
Counting All Homelessness in Europe: The Case for Ending Separate Enumeration of 'Hidden Homelessness'

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➤ **Abstract_** *This paper explores the challenges around the measurement of all homelessness in Europe. The paper begins by reviewing challenges in relation to definition and measurement and moves on to consider the political and ethical dimensions of measuring homelessness that occurs within housing. The paper concludes by proposing new definitions, including dropping the term 'hidden homelessness', and advocates properly resourced and directed social research. It is argued that physical-legal definitions have proven unsatisfactory in the face of evidence about the importance of the psychological and emotional dynamics around the meaning of home, and that there are ethical questions around imposing categorisations of homelessness on populations who might not see themselves or their situation in such terms. However, while it is argued that there is a need to acknowledge these challenges, there is also an imperative to create a concise, practical and measurable European definition of homelessness.*

➤ **Keywords_** *homelessness enumeration, hidden homelessness*

Introduction: Challenges in Definition and Measurement

To define someone as homeless requires a working definition of what constitutes a home. The practical challenges for defining and measuring all homelessness, which is not a precise concept, as this paper will go on to explore, have always been twofold. The first problem centres on agreeing the definitional lines around where homelessness starts and stops. The second problem centres on the considerable logistical challenges in physically counting, or even accurately estimating, the nature and extent of much of the homeless population. This second problem exists as soon as it is accepted that homelessness can exist *within* housing, whether the definition of 'homelessness' being used is either relatively broad, or relatively narrow.

Definition

In Europe, people who are living rough (street homeless), in encampments or in emergency accommodation or other designated homelessness services that offer temporary accommodation, are usually defined as homeless (Busch-Geertsema *et al.*, 2014). Several countries draw distinctions within this group, for example, the UK and Ireland differentiate between living rough and living in homelessness services (MHCLG, 2019; DRHE, 2019). Finland draws a distinction between those living rough and in basic emergency shelters and other elements within the homeless population, including people having to share overcrowded homes with others because they have nowhere else to go (ARA, 2020). Outside Europe, the USA counts 'unsheltered' and 'sheltered' homeless populations (HUD, 2019).

From a public policy perspective, someone who is living rough, in an emergency shelter, or in temporary accommodation for homeless people, can be easily defined as 'homeless'. This is because they have no living space of their own, let alone something that is fit for habitation, physically safe, private and for which their right to residence is protected by law. Within this definition, as several countries do, it is possible to subdivide between those regarded as experiencing the extremes of homelessness, i.e. living rough and those in shelters or temporary accommodation. Definition is simple, because the people being categorised are in living in external and internal spaces that are widely recognised as homeless *places*.

The idea that someone could be in housing, but also homeless, is not a new one. A 1977 UK law said someone was 'homeless' if they had no accommodation that they could reasonably be expected to occupy¹. If housing was unsafe (including risk of domestic violence), physically unfit for habitation (including severe overcrowding), or insecure, because it was going to be lost within 28 days, someone was legally *defined* as being homeless (Lowe, 1997). Definition as homeless did not, in itself, make someone eligible for assistance from the State, which remains the

¹ <http://www.legislation.gov.uk/ukpga/1977/48/section/1/enacted>

case across most of the UK, with the important exception of Scotland (Anderson, 2019). Nevertheless, UK public policy has been working on the basis that homelessness can exist *within housing* for over forty years. The French legal definition, introduced in 2008, has similarities, again including roofless people but also tenants facing eviction with no prospect of rehousing; people in temporary accommodation and people placed in housing considered to be substandard or unfit. As in the UK, households in unfit housing that contain one or more dependent children or someone with a limiting illness are prioritised. In 2012, this was extended to anyone, again in existing housing, who had been waiting on the social housing list for an abnormally long time (Loison, 2007). The Danish and the Finnish statistics, while not rooted in a legal definition of homelessness, also encompass a similar definition of households in extremes of insecurity or overcrowding as being 'homeless', again including people staying with family or friends who have a roof over their head (Busch-Geertsema *et al.*, 2014; ARA, 2019); this is also the case in Norway and Sweden (Dyb, 2017).

Yet while the idea of being housed and yet still homeless is relatively widespread in Northern Europe, definitions used elsewhere tend to focus on rough sleeping and/or people living in emergency accommodation for homeless people. This is the case in several Eastern European, e.g. Hungary, Poland, and Southern European countries, e.g. Italy and Spain, where literal homelessness (living on the street or in an unregulated shelter, like a homeless encampment) or in accommodation designed to offer shelter to people who would otherwise be homeless, constitutes the official and statistical definition of 'homelessness' (Baptista *et al.*, 2012; Busch-Geertsema *et al.*, 2014; Fondation Abbé Pierre and FEANTSA, 2020).

The European Typology of Homelessness (ETHOS) (Edgar and Meert, 2005) identifies multiple situations in which both housed, and otherwise accommodated people should be defined as 'homeless' and has shaped debate at EU level and beyond (Amore *et al.*, 2011). ETHOS uses three 'domains', adequate accommodation over which someone can exercise exclusive possession (spatial domain), in which there is control over access, privacy and space for social relationships (social domain) and which they have a legal right to occupy (legal domain) (Busch-Geertsema, 2010; Busch-Geertsema *et al.*, 2014; Busch Geertsema *et al.*, 2016).

ETHOS is centred around a set of physical-legal variables being wholly absent, partially present or wholly present, to create a continuum of measurement ranging between homeless and home (Edgar *et al.*, 2007; Busch-Geertsema, 2010). The approach tries to control for social effects, including living situations that do not offer private space for social relationships, as one of the components of homelessness and housing exclusion.

