
Strategically Moving Forward in Combatting Homelessness in Spain

Isabel Baptista

Centro de Estudos para a Intervenção Social (CESIS), Lisbon, Portugal

› **Abstract** *The first National Comprehensive Homelessness Strategy 2015-2020, adopted by the Spanish government in November 2015, is an innovative policy reform developed with wide political consensus at the national level. With an overall aim of overcoming the lack of integrated policies in tackling homelessness, the Strategy envisions the eradication of homelessness as its ‘final horizon’ under the leadership of the public sector. This paper discusses relevant EU dynamics leading to the growing adoption of holistic approaches to homelessness, focussing on the development of Spanish policy and providing comparative snapshots with the path followed by the first southern European homelessness strategy. It explores key drivers behind the adoption of the Spanish National Comprehensive Strategy on Homelessness as well as its contents and underlying principles, and it discusses the Strategy’s potential to deliver on its promises.*

› **Keywords** *Homelessness strategy, policy change, policy innovation, Spain.*

Introduction

Over the last decade, a growing number of EU countries have adopted or announced the development of comprehensive and integrated national strategies to prevent and address homelessness. Spain is the second southern EU country¹ to embrace a political commitment towards “a global and territorially coordinated approach of homelessness policies” (Ministerio de Sanidad, Servicios Sociales e Igualdad, 2015, p.8).

The National Comprehensive Homelessness Strategy 2015-2020 (ENI-PSH – Estrategia Nacional Integral para Personas Sin Hogar 2015-2020) was adopted by the Spanish Council of Ministers on 6 November 2015. The ENI-PSH represents an important strategic step forward in the commitment of the Spanish State to homelessness policies and is, at the same time, a positive response at the planning level to EU demands, to evidence of the increased risks of marginalization in recent years and to growing pressure by NGOs advocating structured and long-term solutions to address homelessness.

This paper provides an outsider’s perspective on the Spanish homelessness strategy, building on available information and on the wider EU context that led to its approval. It discusses the relevant EU dynamics that are impacting in different ways on the decisions of Member States to adopt integrated strategic approaches to homelessness and that are impacting on the increased public and political visibility of the realities of homelessness.

Policy development leading to the adoption of the Spanish homelessness strategy – the latter being a necessary response to the structural limitations of the intervention system (Cabrera and Rubio, 2008) – is briefly described as an innovative policy change within the southern European context.

Comparative snapshots of developments in Spain and Portugal leading to the adoption of both countries’ first national homelessness strategies reveal interesting similarities and divergences that may be useful for informing future debates on the Spanish strategy’s progress.

The discussion around key drivers of the adoption of the ENI-PSH illustrates some convergent and divergent patterns that highlight common EU legacies, shared features within past political and policy frameworks, and relevant legislative and political developments. The strategic role of social organisations and their capacity to foster change is especially important within this debate.

¹ Portugal approved its first national homelessness strategy in March 2009.

Finally, the contents and the underlying principles of the Spanish National Comprehensive Strategy on Homelessness are explored and then discussed within the framework of the Strategy's potential to deliver on its promises.

Strategically Addressing Homelessness in the EU: Dynamics in Progress

For almost a decade, the European Observatory on Homelessness has fostered the production of a growing number of policy reviews on existing homelessness strategies across Member States (e.g. Benjaminsen and Dyb, 2008; Baptista, 2009; Wygnańska, 2009; Hansen, 2010; Houard, 2011; Hermans, 2012; Lux, 2014; Sahlin, 2015).

In 2010, the EU Network of Independent Experts on Social Inclusion recognised a growing trend among Member States “moving in the direction of developing strategies or at least more comprehensive and integrated approaches” (Frazer and Marlier, 2009, p.4), in a context where a number of countries had already developed overall national strategies. It is now possible to identify overall strategic approaches to homelessness across more than 10 Member States (Fondation Abbé Pierre and FEANTSA, 2015).

Over almost two decades, a number of EU-level initiatives have helped in establishing homelessness as a relevant topic on the EU agenda. In 2010, the adoption of the Europe 2020 Strategy would enhance a new governance context, which would provide a unique opportunity to boost EU progress on homelessness. For the first time, the EU set a headline target on poverty reduction – to lift 20 million people out of poverty – and Member States committed themselves to adopting complementary national targets within this framework.

