
The Governance of Homelessness in Liberal and Social Democratic Welfare Regimes : National Strategies and Models of Intervention

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› **Abstract_** *This paper describes and compares experiences from two distinct welfare regimes – liberal and social democratic – in devising and implementing strategic plans to reduce homelessness. National strategies to reduce homelessness have been adopted in a number of European countries in recent years and this paper discusses the degree to which convergence or divergence in approaches can be observed. In particular, it makes visible the underlying intervention models that are reflected in the strategies. In doing so we wish to understand how the general context of national housing and other social policies influences homeless policies and how structural conditions and the goals and means set out in national homeless policies interact. A clear emphasis on outcomes such as reducing the use of temporary accommodation, reducing stays in shelters, providing long-term or permanent accommodation and offering individualised services and support are present in all strategies under review. However, divergences are also evident and the paper explores why this is the case.*

› **Key Words_** *Welfare regimes ; governance ; homeless strategies ; intervention models*

Introduction

Since the publication in 1990 of Esping-Andersen's influential work on *The Three Worlds of Welfare Capitalism*, researchers have attempted to verify, modify and clarify the concepts and data utilised to devise his trilogy of social democratic, corporatist and liberal (and subsequently the southern) worlds of welfare capitalism. Despite the accumulation of further comprehensive comparative data, the application of a variety of statistical techniques to explore this data and variations in the underlying concepts, the somewhat tenuous empirical basis on which Esping-Andersen originally devised his classification (Scruggs and Allen, 2006) has proven to be remarkably robust. Whether rooted in comparative analyses of social policy or more broadly classifying the varieties of contemporary capitalism (Schroder, 2008; Hall and Thelen, 2009), utilising measurements of expenditure or service provision (Castles, 2008; Jensen, 2008; Hudson and Kuhner, 2009), applying different analysis techniques (Bambra, 2007) or specific areas of social and public policy (Kemeny, 2001), distinct and robust patterns of public policy and welfare governance can be clearly identified. This is particularly the case with what Esping-Andersen termed the liberal and social democratic worlds of welfare capitalism.

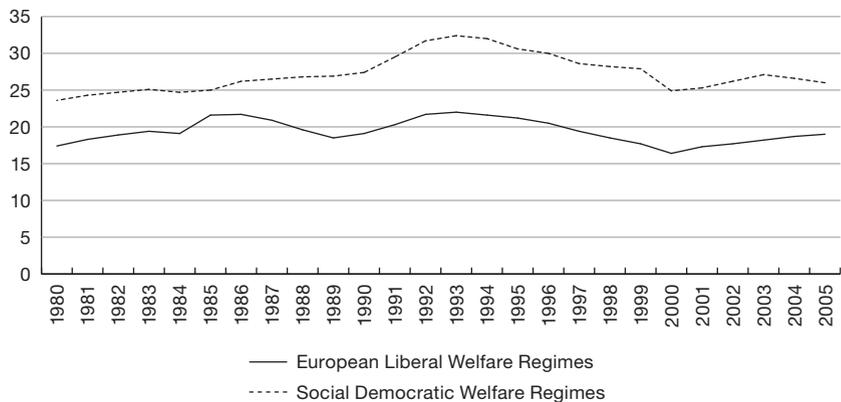
While scholars have debated the existence of a 'southern' world of welfare and the classification of certain countries of 'middle' Europe, virtual unanimity exists in respect of a social democratic or Nordic world of welfare incorporating Denmark, Norway, Sweden and Finland and a liberal world of welfare incorporating the United States, the United Kingdom, Ireland and the Antipodes. Indeed, Castles and Obinger (2008, p.339) have argued that 'families of nations have, if anything, become more distinct with the passage of time, with only the diminishing distinctiveness of continental and Southern European outcome patterns suggestive of a blurring of cluster boundaries already clearly defined in the early pre-war decades.' In many ways, these two welfare regimes represent and articulate diametrically opposed ideologies, what Mannow (2004), tongue in cheek, terms the Good i.e. social democratic, the Bad i.e. liberal and the Ugly i.e. corporatist. It is the 'Good and 'Bad' regimes that are the focus of this paper. Importantly, as Castles and Obinger (2008, p.339) argue:

The direct evidence of territorial or family of nations clustering is simply the fact that groups of nations we know to be linked by language, history, culture and geography are so frequently identified as falling into the same clusters by a technique that is exclusively data-determined, that these clusters persist over time and that they are replicated for policy outcomes and for policy antecedents. That said, the very fact of the strong correspondence between outcomes and

antecedents demonstrated here does vindicate an important aspect of regime theory ; namely that the persistence of policy clusters is, to a significant degree, a function of the persistence of underlying structural characteristics.

Figure 1, using social expenditure data, albeit a relatively crude method of ascertaining welfare effort, clearly demonstrates the considerable and enduring gap between the European liberal and social democratic welfare regimes since 1980.

Figure 1: Total public social expenditure, 1980–2005 (% of GDP)



Source: OECD, Social Expenditure Database (SOCX, www.oecd.org/els/social/expenditure).

Welfare Regimes

In recent years all European nation states with liberal and social democratic welfare regimes have broadly adopted a 'strategic' approach to managing homelessness and have all published a 'homeless strategy'. These strategies generally establish the extent of homelessness and outline a set of strategic objectives that aim to, in many cases, eliminate homelessness. For example, a recent paper examining homeless strategies in Norway, Scotland and Ireland concluded that they demonstrate 'considerable convergence in approaches to tackling homelessness despite continuing divergence in wider housing market structures, notably in the balance of tenure' (Anderson et al., 2008, p.52).

