Harmonising Hostel Standards: Comparing the UK and Poland

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Abstract_ This paper reviews the progress being made towards harmonising and regulating hostel standards in Europe, employing the UK and Poland as illustrative case studies. It argues that a ‘levelling up’ harmonisation of ‘actual’ hostel standards appears to be taking place within the UK and Poland, as evidenced by general reductions in the scale of hostels, increases in the level of support they provide, and some attention being paid to user rights and involvement. There are also established ‘normative’ physical and management standards for hostels in both countries, which are enforced to a greater or lesser extent via legal, administrative and financial mechanisms, albeit that with respect to Poland the emphasis to date has mainly been on self-regulation (a situation that is likely to change in the near future). However, as things stand, it is difficult to envisage a rapid levelling up harmonisation in actual or normative hostel standards between the UK and Poland (or indeed across western and central Europe in general), because of the gap that currently exists with regards to physical conditions in particular. On the other hand, it should be possible to develop transparent EU-wide ‘benchmarks’ to allow for consistent comparison in hostel standards within and between countries. The paper contends that such harmonised benchmarks require to be outcome-focussed, and to be fully informed by the perspective of service users.

Key Words_ hostels, standards, harmonisation, regulation
Introduction

This paper reviews the progress being made towards harmonising and regulating hostel standards in Europe¹, employing the UK and Poland as illustrative case studies. An important part of the backcloth for this paper is the pressure for European-wide harmonisation that may arise from the EU Directive on Services of General Interest (Wolf et al, this volume), but also the recent steps that national governments, and in some cases local authorities and NGOs, have taken to improve and harmonise hostel standards within their countries. The paper starts from the assumption that there is a continuing role for hostels in homelessness provision in Europe (see Busch-Geertsema & Sahlin, this volume, for a discussion of what that role should be), and that so long as they exist, hostels should provide as high a quality service to homeless people as is possible.

There are three types of standards the harmonisation of which this paper seeks to explore:

- ‘benchmarking standards’: these are descriptive standards, which seek to clarify the content and nature of a service, rather than to impose a minimum qualitative content. The purpose of this type of standard is simply to achieve transparency about what is provided, not least to enable systematic comparison in competitive tendering and other forms of public procurement, so that equity is achieved between service providers and value-for-money is gained for the public purse.

- ‘normative standards’: these are standards which are aimed at ‘levelling up’ services, so that at least a required minimum is achieved, with aspirational higher standards also sometimes articulated to be worked towards over time. This type of standard is more clearly concerned with improving the experience and outcomes for service users.

- ‘actual standards’: the standards implemented in practice.

The paper’s focus on hostel standards in the UK (specifically England and Scotland) and in Poland enables a detailed comparison to be conducted of the position in a western and in a central European country, where the approach taken to the regulation of hostel standards (and standards within other aspects of social provision) are very different. This particular comparison also enables a consideration of hostel standards in one context (Poland) where provision is heavily NGO-dominated, as compared with the more mixed economy found in the UK (in England, hostels are mainly run by the larger voluntary sector providers, and lower end ‘shelters’ are usually provided by smaller charities or church groups; in Scotland, there has

¹ ‘Hostels’ are defined as in Busch-Geertsema & Sahlin (this volume).
traditionally been more direct local authority provision, but housing associations and NGOs are now heavily involved).

The paper employs the following structure within which we consider hostel standards in Poland and the UK (Donabedian, 1980; see also Wolf et al, this volume):

- the ‘structure’ of provision: the current attributes of hostel settings (i.e. their ‘actual standards’).
- the ‘process’ of regulation: monitoring and regulation of hostel standards.
- the ‘outcomes’ for residents: level of satisfaction with hostels; and the effectiveness of the reintegration process.

It ends with a consideration of the prospects for harmonisation of hostel standards both within and between countries such as the UK and Poland.

**The Structure of Hostel Provision**

There are a range of hostel attributes which contribute to the ‘structure of provision’, including:

- physical standards;
- social standards – including staffing and support services; and relations between residents; and
- residents’ rights and obligations.

**Physical standards**

A key aspect of the general shift towards improved physical standards in the UK (and elsewhere in Europe, see Busch-Geertsema & Sahlin, this volume) has been an emphasis on re-provisioning traditional large-scale hostels to provide smaller forms of provision with more privacy; these smaller units are also usually more specialist and offer higher levels of support (see section on social standards below).

In the UK, there have been substantial improvements in hostel standards over the past two decades reflecting this re-provisioning trend (Crane & Warnes, 2000; Randall, 2003). A central government ‘Hostels Initiative’ led to the closure of many large, poor quality hostels in the 1980s, and their (partial) replacement with alternative provision by housing associations, while at the same time the Department for Social Security closed or re-provisioned all of its very basic ‘resettlement units’ (Deacon & Vincent, 1995). In the 1990s, a series of ‘Rough Sleepers Initiatives’ enabled further improvements in hostel standards so that, for example, the proportion of beds provided in dormitory-style accommodation reduced significantly (by 2003, around 90 per cent of all hostel
beds in London were provided in single rooms; see Warnes et al, 2004). More recently, there has been a move towards ‘cluster’ arrangements within hostels, to create a more ‘home-like’ environment (Pleace & Quilgars, 2003). Despite these gradual improvements, concerns about hostel standards have persisted (Randall, 2003), and in January 2005 the Government launched the ‘Hostels Capital Improvement Programme’ to further upgrade the interior of hostels across England (Communities and Local Government, 2006). Only single room accommodation will be built under this programme; while other stated priorities with regards to physical conditions and layout include a ‘welcoming reception area’, non-institutional décor, and integrated ‘activity’ spaces allowing for interaction with the local community.

