurity within the same framework. The housing criteria is that most commonly used to broaden the definition of homelessness when the objective is to identify the homeless and construct systems for classifying the homeless. Thus, the (strictly) homeless become a type of housing accommodation, among a variety of types and located along a continuum of types of accommodation which extends from the strictly homeless to varying degrees of housing deprivation. In this case it is often assumed, even if it is not conceptually necessary, that there is a continuity between homelessness, housing exclusion, bad housing and housing needs etc.; and the notion of risk or similar notions are employed to connect the different "circles".

This type of extension turns out to be an inadequate basis for tackling heterogeneity, in particular the issue of the continuity and the borderlines between homelessness and bad and marginal housing. Certain situations included in the classifications, including many of those defined as "insecure" and "inadequate", may not be risk situations, or conversely may already be included within homelessness.

> Can all 'housing problems' be identified as 'risks of homelessness'? If risk is taken in the sense of a situation in which the probability of becoming homeless is higher, the answer is certainly no. On the one hand, only a fraction of marginal housing situations result in homelessness. On the other hand, and though further studies should be conducted on the last dwelling of homeless people, to know from what kind of housing situation they came [some research highlights that] a majority of homeless people were previously tenants or owner-occupiers of flats or houses (Marpsat, 2005: 5).

The point is that it is not possible to say whether a situation is a risk situation from the housing dimensions alone. Some situations of inadequate or insecure housing may not constitute, as such, a risk of homelessness: no more than does general poverty, regardless of the type of accommodation. If it is then considered that some "situations or characteristics could be identified as linked to a higher probability of homelessness" (Marpsat, 2005: 6), it seems clear that the determinants of risk must be sought in the interaction between various factors (identifiable at micro or structural level) that constitute the processes/risk of exclusion. For example, according to Marpsat (2005: 6):

> Some housing situations can lead to a high risk of homelessness, such as being housed by family or friends […]; living in a place where the local housing market is characterised by very few inexpensive dwellings leads to a higher risk of homelessness for all people who are either unemployed or with a precarious, part-time or low paid job. The confronting of a very tight housing market and a job market where precariousness is frequent are the main factors of homelessness […]; to have to leave rapidly the place where one lives, such as in the case of domestic violence […] to have characteristics which can be discriminated against by landlords, such as coming from a foreign country.

As for the policy implications of these questions, the critical issue is that most social measures in housing are ineffective or not very effective for the homeless. The aforementioned FEANTSA report (2008) cites housing policies and the marginalisation of the most effective measures for the homeless – public/social housing – in many countries, as some of the main reasons for homelessness. Indeed, some countries give almost no formal role to housing policy in tackling homelessness. Housing policies rather seem to tackle middle-income families, with vulnerable groups often left to other social policies to deal with. Where housing policy does look at vulnerable groups it tends to take an approach focused on specific disadvantages, for example disability, illness, unemployment or being a single parent. Homelessness itself is not seen as a cause of vulnerability.

Housing vs. (Social) integration?

A key issue about the effectiveness of policies on homelessness regards the relationship between housing and social integration outcomes. As stated by Busch-Geertsema and Fitzpatrick (2008: 74) with reference to preventative measures:

> Is the sole criterion for success based on the target group's success in avoiding the loss of their accommodation or their managing to move to other accommodation […]? Or are such policies only to be considered effective if they achieve (or preserve) a person's wider integration?

The question brings us again to the opposition of paradigms mentioned at the beginning. If the question of homelessness is set in a framework that addresses it as a "social" or poverty issue, then the emphasis is on inclusion processes as a whole, rather than on housing outcomes themselves. If the ultimate aim is social reintegration, then accommodation must be viewed as an ingredient in the social reintegration process and assessed on the basis of its effectiveness in that process. The role that rehousing plays in the inclusion processes of homeless persons can be interpreted by reference to the various reintegration experiences and the different types of reintegration achieved (Tosi and Torri, 2005).

This viewpoint is often accompanied by an underestimation of the housing factor in defining homelessness and policies for the homeless. In reality, it is a question of combining two arguments: (a) that in many situations the provision of accommodation may not be enough for integration; (b) that providing housing (apart from clearly being a sufficient response to a condition of homelessness in many cases) is in any event a powerful integration factor, even, and more paradoxically, for those in conditions of extreme homelessness.

This last argument has often been advanced in the field of homelessness as a criticism of some 'specialist' approaches (e.g. of the 'staircase approach'). Hence, it has been claimed that "the integration of homeless people should be facilitated by providing the homeless with normal and cheap housing to normal building standards, with usual tenancy agreements" (Busch-Geertsema, 2005). The same idea usually lies behind the different versions of the "housing first approach".

Numerous research studies now indicate that access to normal, acceptable, affordable housing may be a basic ingredient of the social reintegration process. However, housing in this sense is not in itself a reliable indicator of the success of a reintegration programme for many homeless persons. Reintegration cannot be guaranteed by rehousing alone; rehousing does not guarantee the creation of the 'home' dimension, that is the realisation of that set of values – freedom, security, privacy, comfort – which have been historically constructed around living at/having a home and that lies at the heart of our integration system. Failure to 'make a home' may reveal reintegration failure. In these cases rehousing does not put an end to vagrancy (Tosi and Torri, 2005).