Given the ideologically disparate roots and contemporary manifestations of welfare governance in the nation states that comprise the liberal and social democratic welfare regimes, we are interested in understanding the context, impetus and policy interventions that different regime types have harnessed and deployed in seeking to achieve such objectives and, by expanding the range of countries, exploring the degree of convergence evident. In doing so we draw upon the perspective adopted

by Goodin et al. (1999), who argue that all welfare states have much the same policy goals, but prioritise them differently. For example, they suggest that the liberal welfare-capitalist regime gives priority to economic growth and efficiency, and attempts to design policy interventions that avoid 'welfare dependency', target welfare benefits and minimise state interventions in order to allow the market to allocate goods and services. While social democratic welfare regimes also seek strong economic performance, they claim a high priority for reducing poverty, inequality and unemployment. Universal benefits and services are characteristic of such regimes. This highly simplified account aims to capture the essence of the ideology that guides policy interventions in these regimes. On this basis, we argue, following Goodin et al. (1999), that we can assess our expectations from these regimes in terms of policies for the homeless.

Thus, we know that liberal regimes are particularly keen to minimise welfare dependency and they do this by promoting employment, restricting access to welfare benefits (particularly cash benefits) and facilitating a flexible labour market. By doing so such regimes expect to generate high economic growth rates, the benefits of which are expected to filter down to the general population and raise living standards. On the other hand, social democratic welfare regimes give higher priority to combating social and economic marginalisation and reducing inequality, so it is reasonable to expect that these regimes are considerably more interventionist in resolving homelessness than the liberal regimes. Homeless policies and interventions are therefore framed within a context of both housing policies and social policies.

Housing and the welfare state

Although not entirely self-evident, many analysts of homelessness have argued that one area of public policy intervention crucial to solving homelessness is the provision of adequate and affordable housing and this has led to demands for a right to housing as a means of eliminating homelessness. Interestingly, we only find the beginnings of a rights-based approach in some of the liberal welfare regimes. Kemeny (2001) has argued that the general welfare tone of a nation state is a good predictor of the nature of housing provision, with more miserly welfare regimes tending to have high rates of homeownership in line with a generalised tendency towards the privatisation of services, and more generous welfare regimes tending to have higher rates of rental housing (both public and private) and thus less homeownership. He termed these systems respectively 'dualist' and 'integrated' and Hoekstra (2009) has provided empirical evidence for this thesis, arguing that Denmark and Sweden have integrated rental systems, with Ireland and the UK having decidedly dualist systems.

However, the relationship between the welfare state and the housing sector is complex (Fahey and Norris, 2009). Malpass (2008), challenging the portrayal of housing as the 'wobbly pillar' under the welfare state (Torgersen, 1987), argues that the housing system has its own dynamics, rooted in market mechanisms, and 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' (2008, 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 nations (Finland, Norway and Iceland) to Denmark and Sweden with substantial public and private rental sectors. The housing systems in these five countries have developed along different patterns resulting in a diversity of systems that have no parallels in their welfare state arrangements. Similar diversities are found in the liberal welfare systems addressed in this paper: the UK has an extensive (although shrinking) council housing sector, whereas Ireland remains largely dominated by homeownership.

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 also considerable variation within each regime. For instance, a system of municipal housing queues was widely abolished in Sweden as part of welfare reforms during the 1990s, which had a significant impact on the increased use of second-hand contracts (flats rented by local social services and sublet on special conditions to the clients) in the field of homelessness services (Sahlin, 2005).

Homelessness, poverty and welfare governance

Regimes with high levels of poverty are, on the face of it, more susceptible to higher rates of homelessness. Using data from the European Community Household Panel between 1994 and 1998, Fourage and Layte (2005) found that social democratic welfare regimes were considerably more successful than liberal welfare regimes at preventing both short-term and long-term poverty. On the basis of our knowledge of the characteristics of both social democratic and liberal welfare regimes generally, and specifically in relation to housing and anti-poverty policies, we wish to explore how these regime types have attempted to 'eliminate' homelessness and the degree to which the characteristics of these strategies reflect existing welfare arrangements. Our working assumption is that such strategies – because they in part interact with

broader issues of central–local government relations, welfare governance, housing policy, criminal justice policies, social inclusion policies, drug and alcohol policies, mental health policies etc. – reflect these dominant philosophies.

To assess these expectations, we review the ‘homeless strategies’ that have been published in recent years in the four Nordic countries conventionally viewed as social democratic welfare regimes and in the liberal regimes of the UK and Ireland. In doing so we wish to make visible the ‘strategies’ deployed and the degree to which they match our expectations. The review is largely informed by the various national strategy documents. The national strategies are at different stages of implementation, but for the majority of countries involved there are no evaluations or other forms of assessment at this point. The documents are expected to reflect the overall approach and the modes of governance within national homeless policies, which is the topic of the paper, rather than the effects and outcome of the strategies.