These three domains of the physical, social and legal are used as a conceptual framework. ETHOS includes seven broad types of homelessness². Someone is homeless if they are excluded from all three domains, or from the legal and social domains, i.e. no legal title to occupation and no private space. However, exclusion from the physical and social domains is not defined as homelessness, rather as being housing exclusion. The logic here is that legal rights to occupy housing forms the line between being homeless and being (very) poorly housed. To use one example, someone at risk of domestic violence and abuse, but with legal rights to occupy their current housing (who would, for example, be defined as homeless under UK law), is *not* classified as homeless by ETHOS. It seems strange that someone who is physically unsafe in their own home is not classified as 'homeless' by ETHOS (Bretherton, 2017 and 2020).

There are also some inconsistencies in the detail of ETHOS. People living temporarily with friends or family are classified as in a state of 'housing' exclusion, but they are excluded from both the legal and social domains, which is interpreted elsewhere as a state of homelessness. Equally, someone living in a temporary or non-conventional structure, which could be on illegally occupied land, is also defined as experiencing housing exclusion (Amore *et al.*, 2011; Sahlin, 2012). ETHOS also classifies groups of people who are about to be discharged from institutions, such a prison and long stay hospitals, as 'homeless', without qualifying this by limiting it to people without a home to go to when they leave. Immigrants in reception or short-term accommodation due to their status are also classified as homeless (see Hermans *et al*, in this issue), which is not a definition any European government would accept.

ETHOS Light, a simplified version of the typology which was designed to support measurement of homelessness at European level, reclassifies people living temporarily with family or friends as 'homeless' (Busch Geertsema, 2010). Neither ETHOS, nor ETHOS Light define unfit housing, i.e. much too small, in very poor repair, or physically unsafe as constituting a state of homelessness.

ETHOS has been important in advancing debates about the nature and breadth of experience of homelessness, shifting perceptions that it is just about rough sleeping. Canada and New Zealand made reference to ETHOS in development of homelessness statistics. However, the definition has incompatibility with some elements of mainstream understanding of homelessness. Denmark and Finland, the UK and other countries also regard people staying with friends or family because they have nowhere else to go, or young people 'sofa surfing' as homeless

² <https://www.feantsa.org/en/toolkit/2005/04/01/ethos-typology-on-homelessness-and-housing-exclusion>

(Busch-Geertsema *et al.*, 2014). At present, definitional ambiguities around who is homeless and who is experiencing housing exclusion or acute housing need have yet to be resolved at European level.

Another challenge centres on ideas about minimum physical standards and what constitutes overcrowding reflects the differing cultural and socioeconomic norms in different European countries. A shorthand for this is intergenerational living in Europe. Several generations of the same family are, broadly speaking, more likely to live together under the same roof in some parts of Europe and less likely to do so in others. Different countries have different minimum standards in relation to space, overcrowding, number and use of rooms, utilities or thermal efficiency. Homelessness is sometimes defined in terms of housing being physically unfit for habitation and overcrowding, ideas about what constitutes 'unacceptable' housing, that it is not reasonable for someone to occupy, are not consistent across Europe.

Measurement

Definition is not always followed by enumeration. French (Join-Lambert, 2009) and Spanish (Sales, 2015) national surveys do not encompass rural areas and smaller towns, which means that at least some of the homeless populations are not recorded. In France and the UK, there are differences between what is defined as homelessness legally and recorded in administrative systems and data collection on homelessness as a whole. France counts people living rough, in emergency shelters and in temporary accommodation, albeit in a survey that does not cover smaller towns and rural areas, the UK has administrative data on people seeking assistance under homelessness laws, which vary by the four devolved national jurisdictions and England counts people living rough, but does not collect data on people in emergency and temporary accommodation who are homeless, but not able to gain assistance under the law.

A lot of homelessness is difficult to count. Lohmann (2021) reports some success in surveying householders in Germany about whether or not they had accommodated people who had nowhere else to go or stay. However, broad challenges exist in finding homeless people who are not relatively easily detected by surveys that are targeted on emergency and temporary accommodation intended for homeless populations. Homeless people can be found and counted in three ways: via contact with social protection/social housing systems recording details of applicants' living situations; when homelessness is found by either dedicated surveys or within sample surveys of the whole population and, depending on how data are collected, when a country undertakes a census.

When visibility and enumeration depend on contact with social protection and social housing systems, those who do not contact these systems are not counted. Administrative systems also tend to associate people with their home addresses, because many public services operate on a decentralised basis, covering specific geographical areas, with housing, health, education and welfare often being administered with systems that expect local connection to be demonstrated via an address (Baptista *et al.*, 2015). These systems are not designed to find or connect with someone with no fixed, indeed no legal, address.

Population sample surveys are hampered by the relative *rarity* of homelessness. This does not mean that the problem does not impact on a significant number of people, rather it is the case that when, typically, a few thousand households are being sampled out of millions, the chances that they will land on housing containing people experiencing homelessness within housing, e.g. staying with friends or relatives because they have nowhere else to go, are small (ONS, 2014).

Concealed or 'doubled up' households, such as two families living in housing designed for one, need to be in that situation at the point data are collected. Equally, people whose homelessness is inherently mobile, moving between the floor, sofa or spare room of one family member, friend or acquaintance after another, will again need to be in that situation to be found, and recorded, by a census or a sample survey. Even if they are present, the survey or census needs to be designed to collect data on them and also is reliant on households containing homeless people choosing to respond.

