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The European Journal of Homelessness provides a critical analysis of policy and practice on homelessness in Europe for policy makers, practitioners, researchers and academics. The aim is to stimulate debate on homelessness and housing exclusion at the European level and to facilitate the development of a stronger evidential base for policy development and innovation. The journal seeks to give international exposure to significant national, regional and local developments and to provide a forum for comparative analysis of policy and practice in preventing and tackling homelessness in Europe. The journal also assess the lessons for Europe, which can be derived from policy, practice and research from elsewhere.

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Articles

Part A

Tracing the Right to Access to Housing: Insights from Human Rights Theory and Practice[1]

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Abstract_ *Access to housing is a major challenge worldwide, with structural inequalities making the affordability of housing an issue and adding to the problem of homelessness. While there has been extensive research on the right to adequate housing, the issue of access to housing has not been explored in-depth. This paper addresses this gap by conceptualising access to housing as part of a broader bundle of rights. The paper also presents a typology of physical, human, and systemic or institutional barriers that hinder access to housing and discusses the responsibilities of governments under international human rights law to address these challenges. By analysing the European Court of Human Rights case law, the paper identifies the European Court's approach to cases dealing with barriers hindering access to housing and the State's obligations. Although there is a limited approach to systemic or institutional barriers in the European Court's case law, clear obligations regarding physical and human barriers are identified. Through this theoretical and empirical contribution, the paper aims to offer insights to inform policy development and reduce homelessness.*

Keywords_ *human rights law, right to housing, access to housing, barriers*

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Introduction

Significant problems in accessing housing are being reported across the world, contributing to a rise in homelessness. The exponential increases in the cost of housing limit disadvantaged social groups' prospects of finding affordable, adequate homes (Charlampakis et al., 2022). Driven by legal, economic, and political factors, the trends are common to urban areas and have recently been coupled with growing inflation (HousingAnywhere, 2023). These affordability crises add to earlier challenges and deeper structural problems in providing a home for all, like socio-economic inequalities, discrimination, physical obstacles, and other accessibility problems (Ringelheim and Bernard, 2013). For many people, access to housing is becoming increasingly difficult.

Access is the "method or possibility of getting near to a place or a person".[2] It expresses both a physical reality (i.e., entering a residential space) and an abstract one (i.e., participating in the market or applying to social programmes). Barriers hindering access to housing can be inadequate layouts and facilities such as doors, walls, elevators, and stairs (Rodríguez de Santiago, 2016). Some result from human discrimination (Ringelheim and Bernard, 2013). Other barriers result from institutional regulations and practices (Ponce, 2010; Nogueira, 2020). Likewise, administrative procedures sometimes set burdens or excessive requirements, preventing those without the necessary resources and skills from accessing social housing benefits (Nogueira, 2020; Ranchordas and Scarcella, 2021). Shortages and market failures in providing affordable housing add to that list, resulting in exclusionary settings hinged on people's economic capacity (Kenna, 2010).

The alternative to adequate housing is substandard housing or the lack of a roof over one's head. Thus, barriers to access to housing may constitute a serious problem contributing to chronic and severe homelessness. In 2022, around 895 000 people were sleeping on the street or living in emergency or temporary accommodation across the European Union (Fondation Abbé Pierre and FEANTSA, 2023). Improving access to housing and addressing barriers can significantly reduce homelessness. Without an in-depth analysis of the right of access to housing and measures aimed at overcoming these barriers, the homelessness situation will only get worse.

Human rights researchers have examined different aspects of the right to adequate housing. Most studies focus on (legal protection) against losing one's home: evictions (Vols et al., 2019; Carr et al., 2018). A smaller, but still considerable, body of papers concentrates on issues such as substandard housing or the protection

2 As defined by the Cambridge Dictionary. See https://dictionary.cambridge.org/dictionary/english/access

of residents against a dangerous living environment (Cittadini, 2021). Surprisingly, only a few publications have explicitly addressed the access dimension of housing. Some studies have delved into the problems particular social groups face in accessing housing (Mayock et al., 2012). Other studies have analysed public policies favouring access to housing, such as the Housing First programmes (Hansson, 2021). There are also excellent studies on discrimination in a housing context (Benito, 2020). However, to our knowledge, no paper has focused on how the right to *access* housing could be conceptualised on a broader level. International human rights law's failure to address this issue is a symptom of a more general "normative weakness in identifying what the right to housing is and a resulting uncertainty about when, and by whom, it can be claimed" (Hohmann, 2013, p.2).

Previous research has clearly shown that a relation exists between the lack of (legal protection of) access to housing and homelessness (see, for example, Loison-Leruste and Quilgars, 2009; Anderson and Serpa, 2013; Watts, 2014; Stewart, 2019; Collins and Stout, 2021). The lack of clarity and contextual definition of rights terminology has limited the potential of a "human rights-based approach" to address issues related to accessing housing and its impact on homelessness (Kenna, 2010). We aim to deepen our understanding by defining and exploring the international right to access housing from a human rights law perspective while clarifying the corresponding state obligations. We hope that the resulting insights will help design and develop better policies and regulations to reduce homelessness.

This paper examines how access to housing could be considered part of a bundle of rights that make up the right to adequate housing. It also offers a categorisation of barriers that may prevent people from accessing housing, contributing to homelessness. Additionally, an analysis of the role of these barriers in the European Court of Human Rights (ECtHR) case law is presented. We present the results of an analysis of a sample of 79 cases, comprising both judgments and decisions, to identify whether and how the Court addresses the barriers that hinder access to housing. While previous studies have analysed the ECtHR's case law from the perspective of socio-economic rights (Palmer, 2009; 2010) and, particularly, housing (Koch, 2009; Leijten, 2018), most focus only on a limited number of ECtHR judgements and do not analyse decisions dealing with the admissibility of complaints.

The paper has the following structure: in section two, we discuss the concept of a tripartite housing rights bundle and analyse the elements that comprise it, which include access, occupancy, and exit rights. Moving on to section three, we outline some theoretical perspectives that will help us understand the concept of access rights. Here, we propose a typology of the barriers that prevent access to housing. Afterwards, we discuss the obligations of governments under international human rights law concerning these barriers. Section four analyses the case law of the ECHR to determine whether and to what extent the court addresses access rights in the face of obstacles to housing. Finally, we provide conclusions.

Access to Housing in the Context of the Right to Adequate Housing

The right to adequate housing is well established in international human rights law. It has been recognised as a component of the right to an adequate standard of living enshrined in Article 25 UDHR and Article 11 ICESCR. It is present in various regional instruments, such as the Revised European Social Charter and the Arab Charter on Human Rights. Albeit not explicitly coded, it has also been implied through the interpretation of the African Charter on Human and People's Rights and the instruments in the Inter-American Human Rights System. Likewise, although the European Convention on Human Rights (ECHR) has not expressly codified the international right to housing, the ECtHR has upheld that Article 8, which protects private and family life, entails certain obligations relevant to safeguarding elements of the right to adequate housing (Fick and Vols, 2022).

The right to adequate housing has been studied widely. However, most studies focus mainly on legal doctrinal descriptions of the right to adequate housing in one or more specific treaties or countries. While these papers are a welcome contribution to the body of knowledge on how the right to housing should be interpreted in a certain treaty or national context, they often do not provide us with deeper insights into the meaning of the right to housing on a more abstract, conceptual level.

We hold that clear and precise concepts facilitate interoperability of reasoning and interpretations through different legal systems and documents, allowing for more efficient communication between the different spheres applying and interpreting the international right to adequate housing. Moreover, a clear conceptualisation may also reduce the margin of deference to courts and states when applying international human rights law, as they are bound to more transparent and verifiable analytical processes.

Luckily, a few publications have explored the meaning of the right to housing at a conceptual level. Hohmann, for example, distinguishes the right to housing from housing rights. According to her, the right to adequate housing should be defined as a "human right, codified or implied into international and regional rights covenants, and into domestic constitutional orders through bills or charters of rights" (Hohmann, 2022a). According to Hohmann, housing rights are "legal rights arising from the non-constitutional level domestic law of particular states", including the regulation of tenancies and social or public housing provisions (Hohmann, 2022a, p. 3). Hohmann also argues that "aspects of a person's relationship with housing and home may be protected by other rights (such as the right to privacy, freedom of expression, and indeed property), a right to housing is based on the insistence that housing is itself fundamental, not merely instrumental, to the realisation of other needs and goods" (Hohmann, 2022b, p.128).

Fitzpatrick and others also distinguish between the right to adequate housing and housing rights. Yet, they do not define both concepts clearly but refer to housing rights as "protection from eviction and harassment for those who have housing" (Fitzpatrick, 2014, p.448). The right to adequate housing is "for those who lack minimally adequate accommodation" (Fitzpatrick, 2014, p.448). The authors acknowledge that there are rights to housing that individual citizens may enforce in domestic courts (Fitzpatrick, 2014). Besides that, a programmatic approach to the right to housing exists that "binds the state and public authorities only to the development and implementation of social policies, rather than to the legal protection of individuals" (Fitzpatrick et al., 2014, p.453).

Vols (2022) proposes the concept of multiple housing rights, which can be classified into three dimensions or types: access rights, occupancy rights, and exit rights. While these dimensions are interconnected, they relate to different housing issues. Access rights refer to the right of people to enter and acquire housing, whether through ownership, rental, or other means. This dimension's main concerns are the lack of available housing and other barriers that hinder individuals from utilising housing. On the other hand, occupancy rights come into play when individuals already occupy housing but face limitations in enjoying their residence. Substandard housing conditions, unauthorised entry, and health hazards in the housing surroundings are some of the issues that fall under this dimension. Exit rights, the third dimension, are applicable when individuals must leave their homes voluntarily or involuntarily, mainly due to evictions.

In this paper, we build upon Vols' typology of three rights to adequate housing. We conceptualise the right to adequate housing not as one monolithic right but as a bundle of rights. The concept of a bundle of rights is more commonly used in the context of the right to property but not in the context of the right to housing (Hohmann, 2022b). This paper will focus on access rights, but because of the close interconnectedness of the three types, we will briefly discuss the occupancy and exit rights in this section.

Occupancy rights are linked to protection against home searches and trespassing. They also entail obligations to secure all the elements necessary for enjoying adequate housing. The United Nations Committee on Economic, Social and Cultural Rights (CESCR) has explained this idea in its General Comments No. 4, which mentions the availability of services, materials, facilities, infrastructure, habitability, location, and cultural adequacy.[3] Therefore, occupancy rights can be seen as the right to peacefully enjoy a home that meets certain standards compatible with human dignity.[4] This also relates to the ECtHR case law on the right to private and family life (art. 8 ECHR). In cases such as *López-Ostra v. Spain*, the Court has stated that Art. 8 ECHR protects homes from environmental pollution, which can disturb private and family life.[5]

Exit rights, which have enjoyed particular attention in international human rights law, deal mainly with evictions (i.e., the loss of one's home). UN treaty monitoring bodies have provided interpretive General Comments to ensure that evictions occur in a way compatible with human rights. The CESCR has greatly contributed to laying down some procedural guidelines in its General Comment No. 7 on forced evictions.[6] In a series of decisions on individual communications, the UN Committee has examined the exit rights of vulnerable citizens affected by evictions, explicating particular and concrete eviction protections (Vols, 2023). The UN Special Rapporteur on the right to adequate housing reproduced these protections in several reports.[7] Similarly, in addressing collective communications relating to evictions, the ECSR has also relied on General Comment No. 7 to make recommendations to states.[8] Exit rights and evictions have been addressed in the ECtHR case law as well. In cases such as *McCann v. UK*[9], *Yordanova et al. v. Bulgaria*[10], and *FJM v. UK*[11], the European Court has articulated several (positive) obligations in this regard.