First, a brief comment on the use of the word ‘strategy’ is warranted. For centuries governments have devised strategies to govern vagrancy and homelessness, with punitiveness the dominant motif for these interventions (Beier and Ocobock, 2008). Rose (2000, p.187) has suggested that in understanding the techniques by which desired outcomes are achieved for citizens we see two primary mechanisms at work: ‘those that seek to regulate conduct by enmeshing individuals within circuits of inclusion and those that seek to act upon pathologies through managing a different set of circuits, circuits of exclusion’. An extensive literature now exists on the ‘circuits of exclusion’ that are utilised in many liberal welfare regimes, particularly in North America and the Antipodes, which documents the criminalisation of the homeless through civility laws, zoning ordinances and other techniques for the management of urban spaces (Hermer and Mosher, 2002; Mitchell, 2003; Walsh, 2003; Amster, 2008). It is also increasingly evident that penal populations vary by welfare regime with liberal regimes having a dramatically higher per capita prison population than social democratic regimes (Lacey, 2008). On the other hand, a number of scholars have suggested that strategies that regulate public space are not unequivocally punitive, nor are they uniformly imposed in all liberal regimes, but are a complex mixture of responses to local conditions and contain elements of care as well as control (Fitzpatrick and Jones, 2005; Laurenson and Collins, 2007; Johnsen and Fitzpatrick, 2008; Murphy, 2009). In addition, cross-national research on this issue notes that such strategies are not only applied in liberal welfare regimes but elements can also be found in social democratic and corporatist regimes (Doherty et al., 2008; Meert et al., 2006).

Thus, ‘strategy’ suggests that policies aimed at ‘managing’ the homeless may be formally inclusionary, formally exclusionary or a mixture of both. Homeless strategies in different welfare regimes may mean very different things and may have very

different ideological assumptions about the nature of homelessness and the purpose of the strategy. In other words, the governance of homelessness via homeless strategies may reflect the broader ideological temper of welfare regimes, with some national variation, and therefore may have distinct and different objectives. In summary, in this paper we aim to compare the experiences across two theoretically distinct welfare regimes and discuss the relationship between the goals and means set out in national strategies and the general characteristics of homeless policies and interventions in the different countries.

Approach

We are cognisant of the methodological difficulties in conducting cross-national research. As Quilgars et al. (2009, p.20) have argued, 'researchers need to interpret information across historical, cultural and socio-political contexts, collecting specific information within a framework that is at once flexible enough to facilitate this, as well as robust enough to allow information, there is a risk of collecting intrinsically fascinating but largely un-interpretable information'. To facilitate the generation of the required information and to avoid the difficulties highlighted above, the initial framework was agreed on by the authors at a face-to-face meeting in January 2009 and it was also decided that the initial process would be a reading of strategies that we were unfamiliar with. Thus, Benjaminsen would initially 'read' the strategies for England and Scotland, Dyb the strategies for Wales, Northern Ireland and the Republic of Ireland and O'Sullivan the strategies for Denmark, Finland, Norway and Sweden. The rationale for this approach was both methodological and ethical. Methodologically, it would allow a fresh reading of the strategies and provide insights for a second face-to-face discussion in April 2009. Ethically, the authors had varying degrees of input in the process of developing, contributing to, commenting on, advising on or implementing the strategies in Norway, Denmark and the Republic of Ireland and were conscious of minimising any potential bias.

Extent of homelessness

Although a figure exists indicating the extent of homelessness for each of the countries under review, incompatibilities in data collection and methodology render a comparison both problematic and unhelpful. For example, for the Nordic countries and Ireland, a snapshot or stock figure is available, generally collected through survey research; whereas for the UK, the primary national level data is administrative flow data, which may be subject to extensive gate-keeping (Pawson, 2007). Without the application of adequate care, a superficial reading of the data would suggest a much higher rate of homelessness in the UK, even on a per capita basis,

than in the Nordic countries and Ireland, but this is not necessarily the case. Therefore, this paper outlines definitions of homelessness but does not engage with the issue of the extent of homelessness.

The concept of governance

As mentioned above, this paper aims to investigate homeless strategies and the mode of governance reflected in the strategy documents. In the academic discourse the word 'governance' has come into use as a description of new ways of governing and steering. The concept aims to capture increasingly complex structures of interaction between a variety of (often both public and private) stakeholders. The definition and use of 'governance' is rather ambiguous. It is quite common though to describe governance as an indicator of a decrease in the power of the state and a corresponding increase in the power of civil society (Mayntz, 2003). A core idea of governance is of cooperation and negotiation between public and civil stakeholders mobilised to solve complex problems. In particular, Pierre (2000) emphasises that the emergence of governance should not be taken as proof of the decline of the state, but rather as an indication of the state's ability to adapt to external changes. In this paper 'governance' is used in a broad sense to capture how homelessness is governed in the nine national strategies. The next two sections identify the objectives of the strategies, how they define homelessness, the key actors and partners and the basic ideas to be 'read' from the strategy documents, which are all elements of a governance structure.

Homeless Strategies in Liberal Welfare Regimes

The liberal welfare regimes covered in this paper are England, Ireland, Northern Ireland, Scotland and Wales. All five strategy documents are extremely detailed. This is likely to reflect the relationship between the national and local authorities. Although the guidelines for implementation of the strategies are expressed as expectations and not obligations, there is limited room for the local authorities to make their own local plans, in contrast to the Nordic welfare states where local authorities hold far-reaching autonomy and extensive responsibilities. Table 1 summarises the strategies.