There is some evidence that people living rough hide for safety reasons, that the population will change from night to night, as people come and go and as people who found shelter one night, cannot do so on the next night. Here the methodological challenges might feel quite different, but the problem is essentially the same, the population being enumerated is mobile, fluid in composition and difficult to find. Danish practice has been to combine administrative data from services with a survey, using a mixed method approach, but elsewhere, the use of street counts remains widespread (Baptista *et al.*, 2012).

Political and Ethical Dimensions

Measurement of homelessness does not just present challenges in definition and enumeration. The act of collecting data on the extent of homelessness is a political one, because a government acknowledges homelessness as a social problem and, by extension, takes on some responsibility for that social problem by generating statistics about it. Lobbying a state to do more about homelessness, or to acknowledge the problem to begin with, also often involves generating numbers. Although

voluntary sector, faith-based and charitable groups focused on reducing homelessness are unlikely to ever find the resources for a representative sample survey and have to rely on administrative data and/or estimates.

Wider definitions of homelessness, which include all homelessness, also influence debates about the nature and extent of the social problem. Broadly speaking, wider definitions find greater evidence of directly economic causation, i.e. homelessness generated by inequality, and, depending on the context, can indicate that the homeless population with high and complex needs, including addiction, severe mental illness and repeated contacts with criminal justice systems, represents only a *minority* among homeless people (Culhane, 2018). This represents a potential challenge to mainstream narratives about homelessness on the political right, because rather than the story of homelessness being individual, i.e. associated with mental illness, addiction or criminal behaviour, potential associations with housing and labour market failures, alongside deficits in social protection and public health systems can become much more apparent.

The ethical dimensions centre around the ways in which 'home' is defined and how homelessness, alongside housing exclusion more generally, is categorised in relation to that definition. The key issue here is that having a home is not just seen in physical-legal terms, but is bundled together with a lot of expectations about how someone should live and behave in society. In essence, the definition of 'home' being used to classify someone as homeless may out of sync with who that person is, what they may want and how they define the idea of home.

Political dimensions

The first aspect of the political dimensions of homelessness centres on what broader definitions do to the numbers. In England, around 5 000 people sleep rough at any one point, almost certainly an undercount, as street counts miss people who hide, squat, are not bedded down or not within the areas being covered (MHCLG, 2019). To put that in context, England's population is around 56 million (UK population is around 66 million), i.e. around 0.0008% of the people living in England are living rough at any point, according to these statistics³. Using a broader definition, including homeless households in temporary accommodation and people in emergency shelters and homelessness services, scales that up to an estimated 280 000 people in England, i.e. around one person in 200 is homeless at any point (Shelter, 2019). That figure excludes anyone staying with family members, friends or acquaintances or living in squats, or other insecure accommodation. Data are

³ In 2020, it became apparent that this was an undercount, when the 'everyone in' scheme placed all rough sleepers in England in hotels and temporary accommodation in response to the outbreak of COVID 19 in the Spring, the number was closer on 15 000 (i.e. 0.027% of population).

simply lacking here, which means generating even a broadly representative estimate is not possible. However, the limited information that there is suggests that accurate data on people in these situations might add tens of thousands of people to the homeless total for England (Fitzpatrick *et al.*, 2019). The broader the definition, the bigger the social problem, counting all homelessness produces jumps in numbers that are in orders of magnitude, from next to nothing to the equivalent of the population of a city.

Finland shows this effect from another angle. From an external perspective, while Finland's efforts to pursue a functional, then actual, state of 'homelessness zero' continue apace, this is a country with almost no homelessness: 4 600 lone adults and 264 homeless families and couples, in a country of 5.5 million people as at the 2019 national count (ARA, 2020). Looking at those figures more closely shows something else, 68% of the 4 600 lone homeless adults were living 'temporarily with friends or relatives' (ARA, 2020). As noted, Finland's use of a definition includes some elements of homelessness among housed people, which if it were not being counted as homelessness, would reduce numbers to residual levels. However, Finland's national statistics are a mix of local authority administrative data and estimates, so that while they provide at least some sense of scale, the Finnish counts do not provide a roadmap for wider, comparative analysis of all homelessness in Europe.

Again, in several European countries, as in the USA, homelessness is largely defined and counted on the basis that it only encompasses people living rough and/or in emergency shelter (Busch-Geertsema *et al.*, 2014; HUD, 2019). A lot of medical research also uses only a living rough/emergency shelter definition (Van Straaten *et al.*, 2015; Fransham and Dorling, 2018; Lewer *et al.*, 2019; Perera and Agboola, 2019). These counts and analyses are not necessarily constructed in opposition to a wider definition of homelessness. Rather it is a reflection of popular narratives about homelessness as only meaning people living on the streets, who are there because of 'sin' (addiction) and 'sickness' (severe mental illness); popular images of homelessness influence how it is defined and measured and those images do not necessarily reflect realities like the presence of family homelessness (Gowan, 2010; Buck *et al.*, 2004; Hodgetts *et al.*, 2006).

A broad definition of homelessness challenges mainstream narratives about the nature of society, disrupting 'capitalist realist' imagery (Fisher, 2009; Krugman, 2020). Wider definitions of homelessness tend to incorporate populations who tend *not* to have high and complex needs, such as severe mental illness, nor to exhibit behaviours that include criminality and addiction, and whose main characteristic is poverty (Burt, 2001; Bramley and Fitzpatrick, 2018). If homelessness is not just

about individual pathology (Fopp, 2009), but may sometimes have purely structural causes (Marcuse, 1988), that raises some very uncomfortable questions about the nature of society.