The boundaries of the different rights in the bundle are somewhat fluid. Often, access rights overlap with the exercise of occupancy or exit rights. When a housing agreement ends, be it a termination of a tenancy or a mortgage foreclosure, people often have to find new accommodations. Exit rights stipulate when an eviction is

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3 CESCR General Comment No. 4. *The right to adequate housing (Art. 11.1)*, (E/1992/23), 13th December 1991, para. 8

4 CESCR General Comment No. 4. *The right to adequate housing (Art. 11.1)*, (E/1992/23), 13th December 1991, para. 8

5 ECtHR, *López-Ostra v. Spain*, No. 167980/90, 1994.

6 CESCR General Comment No. 7. *The right to adequate housing (Art. 11.1): forced evictions*, 20th May 1997

7 Report of the Special Rapporteur on Adequate Housing as a Component of the Right to an Adequate Standard of Living, (E/CN.4/2004/48), 8 March 2004, p.92; Special Rapporteur on the right to adequate housing, *Guidelines for the Implementation of the Right to Adequate Housing*, (A/HRC/43/43), 26 December 2019, para. 34-38.

8 ECSR, *European Roma Rights Centre (ERRC) v. Belgium,* Complaint No. 185/2019, 16 June 2023, para. 19 and 31.

9 ECtHR, *McCann v. United Kingdom*, No. 18984/91, 1995.

10 ECtHR, *Yordanova et al. v. Bulgaria*, No. 25446/06, 2012.

11 ECtHR, *FJM v. United Kingdom*, No. 76202/16, 2018.

deemed lawful and executed following proper procedures (Sweeney et al., 2023). Access rights regulate the transfer from the previous housing to the new housing. The interconnection of the rights, for example, becomes apparent in the CESCR requirement to "ensure that adequate alternative housing, resettlement or access to productive land" is provided to those affected by an eviction who cannot provide for themselves.[12] Here, exit and access rights are both relevant. In other cases, there is a clear link between occupancy and exit rights. For example, in the case of *Fedeyeva v. Russia,* the ECtHR examined occupancy and exit rights in the context of individuals seriously affected by polluting and health-threatening factories close to their homes.[13]

International law and literature have paid less attention to access rights to housing compared to exit or occupancy rights. This may be due to the high level of discretion treaty monitoring bodies have given to states regarding their responsibilities toward providing access to housing. However, an analysis of international law shows that some international obligations can still be identified.

The Right to Access to Housing: Situations, Barriers, and International Obligations

Access rights are relevant when people want to enter, acquire, rent, or start using housing in any other way. References to access rights can be found in various treaties and other human rights documents.[14] For example, Article 31 of the Revised European Social Charter requires state parties to undertake measures designed to promote access to adequate housing and to make housing affordable to those without adequate resources. Article 19 of the European Pillar of Social Rights states that access to social housing or housing assistance of good quality needs to be provided for those in need.[15]

12 CESCR General Comment No. 7. *The right to adequate housing (Art. 11.1): forced evictions*, 20th May 1997, para. 16. See also See CESCR, *López Albán v. Spain*, Communication no. 37/2018, 11th October 2019; CESCR, *El Ayoubi v. Spain,* Communication no. 54/2018, 23 March 2021.

13 ECtHR, *Fedeyeva v. Russia*, No. 55723/00, 2005.

14 See Report of the Special Rapporteur on adequate housing as a component of the right to an adequate standard of living, and on the right to non-discrimination in this context, *Guidelines for the implementation of the right to adequate housing* (A/HRC/43/43), 26th December 2019, p.33.

15 2017 European Pillar of Social Rights proclaimed by the European Parliament, the Council of the European Union and the European Commission, at https://commission.europa.eu/system/files/2017-11/social-summit-european-pillar-social-rights-booklet_en.pdf

This section begins by examining situations where access rights are applicable. Following that, we categorise barriers that may impede individuals from obtaining housing. After that, we discuss various governmental obligations arising from the right to access to housing.

Situations where access rights are relevant

Access rights are important in various situations. For example, someone living on the street (and considered roofless) may search for stable housing and rely on their right to access the housing market/system. Similarly, immigrants arriving in a new country may need to establish residence and occupy new housing. In both cases, they are essentially starting fresh in the housing context and may require their access rights to fulfil their housing needs.

The right to access housing may also play a role when someone has to relocate for other reasons. These moves can be by choice or necessity, such as when a family composition changes and requires space. In such instances, they may choose to move into a new home or make necessary adjustments after a household member becomes independent. [16] In cases where vulnerable household members are experiencing challenging living conditions, such as those caused by domestic violence [17], moving to other adequate housing is often essential to safeguard their fundamental rights to life, liberty, privacy, and independence. [18]

Another situation may be that someone resides in a house, but that house is inadequate. For example, the dwelling may be severely deteriorated or damaged because of an accident, the owner's mismanagement, or a natural disaster. These substandard conditions do not meet the international right to housing standards. [19] While people are often not considered roofless, the European Typology of Homelessness and Housing Exclusion (ETHOS) prescribes that they may be considered homeless because their dwelling does not meet sufficient structural

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16 With noticeable differences deriving from cultural (family conceptions) and socio-economic (housing and labour market conditions) factors, there is a general trend and a socially accepted expectation of emancipation across European countries. For further reading see Stanojević and Tomašević, 2021.

17 In this sense, it is important to consider the critique that gender studies have made of the concept of the home as a space of privacy and autonomy for everyone. Certain social groups, such as women, have found the home to be a threat to their own dignity. See Carr and Wong, 2014.

18 It is likely to be the women experiencing violence who leave the household, rather than the perpetrators. This calls for special attention to these situations, which are one of the main causes of homelessness among women. See Special Rapporteur on adequate housing as a component of the right to an adequate standard of living, and on the right to non-discrimination in this context, *Guidelines for the Implementation of the Right to Adequate Housing* (A/HRC/43/43), 26th December 2019, para. 51; OHCHR, Women and the Right to Adequate Housing, p.76.

19 CESCR General Comment No. 4. *The right to adequate housing (Art. 11.1)*, (E/1992/23), 13th December 1991, p.8.

conditions of health and safety in accordance with the law.[20] One could argue that the resident needs to access adequate housing in this situation. In such a situation, occupancy rights and access rights interplay. The residents have two options. First, they may rely on their occupancy rights and demand the government or property owner to repair the house in accordance with the building regulations. Second, they may want to leave the homelessness situation and move to adequate housing by relying on their access right to adequate housing.

People in these situations may encounter various physical obstacles and human and institutional constraints hindering access to housing. Additionally, shortages of affordable housing limit any possibility of finding a home, particularly affecting those in the most disadvantaged economic situations. These obstacles, constraints and shortages can be conceptualised, for the purpose of analysis, as barriers to access to housing.

A typology of barriers to access to housing

A combination of physical, human, and institutional factors often hinders access to housing. These can be seen as barriers preventing people from realising the expectations derived from their right to adequate housing. By identifying and categorising these barriers, we can contribute further to understanding the meaning of access to housing under human rights law.

Physical barriers

The inability to enter or move freely in and out of the dwelling is a significant barrier to accessing adequate housing. Physical barriers may limit personal freedom, autonomy, and respect for life. Everyone is likely to be affected by them, but their impact is more significant on those who need physical, sensory, or cognitive support and those who cannot decide where or what kind of dwelling they live.[21] Physical barriers can arise from various causes. They can be doors, stairs, or walls. However, they may also arise from inadequate housing layout or the lack of elements, services, or facilities. Physical barriers can be classified depending on whether they are found within the premises (internal physical barriers) or in their surroundings (external physical barriers).

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20 FEANTSA (2006) European Typology of Homelessness and Housing Exclusion (ETHOS), accessible at https://www.feantsa.org/download/ethos2484215748748239888.pdf

21 Special Rapporteur on adequate housing as a component of the right to an adequate standard of living, and on the right to non-discrimination in this context, *The right to adequate housing of persons with disabilities*, A/72/128, 12th July 2017; Special Rapporteur on the rights of persons with disabilities, *Rights of older persons with disabilities*, A/74/186, 17th July 2019, para. 55-56.

The internal physical barriers derive from the configuration of the dwelling. These barriers may concern disability issues. If accessing and exiting a building requires the use of stairs or steps, it may become impossible for individuals who lack the necessary mobility skills (Rodríguez de Santiago, 2016; Nasarre and Simón, 2020; Stadler and Collins, 2023). Similarly, if the living space is not adapted to accommodate different cognitive or sensory perceptions, it may significantly affect the occupants' independence, limiting the property's usability. Poor architectural designs can also make it difficult for people to move around freely or make necessary adjustments.[22] However, barriers may be deemed legitimate when they aim to block the entrance of uninvited visitors, protecting the privacy of the dwelling, such as locked entrance doors.

External physical barriers refer to limitations on using a dwelling that originates from outside the premises. These limitations can make it difficult to carry out daily activities due to barriers or a lack of necessary services and facilities essential for adequate housing. Examples of such obstacles include nursing homes or other institutional homes located near highways or in peripheral areas that require the use of vehicles. While people may be accommodated in such places, they may not be free to move around as they wish (Velasco, 2018). Similarly, some houses may lack access to essential services such as water, electricity, or gas supply, which can impede the preservation of the right to life within the home (Benito, 2020). Obstacles in accessing essential items can constitute a barrier to accessing housing.

Human barriers

Human barriers take the form of human actions preventing others from accessing housing. Examples include physically blocking people from entering buildings or refusing to enter into tenancy agreements or mortgage loans with prospective residents. It is important to recognise that these barriers can be intentional or unintentional. Addressing them may require a concerted effort. In a liberalised housing market, individuals are free to negotiate agreements related to the possession of residential properties (e.g., leases). Hence, property owners have the right to refuse interested parties who do not align with their interests. They may, for instance, choose certain candidates over others or deny residential use completely (Van Tongeren, 2022; Stadler and Collins, 2023). Denying a person access to housing may constitute a legitimate decision within this framework. Yet, the right to property is no absolute right (Casla, 2023). Human rights law and the pursuit of legitimate public interests may restrict the uses of real estate, including the selection of buyers or tenants.

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22 Special Rapporteur on adequate housing as a component of the right to an adequate standard of living, and on the right to non-discrimination in this context, *The right to adequate housing of persons with disabilities*, A/72/128, 12th July 2017, para. 40.

While owners have a significant degree of control over their property, they cannot behave in a way that violates the international right to housing. When human barriers follow patterns of discrimination, such as exclusion based on racial, cultural, gender, ideological, or other grounds, they may constitute a severe breach of international law (Van der Bracht et al., 2015; Benito, 2020). Anti-discrimination law has significantly contributed to establishing clear standards that allow for identifying what comportments represent legitimate or illegitimate human obstacles (Benito, 2020; Silver and Danielowski, 2019).

Systemic or institutional barriers

Systemic or institutional barriers are the third type of barriers in our categorisation and are linked to the concept of housing systems. According to Kenna, housing systems are mainly structured around markets. These systems cover various subsystems related to property rights and registration, housing finance, residential infrastructure, regulation, and housing subsidies or public housing (Kenna, 2010). A major systematic barrier to access to housing can result from the acceptance of the market as the primary producer and allocator of housing. This market-based approach may exclude individuals who lack the financial means to secure housing. Governments may intervene in the market, address market failures and excesses, and provide, for example, free or affordable housing to (parts of) the population. By doing so, these governments challenge the free market approach, where the state is only responsible for ensuring property and contract law rights (Kenna, 2010, p.103).

Yet, government interventions such as regulations, policies, and administrative practices may also legitimately or illegitimately block access to adequate housing. The efforts made by some States to realise this right through the ratification of treaties and the development of legislation can be frustrated by the lack of means or inadequate regulations and administrative conduct in other contexts. These barriers exist between individuals and their expectation of public support in securing their right to housing. They may result from planning powers, internal regulations, or administrative decision-making (or the lack thereof). These barriers involve using public authority in a manner that obstructs access to housing for individuals who often lack the means and rely on government assistance.