Table 1: Homeless strategies in liberal welfare regimes

	Ireland	Northern Ireland	Wales	England	Scotland
Strategy, title and period	<i>The Way Home: A Strategy to Address Adult Homelessness in Ireland</i> 2008–2013	<i>Decent Housing Strengthens the Community</i> Period not settled in the strategy document	<i>National Homeless Strategy for Wales</i> 2006–2008	<i>Sustainable Communities: Settled Homes; Changing Lives; A Strategy for Tackling Homelessness</i> 2005–2010	Homelessness (Scotland) Act 2003
Objectives	Increased focus on prevention, take action to tackle a wide range of causes of homelessness Eliminate long-term use of temporary accommodation (six months+) Eliminate rough sleeping	Increase the focus on first-time prevention, stop homelessness occurring Provision of high-quality temporary accommodation with assessment of needs and support Sustain tenancies and prevent reoccurrence of homelessness	Priority to prevention Reduce repeated homelessness Eliminate rough sleeping Increase quality of temporary accommodation and reduce time in temporary accommodation Tailor services to meet individual needs	Expanding housing opportunities, including for those who need additional support and for disadvantaged groups Offering a wider range of preventive measures Increasing access to settled homes, halving the numbers living in temporary accommodation by 2010	Ending the priority/non-priority need distinction by 2012 Removing the local connection requirement Providing for households found to be intentionally homeless to be temporarily accommodated with an appropriate programme of support

	Ireland	Northern Ireland	Wales	England	Scotland
Key actors/ partnership	Cross-Department Team on Homelessness Social, health and housing authorities are key players at both national and local levels Partnerships between local public agencies, health services and voluntary sector – emphasis on involving mainstream services	Main national agency: Northern Ireland Housing Executive Others: health and social services and probation services Emphasises both formal and informal partnerships between voluntary sector and statutory agencies Addresses user involvement	Main national agency: Housing Directorate All-Wales housing advice forum comprising the Legal Services Commission, NGOs and local government representatives Relies on both public and voluntary sector on local level	Multiple agencies of central government, local authorities, voluntary sector, local communities	Scottish government, local authorities, voluntary sector

	Ireland	Northern Ireland	Wales	England	Scotland
Definition of homelessness	<p>Legal/statutory definition, Housing Act 1988:</p> <p>A person is officially regarded as homeless if the local housing department judges that they have no accommodation that they can reasonably occupy, or are living in some form of emergency accommodation and are judged to have insufficient resources to secure reasonable accommodation</p>	<p>Legal/statutory definition, The Housing (Northern Ireland) Order 1988 and Homeless Act 2002:</p> <p>A person is homeless if they have no accommodation available for their occupation in the UK or elsewhere. A person is not treated as having accommodation unless it is reasonable for them to occupy it</p>	<p>Legal/statutory definition:</p> <p>A person is homeless if he/she has no accommodation in the UK or elsewhere or has accommodation but cannot reasonably occupy it</p> <p>A wider definition is recommended:</p> <p>Where a person lacks accommodation or where their tenure is not secure</p> <p>A wide definition of rough sleeping is recommended</p>	<p>Legal/statutory definition:</p> <p>People are homeless if they do not have accommodation that they have a legal right to occupy, which is accessible and physically available to them</p> <p>The 'main homelessness duty' of local authorities is owed only to those homeless applicants who are also eligible for assistance, in a priority need group, and not intentionally homeless</p>	<p>Legal/statutory definition:</p> <p>With the Homelessness Act of 2003 priority need was extended to certain groups of young homeless people, vulnerable adults with a personality disorder, individuals discharged from prison, hospitals, and the armed forces and individuals at risk of violence or harassment</p>
Basic idea/philosophy	<p>Housing-led: strengthen the emphasis on prevention and access to permanent housing</p> <p>More responsibility put on local authorities and reducing the role of the voluntary sector (compared with former intervention schemes)</p>	<p>Housing-led: increased emphasis on services – develop a range of new services to meet the diversity of needs</p> <p>Services are aiming at sustaining tenancies and preventing homelessness</p>	<p>Housing-led: strong focus on structural causes of homelessness, e.g. the housing market</p> <p>Develop services, in particular to prevent homelessness and improve access to social housing</p>	<p>Reducing use of temporary accommodation, focus on prevention, individual support, housing supply, interagency work, and partnerships among local authorities and voluntary sector</p>	<p>'Housing first' based interventions: providing targeted services, individualised support, coordination of support, strengthening responsibilities of local government and adopting local homelessness strategies</p>

Ireland

Ireland has a five-year strategy (2008 to 2013) to prevent and reduce homelessness, which was launched in September 2008. It builds on an earlier strategy that was independently reviewed in 2005, which led to the reformulation of objectives (O'Sullivan, 2008). A national implementation plan was launched in April 2009 (Department of the Environment, Heritage and Local Government, 2009). The strategy has three core objectives: eliminating long-term occupation of emergency homeless facilities, eliminating the need to sleep rough and preventing the occurrence of homelessness as far as possible. Additionally, the need to meet long-term housing needs, ensure effective services for homeless people and better co-ordinate funding arrangements is emphasised.

The homeless strategy represents a shift in the focus of Irish homeless policy in at least three ways. First, it adopts a more comprehensive approach than in the past and a key theme going through the document is the responsibility and the need of a wide range of services to participate in reducing homelessness. Second, emphasising prevention and ending long-term homelessness demand a shift in service provision from temporary services to services addressing the causes of people becoming homeless and the need to sustain tenancies. Third, the scope of the homeless policy is geographically extended to become a national issue rather than one primarily for Dublin. The strategy addresses the responsibility of all local authorities to participate and to implement the objectives. A potential consequence of strengthening the responsibilities of the local authorities and turning the interventions from temporary accommodation to permanent housing is a reduction of the traditional roles occupied by NGOs.