However, running counter to this dominant trend towards smaller, higher quality provision, is the development since the mid-1990s of ‘winter’ and ‘Open House’ ‘shelters’ providing free accommodation to rough sleepers in basic, large-scale settings in a range of locations across England (Pleace, 1998; Crane & Warnes, 2000). These sorts of facilities have been said to offer ‘... a tolerant and non-judgemental environment with minimal barriers to access’ for those homeless people who may find it difficult to deal with more structured regimes (Pleace & Quilgars, 2003, p. 24). They also seem to play a particular role in providing emergency accommodation to migrant workers and others who do not have recourse to public funds (London Housing Foundation, 2005). However, these basic shelters remain controversial as ‘low threshold’ is often taken to justify ‘low quality’ provision (Busch-Geertsema & Sahlin, this volume), and for some they represent the ‘danger of the return of the basic hostel’ (Swain, 2007).

In Poland there is no research evidence on the actual physical standard of hostels (Wygnanska, 2006), but the following general description gives a flavour of the rudimentary standards that often still pertain:

- a typical ‘night shelter’: located in a barrack or unconverted building, with two large rooms, equipped with ten to fifteen bunk beds. These night shelters will also usually have an entry/admission room, and common bathrooms. They are normally staffed by a manager and a helper (who may or may not be trained in First Aid). They are open only at night, but many clients come back on a regular basis.

- a typical ‘shelter’: located in a barrack or former railway or other institutional old building, with five to 15 rooms, providing for between two and five people in each, in bunk and single beds. These shelters typically have common bathrooms, a kitchen, and laundry facilities. They are usually run by a manager and a social worker, supported by volunteers recruited from among the clients.

Both the ‘night shelters’ and the ‘shelters’ have generally been sited on the fringes of towns and cities, often in proximity to industrial rather than residential areas.
However, in cities such as Warsaw, Gdansk, Wroclaw and Poznan there is a proportion of higher quality provision located in new buildings, and in better neighbourhoods, offering single room accommodation. Diversity in hostel standards in large urban areas is encouraged by the traditions of particular service provider networks: there are five major NGOs in Poland, and each of them has a deeply rooted ideology which underpins the way in which they provide their services, including the quality of their hostels. For example, in the 1990s the practice of one of these large NGOs – the MONAR Association – was to colonise abandoned spaces like subways and unused buildings and equip them as low threshold shelters. Lack of resources meant that physical standards were poor in these makeshift, large-scale shelters, and little support was provided to residents. In contrast, homes for expectant mothers and single mothers with infants, run mostly by church organizations, tended to be smaller in scale and to offer better physical standards, with trained support staff on site.

Recently, and consequent upon a growing recognition that homelessness is a complex, multi-dimensional problem, standards of service have gradually improved across the board, and one result has been a tendency to restructure large-scale facilities (like those of MONAR) into smaller and more specialised provision. While the initiative has largely come from the NGO sector (Wygnanska, 2007), local as well as national government have also developed more sophisticated policies to address homelessness. The most important current example is the National Programme for Financial Support for the Construction of Facilities for the Homeless\(^2\). Local authorities and NGOs can apply to this programme for partial funding to construct new hostels and other facilities for homeless people, or to improve the quality of existing facilities. This National Programme is the first government funding stream in Poland dedicated to capital investment which is open to NGOs. NGOs have traditionally had access to only revenue funding from national government, and any capital investment has tended to be sourced from in-kind charitable donations or from European sources. The absence of capital funding from domestic sources has contributed to the low physical quality of much of the hostel provision in Poland.

However, it is important to stress that both in Poland and in the UK poor conditions in hostels are not always solely attributable to a lack of resources. Thus, a diversity of physical standards (as well as differential requirements with regards to standards of behaviour and levels of engagement with social workers) explicitly accompanies the ‘hierarchical structure’ in Pomeranian Standards for Services in hostels in

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Poland (see section below on reintegration). In the UK, Evans (1991) concluded that local authority hostels were often kept deliberately basic to minimise statutory homelessness applications, albeit that this was not formally acknowledged. More recently, a ‘pathways’ approach has been established in some local authority areas in England (such as Camden in London), whereby homeless people are initially accommodated in a short-term ‘assessment’ hostel where conditions are kept basic in order not to create any expectation of permanence. This sort of approach is also a feature of hostel policies elsewhere. In the Czech Republic, for example, it is an explicit policy objective to avoid ‘excessive comfort’ to discourage long-term residence in hostels:

‘The objective of the [physical] setting in hostels is to support the users and motivate them in not remaining dependent on the social service for too long but wanting to leave to a more favourable background of a home.’ (Hradecky, 2007, p. 11)

Social standards

This topic covers two key elements:

- staffing arrangements and support within hostels; and
- relations between residents in hostels.

**Staffing and support.** The staffing and support arrangements within hostels can be even more critical to residents’ quality of life and future prospects than physical standards:

‘Hostel residents say that it’s the way front-line staff work with them that makes the biggest difference.’ (Communities and Local Government, 2006, p. 9).

In the UK, hostel staff are relatively poorly qualified, requiring only a basic vocational (non-university) qualification. In Poland, in contrast, a requirement for shelters to employ a (university-educated) social worker is one of the key attributes which differentiates them from night shelters, and in other countries (e.g. Germany) there is a similar expectation that hostels will employ at least one qualified social worker. However, there is some evidence of greater flexibility in the qualifications and specialised experience expected from hostel staff in some countries. For example, there is the beginnings of a shift away from emphasising social work qualifications to more practical skills in the recruitment of hostel staff in Germany, and in England there has been a move away from insisting on previous experience of the homelessness sector (Communities and Local Government, 2006).