Urban planning regulating land use is crucial for implementing the right to adequate housing. However, these regulations are also one of the main institutional barriers to accessing housing (Lind, 2017; Haffner et al., 2008). They may limit the availability of suitable land for settlement and the development of adequate housing. Uneven administrative distribution of services and facilities, such as social housing being concentrated in adverse and peripheral areas, can also create external physical barriers (Ponce, 2020). Additionally, zoning and housing regulations may reinforce discrimination by spatially projecting socio-economic, racial, cultural, health, and other inequalities (Van Tongeren and Vols, 2017; Lewis and Richardson, 2020).

Administrative procedures that set disproportionate eligibility requirements impose hefty bureaucratic burdens or have long response times, making it difficult for those without the necessary skills and resources to access social housing programmes (Nogueira, 2020). Roofless people and those living in inadequate housing require an administrative response proportional to their situation's emergency, which cannot depend on the availability of time, devices, and resources often needed to follow lengthy and time-consuming proceedings.[23]

Such administrative designs and practices may lead to what Nogueira calls 'administrative vulnerability' (Nogueira, 2020). These situations reinforce the social vulnerability of those seeking assistance due to the demand for specific skills, the imposition of documentary burdens, or the slow process. For example, the digitisation of administrative procedures for housing subsidies creates a significant disadvantage for households with low digital literacy rates. Those who have difficulty acquiring the necessary skills to handle digital resources have their inequality unfairly reinforced due to structural factors.

Administrative or political disagreements cannot justify inadequate planning, procedural barriers, or resource misallocations. Adequate public intervention is crucial to help people who lack the necessary economic means and those facing physical and human barriers in the private market to access affordable housing. These institutional barriers pose a significant hurdle to exercising the right to housing and fall outside the margin of deference conferred to the states. They have a special impact on those who rely on public support and obstruct essential channels for securing access to housing.

Different Governmental Obligations and Access to Housing

It is generally accepted that various obligations flow from the international right to housing (Hohmann, 2013). These have been conceptualised and classified as obligations to "respect", "protect", and "fulfil" by the Maastricht Guidelines on Violations of Economic, Social and Cultural Rights.[24] While their relationship to the right to access to housing is not clarified, we can logically reconstruct their meaning.

23 CESCR, *Ben Djazia and Belili v España*, no. 5/2015, para 15.3.

24 International Commission of Jurists, *Maastricht Guidelines on Violations of Economic, Social and Cultural Rights*, 26th January 1997.

States should *respect* citizens' right to access to housing. This means that public authorities should refrain from delimiting urban property in a way that makes it impossible to develop affordable housing, impose disproportionate conditions for the establishment of one's residence through administrative licenses or discriminatory policies, or create physical barriers in public spaces that would prevent people from living or disturb their private and family life inside their homes. Article 5 of the International Convention on the Elimination of All Forms of Racial Discrimination (CERD) binds States Parties to prohibit and eliminate racial discrimination in all its forms and to guarantee the right of everyone, without distinction as to race, colour, or national or ethnic origin, to equality in the enjoyment of the right to housing. This provision has been interpreted in the sense that domestic housing policies must not engage in acts or practices of racial discrimination against persons.[25]

An international obligation to *protect* access rights also exists, requiring the states to prevent others from blocking access to housing. Authorities must intervene and resolve situations that hinder access to housing, such as physical or human barriers, including illegal occupation of a home or discriminatory practices in the private (rental) market. This mandate can be interpreted as a public interest reason which, in proportion and balance with other individual rights, allows intervention on property and persons. Article 9 of the Convention on the Rights of Persons with Disabilities (CRPD), for instance, obliges states to take measures to overcome physical barriers to ensure that all housing, including privately rented, is accessible to persons with disabilities.

Lastly, under international human rights law, states must also *fulfil* the right to access housing. This obligation can be achieved in many ways, including the direct public provision of adequate housing or through subsidies and allowances to facilitate access to the housing market. International law does not dictate the specific political strategies to fulfil this right.[26] However, the lack of affordable housing for low-income households and young people has repeatedly been a concern for the CESCR.[27] States must ensure the availability of resources regardless of the strategy employed to ensure the right to access housing for all. Article 28.2 CRPD also binds the State parties to take appropriate measures to "ensure access by persons with disabilities to public housing programmes". The Convention has been interpreted as requiring "access to public and subsidised housing programmes in the

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25 CERD, *L.R. et. Al. v. Slovakia*, Communication No. 31/2003, 7 March 2005, p.10.9.

26 CESCR General Comment No. 4. *The right to adequate housing (Art. 11.1)*, (E/1992/23), 13th December 1991, p.12 and 14.

27 See for example ESCR. IX-2 Conclusions. Spain (IX-2/def/ESP/16/EN). 1986; ESCR. VIII Conclusions. Spain (VIII/def/ESP/16/EN), 1984; ESCR. XVII-1 Conclusions. Spain (XVII-1/def/ESP/16/EN). 2005.

community", "especially for those persons with disabilities who live in poverty".[28] Article 16 of the ICESCR has also been interpreted to impose such obligations.[29] These resources should be quantified within a "national housing strategy" and according to the appraisal of the "available resources" in the most cost-effective way.[30] In line with that interpretation, States are bound to reserve, either through public assets or private provision, the necessary means to provide housing for people experiencing homelessness, focusing on particularly vulnerable groups.

The various obligations related to the right to access to housing play an important role in the monitoring system of CESCR. The reporting guidelines of CESCR require States to provide information related to access to housing.[31] States should mention if a national survey on homelessness is conducted and present its findings. This should include the number of individuals and families who are homeless and how many lack access to adequate housing. Furthermore, states should describe the measures taken to ensure access to adequate and affordable housing for people, regardless of their income or access to economic resources.[32]

Besides that, CESCR requires states to provide information on the impact of social housing measures, waiting lists, and the average waiting time for obtaining low-cost social housing. States should also indicate the measures they have taken to make housing accessible and habitable for people with special housing needs, including families with children, persons with disabilities, and older people. Lastly, states need to indicate the legislative and other measures they have taken to ensure that housing is not built on polluted sites or in the immediate proximity of pollution sources threatening the health of inhabitants.[33]

Member States have submitted numerous reports to the CESCR with (parts of) the required information on implementing the right to access to housing. CESCR has published hundreds of recommendations for improving access to housing. Most of these recommendations can be found in the Universal Human Rights Index (UHRI) dataset. The recommendations published on UHRI have been studied before in

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28 CRPD, Bellini v. Italy, Communication No. 51/2018, 27 January 2023, p.78.

29 ESCR. XX-4 Conclusions. Spain (XX-4/def/ESP/16/EN). 2015; CESCR. XXI-4 Conclusions. Spain (XXI-4/def/ESP/16/EN). 2019.

30 CESCR General Comment No. 4. *The right to adequate housing (Art. 11.1)*, (E/1992/23), 13th December 1991, p.10

31 Secretary-General United Nations, Compilation of Guidelines on The Form and Content of Reports to Be Submitted by States Parties to The International Human Rights Treaties, HRI/GEN/2/Rev.6 3 June 2009, https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno= HRI%2FGEN%2F2%2FRev.6andLang=en

32 Ibid, p.36.

33 Ibid, p.36.

the context of housing for specific countries (see, for example, Vols et al., 2024). Yet, no study has exhaustively analysed all CESCR recommendations related to access to housing.

This paper is not intended to provide such a comprehensive analysis because the paper's main focus is on presenting the conceptual typology and the analysis of European case law. Still, a cursory examination of recent UHRI data indicates that it may be worthwhile to conduct a thorough analysis of the abundant data available. For example, in 2024 CESCR recommended that Ireland should take all necessary measures to ensure gender mainstreaming and budgeting in all policies and programmes. This would promote full access to adequate housing for women, especially migrant, Traveller and Roma women, women of African descent, women with disabilities, and bisexual, lesbian, intersex, and transgender women.[34]

In 2023, CESCR highlighted concerns about the limited access to housing for asylum-seekers, refugees, and internally displaced persons in Armenia.[35] Similarly, CESCR expressed several concerns about France's access to housing issues in the same year. Specifically, the French Government failed to provide enough halting sites for Travellers and did not recognise caravans as dwellings, which prevented Travellers from accessing certain rights. Moreover, migrants and asylum-seekers living in informal settlements lacked access to water and sanitation. The CESCR also noted that individuals of North African and sub-Saharan origin faced discrimination in France and had difficulty accessing housing.[36]

These recommendations only scratch the surface of the vast amount of data in the UHRI dataset and require further research. This paper, however, aims to delve into another relevant dataset for implementing the right to access to housing.

The Limited Right to Access Housing in the ECtHR Case Law

In a European context, the case law of the ECtHR is highly relevant because aspects of the right to housing are justiciable under the ECHR. Therefore, we explore the extent to which the ECtHR discusses the State obligations in the context of different barriers to the right to access housing. We have systematically analysed 79 cases to identify mentions of the three types of barriers as conceptualised in this study

34 E/C.12/IRL/CO/4 (CESCR 2024), https://uhri.ohchr.org/en/document/64f89e5d-83ec-4d98-bf3f-3201b61e4d43.

35 E/C.12/ARM/CO/4 (CESCR 2023), https://uhri.ohchr.org/en/document/29a6b815-778f-4e75-ad36-48e6f1566989.

36 E/C.12/FRA/CO/5 (CESCR 2023), https://uhri.ohchr.org/en/document/f8a46c03-f05e-4754-9eb4-0f62d9f7e95d

(physical, human, and systemic or institutional). Furthermore, we analysed whether the ECHR holds that there are obligations to respect, protect, and fulfil the right to access to housing.

Various data collection methods were used to collect the relevant ECtHR case law. First, we analysed a dataset associated with the EVICT research project, which consisted of nearly 500 manually annotated ECtHR judgments and decisions on Art. 8 of the ECHR that deal with housing issues (Mohammadi et al., 2024). Out of these, we manually identified 56 cases related to access to housing. Additionally, we conducted a thorough literature review on housing and the ECHR and added 23 other cases related to Art. 6, 8, and 14 of the ECHR and Art. 1 of the First Protocol to the ECHR.[37] We then analysed this set of judgments and decisions to determine whether the European cases on access to housing dealt with physical, human, or institutional barriers. We examined the applicant's claims and the case's factual background. Finally, we analysed the ECtHR's reasoning to identify the Court's assessment of the merits and the State's obligations.

In all cases, we have found mentions of the three barriers identified in this paper (physical, human, and institutional). In many of the cases, problems arise from more than one barrier. In nearly all cases, institutional barriers played a role in the case. Human barriers played a smaller role (relevant in 19 cases), and physical barriers played an even smaller role (relevant in seven cases). The applicants brought up various issues that resulted from actions taken by private individuals, such as disputes over enforcing private contracts, discrimination, labour relationships, and squatting. However, most cases dealt with issues concerning the allocation of publicly owned housing and planning decisions.

Physical barriers

Cases dealing with physical barriers are scarce in the European case law. Five cases address internal structural obstacles hindering access to adequate housing, and two are concerned with external physical obstacles. The absence of a definition of adequate housing or minimum building standards under the ECHR may explain the low prevalence of such cases. Our analysis has not revealed obligations to respect the right to housing. However, the ECtHR case law has provided some insights into the State's obligations to *protect* and *fulfil* citizens' right to access to housing in the face of physical barriers.

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[37] These provisions hold a series of rights that directly intersect with the right to housing: Art. 6 ECHR recognises the right to a fair trial and encompasses a series of procedural protections. Art. 8 ECHR recognises the right to respect for private and family life, home, and correspondence. Article 14 holds a prohibition of discrimination. Art. 1 of the First Protocol to the ECHR protects the right to private property.