In 2010, the Joint Report on Social Protection and Social Inclusion – one of the key instruments of the Social OMC (Open Method of Coordination for social protection and social inclusion) that is published annually by the European Commission – called on Member States to develop comprehensive homelessness strategies, and provided guidance on how to do this, putting a strong emphasis on effective governance, monitoring and evaluation, and on the setting of specific targets. The European Consensus Conference on Homelessness held in Brussels in December 2010 resulted in a set of policy recommendations, which aimed to provide a sound basis for strengthened ‘ambition and action’ in the area of homelessness. Its conclusions clearly highlighted the need for an integrated strategic approach towards homelessness, both at EU and national levels.

The European Parliament's Resolutions adopted in September 2011 and January 2014 urged the Commission to develop an EU homelessness strategy that could support Member States in taking up the fight against homelessness, recognising that "an increasing number of Member States have a holistic homelessness strategy and could benefit from European cooperation to further develop their policies."²

Within the framework of the EU Social Investment Package (SIP)³ launched in 2013, the Commission called on Member States to develop integrated national strategies on homelessness and at the same time committed itself to monitoring progress within the framework of the European Semester exercise. Moreover, the SIP included a staff working document entitled 'Confronting Homelessness in the European Union', which explored, among other issues, core elements of integrated homelessness strategies. At the Ministries' informal Round Table on Homelessness in the EU and the Social Investment Package, also in 2013, six principles were agreed, which would inform homelessness policy across Europe, including the commitment 'to enhance the development and implementation of national homelessness plans and respective monitoring'.

Additionally, evidence of increased dynamics around strategic approaches to homelessness is growing across Europe. The first Spanish strategy on homelessness takes on this EU 'legacy' and positions itself also as a response to "EU demands on Member States to better develop integrated policies on homelessness" (Ministerio de Sanidad, Servicios Sociales e Igualdad, 2015, p.7).

However, those EU-driven dynamics seem to be developing in different ways and with various complexities. Benjaminsen and Dyb (2010) note that holistic approaches to homelessness seem to follow a geographic pattern across Europe. According to these authors, such approaches appear primarily in northern and western European countries rather than in southern and eastern countries – a trend that may be explained by the relevant histories of welfare policy formation (older versus younger) and the role of the state within specific national contexts. In some Member States, these strategic policy approaches to homelessness are barely emerging, whereas in others the national strategy process has gone through various stages of evaluation and revision (Owen, 2015). In central and eastern European countries, homelessness policies remain largely anchored in specific social assistance programmes (Šoštarić, 2013).

² European Parliament Resolution on an EU Homelessness Strategy, 16 January 2014, available at: <http://www.europarl.europa.eu/sides/getDoc.do?type=MOTION&reference=P7-RC-2014-0008&language=EN>

³ Communication from the Commission Towards Social Investment for Growth and Cohesion, available at: <http://ec.europa.eu/social/BlobServlet?docId=9761&langId=en>

Yet, there is also evidence of extensive variation as regards the structure, focus and scope, as well as the sustainability and effectiveness of existing homelessness strategies. Benjaminsen *et al.* (2009) found that strategies developed in social democratic welfare regimes (e.g., Norway, Sweden, Denmark and Finland) tend to have fewer but more focused targets and objectives. Some countries, given the complexity of their administrative and territorial competencies, have engaged in strategically responding to homelessness at the regional level (e.g., Belgium and Germany). In other countries (e.g., Portugal), national strategic approaches to homelessness have initiated innovative developments (Baptista, 2009) that would not be properly implemented. Finally, in some ‘modern, inclusive’ welfare states (Sahlin, 2015) like Sweden, national strategies appear to have followed ‘inverted time trajectories’.⁴

Overall, strategic planning and the implementation of policies to address homelessness have become more common across Europe. However, the varying systems and structures and the connections between them are determining how such programmes and plans evolve in specific national contexts.

Responding to EU Challenges: From Strategic Planning to Actual Delivery

Spain’s commitment to the EU2020 target of reducing poverty and social exclusion is translated into a national goal of reducing the number of people at risk of poverty and social exclusion by between 1.4 and 1.5 million by 2019. In recent years, poverty, social exclusion and inequality have worsened in Spain and remain among the highest in the European Union (e.g., the poverty rate⁵ reached 22.2% in 2014 against an average of 17.2% in the EU-28).

Over the last fifteen years, a series of social inclusion plans and strategies have been put in place in response to the regular reporting and assessment exercise set up by the European Commission through the social Open Method of Coordination (OMC). The first National Action Plan for Social Inclusion of the Spanish Kingdom (*Plan Nacional de Acción para la Inclusión Social del Reino de España*), established in 2001, has been succeeded by six more national plans, the most recent one for the period 2013–2016.