For example, if homelessness narratives are focused on the 5000 people living rough in England, whose situations can be explained using stories of individual action and inaction (sin) and complex needs (sickness) that have ‘disconnected’ them from society, homelessness can be presented as a tiny, indeed residual, social problem (Anderson, 1993; Gowan, 2010). The narrative around homelessness in England becomes very different if there is the equivalent of an entire city, including tens of thousands of children, experiencing homelessness, some of whom have high and complex needs, but *most* of whom are simply poor (Shelter, 2019). When homelessness often does not come from addiction or mental illness, but from a mix of insufficient income and bad luck (O’Flaherty, 2010), maintaining narratives that it is all about ‘sin’ and ‘sickness’ becomes difficult.

If homelessness includes working people experiencing extremes effects of after housing cost poverty and includes families, usually headed by women, where homelessness was triggered by domestic violence and poverty (Fitzpatrick and Pleace, 2012; Baptista *et al.*, 2017), more and more of the homeless population has no experience of mental illness, addiction or crime. Once the definition shifts beyond people living rough and/or in emergency accommodation, women also appear in greater numbers. Counting homelessness that is not confined to the streets and shelters raises serious questions about the longstanding assumption that lone women are very much less likely to be homeless than men (Pleace, 2016; Bretherton, 2017).

Marquardt (2016) uses the example of Germany to explore these tensions around the collection and coverage of homelessness statistics. While policy has since shifted, she argues that the German State resisted enumeration because it did not want to clearly visualise homelessness and then be compelled to do something about it. Taking this line, homelessness statistics in general, and the recognition of wider homelessness within those statistics can become a policy ‘weapon’. To return to the earlier example, if homelessness is defined as including relatively large numbers of highly economically marginalised people, staying with friends and relatives because they have nowhere else to go, who lack the ‘expected’ characteristics, i.e. they are not lone men, do not have high prevalence of addiction, mental or physical illness, but are instead characterised primarily by poverty, homelessness starts to look and feel *very* different. Collecting statistics on this population changes, as Marquardt argues, how we visualise homelessness, i.e. homelessness starts to look like some causation is down to macro-economic effects, not individual ‘sin’ (addiction) or ‘sickness’ (mental illness) (Gowan, 2010). Redefining and

then counting populations whose position in homelessness cannot be 'explained' in terms of high individual prevalence of crime, addiction and severe mental illness, brings both benefits to those populations and additional costs to the State.

There is also an incentive, from this perspective, for governments and other interested parties to pronounce certain elements within the homeless population, such as large groups experiencing homelessness for largely socioeconomic reasons, as 'difficult' or 'impossible' to count (Marquardt, 2016). Mostowska (2020) makes comparable points about homelessness statistics sometimes having a clear political function, arguing that Polish data collection is focused on homeless populations that fit within a 'sin/sickness', or individual pathology, narrative, in marked contrast to Scandinavian data collection using much broader definitions, including forms of homelessness experienced within housing. Mostowska shows how homelessness statistics in Poland and Scandinavia reflect and reinforce the images of homelessness on which policy is based; in Poland, data are collected that only really allow for an image/definition of homelessness as an issue of individual pathology.

Ethical dimensions

Marquardt (2016a) argues that the assumptive baggage attached to mainstream images of 'home' means that homeless people have tended to be classified as 'insufficient dwellers'. This creates homeless service frameworks that problematise poverty, exclusion and vulnerability in therapeutic (individual), rather than structural, terms. Housing First was designed to change the dynamic within some American homelessness services, replacing systems that tried to modify someone's behaviour so they fitted into a strictly defined image of a 'housing ready' individual. However, it has also been pointed out that the goal of the original form of Housing First could be seen as same as the American linear residential treatment services that it sought to replace, a 'normal' life in a 'normal' home in a 'normal' community (Willse, 2010; Hansen Ljöfstrand and Juhila, 2012). The narratives for very different types of homelessness service are consistent, in the sense of always being about how a homeless individual "needs to change" and the best ways to facilitate that change.

There is a clear distinction between, for example, the minimum physical and legal standards set out in the OHCHR and UN Habitat *Right to Adequate Housing* (OHCHR and UN Habitat, 2009) and the emotional, cultural and personal idea of 'home'. Veness (1993, p.319) notes:

... definitions of home are comprised of an assortment of environmental and emotional components, which of the specific components of home are deemed essential depends on prevailing cultural ideals, social relations and individual needs.

Not only is an idea of 'home' something that is personal, it is also the case that something with the required physical-legal elements of 'home' might also be a surveillant, oppressive and physically dangerous place (Veness, 1993). 'Home' has clear physical-legal components in European countries, but a ton of cultural and ideological assumptions about what is meant by 'home', which are not necessarily spelled out, also tend come along for the ride (Marquardt, 2016a).

It has been argued that homelessness research has eaten itself, becoming cut off from wider academic debates on the power dynamics of social research and on responsible innovation in social research (Lancione, 2016). There is evidence of a broad tendency to define homelessness as someone being outside a narrowly defined range of accommodation with certain physical-legal characteristics, which include safety and privacy, but without further consideration of the human dimensions of what constitutes a 'home'. There is no direct allowance for the psychological and emotional dimensions of homelessness, nor the precarity of an experience that can take the form of near-constant *mobility*, that is reported in research (Reeve, 2011; Mayock and Sheridan, 2012). In essence, definitions of homelessness have been created without reference to people with lived experience.