The Court has found obligations to *protect* the citizens by enforcing domestic judicial decisions. In the cases of *Shmatova and others v. Russia*[38] and *Samigulliniy and others v. Russia,* [39] the Court estimated the applicants' request to enforce a national judicial decision establishing obligations to fulfil and protect the right to housing in the face of external (road drainage system close to the applicant's house) and internal (central heating system) obstacles. Obligations to protect the right to access to housing facing external physical barriers could also be deduced from cases that are also relevant to occupancy rights to housing. In *López Ostra v. Spain*[40]*,* the Court found in favour of the applicants who alleged a violation of Art. 8 ECHR due to "smells, noise and pollution" caused by a waste treatment plant located "a few metres" from their home. The ECtHR established that national authorities must strike "a fair balance between the interest of the town's economic well-being (…) and the applicant's effective enjoyment of her right to respect for her home and her private and family life". Obligations to intervene against third-party activities that result in external physical obstacles could be inferred from this interpretation.

The ECtHR has declared the existence of obligations to *fulfil* the right of access to housing in the face of physical barriers. In *Marzari v. Italy*, the ECtHR examined an applicant's claim regarding the "local administrative authorities' failure to provide him with accommodation suitable for his disability".[41] While the application was declared inadmissible because the individual had failed to cooperate, the Court acknowledged that "a refusal of the authorities to provide assistance in this respect to an individual suffering from a severe disease might in certain circumstances raise an issue under Article 8 of the Convention".[42] Hence, the State could be deemed bound to obligations to fulfil the right to access housing "where there is a direct and immediate link between the measures sought by an applicant and the latter's private life".[43]

However, the extent of this obligation has never been clarified. In fact, the Court has recently interpreted a wide margin of appreciation for the configuration of housing benefits affecting people facing internal physical obstacles. In *J.D and A v. the UK,* two applicants complained about legislation limiting their options to access adequate housing.[44] Seeking to incentivise small family units to move to smaller apartments, the British Government reduced the housing allowances in

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38 ECHR, *Shmatova and others v. Russia*, 11 February 2020, app no. 36539/08.

39 ECHR, *Samigulliniy and others v. Russia,* 13 November 2022, app no. 61463/14.

40 ECHR, *López Ostra v. Spain*, 8 July 2003, app. no. 16798/90.

41 ECHR, *Marzari v. Italy*, 4 May 1999, app no. 36448/97.

42 Ibid.

43 Ibid.

44 ECHR, *J.D and A v. the UK, 24 October 2019,* app. no. 32949/17 and 34614/17.

proportion to the number of empty rooms in the dwelling. Both applicants required extra rooms due to special circumstances. The first applicant demanded compensation for the reduction of the allowance or the allocation of a smaller house adapted to her daughter, who is affected by "severe physical and learning disabilities". The Court dismissed the claim, finding the reduction and the refusal to provide those means proportionate to Art. 8 ECHR.

Human barriers

Only 19 cases examined in this study address human barriers to access to housing. They concern a variety of issues, including discrimination in the private market, domestic violence, the (illegal) occupation of a dwelling by others, financial debts, and labour relationships. Our analysis shows how the Court found state obligations to respect, protect, or fulfil the right to access housing in most cases.

The ECHR has been interpreted as safeguarding citizens from State arbitrary interventions interfering with expectations derived from Art. 8 ECHR and Art. 1 Protocol to the ECHR. This entails an obligation to *respect* the right to access housing. In *Khamidov v. Russia*, the Court found in favour of applicants affected by the "unauthorised temporary occupation of his estate by State agents" during a counter-terrorist operation that prevented them from accessing their own homes.[45] Denied access to his home, the applicant had to live "in a refugee camp in poor conditions where his nephew, aged one year and seven months, had died of pneumonia".[46] The Court found this to be a breach of Art. 8 ECHR and Article 1 Protocol No. 1 to the ECHR.

In addition to "this negative undertaking", the Court has also acknowledged that states hold "positive obligations inherent in an effective respect (…) for Art. 8 of the Convention".[47] States are, hence, bound to *protect* citizens from other private individuals blocking access to their houses. In *Cvijetić v. Croatia*, the Court declared the lack of State protection in the face of squatters as enabling or creating "a situation where the applicant was prevented from enjoying her home for a very long period of time", and found it in breach with Art. 8 ECHR.[48] Similarly, in *Kontsevych v. Ukraine*, the Court declared the State's failure to "restore the apartment to the applicant immediately" in breach of Art. 1 Protocol.[49] Likewise, the states are found bound to protect citizens' right to access adequate housing from the (violent) actions of others.

45 ECHR, *Khamidov v. Russia*, 15 November 2005, app no. 72118/01, para. 133.

46 ECHR, *Khamidov v. Russia*, 15 November 2005, app no. 72118/01, para. 199.

47 ECHR, *Kontsevych v. Ukraine*, 16 February 2012, app. no. 9089/04, para 45.

48 ECHR, *Cvijetić v. Croatia*, 26 February 2004, app. no. 71549/01, para. 53.

49 ECHR, *Kontsevych v. Ukraine*, para. 44.

The Court's approach to human barriers hindering access to the private rental market has also evolved to acknowledge the State's obligations to protect citizens from discriminatory practices. It had initially held a deferential view of the national legislator in delimiting the parties' freedom to contract. In *Röösli v. Germany*, it held that legislation excluding same-sex couples from a right to tenancy succession, which was recognised for heterosexual couples, was proportionate to Art. 8 ECHR. [50] However, it has progressively developed its initial position, going as far as to consider in recent judgments that "excluding a person in a same-sex relationship from succession to a tenancy in the event of the partner's death" cannot be justified "by the need to protect the traditional family." [51] Following this logic, in *Kozak v. Poland* [52] and *Karner v. Austria* [53], the Court found that the regulations limiting the applicants' right to succeed their partners in the tenancy were in breach of Art. 14 in conjunction with Art. 8 ECHR. Discrimination in tenant selection is a human barrier to access to housing. The State must regulate freedom of contract in a way that impedes discriminatory selection of tenants.

Interestingly, the Court also found that the states were bound to fulfil the right to access housing when facing human obstacles. This means that states may need to provide adequate means to overcome obstacles in accessing housing, such as safe housing programmes or assistance for victims of violence. In *J.D and A. v. the UK*, the Court acknowledged that denying housing benefits to a victim of domestic abuse, which had allowed her to afford a dwelling equipped with a "panic room", was in breach of art. 8 ECHR. The Court emphasised that "in the context of domestic violence (…) States have a duty to protect the physical and psychological integrity of an individual from threats by other persons". [54]

Systemic or institutional barriers

Most cases in European case law refer to systemic or institutional barriers. Many are related to governments' failure to address shortages and other affordability issues. These cases are raised by citizens demanding access to social housing or lower rents in the private rental market. Some cases concern barriers arising from planning decisions limiting construction or the establishment of mobile homes. While less common, other cases deal with the malfunctioning of justice and public administration.

50 ECHR, *Röösli v. Germany, 15 May 1996,* app. no. 28318/95.

51 ECHR, *Fedotova and Others v. Russia*, 17 January 2023.

52 ECHR, *Kozak v. Poland*, 2 March 2010, app. no. 13102/02, para. 99.

53 ECHR, *Karner v. Austria*, 14 July 2003, app. no. 40016/98, para. 41.

54 Ibid, para 105.

The Court has recognised the existence of obligations to *respect* the right to housing regarding different institutional barriers. For instance, it found that states are bound to enforce domestic judicial decisions facilitating access to housing in a reasonable time.[55] It also found states accountable for procedural errors and administrative decisions impeding owners from accessing their property.[56] However, no clarification of the obligations to respect the right to access to housing was provided in other instances. Twenty-four of the analysed judgments addressed domestic regulations limiting the applicants' right to temporarily settle on public land or develop a site appropriate to their cultural identity within their property. The Court dismissed all the applicants' claims, arguing that "there is no right as such under article 8 to choose the location of a home"[57] and that neither Art. 8 ECHR nor Art. 1 Protocol to the ECHR "necessarily go so far as to allow individuals' preferences as to their place of residence to override the general interest".[58] Other judgments and decisions concerning establishing informal settlements have reiterated this deferential interpretation regarding urban planning.[59]

The ECHR has not been interpreted as establishing a general obligation to *fulfil* the right to access housing in the face of systemic barriers like shortages and other market failures. This interpretation is clear in *Chapman v. the UK*:

> Article 8 does not in terms recognise a right to be provided with a home. Nor does any of the jurisprudence of the Court acknowledge such a right. While it is clearly desirable that every human being have a place where he or she can live in dignity and which he or she can call home, there are unfortunately in the Contracting States many persons who have no home. Whether the State provides funds to enable everyone to have a home is a matter for political not judicial decision.[60]

The Court has given the States a wide margin of deference in the configuration of housing policies, considering that "national authorities are in a better position (…) to carry out an assessment of the priorities in the context of the allocation of limited State resources".[61] Provided that the housing policies are proportionate and

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55 ECHR, *Lvin v. Russia*, 4 December 2018, app no. 43301/07; ECHR, *Vakhitov v. Russia*, 9 July 2019, app no. 42932/11.

56 ECHR, Frenkel and others v. Russia, 6 April 2021, app no. 22481/18 and 38903/19.

57 ECHR, *Wells v. the UK,* 16 January 2007, app no. 37794/05.

58 ECHR, *Jane Smith v. the UK*, 18 January 2001, app no. 25154/94.

59 ECHR, *Evangelos Tzamalis and others v. Greece,* 20 October 2009, app no. 5469/07; ECHR, *Salay and Zemanová v. Slovakia,* 28 September 2021, app no. 43225/19.

60 ECHR, *Chapman v. the UK*, 18 January 2001, app. no. 27238/95, para. 99.

61 ECHR, *Šaltinytė v. Lithuania*, 26 October 2021, app. no. 32934/19, para. 77

adequate in pursuing a legitimate aim, as declared in *Šaltinytė v. Lithuania,* "it is not for the Court to say whether the legislation represented the best solution for dealing with the problem".[62]

Following this reasoning, the Court has not recognised a right to the allocation of free housing stemming from the ECHR, and it has only considered demands for social housing within the scope of domestic legislation recognising this right.[63] Faced with demands to the allocation of public dwellings grounded solely on art. 1 Protocol no.1 to the ECHR in *Kvasnevskis and others v. Latvia,*[64] the Court noted "that the applicants did not refer to any particular legal provisions or decisions of public authorities that would lead them to expect that they would be able to claim the right to lease a substitute dwelling". Without a sufficient basis in domestic law, the Court declared their application inadmissible. In *Yasinskyy v. Ukraine*[65], the applicant complained to "have been arbitrarily denied the right to occupy" a particular publicly owned housing unit, "and had been evicted therefrom". The ECtHR did not address the demands concerning the allocation to public housing and dismissed the application by assessing exclusively whether the eviction was proportionate to Art. 8 ECHR. In the context of privatising public housing, the ECtHR has also declared that Art. 1 Protocol 1 "does not guarantee the right to acquire property".[66]

Similarly, Art. 8 ECHR has not been interpreted as compelling to regulate rents in the private market. While states may establish proportionate rent regulations to protect the right to housing, there is no right to demand the establishment of such limitations from the national authorities. This idea can be read in the inadmissibility decision in *Straka and Others v. Slovakia.*[67] The applicants demanded a controlled rent in the context of a series of reforms leading to the liberalisation of rents. The reforms were found proportionate "to Article 8 of the Convention" as they were "accompanied by guarantees preventing tenants who are demonstrably in need and who cannot afford to pay the market rent from being evicted without having been provided with substitute accommodation". The Court did not find the applicants entitled to a reduced rent.

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62 ECHR, *Šaltinytė v. Lithuania*, 26 October 2021, app. no. 32934/19, para. 77

63 ECHR, *Vinniychuk v. Ukraine*, 20 October 2016, app no. 34000/07, para 53.

64 ECHR, *Kvasnevskis and others v. Latvia*, 27 March 2018, app no. 28848/07.

65 ECHR, *Yasinskyy v. Ukraine*, 27 March 2018, app. no. 28848/07.

66 ECHR, *Babenko v. Ukraine*, 4 January 2012, app no. 68726/10.

67 ECHR, *Straka and Others v. Slovakia*, 4 November 2014, app no. 11809/12 and 35284/13, para. 76.

Conclusion

This paper argues that the right to adequate housing can be conceptualised as a bundle of access, occupancy, and exit rights. Access to housing entails both a physical and an abstract reality. It refers to the freedom to participate in a housing market/system, enter a dwelling, and move freely in and out. Therefore, access rights are not only essential to people living roofless, they also come into play regarding migrants seeking a home, households splitting up for diverse reasons, people in need of adapted internal or external facilities, and those living in inadequate housing.