Hostel staff treating residents with dignity is, it is argued, paramount in making hostels ‘humane’ places to be (Ann Rosengard Associates, 2001), but at the same time it is acknowledged that hostel staff face difficult and draining work, meaning that appropriate support and training is crucial (Communities and Local Government,
In Poland, staff attitudes are central to the ‘ethical standards’ specified by all of the current initiatives to ‘self-regulate’ Polish hostels (see section below on ‘self-regulation’). These ethical standards are intended to counter a tendency, revealed by research (Frieske, 2000), for Polish social workers to divide clients into either ‘nobles’ (young people who have only recently become homeless, and who are considered ‘worth’ working with), and ‘hobos’ (usually alcoholics who, according to social workers, have chosen their homeless lifestyle and are not worth working with).

There is evidence in the UK of a growing complexity of needs amongst hostel residents over the past decade or so – particularly in relation to drug, alcohol and mental health problems – and research has highlighted the major challenge this poses for hostel staff (Warnes *et al.*, 2004). The shift towards smaller units noted above is partly a way of increasing staff/resident ratios and offering more supportive and manageable environments within hostels. All hostels in England are now supposed to have a structured ‘key worker’ system, with each hostel resident having a named member of staff who is responsible for their ‘care management’, and for linking them into the specialist addictions, mental health or other support they may need (Communities and Local Government, 2006). A major part of the role of key workers is to facilitate the ‘resettlement’ of hostel residents, as is discussed further below.

In Poland, standards of service in the homelessness field have gradually improved with the growing professionalisation of NGOs, as well as modest increases in the revenue resources available (mostly through European funding). Individual service providers in Poland do not usually employ specialist staff such as psychiatrists and legal advisers. However, in urban areas where there are coordinated networks of service providers such specialist services are organized for all members of the network. In Warsaw, for example, there is a Specialist Heath Clinic for Homeless People employing a range of medical practitioners. In less urbanized areas, ‘homeless centres’ have been created combining many services (e.g. health services, detoxification services, legal advice, long term shelters, youth shelters, job training programmes) within one venue. Moreover, the support that should be offered to individual homeless clients is now specified in legislation (this is discussed further below with respect to residents’ rights and obligations).

*Relations between residents.* Relations between residents are a crucial dimension of hostels that is often given insufficient attention (Neale, 1996). Some people report benefiting from the company in hostels (Deacon & Vincent, 1995), and it is well known that social isolation can be a major barrier to the resettlement of former hostel residents (Jones & Pleace, 2004). However, large-scale hostels in particular can be intimidating places (Pleace & Quilgars, 2003), and research from across the UK has found that people sometimes sleep rough rather than use hostels because they are
frightened of other residents (Fitzpatrick & Jones, 2005). There has been a push towards ‘specialist’ rather than ‘generalist’ hostel provision in the UK in recent years (Swain, 2007), prompted in part by a desire to improve the social environment within hostels, so that people with different sorts of needs do not have to live in close proximity to each other (Ann Rosengard Associates, 2001; Crane & Warnes, 2000). Thus there are now often separate hostels provided for men and women; for families with children and single (childless) people; and for younger and older people (this trend can also be seen in other western European countries, see Busch-Geertsema & Sahlin, this volume). A particularly important ‘divide’ now acknowledged in much hostels commissioning in the UK is between drug users and people with alcohol problems – these two groups are perceived to ‘mix’ badly, as they are often mutually antagonistic, and to be best accommodated separately.

There has been no research on relationships between shelter residents in Poland, but a concern raised by both staff and the clients in discussion on standards for services in Warsaw was the difficulties created by accommodating both recovering and drinking alcoholics in the same hostels, with the former feeling that their efforts to overcome their addiction were undermined by sharing accommodation with the latter. An argument has therefore been made that there should be separate ‘wet’ and ‘dry’ hostels in the city; a development that has already taken place in many cities in the UK.

Residents’ rights and obligations

Hostel providers have a duty to provide a safe and supportive environment for all of their residents, and balancing the maintenance of an acceptable communal living environment with the rights and freedoms of individual occupiers is a particularly difficult challenge.

Highly relevant here is the disempowerment many hostel residents feel in their interactions with hostel staff because of their vulnerability to eviction. In most European countries people living in hostels have few if any legal rights with regards to occupancy of their accommodation. This issue has been the subject of lively debate in the UK, with the argument frequently made that if more rights are given to residents then providers will be more circumspect with regards to who they will accommodate (i.e. they will be less likely to accept those with the most complex needs or challenging behaviour). Nonetheless, in Scotland there are plans to introduce minimum statutory rights for people living in temporary accommodation, including hostels, to protect them against arbitrary eviction, and also against other poor practice, such as unreasonable restrictions on visitors. The relevant draft regulations also set out the legal responsibilities of the occupiers of temporary accommodation, for example, not to

3 The Housing (Scotland) Act 2001 (Section 7)
endanger staff or other occupants or to engage in anti-social behaviour⁴. However, these regulations have not been brought into force as yet.