Homelessness research has explored the idea that home is about identity and that homelessness is social, symbolic and cultural, as well as being a physical-legal, state (Moore, 2007). Work on the gender dynamics of homelessness, particularly women's experience, is important here (Austerberry *et al.*, 1984). Qualitative research on the lived experience of homeless women has provided insights that should be helping reshape debates about what is meant by homelessness (Bennett, 2011; Bretherton, 2017; Bretherton, 2020). McCarthy (2017, p.961) notes:

... the 'home to homelessness continuum' still proves inadequate as a means of conceptualising complexity. A linear continuum does not suffice when women hold a multitude of shifting meanings of both home and homelessness.

'Home' suggests a safe, secure environment, protected from environmental and human risks, where one is dry, safe, warm and not at risk of attack. Work on the gender dynamics of homelessness draws attention to the disconnect that can and does exist between this imagery and lived experience, as housing can be the site of exploitation, abuse, repression and violence, an *unsafe* environment.

Security in a legal sense is often qualified too, protections vary for people who are renting from a private or social landlord and are much stronger in some European countries than others, but there is no absolute safety from eviction (Kenna *et al.*, 2016). Even outright ownership of housing, which brings the highest security, ultimately does not make housing unassailable, for example if an owned family home is in the way of some serious infrastructure, like a major road or a runway.

There is also the literature exploring homemaking among people who are usually defined as homeless. A key argument here centres on the idea of dwelling as difference, on homeless people – unable to access mainstream forms of dwelling – building their own, *alternative* versions of home. This is sometimes in the form of physical structures, like encampments, or adaptations of spaces not designed as dwellings (Herring, 2014; Lancione, 2019). It is also as an internal, emotional process, people finding ways to create their own versions of ‘domestic’ space in homelessness services, or when living on the street (Moore, 2007; Bourgois and Schonberg, 2009).

Alternative ways of living, homemaking while being defined as homeless, can be viewed as a form of resistance, building one’s own home/domestic space in response to a society that will not let you live as most citizens do (Lancione, 2019). Governments, including liberal democracies, do not like itinerant populations that are not connected to the socioeconomic mainstream. Putting it crudely, if someone pitches a tent in a field, pursuing homemaking choices that are not reflective of the norms of what constitutes a home, the chances that they will simply be left alone are slim. Some countries police homelessness encampments/unregulated dwellings by allowing them in certain areas, on at least a semi-permanent basis, but keeping them out of sight and contact with mainstream society (Herring, 2014). Nevertheless, free markets, taxation, indeed the very existence of the State depends on populations behaving in very set ways, which means ‘vagrants’ have always been a population who are to be contained and, to varying degrees, integrated (Ruddick, 1990; Humphreys, 1999; Speer, 2016; Lancione, 2019).

The potential risks in this work are assumptive, i.e. that research will start with and stick to an assumption that homeless people are different and choose to be different, risking misconstruing survival tactics as resistance and expediency as an evidence of wanting to pursue an alternative lifestyle. Some homeless people may indeed want a life of glorious uncertainty (Deacon *et al.*, 1995), but projecting differing cultural norms, choices and characteristics onto homeless populations can be just another form of individual pathology. Some research has been criticised as telling homeless people who they are and for having a predetermined subtext about what is ‘wrong’ with them, which is around assumptions that homeless people have some innate tendency to want to live differently to everyone else (Snow and Anderson, 1987; Jolley, 2020).

The ethical questions around defining and counting homelessness centre on two issues. The first centres on the level of confidence that any data collection genuinely records and represents lived experience of homelessness, given that there are emotional and psychological elements in how a home is defined. The second centres on control and representation, with Housing First we have (arguably) taken

the first steps towards a response to homelessness that is centred on the human being experiencing it, that is built around responding to their expressed opinions and that respects their experiences. Homelessness, defined and counted in the wrong way, risks imposing a reductionist, potentially stigmatising categorisation on people who, if they feel it does not represent them or their experiences, often lack the resources to resist such a definition (Jolley, 2020).

This links to wider social scientific debates. People experiencing homelessness are classified by researchers, by policymakers and by providers of homelessness services, and generally cannot politically mobilise in an orthodox sense and directly represent themselves. The idea of describing someone as a 'rough sleeper', as compared to someone who is 'hidden homeless', does not originate from people experiencing different dimensions of homelessness. People experiencing homelessness, who may see themselves in a variety of very different ways, can have labels placed on them by researchers and often exercise little or no control over how they are defined and counted. There are risks of homelessness becoming enacted in performative acts of social scientific research, which, rather than mapping realities, are led by research processes built and run by academics, rather than being based on dialogue with people experiencing homelessness (Law and Urry, 2004). In essence, the enumeration of homelessness, if done in the wrong ways, risks building an unrepresentative set of images that are disconnected from how people experiencing homelessness see themselves and their situation.

Measuring Homelessness

There are two practical challenges. First, agreeing a working definition of homelessness that can be used on a comparative basis across Europe and, second, building systems that allow for robust enumeration, or at least estimation and projection with a good degree of confidence. Homelessness is not something that governments necessarily wish to record comprehensively, both because of how this can inflate the numbers, and if a government does not wish to generate data that raise questions about dysfunction in housing and labour markets, as well as social protection, housing and public health policies. There are also methodological challenges defining 'home' in a largely physical-legal sense, without the emotional and psychological dimension, raises questions about the efficacy of data collection and there are ethical questions about whether someone should be categorised, or tagged, as 'homeless' by research, or administrative processes, over which they cannot exercise any control.