Northern Ireland

The homeless strategy of Northern Ireland is called *Decent Housing Strengthens the Community*. The document does not specify the duration of the strategy. A more recent document entitled *A Strategy to Promote the Social Inclusion of Homeless People, and Those at Risk of Becoming Homeless, in Northern Ireland* is far more comprehensive than the first mentioned document. The earlier document states that Northern Ireland has the highest proportion of homeless households in the UK, with a particularly sharp increase experienced between 1999 and 2003.

The main objectives set out in the homeless strategy are to increase the focus on first-time prevention to stop homelessness occurring, to provide high-quality temporary accommodation with assessment of needs and support, and the need to sustain tenancies and prevent reoccurrence of homelessness. The strategy explicitly addresses the necessity of interagency partnerships and protocols to achieve the objectives. As well as state and local authority agencies and private

stakeholders, the strategy emphasises user participation in planning the services. Although prevention of homelessness is one of the main objectives, the strategy document does not address prevention of evictions.

Wales

The Welsh homeless strategy, running from 2006 to 2008, succeeds and builds on the strategy first published in April 2003. It is part of the broader housing programme, '*Better Housing for People in Wales*', and is led by the national housing authorities. The strategy has much in common with the basic ideas of those of Ireland and Northern Ireland. The main focus is on prevention, 'to avoid unplanned moves', ending rough sleeping and reducing the use of temporary accommodation. The government sets four targets to be achieved within 2008 (with baseline 2004/5): prevent homelessness among 50 per cent of households who considered themselves to be at risk of homelessness, reduce the number of homeless households found to be unintentionally homeless and in priority need by 20 per cent, reduce the numbers of households in bed and breakfast accommodation by 50 per cent, and reduce the average length of time spent in temporary accommodation by 20 per cent.

Although visible in the other strategy documents, the Welsh strategy is the one that most explicitly addresses the structural causes of homelessness. The document is specific on access to social housing and the supply of affordable housing. It sets deadlines for when objectives and aims should be achieved. A striking feature is the announcement of statutory amendments to help implement the strategy. The strategy also addresses the need for contributions from a wide range of private actors, and in particular the voluntary sector, alongside public agencies.

England

The five-year plan *Sustainable Communities: Settled Homes; Changing Lives; A Strategy for Tackling Homelessness* from 2005 set a key target of halving the number of households living in temporary accommodation by 2010. The plan followed a previous programme set out in the 2002 report *More than a Roof*. It states that considerable success has been achieved in reducing rough sleeping since the late 1990s by improving support and services and almost abolishing the use of bed and breakfast style accommodation. However, the number of households in temporary accommodation has increased.

A notable characteristic of the English programme is that it addresses both personal social causes of homelessness and structural issues such as a housing supply shortage. It emphasises the provision of individualised social support. Under the Supporting People programme, funding is given to support people who have experienced homelessness – both families and single individuals – and those who are at the risk of it, such as people with drug and alcohol problems. It

also addresses the need to increase housing supply and thereby tackle a shortage of affordable housing by producing 75,000 new social rented homes. The combined focus on targeted floating support, increasing housing supply and reducing the use of temporary accommodation underlines that the English strategy is oriented towards 'housing first'.

The English strategy emphasises the involvement of a large number of stakeholders – government agencies, local authorities and NGOs. All local authorities are required to publish local homelessness strategies based on a local review of homelessness in their districts and the strategies should aim at both prevention and ensuring accommodation and support. The programme also encourages cooperation with the voluntary sector in contributing to local homelessness strategies and service provision. Furthermore, it involves setting local targets and monitoring performance on meeting those targets and on the delivery of services.

Scotland

The final report of the *Homelessness Task Force* (2000) was the main source for the Scottish strategy outlined in a 2002 action plan. A change in the Housing Act in 2001 and the Homelessness Scotland Act in 2003 introduced a new legal framework for Scottish homeless policies (Anderson, 2007). A key aim is to phase out the differential treatment of households according to priority or non-priority needs. This objective should be reached by 2012. Already by 2003 the definition of priority needs was amended to include, for instance, young homeless people and vulnerable adults with a personality disorder. The long time frame for the implementation of the strategy reflected the need for both housing supply issues and a strengthening of services to be addressed before the objectives could be realised. Furthermore, local authorities were required to assess the level of homelessness in their area and to produce local strategies, including a multi-agency response to homelessness. Even though a 'right to housing' is not explicitly mentioned in the Scottish strategy it has been widely interpreted as a 'rights-based' approach (Anderson, 2007), as an effective consequence of its aim to abolish the distinction between priority and non-priority needs will be that local authorities must provide some form of accommodation to homeless households.

A challenge to the implementation of the Scottish strategy has proved to be the insufficient provision of long-term accommodation. There is evidence that the duration of homelessness has actually increased, mainly due to a shortage of long-term accommodation. A general down-scaling of ambitions from a right to permanent accommodation to a right to settled accommodation has been identified in recent policy developments, and a 2008 government report suggested that

the duty of local authorities to provide permanent accommodation under the Housing Act should be replaced with an option to meet their duty by providing only a short-term assured tenancy in the private rented sector.

Homeless Strategies in Social Democratic Welfare Regimes

The four social democratic welfare regimes considered here have all produced homeless strategies in recent years. In common with the liberal welfare strategies they aim to reduce homelessness by various means, however, they are not underpinned by statute as is the case in a number of the liberal welfare regimes. The social democratic strategies are also noticeably shorter than their liberal counterparts and have fewer but more focused targets and objectives. The strategies are summarised in Table 2.