In England, there are no plans to introduce statutory occupancy rights for hostel residents, but the Government’s (non-statutory) ‘Hostels Review Toolkit’ specifies good practice on evictions (such as no evictions on to the street, and no evictions at night except in an emergency) to which all hostels are expected to adhere (Office of the Deputy Prime Minister (ODPM), 2005). Most hostel residents in England are now given written occupancy agreements or ‘licences’ (Warnes et al, 2004) which should set out these eviction and other key rules within the accommodation. In ‘higher end’ hostels, in the context of a strongly re-integrationist national hostel policy, occupancy agreements also tend to require each resident to work with the service to achieve resettlement (Pleace & Quilgars, 2003). Also relevant to this discussion on residents’ rights and duties is the push within the UK for greater flexibility within hostels so that the most chaotic groups are not excluded from (all) provision (Swain, 2007). Thus there has been a relaxation of the no-drinking rule in many hostels, and a significant growth in ‘wet’ provision for those who are not ready to address their dependency problem through complete abstention from alcohol as some regimes require. There are also other signs of greater tolerance and flexibility with, for example, day-time occupancy now allowed in the overwhelming majority of hostels (Ann Rosengard Associates, 2001; Warnes et al, 2004).

In Poland, there is no statutory protection against eviction. While written ‘contracts’ between shelter residents and social workers are usually constructed within one week of the resident moving in to the hostel, these contracts focus on a ‘plan of activities’ for hostel residents rather than their legal or other rights. The plan of activities should be based on an assessment of individual needs, values, and what outcomes the homeless person wants to achieve. Progress over time is evaluated and, at least in theory, should influence the length of stay in the hostel. Attempts are made to resettle hostel residents through the activities specified in these contracts, but lack of low cost housing with specialist support has been a major barrier to resettlement, at least until recently (this is discussed further below in the section on reintegration). As in the UK, there is a strong emphasis on reintegration of homeless people into the labour market, and many job training facilities have been established in the immediate vicinity of homelessness services.

While Polish NGOs have specified their own contracts with homeless clients for many years, a statutory ‘Individual Programmes for Exiting Homelessness’ (IP) was introduced by the Social Welfare Act of 2004. However, adherence to this programme is not compulsory and there are no statistics on the extent to which it is used. The

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Polish Government is trying to encourage more widespread use of this tool by various means (for example, to apply for resources from the National Homeless People Reintegration Programme\(^5\), service providers have to declare the number of their clients who have signed an IP). Nevertheless, many service providers appear to prefer to continue using their own contracts. There are no specific benefits for hostel residents in signing an IP – apart from health insurance which is also available through unemployment status – nor are there legal consequences for breaking an IP contract.

Another potentially important aspect of homeless people’s rights is the scope given for their participation in the general management and delivery of the services they use. Such ‘user involvement’ is said to be better developed in the UK than in many other European countries (Feigelfeld, 2005), but even here collective forms of involvement are under-developed as compared with other fields of social policy, such as disability (Kennedy & Fitzpatrick, 2001). In a study of hostels across in Scotland, Ann Rosengard Associates (2001) found that regular meetings between staff and residents were a rarity in most hostels, and tended to be restricted to specialist hostels for women or young people, though this may have changed more recently (particularly as a result of regulation under the Supporting People programme, see below). User ‘voice’ seems sometimes to be neglected within hostels because short-stay tenants are assumed to be uninterested in participation (Van Doorn, 2000), but as the Government in England has recently argued:

> ‘Even if the service has a high turnover, such as a direct access hostel, the people using the service have an expert perspective on the effectiveness of the services they receive – they should be consulted regularly to make sure that the service meets their needs’ (Communities and Local Government, 2006, p. 5)

The specific approach taken to user involvement by the MONAR Association in Poland is worthy of note. This NGO has for many years engaged in the practice of ‘therapeutic community’, with all programme participants taking part in meetings which decide on issues such as the process for accepting new clients, the allocation of daily chores, staff selection, and the choice of resident activities. Such therapeutic communities are also found in the UK, but are limited to small, marginal providers, such as Emmaus Communities.

Also important in the Polish context is the ‘self-help’ character of some major service providers. In MONAR, again, the majority of shelter managers are former clients. Aside from social workers (who need a university degree), employees in most Polish homelessness NGOs are ‘recruited’ from shelter residents, with their work (often as

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canteen or maintenance staff) treated as ‘voluntary’ or in lieu of their rent. This emphasis on recruitment of homeless people to work for service providers has been encouraged by both the stress laid on achieving employment outcomes for hostel residents, and funding through the European ‘EQUAL Initiative’ which emphasises client ‘empowerment’. However, obtaining unpaid work from hostel residents could be viewed as an exploitative practice, especially as it may be encouraged by their weak legal position and vulnerability to eviction, and for this reason many would consider it illegitimate to refer to this practice as ‘user involvement’. In the UK, some hostel providers have targets for the percentage of their staff with a history of homelessness – Thames Reach Bondway, for example, have a target of 15 per cent – but this is quite different from the Polish situation, as these ex-homeless people are paid for their work and have normal employment contracts.

The Process of Regulation of Hostel Standards

This section considers how hostel standards are regulated in Poland and the UK. Regulation is defined here as concerned with three elements:

- the *articulation* of a standard (either a normative standard or a benchmark standard);
- *the mechanisms* for ascertaining (non-)achievement of specified standards (i.e. whether a normative standard has been complied with or breached, or how performance/quality compares to a benchmark standard); and
- *the sanctions* attached to breach (normative standards) or relatively poor performance/quality (benchmarking standards).

There are four distinct arenas within which all of these elements of regulation of hostel standards could potentially take place, though they are often closely interrelated, and specific regulatory interventions often straddle more than one arena, as the discussion below will demonstrate:

- the *legal* arena: comprising legal obligations and entitlements (always normative); licensing, inspection, court and tribunal processes; and legal sanctions (both civil and criminal).
- the *administrative* arena: comprising practice standards and guidance (usually normative); inspection regimes (that go beyond ensuring compliance with basic legal requirements), monitoring and complaints procedures; and administrative sanctions (such as a poor grading in public inspection reports, and having functions removed).
• the financial arena: competitive tendering and/or other forms of public procurement within which standards (both normative and benchmarking) are taken into account; financial penalties (e.g. loss of funding, ineligibility to apply for funding) if required standards are not met.