⁴ The Swedish National Strategy that ran from 2007–2009 did not have any continuity until the present day.

⁵ The EUROSTAT figure for the at-risk-of-poverty rate after social transfers.

Measures specifically addressing the homeless population may be found in all the Spanish National Action Plans. In general, those measures have aimed at improving access to accommodation support, social care and health care, and at increasing homeless people's social and labour integration. Since the 2001-2003 National Action Plan for Social Inclusion, homelessness has been identified as a paradigmatic example of extreme social exclusion.

However, and in spite of an increasing number of measures being implemented over the years, homelessness policies in Spain have been lacking an overall integrated approach to provide the necessary framework for changing "the structural limitations of the intervention system in all its aspects, social as well as economic (labour market, health, education, social networks) and political, thus allowing the actual acknowledgement of the right to housing and to dignified accommodation" (Cabrera and Rubio, 2008, p.75).

The National Action Plan for Social Inclusion 2013-2016 (PNAIN) explicitly includes a set of measures directly addressing homelessness, and – for the first time – announced the "design and implementation of a National Comprehensive Strategy on Homelessness, in accordance with European recommendations, in cooperation with the Autonomous Communities, the cities of Ceuta and Melilla and Third Sector organisations" (Ministerio de Sanidad, Servicios Sociales e Igualdad, 2013, p.99).

The National Comprehensive Homelessness Strategy 2015-2020 recognises the need both to respond to national commitments to EU policy and to address the lack of an "overall policy coordinated approach towards homelessness across the national territory" (Ministerio de Sanidad, Servicios Sociales e Igualdad, 2015, p.8), and it proposes a comprehensive reform of the homelessness support system in Spain, where society needs to change to allow the social integration of homeless people (Ministerio de Sanidad, Servicios Sociales e Igualdad, 2015).

Spain, like Portugal, belongs to the relatively less advanced welfare states of southern Europe, where the adoption of national homelessness strategies came later than in the Nordic social democratic welfare states and the Anglo-Saxon liberal welfare states (Benjaminsen and Dyb, 2010). However, in both countries, the course of homeless policies seems to be in line with the paradigm shift that informed the development of the first generation of homelessness strategies in EU Member States – i.e., viewing homelessness as a consequence of a wide range of individual, organisational and structural hindrances, rather than simply a housing or a social problem (Benjaminsen *et al.*, 2009).

Both the recent approval of the Spanish ENI-PSH 2015-2020 and approval of the 2009-2015 Portuguese National Strategy for the Integration of Homeless People represent important landmarks in the holistic approach to homelessness strategic

planning in southern Europe. Both strategies announce the potential for policy change in addressing the fragmented nature of traditional approaches to homelessness.

Yet, the Portuguese National Strategy failed to ensure coherence in the delivery of services in a context where the State has increasing ownership of homelessness policy (Baptista and O'Sullivan, 2008). The gap between the expectations that this first southern European national strategy on homelessness engendered and what had been achieved through its implementation by the end of 2015 (Baptista, 2013) may provide useful lessons for the implementation and evaluation of the Spanish national strategy. All the more so, as it is possible to identify disquieting similarities between both countries in the design and implementation of strategic approaches to social inclusion.

The Interim Report on the Implementation of the National Action Plan for Social Inclusion 2013-2016 confirms a focus on vulnerable groups and highlights the approval of the National Homelessness Strategy in November 2015 (Dirección General de Servicios para la Familia y la Infancia, 2015). However, the report fails to provide any actual assessment of the implementation of the remaining five measures in the sub-section on homelessness. The only information given is the amount of public finances allocated to measures supporting homeless people, which increased from €19,998,037 in 2014 to €20,346,988 in 2015 – an increase of less than 2%. It is therefore not surprising that the European Commission's 2016 Country Report on Spain underlines the weakness of the impact assessment exercise in the mid-term review of the PNAIN.⁶

The 2016 Country Report, which accompanies the 2016 Country Specific Recommendations for Spain, highlights the deterioration of living conditions and the increase in inequality and regional disparities since 2009/2010. The social consequences of evictions and mortgage foreclosures are mentioned as some of the most serious impacts of the crisis. Moreover, the document identifies specific barriers to the delivery of social services, including the lack of integration between programmes, weak coordination (horizontal and vertical) between services, the need to improve monitoring and evaluation mechanisms, and uncertainty about financial resources for existing plans.