The challenges centre on building a representative, accurate and comprehensive definition that is also practical for use and, with that in place, to build better systems for enumerating homelessness. It is not useful to enter into an endless and unre-

solvable debate about the Foucauldian biopolitics of homelessness measurement, nor, by contrast, should any effort be focused on entirely mechanistic spatial-legal definitions of homelessness, because that approach has inherent and serious limits. Alongside this, there is the question of what is actually practical in terms of methodological development, balancing what can be achieved, with a reasonable degree of confidence and robustness, while also arriving at an approach that is practical for use across Europe.

Towards a definition

ETHOS has informed attempts to conceptualise and measure homelessness at global level (Busch Geertsema *et al.*, 2016). A proposed global framework identifies three groups of homeless people, those without accommodation (living rough and in shelters or homelessness services), those living in living in temporary or crisis accommodation and those living in severely inadequate and/or insecure accommodation, including the following groups:

- People sharing with friends and relatives on a temporary basis
- People living under threat of violence
- People living in cheap hotels, bed and breakfasts and similar
- People squatting in conventional housing
- People living in conventional housing that is unfit for human habitation
- People living in trailers, caravans and tents
- People living in extremely overcrowded conditions
- People living in non-conventional buildings and temporary structures, including those living in slums/informal settlements

Modification of ETHOS, along these sorts of lines, synchronising the definitions of homelessness with those used elsewhere, would seem to be a logical way forward (Busch-Geertsema *et al.*, 2016). Amore, whose criticisms of ETHOS have been influential (Amore *et al.*, 2011; Pleace and Bretherton, 2013) has argued that an alternative approach is to establish a baseline for severe housing deprivation, along the same lines as globally agreed measures of absolute and relative poverty (Amore, 2019).

Amore's arguments reflect existing global standards in the *Right to Adequate Housing* (OHCHR and UN Habitat, 2009) which includes access to essential utilities and minimum physical standards, alongside security of tenure. Global definitions of adequate housing include *accessibility* i.e. is housing suitable for habitation if someone has a limiting illness or a disability and *affordability*, i.e. is after housing cost poverty at a level where a home ceases to be sustainable (OHCHR and UN

Habitat, 2009). Another element centres on *location*, which raises another potential dimension of homelessness, a home is not sustainable not because of physical, social, environmental or legal issues around the dwelling itself, rather it is unsustainable because of where it is (OHCHR and UN Habitat, 2009). The idea that an *area* can be detrimental to health, wellbeing and life chances, is also at the core of urban and public health policy across Europe. Spatial concentrations of poverty are viewed as actively generating low social cohesion, poor health and wellbeing and poor life chances (Atkinson and Jacobs, 2010).

Breaking this down a little, a series of what might be termed *threshold challenges* emerge. These threshold challenges centre on drawing distinction between a state of homelessness, as distinct from the much more widespread state of workless and in-work poverty and exclusion, often, though importantly not always, accompanied by bad housing, that is experienced by tens of millions of people in Europe (Toro *et al.*, 1995; Piketty, 2015; Wilkinson and Pickett, 2017).

Beyond this, there is again the question of differing cultural and legal definitions of what constitutes *uninhabitable* housing across Europe. This is not a question of absolutes, dozens of people sharing housing that is designed to house four or five people, lack of working plumbing, electricity supply and a roof that is not weather proof are, at least nominally, unacceptable everywhere. However, interpretations as to whether a given situation is housing exclusion or a state of homelessness vary and will continue to do so. For example, around 15.7 per cent of the (then) EU-28 population lived in an (Eurostat defined) overcrowded household in 2017. The overcrowding rates for Hungary, Poland, Bulgaria, Latvia and Romania were all above 40 per cent, but the reasons were not simply about affordable housing supply or GDP, they also reflected differing social norms (Eurostat, 2019). It is not possible, for example, to just apply North Western EU standards about 'overcrowding' or 'unfit' housing as the benchmark for the South and East of Europe.

Another threshold challenge centres on the point at which forthcoming eviction should be regarded as a state of 'homelessness'. Wales and then England decided that the former practice of defining someone threatened with eviction within 28 days, with nowhere else to go as homelessness was insufficient for effective prevention and upped the time before eviction to up to 56 days (Mackie *et al.*, 2017). In other contexts, however, homeless would be regarded as starting at the point of physical eviction and not before. There are also questions around whether a given level of after housing cost poverty, placing an individual, couple or family in a financial situation they cannot sustain, should also be seen as representing a state of (imminent) homelessness.

Homelessness might also be regarded as referring to someone with a limiting illness or disability living in housing that actively disables, rather than enables them, because its design and lack of suitable adaptation actively impairs their control over their own life. Area effects are last on this list, the question again being, at what point, if at any point, does a neighbourhood reach the point of being so risky to wellbeing, be it in terms of crime levels, lack of economic opportunities or breathable air and drinkable water, that the people living in it should be regarded as homeless.

Adding to this complexity are the arguments that home and hence homelessness can only be properly understood as an emotional and psychological state, not simply in physical-legal terms. On top of that, there are the surveillant and politically driven distortions that accompany the ways in which homelessness is sometimes defined, imposing categorisations on people who have little or no say as to whether or not they are within a certain group.

There is, to borrow from American terminology, a need to descope this, revising down objectives and expectations so that a workable solution can be arrived at, feasible with the available resources. The most logical course is aim for ETHOS 2.0, with an emphasis on practicality, simplifying, clarifying and streamlining, rather than increasing complexity.

Risks exist in reducing homelessness to simple, but broad, categories, such as people living in severely inadequate (including unsafe situations where someone is facing violence or abuse) and/or insecure accommodation. This is because we are instantly back with the arguments about what 'inadequate' and 'insecure' mean in different cultures and countries, and, again, the emotional, psychological and surveillant dimensions of defining and measuring homelessness are not in the picture.