• the self-regulation arena: imposed, for example, by regional networks of service providers on its members, usually via joint drafting of standards by members and then their promotion as a good practice; sanctions here are generally confined to a loss of prestige or standing amongst peer organizations.

Legal regulation

In both the UK and Poland, as well as in the majority of other European countries, there are basic health, safety and building regulations which the law requires hostels to adhere to. In the UK hostels are subject to health and safety standards applicable to all dwellings⁶, and local authority officers have a variety of enforcement mechanisms open to them if any accommodation does not adhere to these standards, including ordering demolition in the most extreme cases. In Poland, all hostel facilities should meet fire safety requirements⁷, enforced by the State Fire Service, and sanitary requirements, regulated by the Chief Sanitary Inspectorate⁸. They are also supposed to meet building construction regulations. However, it seems that all parties are aware that imposing these legal standards would, in many cases, lead to hostel closures as service providers do not have the resources to cover adjustment costs. Therefore, while the legal provisions are in place, they are often not actively enforced by the relevant official bodies. That said, Mazovian⁹ shelters are systematically inspected before each winter season. These sanitary reports address the general physical condition of the buildings (water system, central heating, gas fittings and plumbing); the number of hostel places available; equipment such as beds and blankets; and the provision of common facilities such as kitchens and bathrooms. According to the 2006 inspection report (Uramowska, 2006), five of 46 hostels were not meeting the required standards and these were temporarily closed down until required renovations were carried out. Results of sanitary inspections are binding and breach of statutory sanitary standards can lead to hostel closures.

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⁶ In England there is a new Housing Health and Safety Rating System, with additional standards required in shared accommodation, such as that provided in hostels and Bed & Breakfast hotels (ODPM, 2006). See The Housing Act 2004 (Section 9).


⁹ Mazovia Voivodship is the biggest of 16 Polish ‘regions’, and is where the capital, Warsaw, is located.
In the UK, there are myriad additional legal regulations affecting hostels beyond basic health and safety. Thus, hostels and Bed & Breakfast hotels are subject to mandatory licensing arrangements for Houses in Multiple Occupation (HMOs)\(^{10}\), and conditions relevant to the granting of HMO licenses include both accommodation standards (e.g. space standards, kitchen and sanitary facilities, fire safety, etc.) and tenancy management standards (e.g. the provision of written occupancy agreements, notice of landlord inspections, prevention of anti-social behaviour by occupants, etc.). To operate an HMO without the appropriate license is a criminal offence.

In England, there are specific legal provisions with regards to the temporary accommodation of ‘statutory’ homeless households (usually families with children) who are awaiting re-housing by a local authority. Any temporary accommodation allocated to these households must be ‘suitable’, with detailed statutory guidance (and an appeal to the courts) provided on ‘suitability’ in this context (Department for Communities and Local Government, 2006)\(^{11}\). There have for many years been particular concerns regarding the use of commercial Bed & Breakfast hotels for families with children, and it is now prohibited for local authorities to accommodate statutory homeless families in Bed & Breakfast hotels for more than six weeks\(^{12}\). In Scotland there is similar though not identical legal regime for the regulation of temporary accommodation allocated to statutory homeless households\(^{13}\).

In Poland, a Ministerial order on standards of services for homeless people is expected to be issued next year, which will include legal regulation of hostels. There is controversy amongst Polish homelessness NGOs over the imposition of these legal standards, and two opposing views can be identified:

- a positive view, which holds that legal standards are useful because they allow for evaluation and improvement in hostels and professionalisation of the sector. The NGOs which hold this view have been actively advocating for the introduction of legal standards, but only so long as these standards are consistent with the self-regulation measures already in place.

- a negative view, which posits that the activities of NGOs are so diverse that they cannot be regulated by law, that legal standardization threatens the independence of the voluntary sector, and that there are in any case no resources within the sector with which to implement the process of legal harmonization.

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\(^{10}\) In England and Wales, Housing Act 2004 (Part 2); in Scotland, the Civic Government (Scotland) Act 1982 (Licensing of Houses in Multiple Occupation) Order 2000.

\(^{11}\) Housing Act 1996 (Section 206)

\(^{12}\) Homelessness (Suitability of Accommodation) (England) Order 2003

\(^{13}\) Homeless Persons (Unsuitable Accommodation) (Scotland) Order 2004
A fear that the Ministry will impose ‘hard measures’ on matters such as the number of people per room, size of the hostel, minimum temperature, and formal qualifications of staff, underlies the negative attitude to legal standardization on the part of some Polish NGOs. Such hard measures are difficult for many hostel providers to fulfill due to inadequate resources, thus their imposition may lead to hostel closures. On the other hand, the lack of an appropriate inspection and monitoring regime (see below), means that an existing Ministerial standard on Homes for the Disabled, Chronically Sick and Elderly\textsuperscript{14} in Poland is often violated (Mizejewski, 2007), and the same may well happen with any attempted regulation of homelessness services.

**Administrative regulation**

In the UK there is extensive administrative regulation of hostels. This regulation regime comprises inspection programmes to establish whether minimum ‘normative’ standards are met (including, but extending beyond, basic legal requirements), and the relevant criteria also allow for testing against aspirational standards too.