Table 2: Homeless strategies in social democratic welfare regimes

	Norway	Finland	Sweden	Denmark
Strategy, title and period	<i>The Pathway to a Permanent Home – Strategy to Prevent and Combat Homelessness</i> 2005–2007	<i>Programme to Reduce Long-Term Homelessness</i> 2008–2011	<i>Homelessness, Multiple Faces, Multiple Responsibilities – A Strategy to Combat Homelessness and Exclusion from the Housing Market</i> 2007–2009	<i>National Strategy to Prevent and Combat Homelessness</i> 2008–2011

	Norway	Finland	Sweden	Denmark
Objectives	<p>Reducing the number of eviction notices by 50 per cent and the number of evictions by 30 per cent</p> <p>No one shall have to spend time in temporary accommodation upon release from prison or discharge from an institution</p> <p>Improve the quality of overnight shelters and no one shall be offered overnight shelter without a quality agreement</p> <p>No one shall stay more than three months in temporary accommodation</p>	<p>To halve long-term homelessness by 2011 by increasing the number of homes and places in care by around 1,000 to 1,200 and creating a well-functioning body of social, health and rehabilitation services for the worse-off groups</p> <p>To develop more effective measures to prevent homelessness</p>	<p>Everyone has to be guaranteed a roof over their head and be offered further coordinated action based on their individual needs</p> <p>Decrease the number of persons leaving prison, treatment unit, supported accommodation and care houses without any accommodation arranged</p> <p>Facilitate entry into the ordinary housing market for persons in housing ladders, training flats or temporary accommodation</p> <p>The number of evictions has to decrease and no children are to be evicted</p>	<p>No one should need to sleep rough</p> <p>Stays in homeless hostels should be reduced to three to four months for those who are ready to move to own housing eventually with support</p> <p>Young people should not be in homeless hostels but be offered other solutions</p> <p>A housing solution shall be available upon institutional release from prison or hospital</p>
Key actors/ partnership	<p>National co-ordinator: the state Housing Bank in cooperation with other welfare agencies, in particular the social service authorities</p> <p>The municipality is the main player in this strategy, NGOs play a subordinate part</p>	<p>Central government, state agencies and local government</p> <p>A basic principle in housing solutions for the long-term homeless is that the local authorities' Social services and health departments should be responsible for organising housing assistance</p>	<p>Central government: the National Board of Health and Welfare is responsible; local government and NGOs</p>	<p>Central government and local government</p>

	Norway	Finland	Sweden	Denmark
Definition of homelessness	<p>Housing-based, used in the national surveys:</p> <p>People not owning or renting their own place of residence, but who are referred to casual or temporary accommodation, who live temporarily with relatives, friends or acquaintances, or who are held in custody or in an institution and are due to be released or discharged within two months and do not have a place of residence</p>	<p>Defines long-term homelessness as:</p> <p>Long-term homeless people constitute a group of homeless persons whose homelessness is classed as prolonged or chronic, or threatens to be that way because conventional housing solutions fail with this group and there is an inadequate supply of solutions which meet individual needs</p>	<p>General definition used in national homeless surveys is almost identical with Norway's definition</p> <p>Target group for the homeless strategy is wider and includes people who currently have somewhere to stay but whose housing situation is uncertain in various respects</p> <p>Focuses on the complexity of homelessness and housing exclusion</p>	<p>Housing-based, situational definition of homelessness used in national survey of homelessness</p> <p>The definition is based on selected categories of ETHOS definition modified to the national context</p> <p>Main categories: rough sleepers, night shelters, hostel users, transitional, temporary accommodation, staying with friends and family temporarily and without a contract, institutional release from prison or hospital without a housing solution</p>
Basic idea/ philosophy	<p>'Housing first' principle:</p> <p>to phase out hostels and other temporary low-quality accommodation provisions, and offer instead permanent housing with support when needed</p>	<p>'Housing first' principle:</p> <p>solutions to social and health problems cannot be a condition for organising accommodation: on the contrary, accommodation is a requirement which also allows other problems of people who have been homeless to be solved</p>	<p>Housing as the key focus of intervention</p> <p>The strategy aims to reduce the 'staircase of transition' model, but does not abandon it</p>	<p>'Housing first' based interventions:</p> <p>providing targeted, individualised support, coordination of support, strengthening responsibilities of local government and adopting local homelessness strategies</p>

Denmark

The Danish strategy on homelessness sets four targets: that no one should sleep rough, that no young people should stay in shelters, that people should stay no longer than three or four months in a shelter and that upon a person's release from prison or hospital a housing solution should be in place. The strategy selects eight municipalities, which represent half of all people experiencing homelessness in Denmark, for an intensified effort to fulfil national goals. Each municipality involved has to pass a local homelessness strategy and the implementation of the strategy is carried out in bilateral negotiations between the state and the municipality about which interventions to put in place. Responsibility for achieving the goals lies at municipal level and local political commitment is a condition for participating in the strategy for the eight municipalities. The strategy emphasises housing first as a leading principle and aims at reducing time spent in temporary accommodation and developing more support for those in housing. It also seeks to develop more evidence-based knowledge on what interventions actually work and involves a focus on social methods. Outcomes of different types of interventions will be monitored.

The strategy mainly focuses on extending services and interventions within the existing social service legal framework, which defines a range of services such as supported accommodation and individualised support in housing. A system of municipal referral to public housing already exists in Danish housing law but there is no explicit mention of addressing local shortages of public housing in the strategy although there is room for building supported accommodation within the strategy. Thus, the Danish strategy is mainly focused on social services and individualised interventions anchored within a local municipal framework.