The need to overcome some of these barriers that continue to affect the planning and delivery of services in the Spanish context has been recognised in both the National Action Plan for Social Inclusion 2013-2016 (PNAIN) and the National Comprehensive Homelessness Strategy 2015-2020.

⁶ Available at: http://ec.europa.eu/europe2020/pdf/csr2016/cr2016_spain_en.pdf

In Portugal, similar obstacles to the implementation of the first national homelessness strategy have been identified (Baptista, 2013): resource allocation that is not clear or transparent, weak horizontal coordination at state level, and a failure to implement monitoring and evaluation mechanisms. Yet, the potential for change created by the operationalization of the strategy's principles and methodology led to positive changes in the development of local responses to homelessness in major cities.

In both countries, while there seems to be a genuine desire to respond positively to EU challenges at the level of strategic planning in the social sphere – embodied by the existence of several national strategies (e.g., the Spanish State Housing Plan; the Portuguese National Housing Strategy; national plans on childhood and adolescence; national strategies for the social inclusion of Roma) – there is a systematic failure to provide evidence-based evaluations of the impact of policy measures.

The report on Homelessness and Housing Exclusion across EU Member States (Frazer and Marlier, 2009)⁷ already identified the need for the European Commission (and Member States) to enhance monitoring and reporting mechanisms on homelessness and housing exclusion by agreeing on a “common framework and common guidelines” (Frazer and Marlier, 2009, p.8) as well as the need to support transnational exchange and learning in this domain.

It is clearly too early to assess whether the ENI-PSH will deliver on its promises and take a step to overcome this ‘southern paradox’. However, critically assessing the opportunities and obstacles encountered in implementing it – as measured against policy experiences in other national contexts – may make a valuable contribution to avoiding some of the mistakes that all European countries have made in trying to stop, reduce and prevent homelessness (Pleace, 2015).

⁷ This report summarises the main findings from the national analysis undertaken by the EU Network of Independent Experts on Social Inclusion, available at: <http://ec.europa.eu/social/BlobServlet?docId=9046&langId=en>

Key Drivers of the Adoption of the First Spanish Homelessness Strategy

The National Comprehensive Homelessness Strategy 2015-2020 identifies three major drivers for its adoption:

- the need to respond to European commitments for an integrated policy approach to homelessness;
- the Spanish context of homelessness support policies and the need to adopt an overall approach;
- the situation of homeless people in Spain, aggravated by the economic crisis.

Cabrero and Gallego (2016) add two more factors that, in their opinion, also contributed to the approval of this first strategic approach to homelessness in late November 2015: (i) national legislative developments in 2013 and 2014; and (ii) increasing pressure from social platforms and organisations working in the fields of homelessness and housing exclusion.

From a Portuguese perspective, these key drivers appear both familiar and unfamiliar. The EU influence on the adoption of a strategic approach to homelessness in both countries is a similarity that we have addressed in earlier sections. The main difference here between the two (first) homelessness strategies is the extent of the 'EU legacy' – i.e., in 2009 there were significantly fewer EU initiatives (e.g., resolutions, reports, conferences) driving Member States to adopt holistic approaches to homelessness than in 2015. Nevertheless, in both countries the role of the social OMC was particularly relevant as regards commitments in the national action plans for inclusion.

The need for an overall policy framework in the Spanish context also shares some similarities with the Portuguese context. Portugal and Spain share similarities as regards the late emergence of their welfare states following long periods of dictatorship, a relative inefficiency in their social protection systems, and the centrality of family as a safety net. Despite major transformations in social policies since the late 1970s, neither country has been able to provide a comprehensive and adequate response to homelessness (Torres, 2006; Baptista and O'Sullivan, 2008; Cabrera and Rubio, 2008; Baptista, 2009). In both countries, homelessness has been approached from a social services point of view rather than a housing perspective (Baptista, 2009; Aldanas, 2013), which has directly influenced policies and measures to tackle homelessness. The adoption of an overall integrated approach to homelessness came at a crucial stage in solving – rather than managing – the problem in both national contexts.

One major difference appears when comparing key drivers in both countries: the role played by national legislative developments in Spain – i.e., the explicit announcement of a measure for the design and implementation of a homelessness strategy in the National Action Plan for Social Inclusion 2013-2016 and the legislative proposal for a national homelessness strategy that was approved by the Spanish Parliament in April 2014. The former was mentioned earlier and represents the achievement of EU commitments at national level. The latter represents an important political consensus around the homelessness issue. Both legislative developments represent important steps in the policy process, as homelessness achieved recognition as a political issue, creating ‘an opportunity for action’ (Kingdon, 1984) that could be embodied in the formal adoption of the ENI-PSH in 2015.

