
Welfare States and Homelessness¹

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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.

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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 policies³ 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 (<i>iussoli</i>)
Germany	Conservative	Exclusionary
	Rights based on work	Rights based on lineage (<i>iussanguinis</i>)
Sweden	Social democratic	Inclusive
	Rights based on citizenship	Rights based on residence (<i>iusdomicilii</i>)

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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