Finland

There are two striking characteristics of the Finnish policy on homelessness. First, the need to strengthen the housing supply is identified as the main issue, thus initiating a housing-led policy from the very beginning. Second, various private stakeholders along with public bodies were mobilised to solve the problem; their cooperation is organised in the formal framework of the Y-foundation (Kärkkäinen, 1999).

Finland succeeded in reducing the number of homeless people to a certain level, but long-term homelessness remained a persistent problem. A working group set up by the Finnish Ministry of the Environment to address the issue proposed that long-term homelessness should be halved by 2011 and eliminated entirely by 2015. Another working group was appointed to draw up more detailed proposals. The group submitted their unanimously agreed proposals in January 2008 and the Finnish government approved the programme on 14 February 2008. The agreed programme is structured around the housing first principle: 'Solutions to social and

health problems cannot be a condition for organising accommodation: on the contrary, accommodation is a requirement which also allows other problems of people who have been homeless to be solved. Having somewhere to live makes it possible to strengthen life management skills and is conducive to purposeful activity.' It further argues that 'Long-term homeless people constitute a group of homeless persons whose homelessness is classed as prolonged or chronic, or threatens to be that way because conventional housing solutions fail with this group and there is an inadequate supply of solutions which meet individual needs.' In relation to residential home accommodation, the strategy contends that they do little 'to promote the rehabilitation of the long-term homeless and help them adjust to independent living' and they will be systematically closed down. Furthermore, a basic principle in housing solutions for the long-term homeless is that local authority social services and health departments should be responsible for organising housing assistance. The programme is 'by nature a broad partnership agreement' (Tainio and Fredriksson, 2009).

Norway

Launched in 2004, the Norwegian strategy on homelessness, entitled *The Pathway to a Permanent Home*, built on the experience of an earlier national strategy (*Project Homeless 2001–2004*) and specified a number of targets for the end of 2007 (see Table 2). The strategy document emphasises the need for cooperation between a range of public and private stakeholders. It sees the Norwegian State Housing Bank as the key co-ordinator and the local authorities as the key implementers, although a host of other state agencies and non-governmental bodies also have a role. Edgar (2006, p.4) observes that the strategy 'is presented under the umbrella of a national housing policy whose aim is to ensure an efficiently functioning housing market. This indicates a structural analysis in which the aim is to provide housing for groups who are disadvantaged in the housing market and to provide measures to enable these groups to continue to live in their own homes.' In other words, homelessness is primarily targeted as a housing issue.

An evaluation of the strategy at the end of the period found that its objectives were not fully realised (Dyb et al., 2008). The evaluation report discusses the obstacles connected with implementing the national strategy in a system where local authorities have considerable autonomy. The national government can use funding as an incentive but can exercise little power to impose the strategy. Although the strategy is housing-led, the statutory duty to provide housing for households in need is relatively weak. The municipalities identify lack of housing as the vital obstacle against achieving the objectives. Paradoxically, although the housing authority is the major player at the national level, local responsibility for homelessness rests

with one of the social authorities (Ytrehus et al., 2007; Dyb et al., 2008). No new homeless strategy has been launched, however, the objectives of the 2005–2007 strategy are still in place, following an increased allocation of national funding.

Sweden

On 1 November 2007 the Swedish Ministry of Health and Social Affairs published a report entitled *Homelessness: Multiple Faces, Multiple Responsibilities: A Strategy to Combat Homelessness and Exclusion from the Housing Market*, which provides a framework for the period 2007 to 2009. The objectives specify the direction of the strategy and the means to monitor and develop the actions taken. Previously, responsibility for combating homelessness rested largely with municipal social services. The report says that social services still have a responsibility, but if work to address homelessness is to be successful in the long term, more actors must be involved. The purpose of the strategy is to establish a structure that clarifies the various roles and responsibilities of the multiple actors at national, regional and local levels in work to address homelessness and exclusion from the housing market. Its core objectives are outlined in Table 2. The strategy aims to stimulate the development of housing solutions so that homeless people shall have a tenancy in the ordinary housing market, and to build on experience from successful staircases of transition and methods from housing first. Generally the use of interventions based on the staircase of transition and of secondary contracts is widely used in Sweden, and should be seen in relation to reforms of social housing, as municipal housing queues have been abolished in most Swedish cities and the social responsibilities of housing companies have been reduced (Sahlin, 2005; Löfstrand, 2005). In this way the Swedish strategy suggests increased emphasis on housing first and the need for tenancies in the ordinary housing market, but does not propose an abandonment of the staircase model.

The National Board of Health and Welfare is to deliver a joint report from the government agencies no later than 1 July 2010 on how local development work has helped to achieve the objectives. This report will inform future government priorities. In addition, the government commissioned the National Board of Health and Welfare to outline a mechanism to monitor homelessness accurately, which was presented in March 2009 (Socialstyrelsen, 2009).

Comparing Homeless Strategies

This section considers the validity of Esping-Andersen's notion of distinct welfare regimes, of which the liberal and social democratic are included in this discussion. The paper has outlined the very different housing systems in the countries under discussion, which show distinctive features that do not fully correspond to a particular welfare regime. The review of homeless strategies, mainly on the basis of government documents, shows striking similarities in the governance of homeless policies within each welfare regime, although there are also evidently some differences.