This pattern is in clear contrast with the development of the other ‘southern strategy’, where this kind of political legitimation occurred only at a later stage. In Portugal, there was no political consensus (or explicit endorsement by the Government) on the need for a national approach to homelessness before its approval of the national homelessness strategy, which was never translated into a legal act.

Another difference between the two strategies is the pressure created by social platforms and organisations working on homelessness and housing exclusion in Spain, which helped lead to the political initiative for a strategic and integrated policy approach at national level. In both Spain and Portugal, charities and NGOs have played a central role in the delivery of social services, including within the homelessness sector. However, the role and the organisational and political capacity of the third sector in both countries are hardly comparable.

The high degree of centralisation of the Portuguese State in the design and implementation of social policies has prevented third sector organisations from pushing social rights issues onto the national political agenda (Ferreira, 2004), something that is aggravated by a strong financial dependency on the State. Within such a framework, the capacity of the sector to intervene politically depends greatly on the degree of intra-sectoral organisation (Santos, 1999). The homelessness sector in Portugal is not an example of a strongly-organised sector capable of exploiting existing political opportunities and putting pressure on the political decision centres: the Government and the Parliament.

Spain is a highly decentralised state, in which social protection competences have been devolved to the Communities. The Public System of Social Services is responsible for implementing homelessness policies at the regional and local level. The Ministry for Health, Social Services and Equality coordinates and co-finances homelessness services through the Public Social Services Network. Social organisations play a major role in implementing projects and services to address home-

lessness. However, from an outsider perspective, there are aspects of the organisational capacity of the third sector in Spain that contribute to their greater ability and power to influence policy than is the case in Portugal.

The Spanish NGO Platform of Social Action is a private, nationwide non-profit organisation involving NGOs, federations and other relevant social entities, and one of its main goals is to strengthen the social sector. It has launched two Strategic Plans for the Third Sector of Social Action, the last one covering 2103-2016 (II Plan Estratégico del Tercer Sector de Acción Social). This Plan recognises the diversity within the sector but aims at promoting cooperation and unity around common projects and a commitment to social change. Moreover, the Platform is supported by the State Council of Social NGOs established by law in 2005, which, under the auspices of the Ministry for Health, Social Services and Equality, promotes NGOs and acts as an advisory body in the development of public policy.⁸ Last but not least, it is important to mention the role of the Federation to Support Homeless People (Federación de Entidades de Apoyo a las Personas Sin Hogar – fePsh), formally established in 2010, which assembles over 40 organisations across Spain and aims, among other things, to generate opinions and push homelessness onto the political agenda.⁹

The first National Comprehensive Strategy on Homelessness explicitly recognises the increasing demand from third sector organisations in Spain for a holistic and integrated approach to homelessness – advocacy work that also pushed the initiative forward. The first Portuguese national homelessness strategy can only claim to have been supported by relevant NGO federations – none of which are linked to homelessness, as such federations do not exist in Portugal – once the drafting process had begun (Baptista, 2009).

Overall, if the Spanish homelessness strategy shares some foundational elements with its Portuguese counterpart, the former strategy seems more robust in terms both of political endorsement from the central state and the strategic role and capacity of the NGO sector. These differences may prove crucial in the implementation stage, even if the lingering political uncertainty and unrest in Spain seem to be hindering implementation of specific measures and policies in the initial stages.

⁸ More information on the operation of the Council is available at: <http://www.msssi.gob.es/ssi/familiasInfancia/ongVoluntariado/consejos.htm>

⁹ More information on the fePsh is available at: <http://www.fepsh.org/es/presentacion.html>

The Spanish National Comprehensive Strategy on Homelessness: From Managing to Ending Homelessness?

The Spanish homelessness strategy aims at overcoming a lack of integration in policies that tackle homelessness, and it envisions the eradication of homelessness as its ‘final horizon’ under the leadership of the public sector.

Similar to other plans and strategies adopted in different EU Member States, the ENI-PSH adopts the ETHOS typology (Edgar, 2012) as its conceptual model, and this provides the basis for identifying the homelessness situations on which the strategy will focus – i.e., the roofless and houseless categories.