Thus in England, the Housing Inspectorate arm of the Audit Commission inspects hostels and all other temporary accommodation used by local authorities for statutory homeless households, focusing on its quality, appropriateness, and location. Also, as part of the Housing Corporation’s regulatory function, they inspect hostels run by housing associations (for statutory and non-statutory groups). A poor assessment of hostels and temporary accommodation can affect a local authority’s or housing association’s published grading, which can impact upon their funding opportunities. Persistent concerns about hostel standards in England (Randall, 2003) meant that consideration was recently given to the feasibility of establishing a specialist ‘Hostels Inspectorate’ (ODPM, 2002). However, the Government has instead produced a voluntary ‘Hostels Review Toolkit’ which is intended to ‘… enable local authorities and hostel providers to work together to raise standards.’ (p. 5). The Toolkit specifies both minimum standards that all hostels should reach (e. g. individual rooms with locking doors, and key workers for all residents), and good practice that they should aspire to (e. g. non-institutional appearance of exterior of building, and access to specialist services). The extent to which local authorities have actually used the Hostels Review Toolkit to evaluate and improve hostel standards in their area is unclear, and as no sanctions are attached to breach, use of this Toolkit resembles self-regulation more than administrative regulation.

Communities Scotland, as part of their rolling programme of inspection across all social housing in Scotland, investigates the quality and appropriateness of hostels

\textsuperscript{14} Minister of Labor and Social Policy (2000) *Rozporządzenie w sprawie domów pomocy społecznej*, (Order on Social Welfare Homes), Dz. U. Nr 82, poz. 929
and other temporary accommodation used by local authorities for statutory homeless households. The Care Commission inspects all hostels registered as ‘social work’ facilities in Scotland, measuring them against a set of ‘National Standards for Care’. This is a rather stricter form of regulation than pertains in housing-led inspections, reflecting the assumption that if facilities are registered with social work departments they are catering for particularly vulnerable people and should be more closely regulated. There has been no suggestion of a ‘Hostel Inspectorate’ in Scotland, but the Scottish Executive Homelessness Task Force commissioned a report on the ‘The Future of Hostels for Homeless People’ (Ann Rosengard Associates, 2001), which highlighted that the key ‘hostel standards’ issue in Scotland was Glasgow’s large (250-bed) male hostels, several of which have now been closed.

In Poland hostels may be inspected by the National Audit Chamber (NAC) to the extent that they use public funding from the Polish state (private and European funding is not subject to the NAC’s control). Such inspections take place on an ad hoc basis, usually when the issue of homelessness moves up the political agenda for some reason. Thus inspections took place in the late 1990s during severe winter conditions when some rough sleepers were reported to have died from hypothermia. Inspections focus on issues such as the bed-spaces provided in proportion to the public funding provided, access procedures, and overall standards within the hostel. These inspections often result in an increased interest in homeless provision amongst the general public in Poland and the sanctions are financial – shelters can apply for new funding but are unlikely to get it and their current funding may be withdrawn.

**Financial regulation**

Finally, financial incentives and penalties can be used to regulate standards; very often these complement legal and administrative regulation, so that those who fail to meet specified standards are ineligible for funding streams. In the UK, for example, hostel providers have to comply with the relevant Quality Assessment Framework in order to gain access to Supporting People funds which provide ‘housing-related support’, and a poor inspection report can make it difficult for housing associations to gain access to development funding. Further, in order to gain funding under the Hostels Capital Improvement Programme in England, hostel providers will have to adhere to its quality principles as outlined above. Existing hostels and other projects can be also ‘decommissioned’ by local authorities – the support service passed on to another provider – because of poor performance, or because the service is no longer considered ‘strategically relevant’.

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15 The Regulation of Care (Scotland) Act 2001
Poland provides an example of where financial mechanisms can impact on hostel standards even in the absence of associated legal or administrative regulatory regimes. As noted earlier, in 2006 the National Programme for Financial Support for the Construction of Facilities for the Homeless was established whereby local authorities and NGOs can apply for partial funding for the construction of social housing, supported apartments, night shelters and ‘homes for the homeless’. A Ministerial order provides criteria for evaluating applications, focusing mainly on cost, and on physical attributes, such as overall number of places provided. The ‘social’ criteria (i.e. on staffing arrangements and support) resemble the conditions within current (typical) night shelter and shelters, and so are unlikely to prompt any general improvements in this respect, though they may lead to increased physical quality in those shelters which manage to get through the application process.

**Self-regulation**

In Poland, there is currently a heavy emphasis on self-regulation of hostels and other homelessness services. This reflects the relatively recent recognition of homelessness as a social problem, and the rapid expansion in services from around 1990 (mainly in the NGO sector) to tackle the problem. There are at the moment at least three relevant initiatives by NGO networks to self-regulate hostels and other homelessness services: Standards for Services of Institutional Support for the Homeless of Pomeranian Forum (Meller & Szczypior, 2006); Shelter Standards of Caritas Kielce (Słowik, 2005); and Warsaw Council for the Homeless Draft Standards for Services. All of these initiatives cover similar ground including, for example, the suggested number of places in each facility, the specialization of the staff, ethical codes for staff, and the general aims of the service.

The Pomeranian Standards offer both minimum and optimum standards, and have now gone beyond a purely self-regulatory function, with gminas (the lowest level of local government) in Pomerania allocating public funding only to those homelessness services which adhere to the self-regulation standards. Applicants who do not meet the minimum standards – which are the subject of inspection – are given time to adjust but may also be denied funding. The standards are also included in the Pomeranian Strategy for Social Policy for 2007–2013 and are the subject of the Homelessness

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16 Minister of Construction, (2007), Rozporządzenie w sprawie szczegółowego trybu i terminów składania i rozpatrywania wniosku o udzielenie finansowego wsparcia na tworzenie lokali socjalnych... (Order on the Procedure and Time Limits for Applications for Financial Support for Gminas in Construction of Social Housing... ), Dz. U Nr 52, poz. 346

Agenda Partnership\textsuperscript{18} funded through the EQUAL Initiative. The Standardisation Working Group of the Partnership regularly adjusts the standards according to the experience of its members, and external experts are consulted as well.