Physical, human, and systematic or institutional barriers can hinder access to housing. While barriers may be legitimate (i.e., a door protecting the privacy of a home), sometimes they represent an encroachment of the right to adequate housing. These limit a person's prospects of finding adequate housing, forcing them into situations of vulnerability and homelessness. This is especially true when the barriers follow patterns of discrimination, or they constitute a significant handicap for people with mobility or sensory restrictions.

Different obligations to respect, protect, and fulfil the right to access to housing stem from international law. This paper has analysed the extent to which states' obligations concerning these barriers have been discussed by the ECtHR. Our analysis shows that the ECtHR has recognised obligations to respect the right to access to housing of citizens facing human barriers in its case law. The Court has also acknowledged the existence of obligations to protect and fulfil the right to access housing from physical and human barriers. However, the Court's approach to systemic and institutional barriers has been more nuanced. Albeit observing obligations to respect access rights (i.e., the delay in allocating social housing recognised by domestic law), the ECtHR has been largely deferential to the States. According to the Court's logic, providing housing to those in need would be "a matter for political not judicial decision". This narrow interpretation could be disputed in the light of other human rights bodies' work, such as the CESCR's conclusions and decisions or the reports of the UN Special Rapporteur on the right to adequate housing.

Moreover, it is important to note that those obligations are mostly identified when citizens already hold titles or expectations of access (i.e., ownership, social housing entitlements, debts, ownership, judicial decisions). The Court seems mainly concerned with protecting the home. In this regard, it could be argued that the ECHR has been interpreted as including a right to "recover the home". That is a right to access a place citizens hold "sufficiently close and continuing links". However, the ECtHR's findings in *Kozak v. Poland* and *Karner v. Austria* regarding states' obligations to prevent discriminatory practices in access to housing, or the positive state obligations found in *J.D and A. v. the UK* to provide the necessary means (including housing benefits) to protect victims of gender-based violence, demonstrate that the Court's understanding of the right to housing is broader than this. It also includes elements of the complex right to access to housing.

Access rights clearly have had a limited run in ECtHR case law. Nonetheless, these interpretations are authoritative and helpful to understanding the State's obligations concerning barriers to access to housing and how to prevent and address homelessness. These barriers are complex in nature insofar as they may manifest themselves as legitimate on certain occasions. Analysing the ECtHR case law helps clarify in which situations these barriers are unjustified and how they can be addressed. This paper ultimately demonstrates to what extent the discussion on homelessness and access to housing is not only about the provision of financial means or housing units but a complex plurality of situations to which law and public policy must pay special attention.

As state practice is to be guided by international law, understanding the meaning and scope of these international mandates is important for designing regulations and public policies that align with the international right to housing. The doctrinal analysis of the ECtHR's case law, underpinned by the conceptualisation proposed in our study, leads to innovative conclusions regarding the right to access housing in the ECHR framework. However, it also opens the door to new research, which, based on the typology of barriers and state obligations proposed in our study, investigates their treatment in state practice or the decisions and reports of other international human rights law bodies, like the CESCR or the ESCR.

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Sustainability and Capacity Analysis of Croatian Homeless Service Providers

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Abstract_ *Homelessness is a complex phenomenon in today's societies. As such, it is both a manifestation of extreme poverty and social exclusion and a symptom of globalisation and systemic changes in the world economy. Nevertheless, there is a significant research gap regarding the financial, institutional, and social sustainability of homeless service providers, which are the main type of service providers in most EU Member States, especially in Eastern European countries such as Croatia. This study addresses this gap with a mixed methods approach that includes a literature review, a survey of all Croatian homeless service providers, and a focus group with selected providers. The result is that the temporary funding of projects is one of the main problems in attracting and retaining staff and volunteers and ensuring the longevity of the service. We find that civil society organisations (CSOs) from large cities have better financial prospects and find it easier to find adequate staff than those in smaller cities. In terms of social sustainability, much of the success is based on the commitment and social capital of the individual members of the CSOs. We propose that the current project-based funding scheme is changed on the national level into a contract-based funding system to enable a stable financial structure, a more attractive working environment, and a better social reintegration rate for users.*

Keywords_ *homeless, service providers, social service, civil organisations, sustainability*

Introduction

Homelessness is a complex phenomenon in contemporary societies, and it is increasingly a part of their research and policy agenda (Tipple and Speak, 2005). Homelessness is a "manifestation of extreme poverty and social exclusion, it reduces a person's dignity as well as their productive potential and is a waste of human capital" (Baptista and Marlier, 2019, p.23). It is a symptom of globalisation and systemic changes in the world economy (Ferenčuhová and Vašát, 2022). Cooper (1995) distinguished between absolute and relative homelessness, absolute being people with no access to shelter or the roof over their heads, while relative homelessness he divided into three degrees. Primary homelessness is "people moving between various forms of temporary or medium-term shelter", secondary is "people constrained to live permanently in single rooms in private boarding houses" and third degree are "housed but with no condition of a "home", e.g., security, safety, or inadequate standards" (Bilinović Rajačić and Čikić, 2021, p.13-14). Ferenčuhova and Vašat (2022, p.1220) frame homelessness as a "structurally conditioned phenomenon, connected to the operation of economic and political regimes and their variety", and that one of the causes of growing homelessness is the rapid modernisation of society. The United Nations (UN) (2009) used to distinguish between two categories of people experiencing homelessness, primary (living on the street) and secondary (frequent moves, long-term sheltering, people with no fixed abode), and today the UN and most European Union (EU) Member States adopt a definition developed by the European Federation of Organisations Working on Homelessness (FEANTSA)[1], which recognises different forms of homelessness and living situations within the framework of the European Typology of Homelessness and Housing Market Exclusion (ETHOS) developed in 2005. According to the ETHOS typology, there are four categories of homelessness: rooflessness, houselessness, insecure housing, and inadequate living conditions. These categories are each subdivided into housing categories, which in turn are subdivided into types of living situations (FEANTSA, 2017). The ETHOS Light typology is a simplified version of the ETHOS typology with fewer categories, and is mainly used for statistical purposes and comparisons across EU MS.

There are many forms and manifestations of homelessness, according to the ETHOS typology, and homelessness is more than just not having a place to sleep. There are some criticisms of the ETHOS typology, for example, that there is no clear distinction between homelessness and housing exclusion (Bilinović Rajačić and Čikić, 2021). A typology based on the risk of homelessness could be acute, immediate, or potential, while a typology based on frequency and duration could

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1 Detailed overview of ETHOS typology can be found in the following web page: https://www.feantsa.org/en/toolkit/2005/04/01/ethos-typology-on-homelessness-and-housing-exclusion.

be temporary, episodic, or chronic (Bilinović Rajačić and Čikić, 2021). Many other typologies and definitions of homelessness could be found in the literature, including various theoretical streams on the causes of homelessness. Some of the main drivers for homelessness in the EU countries are the lack of affordable housing supply and changes in the labour market, i.e., short-term and precarious employment, low wages, unemployment, and long-term unemployment (Baptista and Marlier, 2019). No matter what typology or definition is applied, the homeless represent the population of absolute poverty that includes the inability to meet basic human needs, including housing (Kostelić and Peruško, 2021).

There is a significant gap in research that assesses homeless service providers, including their capacity or success in the reintegration of people experiencing homelessness back into society. Even in the Western European countries, where research on homelessness is more extensive than in Croatia or other Eastern European countries, evidence on fighting homelessness and housing exclusion (HHE) is still weak (Baptista and Marlier, 2019; Šikić-Mićanović, 2023).

This paper aims to identify the main challenges faced by service providers and propose interventions that could increase their financial, institutional, and social sustainability. The paper is guided by the following research question: To what extent are Croatian homeless service providers sustainable from a financial, institutional, and social point of view? The research follows a mixed research method combining a literature review, survey, and a focus group to answer the research questions.

The first part provides a literature review of homelessness in Croatia, followed by the analysis of services to combat homelessness. Since civil society organisations provide services to the people experiencing homelessness in Croatia, we address their operational sustainability. In the last part, methods and research findings are presented with conclusions and recommendation for future research.

Homelessness in Croatia

Since the Western economies led the way in industrialisation, they faced homelessness much earlier than Eastern European countries. Homelessness has been recognised and addressed under socialism in Eastern European countries, including Croatia, where the transition from socialism to a market economy led to an increase in homelessness. The transition to a market economy led to an unequal distribution of wealth through a ‘give-away’ privatisation of almost the entire public housing stock. Sitting tenants had the privilege of purchasing their homes at a low price in the first part of the 1990s. After that intervention, government withdrawals from the housing field and meeting housing needs have been left to a speculative market (Bežovan, 2012). This led to an increase in inequalities in society in circumstances of deep economic crisis and precarity of housing.

Under the principle of subsidiarity in the EU, housing policies are the responsibility of member states. The Croatian Constitution does not mention a responsibility by the Government for housing rights of its citizens (Šoštarić, 2013). Homelessness is only addressed in the national plan against poverty and social exclusion for the period 2021 to 2027; however, it contains no concrete measures aiming to prevent or eradicate homelessness. Compared to the European average (EU 27) where 17.1% of the population lives in overcrowded conditions, in Croatia 38.5% of the population lives in such conditions (Eurostat, 2022), which is the evidence of complex housing crisis.

To know the number and legal position of the people experiencing homelessness, defining criteria must be in place. Definition of a social group determines who is included or excluded from social support and services, i.e., who receives help and who does not. The lack of an all-encompassing definition, such as the ETHOS typology, leaves many people without the help they need. The official number of people experiencing homelessness in Croatia was 525 in 2021, but there are current estimates of more than 2 000 absolute and over 10 000 relative people experiencing homelessness in Croatia (Bežovan et al., 2023). In Croatia, homelessness is mostly attributed to men, while women's homelessness is still not recognised and explored enough (Šikić-Mičanović and Geiger Zeman, 2011).

In the 1990s, there were three main reasons for homelessness in Croatia: 1) lack of financial means to pay rent, 2) vagabond lifestyle, and 3) refugees and exiles (Robić, 2017). According to Šikić-Mićanović and Geiger Zeman (2011), the common pathways leading to homelessness are violence and childhood trauma, unemployment, debt and financial problems, health problems, forced exile, divorce, war[2], death of spouse, imprisonment, and life choices. Kostelić and Peruško (2021) state that health problems and loss of work are the most common causes of homelessness in the city of Pula. Comparing gender, men usually become homeless due to loss of a job, long-term unemployment, war, imprisonment, and drug addiction, while women become homeless mostly due to death of a spouse, past and current neglect and abuse, and single parenthood.

Ever since the economic crisis of 2008, and the collapse of global housing market, general awareness of the social problem and the research on people experiencing homelessness is gaining momentum in Croatia. Since 2022, Croatian law defines a homeless person as "a person who does not have a place to live or the means to

2 Croatia was in the war for independence that lasted from 1991 until 1995.

cover living expenses and is accommodated or uses the service of organised housing in a shelter or overnight accommodation or stays in public or other places that are not intended for housing" (Social Welfare Act 18/22, 2024). This definition does not include persons living in overcrowded accommodation, nor those who are about to leave an institution such as a foster home or an orphanage once they reach 18 years of age, which is considered an adult in Croatia, or those coming out of a prison (Bežovan, 2019).