A workable definition of overcrowding as being a form of homelessness cannot be about crossing narrowly defined margins, homelessness is a unique form of social distress and is *distinct* from poverty and housing exclusion. Here, US experience might be useful, particularly the definition of 'doubling up' among poorly housed families, i.e. two families living in a dwelling designed for one (Bush and Shinn, 2017). A working definition, again emphasising *homelessness* as representing a unique form of social distress, might be anyone living in housing at 200 per cent of designed occupancy or above. This is arbitrary, as it is quite legitimate to ask why not 150 per cent or 120 per cent, but 200 per cent occupancy represents extreme overcrowding and homelessness, if it is something distinct from housing need, is distinguished by being an *extreme* state.

The concept of medical priority for rehousing, used by social landlords across Europe, i.e. providing better housing to someone whose health and wellbeing is being undermined by their current housing (or lack thereof) (Pleace *et al.*, 2011;

Bretherton *et al.*, 2013) is also potentially useful. There are also validated statistical measures that assess the impact of housing and neighbourhood on mental and physical health (Pleace with Wallace, 2011). Developmental work, with health scientists, is required, but beyond the essential requirement for homelessness to encompass women and children (and sometimes men) at risk of domestic violence and abuse, housing that is actively disabling and/or injurious to health and wellbeing, including association with significant emotional and psychological distress, also needs to be included in a definition of homelessness.

A situation of homelessness in terms of physical adequacy and legal security can be based on ETHOS and its conceptualisation of the spatial, social and legal domains that constitute homelessness. Those elements in ETHOS that are contradictory, or entirely out of step with mainstream definitions and understanding of homelessness, can be relatively easily ironed out (Amore *et al.*, 2011; Pleace and Bretherton, 2013). Arriving at minimum physical standards that are generally applicable across Europe represents a challenge, but perhaps the best solution here is to follow Amore's (2019) suggested direction and just look instead to using minimum global standards (OHCHR and UN Habitat, 2009) as the reference points.

Precarity is complex to define, because security of tenure is rarely absolute, even owning both the housing and the land it is built upon is not necessarily a situation of total security, not if the property is in an urban regeneration zone, or in the way of a new runway, motorway or high speed train line. In some European countries living in the private rented sector is simply *inherently* insecure. However, moving back to the point that homelessness represents an extreme, a unique form of distress, defining housing precarity that represents actual homelessness could be defined as encompassing people without any legal rights to occupy either the land and/or building they are living in, or who are in the *process* of being evicted, without any other housing option being available to them.

Safety is another dimension. Safety from abuse, repression and violence within housing that removes what should be the safety of home, someone cannot have a 'home' in which they are unsafe or being subject to abuse. Safety might also be taken as extending to not living in an unsafe environment, both in the sense of physical risks from crime, but also in areas without green space, where environments are degraded and represent potential risks to mental and physical health.

Spelling this out, all homelessness can be defined as:

- The points raised by research about how definitions can express, and potentially help weaponise, surveillant and stigmatising images of homelessness are difficult to ignore. Any revised definition of homelessness has to be tested and, crucially, *agreed with* representatives of the people it is being applied to. This

should be the first stage in developing and testing a pan-EU definition of homelessness. Coproductive research and policy, as Housing First has shown, is the best way to reduce and prevent homelessness and, if we recognise that home and homelessness are emotional and psychological, rather than simply legal and physical constructs, talking to people with these experiences is the first step in building accurate systems of measurement.

- Incorporating existing and new definitions within a modified form of ETHOS. It is important that exclusion from the physical and social domains is recognised as constituting a state of homelessness, so that living (unwillingly) with family, friends and acquaintances, because there is no other housing option, constitutes homelessness. Incompatibilities with all other mainstream definitions of homelessness, i.e. around asylum seekers and people living in institutional settings, also need to be modified.
- A new ETHOS 'domain' centred on health and wellbeing is required. Housing or accommodation that is actively disabling for an individual and/or actively undermines mental and physical health, including associations with significant emotional/psychological distress, constitutes homelessness. Someone in a home that is the site for domestic abuse and/or violence is homeless. People living in housing situated in areas that are highly environmentally and socially degraded, where health and wellbeing are being threatened as a consequence, are also homeless.
- Overcrowding at 200 per cent or above designed capacity for a dwelling constitutes homelessness. Physical standards below those specified by OHCHR and UN Habitat also constitute a state of homelessness. Precarity, i.e. insecure accommodation that constitutes a state of homelessness encompasses people without any legal rights to occupy the land/building where they are living and those actively being evicted from housing, with no other housing option available.

The term 'hidden homelessness' needs to be made redundant. There is no consensus about what 'hidden homelessness' is, but the inherently vagueness is less of a problem than a term that suggests that there are different 'levels' of homelessness, some of which are less serious than others. Rough sleeping might be the extreme, but all homelessness is *very* destructive for every human being who experiences it and for the European societies in which it occurs. There are risks in using definitions that might be misread, or deliberately employed, as indicating two levels of homelessness, i.e. 'real' homelessness that is people living rough and in emergency shelters and, be it implicitly or explicitly presented as such, the less serious form of 'hidden' homelessness. The political right has successfully deployed a tactic of equating homelessness with rough sleeping for decades, setting and

shrinking the narrative to successfully hide the true scale and socially destructive effects of what is often a much more widespread social problem (Anderson, 1993; Cloke *et al.*, 2001).