Sahlin (2004) finds that a new way of governing homeless policies is to take control of the discourse, for example by defining and delimiting who is to be considered a homeless person. In the liberal welfare regimes under discussion, a legislative and statutory definition of homelessness is largely adopted; whereas in the social democratic regimes, definitions have evolved through experience and consensus. As a consequence, homelessness is generally defined more broadly as a housing issue in the liberal regimes, which simultaneously define who is *not* entitled to assistance with a housing problem. However, the liberal strategies also move beyond housing issues to address a wider range of problems linked to homelessness and causing homelessness. This may represent a fundamental political shift both in the definition of homelessness (in practice although not in legislation) and in the approach to dealing with homelessness, and indicates a turn towards viewing homelessness as not simply a housing problem but also as a consequence of a wide range of individual and structural deficits.

Sweden, Norway, Denmark and in particular Finland apply definitions of homelessness that derive from positions in the housing market. The first three states have a rather narrow definition compared with that of Finland and also compared with those of the liberal regimes. Despite a 'housing-led' definition, the social democratic regimes have arrived at a perception of homelessness from the perspective of individual vulnerabilities. This may reflect the increasing integration of housing and general welfare policies, the fact that homelessness is to a greater extent concentrated among people with complex social problems and that homeless populations have generally been somewhat smaller in the Nordic countries than in the liberal welfare regimes, comparative methodological difficulties notwithstanding. But it may also reflect more profound features of the welfare states, for example the difference in public social welfare expenditure as illustrated in Figure 1. The higher level of social expenditure in the social democratic regimes is likely to reduce poverty and the number of households with difficulties managing in the housing market. However, it should be mentioned that the level of homelessness in Ireland is lower than it is in Norway (Anderson et al., 2008).

Housing supply issues are only a minor aspect of the social democratic strategies, whereas aims at increasing the housing supply are explicitly mentioned in most of the liberal strategies, most notably in the English and Scottish strategies. With the exception of Finland, which has traditionally taken a housing-oriented approach to homelessness, a characteristic of the strategies in the Nordic countries is a concentration on strengthening social services and interventions for the homeless though also with a focus on developing targeted accommodation and preventing homelessness stemming from evictions.

All Nordic capitals have higher numbers of homeless people than are found in the rural/provincial districts (Benjaminsen and Dyb, 2008) and housing markets are generally tight in the Nordic capitals. Seen in this light it might be a challenge to achieve the goals set in the Nordic strategies without addressing general housing supply issues. The shortage of public housing, together with a focus on individual vulnerability and a rather narrow definition of homelessness, has created specific segments in the housing sector for those defined as homeless. Most notably in Sweden the reform of public housing has played an important role in the growth of the secondary housing market and special contracts for people defined as homeless (Sahlin, 2005). The 1.5 per cent of public housing in Norway earmarked for people in need of help creates a specific and stigmatised segment of the housing market, and a strong emphasis on developing individualised housing solutions has been a characteristic of the formulation of Norwegian homeless policy. In Denmark, which has a relatively large public housing stock, the social responsibilities of the public housing sector have been largely upheld and, unlike Sweden, public housing still plays an important role in the provision of housing for marginal groups as the municipalities make widespread use of their right to refer individuals with social needs to public housing.

Looking at the Nordic social democratic regimes it becomes clear that homelessness policies are determined by both the housing system and welfare policies. This is also evident for the liberal regimes, which perhaps explains why we find homeless policies with strong similarities within very divergent housing systems, not only within the Scandinavian countries, but also across both the social democratic and liberal regimes.

All the homeless strategies address a wide range of stakeholders that should be involved. In particular the liberal welfare states emphasise the participation of cross-department groups of housing authorities, health authorities, probation services and the NGO sector in implementing the strategy. The importance of anchoring services on the local level is emphasised in both the liberal and social democratic regimes. However, the role of NGOs is more significant in the liberal regimes. A common feature of all strategies is the emphasis put on the role of the

municipal authorities. However, local government bodies have a greater degree of autonomy and responsibility in the social democratic regimes, which might mean that they need to use incentives rather than impose statutory duties to implement the strategies. Nevertheless, the documents show striking similarities with regard to the stakeholders that are called upon to interact and form partnerships to achieve the strategic targets.

A crucial challenge to the implementation of each of the strategies is the actual transformation of goals set at the national level into practical activities and interventions at the local level. Most of the countries put emphasis on the development of local homeless strategies, for instance on a municipal level. However, the implementation of national policies on the local level also presents some important challenges. The responsibility of homelessness on the local level is mainly anchored in social authorities that have only a very limited (or no) influence on housing supply policies.

Conclusion

Despite the differences in the focus of their strategies, there are considerable common elements across the two welfare state regimes. In all the countries considered the impact of the housing first approach is clear, a finding in line with Atherton and McNaughton Nicholls (2008), albeit that the term 'housing first' is utilised in a fairly elastic manner. This demonstrates the impact of the spread of theory and knowledge among the different countries and the influence of international networks, exchanges of ideas etc. However, individual governments interpret 'housing first' in differing ways (see Dobbin et al., 2007, for a review of public policy diffusion). In the case of the homeless strategies, it would appear that the 'learning thesis' is most appropriate. A clear emphasis on outcomes such as reducing the use of temporary accommodation, reducing stays in shelters, providing long-term or permanent accommodation and providing individualised services and support are evident in all strategies under review. The case of Sweden is somewhat exceptional in this matter, as is Sweden's use of the staircase model and the secondary housing market. Despite these structural conditions, the Swedish strategy nonetheless refers to the housing first principle in an attempt to improve entry into the ordinary housing market. In most of the strategies there is also a clear focus on prevention, especially the English, Norwegian and Swedish strategies, mainly in their emphasis on reducing the number of evictions.

The analysis of the homeless strategies across the different welfare regimes reveals elements of both divergence and convergence. 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.

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