Homelessness is a part of residual social care assistance. The most significant financial assistance comes as guaranteed minimum benefit[3] (ZMN), which is an assistance for housing cost allowance, and a one-time allowance, and the qualification for these rights are based on the income threshold set by the Government, and the implementation is solely on local administration (Šoštarić, 2013). The aim of the housing allowance is to cover rent and utilities, and since 1 January 2024, it is €45[4] (Social Welfare Act 18/22, 2024). In the city of Zagreb for example, the housing allowance is given to a beneficiary of a ZMN in a sum of 30-40% of the ZMN, depending on if it is a household or a single person (City of Zagreb, 2022). Since 1 January 2024, people experiencing homelessness are entitled to €75[5] if they are accommodated in a shelter or overnight accommodation (Social Welfare Act 18/22, 2024).

Larger cities and counties are legally obliged (under the Social Care Act of 2011) to secure and finance emergency shelters and soup kitchens. However, the result from the focus group discovered that only 11 out of 21 counties do provide these services. There are three types of accommodation for people experiencing homelessness in Croatia: a shelter (24-hour accommodation), an overnight shelter (12 hours during summer, 15 during winter), and a daytime service (4-6 hours per day).[6] Concerning regulations, shelter and overnight shelters allow a maximum of 150 beneficiaries, while daytime services allow a maximum 30 beneficiaries per one social worker. Some service providers require a referral document from social services in order to provide them with the service while others do not (Družić Ljubotina et al., 2022). Around 1% of the local administration budget is spent on homeless care in Croatia. Even though the Social Care Act and the accompanying homeless definition in 2011 was a step forward in combating homelessness in

3 ZMN is determined once a year and amounts to €132.72 in 2023 (Government of Croatia, 2023).

4 This amount is calculated as 30% of the ZMN.

5 This amount is calculated as 50% of the ZMN.

6 In 2021, there were 16 shelters (e-Građani, 2023) (including overnight shelters) for people experiencing homelessness in 12 cities: Zagreb, Varaždin, Karlovac, Rijeka, Pula, Osijek, Zadar, Split, Kaštel Gomilica, Šibenik, Dubrovnik, and Slavonski Brod, which according to the Government pages, were established by different types of organisations.

Croatia, it did not serve the main purpose of combating homelessness, i.e., the provision of temporary accommodation until permanent accommodation is available (Fehér and Teller, 2016).

The city of Zagreb has the highest rate of homelessness in Croatia, with an estimated 700 to 1 000 people. At 80%, the majority are men, while women make up the remaining 20%, with an average age of 51.4 (Družić Ljubotina et al., 2022). The city of Zagreb started addressing the problem of homelessness in 1997 when the first homeless shelter was founded. Zagreb has a strategy to combat poverty and social exclusion from 2021 to 2025 (City of Zagreb, 2021). This strategy is composed of a set of measures, with some addressing homelessness, such as sheltering and integrating people experiencing homelessness with temporary accommodation (City of Zagreb, 2021 p. 46), however, the exact meaning of integration is not clearly defined. Measure 11 addresses the prevention of homelessness for young people leaving alternative care institutions by providing them with housing, starting from 2022. There is also Measure 3 that aims to expand the rights to claim housing allowance which could help decrease the number experiencing homelessness by means of analysing and creating the database of all benefactors of this right and defining additional conditions to become a benefactor.

Croatian provision for people experiencing homelessness is fragmented, residual, and only available in emergency situations (Bežovan, 2019). Emergency and transitional shelters are expensive, unsuitable for their needs (unsafe, overcrowded), and not a solution to the problem. They are also referred to as 'passive services' and there needs to be a shift to active services if the goals of the Lisbon Declaration are to be achieved (O'Sullivan, 2022). The Lisbon Declaration of 2021 is a document that builds on the European Pillar of Social Rights and Europeanisation; this part of development might be a viable contribution in making an effective impact in this field (Lisbon Declaration, 2021).

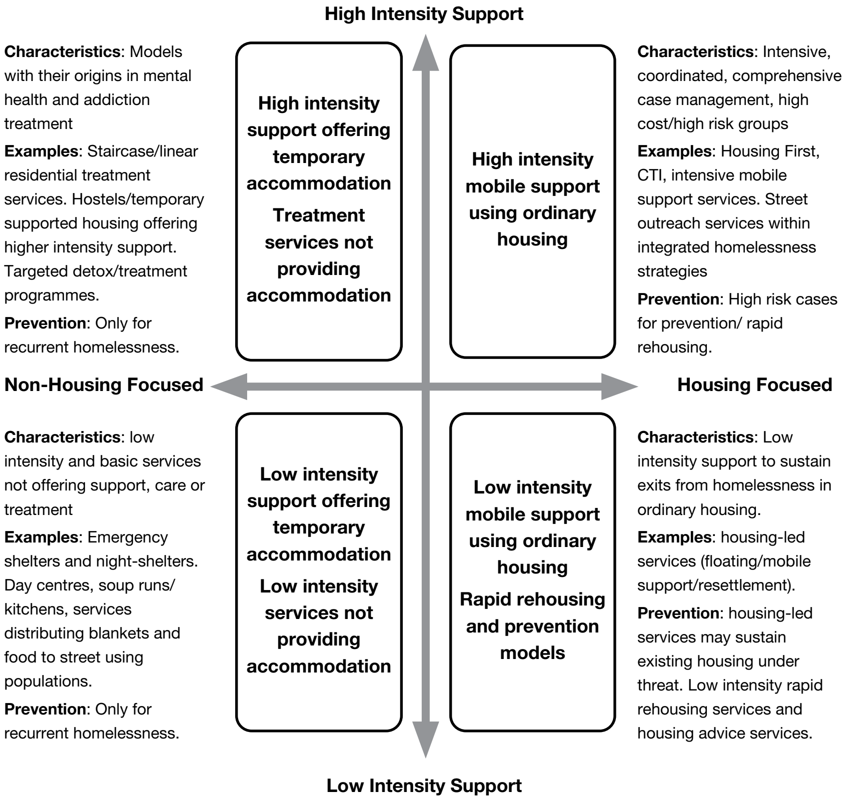
Services to Combat Homelessness

Our view is that homelessness is a condition that a person goes through and should not be considered a permanent condition. As mentioned earlier, homelessness is a symptom of globalisation, and as a symptom, it should be treated with interventions to prevent homelessness, to speed up the exit from homelessness, and to prevent the recurrence of homelessness (Nelson et al., 2021). Dunn (2022) published a compendium of 75 examples on homelessness prevention, suggesting that prevention has been recognised as an important step toward ending homelessness in the UK. According to Fitzpatrick and Davies (2021), homelessness needs to be prevented through detection, support, and protection mechanisms. However, prevention is not commonly applied across Europe and it still in the early stage of development and mostly involves debt counselling, housing advice, mediation, and support services (Pleace et al., 2018).

Any effort (intervention, policy measure, etc.) aiming to reduce homelessness is a desirable innovation. According to O'Sullivan (2022, p.3), the best policy response is to ensure an "adequate supply of affordable and safe housing", as this would reduce homelessness and enable faster exit from homelessness. Pleace et al. (2018) also claim that "part of any serious strategic response to homelessness involves building affordable homes, all the support in the world will not solve homelessness if there is not enough adequate and affordable housing to meet need" (p. 96). The same source labels homelessness as a 'problem of the rent', and the logic behind this is that a person (or a household) can reduce expenditures in many areas, but they cannot reduce the cost of rent, as it will always be more or less the same. This has been demonstrated by Finland, which attributes its low homelessness rate to providing enough social rented housing for specific target groups. Public and social rented housing also provides more secure tenancies than other forms of housing.

The two most common homeless reintegration programmes are the Staircase programme (treatment-oriented) and the less common Housing First programme (housing-oriented) (Tsemberis, 2010). According to Pleace et al. (2018), services for the homeless across EU Member States could be divided into typologies (Figure 1). Based on this figure, Croatian service providers would mostly fit into the third quadrant: non-housing focused and low intensity support, but according to Pleace et al. (2018), other Eastern (and Southern) European countries are likely to have the same type of support and this type of service is the most common in Europe, which means overnight shelters, food distribution daycentres, etc.

Figure 1. A Proposed Typology of European Homelessness Services (Pleace et al. 2018)



Innovative approaches in Croatia

Innovation in care for the homeless means a shift from treatment-oriented services to programmes that empower beneficiaries and help them integrate into society, such as Housing First programmes (Manning and Greenwood, 2019). In Croatia, the Housing First programme is slowly gaining attention. For example, in April 2022, a homeless service provider in the city of Pula held an international online workshop to raise awareness and promote the effectiveness of this programme, while participating in a project to establish a Housing First pilot. Although there is evidence that the Housing First programme is an example of innovation in services for the homeless, it is still not a large-scale solution and its impact has not been sufficiently researched, especially in the context of Croatia (Manning and Greenwood, 2019). According to O'Sullivan (2022), the local context is an important factor, as different Member States are affected to different degrees by the causes of homelessness.

This leads us to conclude that there must be a locally specific response to a problem. Nelson et al. (2021) points out that there is no evidence of Housing First implementation in Eastern European countries, and that the lack of a sound housing system as part of the welfare system may affect implementation.

This leads us to another plausible solution that is currently being applied in Croatia with good results. In 2019, there were two housing communities[7] run by the Croatian Homelessness Network (CHN), one housing adults and one housing young people experiencing homelessness. This type of support fits the local context and yields good results in homeless reintegration, but as explained in the next sections, financial sustainability is uncertain as these are project-funded programmes, with dedicated funds usually up to three years (Bežovan, 2019).

Sustainability of Homeless Service Providers in Croatia

Civil societies in Croatia

In the early 1990s, civil societies became a popular research topic in social science (Heinrich and Fioramonti, 2008; Bežovan and Zrinščak, 2006). The conceptual approach to the study of civil societies goes beyond the boundaries of individual academic disciplines and focuses on the relationship between economy, state, and society. Civil societies cannot exist in a non-democratic regime. According to Ingram (2020), "they are essential building blocks of development and national cohesion" (p. 1).

In post-socialist countries, a rapid democratisation of society took place, accompanied by a strengthening of civil societies, such as NGOs and trade unions, which worked to protect and promote the interests of citizens (Aleksanyan, 2020). After privatisation and liberalisation, civil societies were institutionalised, they increased the political and social activity of the population, and became an "influential agent of political and social change" (Aleksanyan, 2020, p. 33). Green (2017) notes that civil society organisations (CSOs) are under constant pressure from a deteriorating legal and operational environment, and that many governments are pursuing tougher regulations to hinder their work. In the 2017 report, Green (2017) refers to the existence and survival of such organisations due to declining rights to exist and available funding.

The development of civil societies providing services to the homeless and advocating for their rights has followed the same pattern in Croatia since democratisation and has become the cornerstone of a response to homelessness. Furthermore, the fact that CSOs in Croatia retained the pivotal role in caring for the homeless is the result of

[7] It is a temporary housing model in private rental housing, envisaged as a first step for gaining independence, while finishing education and searching for work placement to end homelessness.

systemic[8] policy neglect and failure to recognise it as a problem. However, Croatia is not an isolated case of this practice, there are reports of similar situations in Hungary, where NGOs were the ones taking the role of the main actor in providing services for people experiencing homelessness (Filipovič Hrast et al., 2009).

One definition of civil society defines it as a space between family, state, and market where people come together to promote their common interests (Bežovan and Zrinščak, 2006). Although it is generally accepted that the term civil society refers to positive social values, this definition leaves room for the inclusion of other groups that do not necessarily promote positive values. Ingram (2020) explains that civil societies play an important role in the exchange of information between citizens and government by advocating and making policy proposals and, very importantly for this paper, providing services to the 'poor and underserved'.

The majority (98%) of CSOs in 2018 were registered as associations (Božac, 2020). Since 1998, when the number of associations increased, growth has slowed down. In general, civic engagement, measured by membership in organisations, is rather low in Croatia (Bežovan and Matančević, 2011). About 17% of the population belonged to a civil society organisation in 2011, and there are many associations registered with a minimum number of members (at least three founders) (Ministry of Justice and Public Administration, 2022). The share of volunteers in the population is low at 7%, and CSOs are not able to develop attractive and quality programmes for volunteers (Bežovan and Matančević, 2011). Some of the main weaknesses of Croatian civil society are low participation of the population, low number of volunteers (and unattractive programmes), low recognition by the local community, distrust of the public, low promotion, inability to demonstrate their impact, and low media visibility (Bežovan and Matančević, 2011).