Moves towards self-regulation can often be interpreted as an attempt to avoid, or to act as a substitute for, ‘harder’ forms of legal or administrative regulation, as in the example of the ‘Hostels Review Toolkit’ in England. There is also anecdotal evidence that many providers in England now engage in self-regulation as a ‘dry run’ to prepare themselves in advance of Supporting People reviews, for example.

In the case of Poland, the measures specified within self-regulation frameworks tend to be rather ‘soft’ (so, for example, the number of recommended places ranges from 30 to 50). As previously noted, a Ministerial order is expected next year on standards for hostels and other homelessness services, and those NGOs which are advocating for the establishment of legal standards hope that these will be consistent with the existing relatively ‘soft’ self-regulation standards. However, the evaluation criteria used in the national capital funding programme suggests a conflict is possible, as this included ‘hard measures’ rejected by the NGO networks.

The main motivation for the development of mechanisms of self-regulation amongst Polish NGOs was a desire to achieve transparency of provision in order to enhance the fairness and efficiency of public procurement. Amongst those Polish NGOs which now support the establishment of legal standards, it is likewise hoped that such standards will improve the financial position of the best performing NGOs by facilitating a closer match between funding levels and service quality; this has already happened in Pomerania. It is these financial considerations that are driving NGO support for legal standards, rather than an expectation that they will lead to an immediate improvement in standards for service users, though it is hoped that this will also follow in due course.

\textsuperscript{18} Homelessness Agenda Partnership (Partnerstwo Agenda Bezdomnosci www.ab.org.pl) was established in 2005 to work out a ‘standard for active reintegration into the labour market’ for the homeless. The Partnership is managed by the Pomeranian Forum www.pfwb.org.pl/en/index.php
Outcomes for Hostel Residents

There are two key sets of outcomes which one may expect to be related to hostel standards:

- residents’ level of satisfaction with hostels; and
- the effectiveness of the reintegration function of hostels.

Unfortunately, the evidence on both is currently limited.

**Resident satisfaction**

The available evidence on residents’ satisfaction is very limited in the UK and, especially, in Poland and there appears to be no data which links the regulation of hostel standards with residents’ satisfaction. Thus while there is much advice available to service providers on how best to gather the views of hostel residents (Manzi & Smith-Bowers, 1998; Communities and Local Government, 2006), there is very little central collation of the results of such exercises. There are limited examples of research into these issues, such as Ann Rosengard Associates (2001) report on the hostel experience across Scotland, but even in the UK most evidence is very dated (e.g. Garside et al., 1990). This is a clear research gap, though it should be acknowledged that it would be challenging to directly link regulation of hostel standards with residents’ level of satisfaction, as this would require longitudinal or experimental research designs.

**Reintegration on leaving hostels**

Across many countries in Europe, there is now a strongly re-integrationist approach within services for homeless people (Fitzpatrick & Stephens, forthcoming). Thus, at least in theory, hostels are generally intended to act as temporary provision within which ‘resettlement’ or support staff attempt to move homeless people on to mainstream housing (or other suitable long-term accommodation); encourage them to engage in paid work (or other meaningful activity); reconnect them with family, friends, their home area or last settled base, or help them to build up new social networks; address any addiction or other health issues; and generally help them to reintegrate with ‘ordinary’ life. However, the precise approach taken to reintegration varies considerably, and can be a matter of some controversy (see also Busch-Geertsema & Sahlin, this volume). In both the Czech Republic (Hradecky, 2007) and Sweden (Sahlin, 2005), for example, there seems to be a ‘staircase’-type approach taken, with all homeless people expected to spend a period in night shelters and other basic forms of accommodation, and only after a period of ‘active cooperation with social workers’ may they be considered for move-on accommodation (Fitzpatrick & Stephens, forthcoming). This staircase model has come
under heavy criticism in Sweden in particular because of its judgmental and social control dimensions, and also because very few homeless people actually manage to ‘get to the top’ of the staircase and access mainstream housing (Sahlin, 2005).

Within Poland, there is evidence of a such a staircase-type approach in the Pomeranian Standards for Services, as the predominant idea here is that of a hierarchical approach within which clients are supposed to be willing to graduate from one level of the service to another, finally ending up in stable and independent housing. Each level up is more demanding in terms of the expected input from clients (e.g. sustaining stable employment, staying sober, and resolving family conflict.) An explicit staircase model is not deliberately used elsewhere in Poland, although in practice homeless people have tended to graduate from one service to another (for example, from night shelters, to shelters, then to training apartments) as a consequence of a lack of ‘post shelter’ services enabling them to move on to independent living (Wygnanska, 2005, 2006).

For a long time access to mainstream housing and work appeared an unrealistic aspiration for most homeless people in Poland. However, there have been recent improvements, in part as a result of falling unemployment rates which mean that at least some homeless people are able to maintain stable incomes and therefore gain access to mainstream private rented apartments. Moreover, partnerships of municipalities and NGOs are beginning to establish programmes of supported housing for homeless people who were formerly denied access to municipal housing. One such programme, in the Wola District of Warsaw, provides a good model for mainstreaming and implementation in other communities (Starzynski & Wygnanska, 2006; see also book review by Debski, this volume), but resettlement initiatives like this still tend to be ad hoc rather than systemic in Poland. Various Acts of the Polish Parliament have established Social Integration Centres (SIC), Social Integration Clubs and Social Enterprises to facilitate the access of homeless people and other marginalised groups to the labour market. The impact of these innovations on outcomes for homeless people have not yet been systematically researched in Poland (although see Les & Nalecz, forthcoming).