The adoption of a narrower approach than the one proposed by ETHOS is not new among Member States (Busch-Geertsema, 2010) and like the official definition in the Portuguese strategy – although broader – it may have been the result of a pragmatic need to reach consensus (Baptista, 2009) among a wide range of stakeholders (e.g., central administration, autonomous communities, local authorities, third sector organisations and homeless people themselves).

Thus, the ENI-PSH proposes to provide “concrete efficient solutions” for those two homeless categories, and extends its mandate to the need to establish “preventative actions addressed to all those who are at risk of social exclusion”.

A thorough overview of homelessness in Spain is given in a lengthy and detailed section within the strategy document. However, a complete understanding of the situation is hampered by a lack of existing information and by the restricted focus of the 2012 and 2015 Statistics Spain (INE) surveys on which this section draws, which only covered homeless people using support centres that offered accommodation and/or meals in municipalities with more than 20,000 inhabitants, thus including only a fraction of the entire homeless population.

The Strategy underlines the growing nature of homelessness (from 21,900 people in 2005 to 22,938 people in 2012); the increase in women’s homelessness, particularly among young women (18-29 years old); the increase in homelessness among non-Europeans living in Spain for more than five years (from 19% of the total foreign homeless group in 2005 to 58% in 2012); and the increasing number of people remaining homeless for longer periods of time. Night counts in different Spanish cities provide data on the number of people sleeping rough and on those resorting to homeless accommodation. Based on these figures and on the 2005 and 2012 surveys, the Strategy extrapolates an interval of 30,250 to 36,300 homeless people in Spain in 2015.

A toolkit for developing an integrated strategy to tackle homelessness, which was developed by the European Federation of National Organisations Working with the Homeless (FEANTSA), outlines ten approaches that have been proven to promote the effectiveness of homelessness policies. The ENI-PSH incorporates several of these approaches, some of which are clearly identified in the Strategy's underlying principles.

First, a rights-based approach to tackling homelessness is announced as fundamental to the Strategy and to ensuring public commitment to homeless people's rights (to housing, security, health and protection, and social support). Such public commitment should lead, *inter alia*, to the effective realisation of such rights, which, although proclaimed by the Spanish Constitution, have not yet been fully realised (Cabrera *et al.*, 2008).

The development of the ENI-PSH also reveals the concern to adopt a participatory approach, fostering the involvement of and cooperation between relevant stakeholders: different levels of government, different sectoral agencies, the third sector and people experiencing homelessness. Such an approach will continue during the implementation stage through the establishment of regional and local cooperation structures.

The Strategy's principle of centring on the needs of the individual and on a case-management approach aims to bring (or disseminate) innovation into working methodologies. Once again, it responds to one of FEANTSA's ten approaches: the needs-based approach. Developing policies according to the existing needs of individuals rather than the structural needs of the organisations will certainly present a challenge in a country where "the existence of entrenched operational modes among those in charge of the design, planning, and implementation of the different homeless policies is another non-negligible difficulty" (Aldanas, 2013).

The Strategy recognises ongoing progress in recent years in the production of reliable information on homelessness in Spain and proposes to deepen such efforts by adopting evidence-based policies, investing in sustained research, and ensuring methodological innovation and training.

The approach taken by the ENI-PSH to preventing homelessness – together with emergency and resettlement/integration measures – addresses the need for a comprehensive approach to combatting homelessness directly. A particular emphasis is put on preventing the loss of housing (eviction and foreclosure procedures), which has become a key social and political issue in Spain in the context of the serious housing situation emerging – along with other structural legacies – from the economic crisis (Denche *et al.*, 2015).

Based on this set of main principles, the Strategy aims to reduce homelessness from around 23,000 people in 2015¹⁰ to 18,000 people in 2020. It sets out five main goals or objectives to achieve this:

1. Preventing homelessness
2. Raising social awareness about and fighting against discrimination and hate crimes against homeless people
3. Ensuring physical and mental integrity for homeless people
4. Supporting homeless people to achieve their potential
5. Strengthening the public service system for homeless people, and improving information and evaluation mechanisms

These five goals are translated into strategic aims, which in turn correspond to specific activities and indicators.

The Strategy advocates preventive actions (Objective 1) through the establishment of counselling services to prevent housing eviction and of protocols to address potential homelessness as a result of institutional discharge from detention facilities, youth institutions and immigrant and/or refugee accommodation centres.