While some researchers in Croatia have addressed the issue of homelessness in the last decade, most of the work has been aimed at mapping homeless service providers and demographic indicators of the homeless structure, lived experiences of homelessness, as well as reasons for entering homelessness. Šikić-Mičanović et al. (2020) address the quality-of-service providers in Croatia from the perspective of employees and national level experts, stating that one of the major issues in quality service provision is the lack of quality staff.

The traditional services for people experiencing homelessness in Croatia are, as mentioned above, emergency shelters, soup kitchens, and social support services. Indeed, some of the shelters offer additional services, such as job search assistance (Bežovan, 2019). However, there is no assessment of their capacity in light of

[8] As a contrast to Western countries where homelessness is mostly perceived as individual, rather than a systemic problem.

institutional, financial, and social sustainability. The existing literature suggests a weak and underfunded system and the aim of this study is to assess the sustainability of this system.

In the recent discussion paper, O'Sullivan (2022, p.1) postulates that successful tackling of homelessness is a function of "social protection, health and housing systems" and notes that the weaker the welfare state, the higher the rate of homelessness. Furthermore, O'Sullivan (2022) notes that the services provided to the homeless determine the State's response to homelessness. If Croatia is to achieve the goals of the Lisbon Declaration, and since most of the work will fall on the providers of homeless services, i.e., civil societies, it is of great importance to understand the capacity of homeless service providers in Croatia and how well they are able to prevent and reintegrate people experiencing homelessness into society.

Assessing the Sustainability of Civil Society Organisations

Before turning to the results section, this section examines the common standards and practises used to assess the sustainability of civil societies. Sustainability is commonly associated with the notion of economic, social, and environmental aspects. However, our review of best practises suggests that financial, institutional, and social aspects would give us the best picture of the sustainability of homeless service providers in Croatia. Furthermore, we were not interested in the environmental practices of homeless service providers, rather in their operational capacity to exist and provide services in the foreseeable future.

There is not much literature that addresses the financial, institutional, and social sustainability of homeless service providers. Of the globally recognised indicators for assessing CSO sustainability, the Civil Society Index (in collaboration with CIVICUS) and the Civil Society Sustainability Index are the most commonly used.

The Civil Society Index (CSI) for civil societies was designed by Anheier (2005) and is comprised of five dimensions, which are civic engagement, level of organisation, practices of values, perception of impact, and external environment. This index allows for comparative studies between different countries. The aim of this initiative is to conduct evidence-based assessments of civil societies at the national level.

However, this index has been challenged by Howard (2005) and Salamon and Sokolowski (2006) for its lack of transferability and feasibility, especially when comparing CSOs in different countries (Bežovan and Zrinščak, 2006). Heinrich (2006) argues that some elements of the index are better suited for comparison within countries than the index itself. He also claims that a better definition and a theoretical concept are needed in civil society research and that a good approach in civil society research is to conduct empirical research.

Another approach is the Civil Society Organisation Sustainability Index (CSOSI) methodology that aims to produce annual reports on the sustainability of the civil society sector. According to the United States Agency for International Development (USAID, 2020), it is a global index that covers seven dimensions of sustainability: legal environment, organisational capacity, financial viability, advocacy, service delivery, sectoral infrastructure, and public image.

Other methods for determining CSO sustainability can also be found in the literature. The West Africa Civil Society Institute (WACSI) identifies four dimensions with 15 categories for civil society sustainability: finance, operations, identity, and interventions (WACSI, 2022). According to the Centre for Strategic and International Studies (CSIS), there is no general definition of civil society sustainability, but rather a contextual definition of an organisation, its process, target groups, objectives, funding sources, etc. According to Green (2017, p.4), the definition of CSO sustainability is "the internal characteristics of an organisation that enable it to build its institutional capacity, minimise financial disruption and maximise impact". This definition reflects the aim of this work in two ways, by asking about institutional capacity, which we later refer to as 'institutional sustainability', and by ensuring minimal financial disruption, which we refer to as 'financial sustainability'. We bear in mind that, according to CSIS, these dimensions often do not explain or represent all the factors that influence the sustainability of an organisation.

Lastly, a study by Renoir and Guttentag (2018) provides terms similar to financial sustainability, such as 'organisational longevity' and 'financial resilience'. Organisational longevity refers to the ability of a CSO to last longer than other similar organisations within the context, while financial resilience means that the organisation has a resource base that enables it to continue its services despite a shock or crisis that may occur.

Since in this study we are comparing a small number of service providers (16) with different organisational structures and legal status (associations, charities, religious organisations, etc.), we decided to adapt the CSOSI typology to our needs in order to make the organisations in the sample comparable by keeping the questionnaire loose and open to their discretion, especially when answering the social sustainability part of the questionnaire.

These seven dimensions were developed to reflect the great diversity of CSOs. To simplify this analysis for Croatian providers of homeless services, we cluster these seven dimensions into three clusters. Financial viability corresponds to the 'financial sustainability" cluster; legal environment, organisational capacity, service delivery, and sectoral infrastructure fits under the category we called 'institutional sustainability' in the questionnaire; while advocacy and public image correspond to the 'social sustainability' cluster.

Financial sustainability

CSOs need to be financially sustainable to be resilient and effective in the delivery of their services (Forest, 2019). As a broad concept, financial sustainability could be understood as securing sufficient sources of income to carry out the main activity. It requires planning to secure funds and planning for expenditure over the same period. A financial plan would require a revenue policy adapted to the specific opportunities and availabilities of the public service organisation, but also to its values, risk management, and ethical values (CSS, n.d.).

According to Green (2017), civil societies mostly interact with two types of 'stakeholders', namely those who fund the service and others who receive it. As shown in the results section, in most cases, homeless service providers are dependent on funding from local authorities and national projects, i.e., they rely on grants. Green (2017, p. 2) notes that reliance on grants can lead to a "lack of urgency, foresight, and courage to move out of the comfort zone". Similarly, Forest (2019) notes that over-reliance on international grants can leave an organisation vulnerable to changing priorities and withdrawal of funding.

USAID research (Forest, 2019) examined how civil society organisations can achieve long-term financial sustainability. Their research suggests that social capital is often overlooked, made up of credibility in the local community, volunteer engagement, and community participation. Strong social capital can substitute for the need for financial capital in moments of crisis. Another suggestion is to capitalise their financial resources, such as donations and membership fees. This means that the funds received are used to create greater value in the community, either by investing in social capital or by giving back to the community through funding programmes. The last outcome was the value of land and people, i.e., resources other than financial capital. More so than Forest (2019), Renoir and Guttentag (2018) point out that social capital is a critical factor in the financial sustainability of a CSO, especially in an environment where funding and donor relationships are weak.

These are general guidelines that could increase the financial sustainability of CSOs, and we keep this in mind when assessing the outcomes of Croatia's homeless service providers. Even though some of Forest's (2019) suggestions concern the relationship between social capital and volunteers, we have mainly considered social capital as part of the institutional sustainability of homeless service providers.

When it comes to financial sustainability, in our study we are mainly interested in the funding structures of homeless service providers in Croatia: where do they get funding from, are these sources reliable in the foreseeable future, what donations are they getting, and what is the level of expenditure, etc?

Institutional sustainability

The work of Paidakaki and Lang (2021) examines the institutional sustainability of services for the people experiencing homelessness and how institutions and service providers create bottom-linked governance. According to Renoir and Guttentag (2018), a great enabler of a CSO's sustainability in the institutional sense is organisational culture. Organisational culture means the leadership of an organisation, staff, and organisational flexibility and staff commitment and passion. Staff and organisational flexibility are essential for staff stability which increases the sustainability and resilience of an organisation. Renoir and Guttentag (2018) report that when staff received training and capacity building opportunities, they had a feeling of commitment and more productivity in the long-term. Employment in Croatian CSOs is a type of precarious work which is poorly paid, unprotected, and insecure (Bežovan and Matančević, 2017).

In the Western economies, such as Germany, public sector companies are increasingly becoming more competitive compared to the private sector for young and talented employees (Cordes and Vogel, 2022). There is a significant difference in attitudes toward the public sector or third sector across countries, and it is mostly driven by the trust between public and the Government. However, there is not much literature in Croatia that would show empirical evidence of job seekers preference among public, private, and third sector employment. In our research, we explored the drivers that may attract potential employees to work within the homeless service providers from the perspective of current employees at these organisations.

Social sustainability

Paidakaki and Lang (2021) argue that social sustainability is a concept that is closely linked to specific places, such as a neighbourhood or a city. They explain that social sustainability means broader participation and deeper engagement of society, guided by democratic principles, to produce goods and services that benefit all. Social sustainability can hardly be expressed in an organisation's balance sheet, but social capital, as we have already mentioned, can cushion an organisation's financial failures. According to the United Nations Global Compact (UNGC), social sustainability means identifying and managing positive and negative impacts of the services provided, and the relationship and engagement with stakeholders is critical

(UNGC, 2022). However, the UNGC definition refers to a broad level of both private companies and the third sector and does not reflect the complexity of homelessness service providers and the services they deliver to the most vulnerable.

Civil societies that provide services to people experiencing homelessness are one of the key players in preserving and creating affordable housing for all. We wonder how service providers are perceived by society, how they believe the public see their service, how well they are embedded in the common good, and how influential their social capital is (Paidakaki and Lang, 2021).

According to Pleace (2016), social integration has three main elements that served as inspiration for the research design: social support (support through appreciation, feeling valued, help in understanding and coping with life), community integration (positive, mutually beneficial relationships between HF and neighbours) and economic integration (paid work, education, training, job search). Social services are one of the most important constructs of social capital of civil society organisations (Ayed et al., 2020), and therefore it is important to assess the sustainability of social services to understand the strength of social capital. Green (2017) states that civil society organisations that are not deeply rooted in the community can only offer their services through channels that are not well connected to political, economic, and structural change.

Research Methodology

This section explains the methodology used in this research; a mixed method approach with a quantitative survey and a qualitative focus group.

Survey

To gain insights into the financial, institutional, and social sustainability of homeless service providers, a questionnaire was designed and sent by email to all 19 homeless service providers in Croatia.[9] The identity of the service providers and their responses are anonymised in this study. Out of 19 homeless service providers, 16 of them responded to the survey.

9 List of 19 homeless service providers: "Udruga Oaza", "Prihvatilište Crvenog križa Zagreb", "Udruga sv. Jeronim", "Centar za beskućnike Karlovac", "Udruga Most", "Caritas Šibenske biskupije", "Dom Nade Zagreb", "Institut Pula", "Novi put Varaždin", "Ruže Sv.Franje", "Udruga Pet Plus", "Caritas Zagrebačke nadbiskupije", "Crveni križ Čakovec", "Udruga Tera", "Depaul Hrvatska", "Caritas Đakovačko-osječke nadbiskupije", "Caritas Zadarske nadbiskupije", "Crveni križ Dubrovnik", and "Crveni križ Pula".

The survey was created in Microsoft Word and contained five sections. The first sections contained an introduction and explanation of the context of the survey, the aim of the research, and the contact information of the researchers. The other four sections contain the questions.[10] Section two contains questions on general information about the service provider, such as the year of establishment, the legal status of the organisation, the type of services offered, etc. Section three contains questions on financial information, section four on institutional capacity, and section five on the perception of the service provider in society.

The original timeframe for responding to the survey was two weeks, which was extended to eight weeks due to low response rate. During that time, reminder emails were sent out and were followed by phone calls. After eight weeks, 16 questionnaires were received.

The survey analysis was carried out using SPSS 23 software. The results section follows the structure of the questionnaire and explains the answers. Where appropriate, a table with several variables is provided to make the results easier to read. We use the median value rather than the mean in the analysis. Both the mean and the median represent the central value of a data set, but in the case of many outliers and skewed values, it is recommended in statistics to use the median value.