Towards Measurement

The best solution would be to implement a mix of dedicated sample surveys while adding questions to existing population level surveys, combined with making census data collection sensitive to experience of homelessness. Dedicated, socially scientifically robust research could also provide the means to model and project the extent of homelessness across populations, as well inform restructuring of large scale administrative datasets to record homelessness. With the right set of indicators, the still nascent, but ever increasing capacity of big data, artificial intelligence and machine learning systems might be exploited (Culhane, 2016) to get a statistically robust picture of total homelessness. A robust sample survey could be used to project the actual scale of homelessness at national level and at pan-EU level. The main methodological innovation that is required is to start asking the right questions, as widely as possible, using existing technologies and methodologies that already allow tracking of social problems like health inequalities with a fair degree of precision.

The question remains about how best to record the extent and needs of homeless populations who live off grid, i.e. likely to be missed by sample surveys, census data collection and by administrative systems because they do not use social protection, public health or homelessness services very often, or for long periods. The first point here is that the bulk of homeless populations are generally in services or at least have some contact with them, because actually, literally, surviving on the street on a sustained or recurrent basis without any external help at all is *extremely* difficult (Bourgois and Schonberg, 2009; Lancione, 2019). In addition, both US and, particularly, Danish experience, shows that with the right combination of methodological tools and resources, it is possible to find a lot of homelessness via homelessness services (Benjaminsen and Andrade, 2015).

The use of capture-recapture as an effective technique to find those elements of the homeless population who are off-grid has long been debated (Fisher *et al.*, 1994). Beyond the somewhat queasy feeling induced by talking about counting human beings in, exactly, the same way as estimating the antelope population of a particular bit of African savanna, there are a couple of practical limitations. First, discussion of these methods is firmly grounded in a definition of homelessness that is confined to people sleeping rough, not even necessarily encompassing people in emergency shelters and certainly not those living with friends, acquaintances or

relatives because they cannot access their own housing. There are arguments that capture/recapture has potentially more effectiveness than street counts, with all their many limits around people hiding, lots of buildings and most of any city where the count takes place not being covered and generally only being conducted over short periods. However, these techniques are nevertheless generally posited on the idea – and can only really work properly – on the basis that homelessness exists in one narrow, street using, form and through using a series of repeated street counts that cross compare results and a more reliable, usually larger, estimate of people sleeping rough can be arrived at (Coumans *et al.*, 2017).

The most effective methodology will involve a dedicated analysis, ideally at pan-EU level and from one author's perspective, also involving the UK, that is based on a working definition of homelessness that closely reflects the views, opinions of people with lived experience of homelessness, who are participants in co-productive research rather than research subjects. The nature of the population, the sample universe for homelessness needs to be established, as existing data in most European countries provide only limited insight into what the scale and nature of all experiences of homelessness is.

Counting all homelessness means dedicated, properly resourced research, aimed at encompassing and representing homelessness as a whole, ideally comparative so that the results are generalisable across European countries that differ radically in areas like social protection, public health and social housing, alongside GDP. Beyond this, building indicators and measures of homelessness into mainstream administrative systems, across social protection, public health, social housing and criminal justice, a process that first needs to be properly informed by robust, primary research, is essential. Population surveys designed for other purposes and the collection of census data should, where relevant, also include validated measures on experiences of homelessness.

Over the last 40 years, there has not been enough effort, particularly not enough robust social scientific enquiry, into clearly defining the nature and extent of homelessness at the level of individual countries, nor across Europe as a whole. One challenge centres on where the line between housed and homeless lies. There are difficulties, indeed some quite complex ideas, about how home is an emotional, social construct, which mean homelessness cannot be reduced to one kind of structure instead of another kind, or whether or not someone is living outside; yet these methodological challenges are not insurmountable.

It is arguable that the human sense of what is meant by 'home', as somewhere physically safe, legally secure and reasonably comfortable to live in, has a universal core, albeit that there are important cultural differences about the idea of home. Imposing definitions of 'home' and thus definitions of 'homeless' on people who may or may

not see themselves in those terms has never been helpful. As a starting point, it is necessary to talk to the populations we define as homeless and those experiencing what we define as experiencing other forms of housing exclusion, about what they feel, think and experience. Defining what is homelessness in that way, through human experience, is the first step in recording the human dimensions of this social problem, which in turn will help build an analytical framework through which it will be possible to determine what is, and what is not, homelessness in Europe.

The other challenges are logistical. Mapping a population that is off-grid, in the sense of not being consistently (or sometimes at all) present on administrative systems, that has members who move around unpredictably and sometimes frequently and that is fluid in composition is difficult. Nevertheless we have the example of the Danish systems, combining administrative and survey data, which provide probably the most comprehensive systems for homelessness enumeration on Earth (Busch-Geertsema *et al.*, 2014), and while not perfect, as no system can be, Danish experiences shows what can be done. There is a distinction between impossibility and artificial limits to methodological rigour imposed by resource constraints. While counting numbers at any point, tracking change over time and finding hard to reach populations for enumeration of all homelessness is *difficult*, it is possible to get a lot closer to a full picture of all homelessness in Europe, if sufficient resources were combined with the right research design.

The humanitarian case for having a better understanding of the true scale, nature and distribution of European homelessness has been clear for decades. All homelessness, the experience of living in overcrowded spaces, experiencing unwanted sharing and not having the physical and emotional security of a settled home, now represents an even greater risk to wellbeing because of the pandemic (Culhane *et al.*, 2020). There has never been a greater imperative to secure a better knowledge of homelessness, how it is experienced and where it is, as through that understanding, the scope to maximise prevention and reducing levels, using innovations like the Finnish integrated strategy, can be greatly enhanced.

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