It also envisages the development of a communication and awareness-raising strategy (Objective 2), which will foster the right to a “truthful and respectful image of homeless people” and the elimination of intolerance and indifference towards violence against homeless people.

Objective 3 is to provide a wide range of accommodation solutions based on a housing-led approach, together with an improved network of support services (e.g., mixed outreach teams involving social and health professionals; day centres). Implementing the Housing First model is a specific focus. It prioritises chronic homelessness situations, explicitly adopting some of the principles of the Housing First approach: immediate access to independent and permanent housing; continued support for clients as long as needed and at the required level of intensity; consumer choice and self-determination. The implementation of the Housing First model also aims to increase the involvement of housing entities in ensuring access to public housing.

Supporting homeless people to achieve their potential is the focus of Objective 4. The Strategy aims to introduce a case-management approach based on a collaborative and person-centred strategy in order to ensure that a person who experiences homelessness gets the support they need from the very first moment. There

¹⁰ Estimate based on INE 2012 figures.

is a specific focus on improving the employability of homeless persons by facilitating hiring by social employment companies, and strengthening mixed programmes for training and employment.

The final objective is the strengthening of the public system of social services targeting the homeless population in cooperation with third sector organisations, in order to address the issue of fragmentation and unequal support in Spain. Several actions are foreseen, including: developing a comprehensive public intervention in each territory, ensuring the necessary resources; developing comprehensive homelessness support plans; and ensuring that support services are in line with public regulations. Improving existing information systems on homelessness and enhancing knowledge and research is included in this last objective as key to developing more effective policies.

A one-page section is devoted to evaluation and financing. For the former, the document merely refers to the need to monitor the proposed indicators, the preparation of two monitoring reports (one in 2019 and one in 2021) and the participation of different national and regional stakeholders and even of other Member States and FEANTSA. Funding and the allocation of resources are dealt with very briefly and vaguely, leaving such decisions and responsibility to the different levels of public administration in the different territories.

The final section of the national strategy outlines eight quantified targets for reducing the number of homeless people in Spain to 18,000 by 2020, taking into account different variables: sex, age, health conditions and living situations (i.e., rough sleeping). A summary table provides indicators and data sources for the different actions under each objective.

Discussion

The first Spanish homelessness strategy demonstrates a clear wish to promote policy change and to drive the increased leadership of the public sector in preventing and tackling homelessness, namely through local administrations. Both the strong political consensus around the adoption of the Strategy and the recognition from important players within the homelessness arena¹¹ of the value of such an instrument in the Spanish context are key to success in the implementation stage.

¹¹ See, for example, the press release by the fePsh published on 11 November 2015, available at: http://www.caritas.es/noticias_tags_noticialInfo.aspx? Id=8603

However, the Strategy's potential to foster a more coherent and integrated delivery of policies and measures addressing homelessness may face some barriers due to the gap between the intentions announced and the lack of a pragmatic approach clarifying how to attain them; the quantitative targets set; and the 'proposals for action' under the five objectives.

Several inconsistencies could, in our opinion, benefit from further reflection in order to build on the work already done and improve the feasibility of the proposals, which will necessarily have to be implemented at regional and local levels.

One important barrier to the Strategy's potential effectiveness is the overall lack of information on resources and funding. Moreover, at this stage there are no clear indications as to timelines or the allocation of responsibilities (leading and contributing roles) for implementing the large number of actions proposed, which would positively contribute to the State's 'enabling approach' (Cabrera, 2006)

Moreover, there is room for improvement in the final tables listing the 'actions' identified under each objective; given the lack of clarity and consistency in their selection, they can hardly be defined as measures, activities or targets (e.g., counselling services and support to prevent the risk of eviction, social awareness, disability, Housing First, case management, resource manual on homelessness).

The indicators provided for each 'action' in these tables are mainly output indicators – i.e., they merely identify numbers of protocols, programmes, people, places, localities, etc. There is an overall lack of outcome indicators that could help demonstrate the impact of many of the Strategy's measures and activities, including those that, for example, aim to prevent the risk of homelessness among people in detention or youth institutions, improve access to public or private housing, or implement a case management approach.

From the information provided, it is not clear how the Strategy's effectiveness will be monitored and evaluated. It is also not clear how evaluation of the Strategy will respond to at least one key question on the impact the ENI-PSH aims to have in the Spanish context – i.e., whether the outcomes prevented and/or reduced homelessness?