Conclusion: Re-framing Homelessness as Poverty

In what sense does setting the discussion of homelessness within the poverty framework and extending the concept along the poverty axis constitute a different approach, and what are the advantages? Firstly, by introducing the "social" variables commonly employed in the research on poverty, it is possible to address several critical problems in the study of homelessness, and in particular to take account of the heterogeneity of the phenomenon. This is basically because "broadening" in this direction means taking into consideration the whole set of processes that generate homelessness and that result in different histories of homelessness.

This "extension" means the inclusion of the various factors that explain poverty. Housing factors become one of the possible explanatory dimensions together with others indicated in studies on poverty. In this sense the poverty frame represents a general matrix for the study of homelessness. At the same time it provides several tools for addressing "difficult" cases of poverty – such as rooflessness – and it retains the heuristic and strategic value of the study of the 'literally homeless'. With these specifications, we can try to unravel the muddle of problems that have been built around the term "individual". To the extent that they show traces of traditional structural approaches, also the arguments on the role of institutional and economic resources at times seem to re-propose a criticism of the "individual" approaches to homelessness. And at times they also seem to downsize the importance of individual forms of support to the homeless.

In reality, "individual" can mean different things: it may indicate a level of analysis or place the accent on personal factors or individual deficits etc. If the reference is to the methods of intervention, the term may refer to the level of provision and support, or to specific types of support and forms of provision: an 'individual' method of intervention may encompass "non-material" resources and a casework approach, with perhaps a strong degree of social support etc. Clearly they are forms that can be evaluated differently and which in any case do not imply in themselves any adherence to explanations in terms of personal deficit.

The positive version of the research studies mentioned questions certain conventional solutions because they are proposed indiscriminately (for the homeless in general) and also certain "heavy" forms of individual treatment. The focus therefore returns to the variety of the forms and of the processes that cause homelessness, in order to see if, and in which situations, and under which conditions, the forms of intervention subjected to criticism can be justified: e.g. when it is reasonable or appropriate to turn to transitional housing (Busch-Geertsema and Sahlin, 2007).

As concerns the individual forms of support, one fundamental distinction obviously regards the “gravity” of the condition in question. As has been stated, intensive programmes, such as “intensive case management” or “supportive housing” (a full range of services readily available to homeless people at the same time that housing is provided) “may be necessary for many multi-problem homeless people, simpler interventions can be effective for others” – for example the provision of housing subsidies (Toro and Janisse, 2004: 249). This is the most appropriate area for putting the case for (certain forms of) individual work and casework as opposed to the value of institutional and economic resources.

A similar indication can also be seen in theoretical tools that insist on the consequential character of events, such as, for example, the “moral career” concept (Goffman, 1961): if it is applied to cases of rising pathways and to the possibility of reversing negative spirals, then the concept offers important recommendations for policies against poverty and social exclusion. It suggests that these policies do not necessarily have to offer total support to persons suffering hardship in order to be effective. Most frequently it is sufficient (and at times best) to take action to reverse the path of a downwards-drifting “moral career”, by contributing to or triggering the occurrence of a positive event (e.g. by offering a job opportunity or contact with voluntary groups and hence stimulating a personal reaction which makes subsequent positive events more probable).

This type of approach provides two practical criteria for intervention. The first concerns the indeterminate nature of the type of resource on which the effectiveness of the intervention depends: the “appropriate” resource is not determined by the factors that have constituted the problem nor directly detectable from any specific “manifest” demand at one point in time, but rather requires “individualised” assessment of the role that it can perform in the integration pathway.

The second criterion concerns the possibility that integration pathways must involve change in motivations, dispositions and capacities and that they must reflect the importance of dimensions which affect even the deepest cognitive and emotional levels. Under the individual treatment approach there is a perception – certainly in many cases badly defined and developed – which has been constant in poverty studies: that poverty is a more complex “absence” than simply lack of “objective” resources, such as income, employment, housing; but, even less obvious, that poverty is also the inability to use the resources offered – chronic poverty equates with the progressive loss of these abilities.

Over the course of the recent history of the social sciences, different concepts have been proposed that can help to address these “deeper” dimensions (even if it must be stated that the use of these concepts is often deployed with a culturalist approach which plays down the importance of material conditions and lack of opportunity). They include concepts such as the “culture of poverty” some uses of the notion of social capital which place the accent on personal and cultural (Fukuyama, 1995), and the concept of habitus (Bourdieu, 1980).

Recognition of these deeper dimensions of poverty is better now than in the past. That poverty is now understood as not merely a problem of access to resources but also as implying a lack of ability in taking advantage of resources has been one of the most significant developments of poverty studies in the last two decades (Sen, 1999; Nussbaum and Sen, 1993). This development has led to a perspective on poverty centred more on individual capabilities for using resources and translating them into well-being; whereby poverty is understood as the absence of the capabilities to access available resources effectively. So far this approach has been on the margins of the debate on homelessness and only recently some contributions utilising the capabilities theory have been proposed (McNaughton, 2010 and Fernandez Evangelista, 2010). Its theoretical potential, however, still waits to be appreciated and systematically exploited in the research on homelessness.

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