In the UK there is not an explicit ‘staircase’ model, and insofar as ‘pathways’ approaches are advocated (for example, in Camden London Borough Council) it is made very clear that these are not linear models (i.e. stages can be jumped). As noted earlier, the national hostels policy in England is strongly re-integrationist and thus in the Hostels Capital Improvement Programme, the Government is clear that: ‘The purpose of the programme is to help [residents] to move on to sustainable independent living’ (Communities and Local Government, 2006, p. 5), although it is acknowledged by many in the field that ‘move on’ accommodation is now a major problem in England, especially in London (Swain, 2007). Government has
placed a particularly heavy emphasis on encouraging participation in employment, training or other ‘meaningful activity’ amongst hostel residents, and various projects now provide financial incentives for residents to find paid work. This emphasis on labour market participation has been prompted by the very low rates of employment now found amongst hostel residents in England (usually under 10 per cent); this is a big change from the 1970s and 1980s when a substantial proportion of hostel residents were in work, albeit typically in casual employment (Swain, 2007). However, the Hostel Capital Improvement Programme is very new and there is little evidence so far concerning its success or otherwise in making hostels a route to mainstream housing and/or employment.

In Scotland, the major resettlement programme relates to the closure of four large male hostels in Glasgow. This programme is, unusually, accompanied by a longitudinal evaluation of the quality of life outcomes for ex-residents. However, the evaluation has just commenced and the report will not be published until 2010.

Perhaps most significantly, in both England and Scotland individual ‘outcomes’ measures have recently been established for the Supporting People funding programme. These measures require the actual housing, employment, health and other outcomes to be recorded for every client in receipt of these services, including (ex-)hostel residents. These new outcome measures are important innovations which appear to be unusual in the European context.

Thus, at best, information on the actual outcomes of the reintegration function of hostels is patchy and often non-existent. It is not possible, based on current data, to evidence any link between regulation of hostel standards and resettlement outcomes. As already noted, this would be a difficult methodological exercise, though in the UK at least that may change in the future as a result of the innovations in monitoring Supporting People funding just noted.
Conclusions

There appears to be a ‘levelling up’ harmonisation of actual and normative hostel standards taking place within the UK and Poland. Thus actual physical and other standards appear to have improved in recent years in these countries, with reductions in the size of hostels, increases in the level of support they provide, and some attention paid to user rights and involvement. These trends are not universal but are prominent and can be interpreted as (mostly) progressive. There are also established normative physical and management standards for hostels which are enforced to a greater or lesser extent via legal, administrative and financial mechanisms, albeit that in Poland the emphasis to date has mainly been on ‘self-regulation’ (a situation that is likely to change in the near future).

However, as things stand, it is difficult to envisage a rapid ‘levelling up’ harmonisation in actual or normative standards between the UK and Poland (or indeed across western and central Europe in general), because of the gap that currently exists with regard to physical conditions in particular (see Fitzpatrick & Stephens, forthcoming). This gap may narrow over time as central European countries such as Poland apply more resources to social problems including homelessness, possibly under pressure from more knowledgeable citizens who have heard of or experienced better quality provision in western Europe (a point that is especially relevant to a comparison between Poland and the UK, given the recent migration of many workers from the former to the latter). However, for now a likely political reaction to advocacy about poor hostel standards in countries like Poland is that general standards of living are lower than those in the west, and so there can be no special priority for those in hostels. More generally, where the costs of improved standards fall on NGOs, or private actors, the enforcement of such standards is likely to lead to at least some hostel closures (see also Dyb & Loison, this volume). If the result is an unmet need for hostel places, harmonised (improved) hostel standards may well act to the detriment rather than to the advantage of many homeless people. Thus, programmes of substantial hostel improvements will usually require significant government investment, rather than simply the introduction of legal or other sanctions to impose minimum standards on providers.

On the other hand, it should be possible to develop transparent EU-wide ‘benchmark’ standards to allow for consistent comparison in hostel standards within and between countries. Such harmonised benchmark standards require to be outcome-focused, and to be fully informed by the perspective of service users. We emphasise this latter point because in Poland in particular, discussion of hostel standards has hitherto focused excessively on the service provider perspective to the neglect of service users’ views.
We would recommend that, in addition to physical standards, and staffing and support arrangements, there should also be attention paid to the following aspects of how residents experience hostel life:

- staff attitudes – hostel residents should feel that they are treated with respect;
- relations between residents – residents should not feel bullied, intimidated, etc.
- rules and regulations restricting hostel residents – these should be reasonable, and limited to those necessary for tolerable communal living;
- occupancy rights – residents should be protected against arbitrary eviction; and
- user involvement – residents should have a say in both what happens to them individually and more generally in the running of services.

There should also be standards for the reintegration function of hostels, focused on:

- how the resettlement process is experienced by hostel residents (as empowering or controlling);
- the sustainability of mainstream tenancies or other settled accommodation secured for ex-residents; and
- the quality of life of ex-residents in their new accommodation (e.g. engagement in social networks, employment or other meaningful occupation, access to services, etc.).

Finally, research is required to evidence how (if at all) regulation of hostel standards influences satisfaction levels and outcomes for (ex-)residents.
References