One of the key drivers of the ENI-PSH was the need to respond to the aggravated social needs of homeless persons and, specifically, to the serious consequences for housing of the financial and economic crisis. Although it clearly identifies a sharp increase in the numbers of people becoming homeless following the loss of housing or the financial inability to sustain their home, the Strategy falls short of addressing the issue of housing affordability or access to housing. The Strategy prioritises housing-led approaches and recognizes the effectiveness of Housing First programmes for homeless people with severe support needs. However, rapid access to housing, which has proven to be one of the elements leading to the

success of Housing First (Busch-Geertsema, 2014), depends on the availability of affordable housing (e.g., social, private rented). It would be important to address the mismatch between the scope of the problem, the ‘wished-for’ solutions and the feasibility of implementation.

A similar mismatch applies to the ENI-PSH’s acknowledgement of the investment needed in research and “extending, improving and systematising information on homelessness” and the actual means of and concrete measures for achieving such a goal. Two indicators are included for measuring this goal: number of places undertaking night counts on homelessness; and number of seminars aimed at improving knowledge on homelessness. Further improvement in this domain will certainly be needed in the implementation stage of the ENI-PSH.

One final consideration should be made in respect of the quantitative targets proposed by the Strategy, which have been presented above. Quantifying targets are an important element of a strategic approach to homelessness. The Jury Recommendations at the Consensus Conference on Homelessness underpin the need for Member States to focus on clear targets when developing homelessness strategies; “[w]ithin the proposed EU strategic framework, the Jury calls on Member States to fix dates by which they will end rough sleeping and long term homelessness”(Vandenbroucke *et al.*, 2010, p.3). The Spanish Strategy’s objective for 2020 is to reduce the total number of homeless people in Spain by only around 20%. The aim to end homelessness as the Strategy’s ‘final horizon’ announced in the document’s very first page will certainly remain a very, very distant goal if targets remain at their current level of ambition.

Conclusion

The first National Comprehensive Homelessness Strategy 2015-2020 adopted by the Spanish Government in November 2015 is an innovative policy reform developed with wide political consensus at the national level. Its implementation may represent a decisive step in the paradigm shift necessary to move from a traditional policy response – largely based on reactive solutions – to structured, long-term solutions for ending homelessness.

The ENI-PSH is a positive response to the EU challenge to Member States to strengthen ‘ambition and action’ in addressing homelessness. Learning from the dynamics and complexities of national developments in implementing holistic approaches to homelessness across the EU may prove useful in preparing future stages of the Spanish strategy. The potential of the Strategy to foster a more

coherent and integrated framework for the development of policies addressing homelessness will also depend on the direction of such multi-level dynamics in the national context.

The opportunity to review the Spanish national homelessness strategy has enabled a comparative look at the development of its Portuguese equivalent and the identification of some disquieting similarities but also of some promising divergences at the initial stages of its development. Examples of similarities include insufficient attention to monitoring and reporting mechanisms, problematic horizontal and vertical coordination within public administration systems, and a reluctance to provide clear funding and resourcing information. On the other hand, the recognition of homelessness as a political issue – which already translates into important legal milestones; the commitment and experience of some regional administrations in developing strategic approaches to homelessness; and the organisational and political capacity of the homelessness third sector in Spain may provide a sound base from which to ensure consistent progress in delivering on the ambition and the promises of this first national comprehensive approach to homelessness.

While the ambition to eradicate homelessness under the leadership of the public sector is clear in the Strategy, more transparency and coherence about how to achieve this goal is crucial for successful delivery of policies. The ENI-PSH is based on seven principles, many of which are aligned with approaches that have been found effective¹² in combating homelessness. However, it will be crucial to ensure that implementation of the Strategy will be able to bridge the gap between the idealistic nature of many of those approaches and the practicalities of implementing such changes over the next four years (e.g., ensuring the right to housing, actively preventing homelessness and housing exclusion risks, enhancing innovation in working methods, developing existing information and data on homelessness, and investing in sustained and continued research).

The opening of a second ‘policy window’ (Baptista, 2009) in another southern European country six years after the first will hopefully be able to overcome the apparent paradox between ambitious strategic policy planning in the social arena and meagre outcomes in bringing about actual change in homelessness policies and the delivery of homelessness services.

¹² FEANTSAs Toolkit for developing an integrated strategy to tackle homelessness available at: http://feantsa.org/spip.php?action=acceder_documento&arg=1534&cle=0de165c774c66302f92e3c3c912b64e8ec85abfa&file=pdf%2Fenfr_2006toolkit_5b1_5d-2.pdf&lang=en

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