Focus group

After the evaluation of the survey, a 90-minute face-to-face focus group was organised with the selected respondents. Seven representatives from six organisations providing services to people experiencing homelessness were selected based on two criteria. The first criterion was geographical coverage, with organisations selected from all parts of Croatia, from both large and small cities. This criterion ensured a variety of local-specific context, ranging from the capital to smaller coastal towns. The second criterion was experience in providing services. Taking into account the first criterion, those with the most years of experience were selected. Focus groups are a research tool often applied to complement the survey to gain more insights. It is an inductive research method, and the key value of focus groups are the insights resulting from interaction between participants, who should have similar levels of knowledge and experience of the subject (Skoko and Benković, 2009). The optimal number of participants in the focus group is between five and seven (Krueger, 1994), although larger groups of up to 12 may be allowed (Robson, 2002). The interviewer is responsible for moderating the group interview and adhering to the most important principles of this method (Albrecht et al., 1993). All participants agreed to the session being recorded.

[10] To fine tune the questions, the researchers consulted with Zvonko Mlinar, the president of the Croatian Homelessness Network.

Questions for the focus group were created based on the survey analysis. The aim of the focus group was to expand on the answers which responses were ambiguous, and to gain qualitative insight and motivation behind general answers of the survey. [11] Topics of local political will to invest more in this programme, entrepreneur capacities of organisations, and capacities for networking on local, national, and EU levels were addressed.

Research Findings

Based on the general questions, we learn basic information and the structure of the legal form of our respondent, as well as more detailed information about the services it offers. The oldest service provider was established in 1878, while the youngest was established in 2011. The first service provider started providing services to the homeless in 1999, while the newest was established in 2020. The reason for the discrepancy between the year of foundation and the start of services for people experiencing homelessness is the fact that the organisation did not initially provide services for them, but instead did other community work. The year of foundation and the year of the start of services for the homeless do not necessarily belong to the same service providers, as they remain anonymous.

According to the legal status of the respondents, there are nine associations, of which two are established under the Red Cross, four under Caritas, and one under the status of a legal entity in the name of the Catholic Church. As a primary service, eight provide day care, seven provide accommodation, seven provide overnight accommodation, three provide housing community, and one provides a social self-service. In terms of additional services, all respondents provide psychosocial support, 15 provide job search assistance, 13 provide health and hygiene care, 11 provide community volunteering, eight provide aftercare after leaving the facility, seven provide education and training, four provide social care mentorship, two provide material assistance in the form of food, clothing, and medication, one provides legal aid, one provides assistance in gaining independence, one provides field services, and one provides service of organising free time.

Financial sustainability as a key issue

Differences between the minimum and maximum budget per year are shown in Table 1. As stated in the focus group, the reason is a significant disparity between service providers in smaller and larger cities. [12] Certain organisations in Zagreb or

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11 The focus group took place on 14 September 2023 and was audio recorded.

12 While 16 service providers participated in the survey, not all of them answered all questions. Of the 16 respondents, 14 indicated their annual budget and two left it blank.

Split receive funding that enables them to provide a minimum level of services, while in other cities there is much less support. Some cities even ignore that there are people experiencing homelessness in their area and there is no sanction system for them if they do not provide the funds. However, there is a trend toward more funding and longer project durations in the last five to six years. This has an impact on attracting potential staff and could have an impact on more stable service delivery.

Table 1. Annual budget[13] of the service providers represented in minimum, maximum, and median value from 2017 to 2021.

Year	Minimum	Maximum	Median
2017.	9665,01 €	364987,72 €	63043,33 €
2018.	6092,38 €	364987,72 €	63043,33 €
2019.	8605,08 €	364987,72 €	69546,75 €
2020.	18581,19 €	364987,72 €	71234,19 €
2021.	11281,44 €	364987,72 €	78449,80 €

The annual budget for 2021 is explained in more detail in Table 2 where the amounts are broken down by source of funding.

Table 2. Minimum, maximum, and median amounts of received funding for 2021 per source.

Source	Minimum	Maximum	Median
City	11281,44 €	364987,72 €	34507,93 €
Municipal budget	530,89 €	23890,11 €	7034,31 €
EU project funds	13477,74 €	199084,21 €	47912,93 €
State budget	19908,42 €	62777,89 €	27778,88 €
Private donations	47,78 €	13272,28 €	2269,56 €
Business sector donations	132,72 €	6636,14 €	4207,31 €
Own source of revenue	45,13 €	1287,41 €	518,15 €
Other	12743,78 €	32782,53 €	22763,16 €

Some service providers do receive certain donations from individuals and businesses, as well as help from volunteers.

There are 11 service providers that have a three-year EU or nationally funded project contract, while five service providers have no contract. In Croatia, there is a funding instrument called 'institutional support for stabilisation and/or development of civil society' provided by the National Foundation for the Development of Civil Society, which makes grants for a period of three years. Only six organisations report using this grant. In terms of experience and satisfaction with fundraising

[13] Survey responses were in Croatian kuna (HRK), but for clarity, the amounts were calculated into EUR with the exchange rate of 1 EUR= 7.5345 HRK (1 HRK = 0.1327 EUR).

campaigns, seven service providers reported having no experience, while the average satisfaction of nine service providers is three (ranging from one to five). However, they admit that the lack of capacity hinders their fundraising campaigns at times, as building relationships with donors and volunteers requires dedicated staff to take care of these relationships. There are some exemplary efforts where local authority-led foundations raise large sums of money to build sports and leisure facilities, and this is the model that could potentially be transferred to homeless service providers.

Table 3. Service provider expenditures per item in 2021.

Expenditure item	Minimum	Maximum	Median
Employee expenses	9 954,21 €	244 156,88 €	51 562,81 €
Space rental	731,83 €	15 979,83 €	2 627,91 €
Utilities	449,27 €	59 035,11 €	5 431,02 €
External associates' fees	1 044,66 €	62 912,47 €	6 636,14 €
Direct expenditures for beneficiaries	663,61 €	37 162,39 €	8 730,71 €
Other costs	182,63 €	24 633,35 €	6 105,25 €

Comparing the income and expenditure for 2021, none of the service providers have a negative balance, i.e., they either break even or have a surplus, though two providers did not provide enough information for the calculation.

The difference in income and expenditure for 2021 does not necessarily mean that they have enough funds to provide a quality service or all the services that providers would like to provide, and it means that providers 'get by' with what they have. For example, two service providers explicitly complemented this answer by stating that they needed more staff for which they did not have the sufficient resources. When we also asked service providers how much they thought they needed to run the service, nine service providers declared they require a higher amount than they had, five declared they had the right amount of funds, and two did not answer this question.

We have already noted that larger cities in Croatia are required by law to provide funding for operating soup kitchens and emergency shelters/overnight shelters. The satisfaction level of the 14 service providers who responded to this question regarding the adequacy of funds provided by cities is three out of five. The service providers' assessment of whether they have enough funds to operate their services in the next three years is also three out of five, with one respondent not answering the question. It is interesting to note the result that seven respondents indicate that they have enough funds to hire competent staff, while seven respondents do not have enough funds to hire competent staff, with two providers not answering this question.

The results of the focus group show that organisations from larger cities with a good reputation for service delivery are well staffed and more or less resourced. They are confronted with project-funded activities and have a problem to continue the started activities after the end of the project, which has a negative impact on the beneficiaries and the results of the organisations. On the other hand, organisations from smaller cities that have less capacity to raise funds are not financially sustainable. The current model of grants distribution, where all applicants who meet the requirements receive the same amount regardless of the size and quality of the proposed project, should be revised as its effectiveness is questionable.

Building up institutional sustainability

With much of the funding coming from temporary projects, i.e., project duration between one and three years, homeless service providers struggle to attract motivated and qualified staff. This issue has also been described by Šikić-Mičanović et al. (2020). Short employment opportunities are not the only obstacle in recruiting the right recruits, mediocre salary and demanding and stressful work requirements also demotivate potential staff. Volunteers are a great resource for most service providers, but there is still room to recruit more volunteers for tasks that do not require specific expertise in working with people experiencing homelessness.

Employment motivations in these organisations are ranked in Table 4. The median score for six variables were given values ranging from one (least important) to five (most important) to determine which are the most important motivating factors to work for their organisation.

Table 4. Median opinions of service providers on the importance of various factors influencing motivation to work in their organisation.

Variables	Median value
Adequate salary	5
Flexible working hours	4
Promotion possibility	4
Acquisition of new skills and competences	4
Sense of fulfilment by helping vulnerable groups	5
Other: Work atmosphere and team cohesion	5

Service providers hire external experts only when project funding allows for part-time employment or when they have to meet minimum criteria set by national regulations to pass the inspection by the national authority. In this case, external experts such as social workers, psychiatrists, etc. are hired for a few hours per week.

There are also opportunities to find and recruit volunteers, although the situation here is more mixed. Three providers have not used the help of volunteers in the last five years. The reported number of active volunteers per service provider differ considerably. The minimum percentage of total volunteers per year ranges from 1% to maximum of 90% in 2021. In the last five years, one provider had 979 active volunteers in one year, and some had only one or two individuals per year.

Employment in the civil sector is an option for young professionals looking for their first job. From the focus group, it is clear that dealing with such a vulnerable population with limited resources is very challenging professionally. Even in such unfavourable circumstances, dedicated professionals implement innovative projects, such as Housing First. Personal commitment and value-based engagement last for certain time and often they are exposed to burned-out risk. After getting certain experience they are looking for more stable employment contract and a better paid job.

Social sustainability as a less recognised issue

Personal connections and relationships are a great resource for many service providers when it comes to donating and helping their work. There is a very positive attitude toward relationships with the media that provide support and help in public campaigns. This kind of social embeddedness, mostly in larger cities and for more prominent organisations, produces social capital that organisations use to raise more resources. A few organisations, also counting on local political will, use it for implementation of social innovations. Table 5 shows the median level of cooperation with each actor of 16 respondents, of which four do not cooperate with the employment service, three do not cooperate with the church or other religious organisations, and three do not cooperate with businesses.

Table 5. Level of cooperation between service providers and various stakeholders with median value.

Stakeholder	Median
Cities	5
Centres for social care	4
Croatian employment service (HZZ)	3
Other civil societies organisations	4
Church and other religious organisations	4
Media	4
Business sector	3

There is room for improvement in collaboration with the public, especially in public campaigns with famous personalities such as athletes. Often, the public shapes their attitude towards people experiencing homelessness depending on the cause that led them to homelessness, and in Croatia it is often the individualistic cause and their life's circumstances. In other words, if reasons for homelessness are illness, old age, or social injustice, the public shapes less negative opinions toward homelessness (Družić Ljubotina et al., 2022a). Furthermore, they agree that influential members of the steering board might be beneficial in their work.

The low level of cooperation with the employment service can be explained by the fact that not many people experiencing homelessness are able to work, and therefore, in many cases, there is no need for special cooperation.

Conclusions

Homeless services are regulated, and providers are required to meet the minimum standards set out in national legislation in Croatia. However, these services do not receive sufficient funding from local authorities, cities, or from other sources to meet these minimum standards (e.g., number of staff per 150 beneficiaries, or technical criteria, such as space per beneficiary, video surveillance, kitchenette, etc.), which puts them in a difficult position during inspections from the authorities. Provision of services, which should be permanent and of certain quality, are in the hands of CSOs. Earlier research findings and insights raised issues of sustainable development of CSOs. With the new empirical evidence, this paper responds to the research question on how homeless service providers are sustainable from a financial, institutional, and social point of view.

As far as financial sustainability is concerned, there is still room for improvement in fundraising campaigns and donations from individuals and companies. If more diversified financial resources could be found, this could lead to attracting qualified professionals and creating more stable recruitment opportunities, which in turn could lead to more institutional sustainability. Permanent investment in training of professionals contribute very highly to institutional sustainability.

Initiation and further strengthening dialogue, in this policy neglected area, between cities and national authorities is a step toward a more integrated approach to homelessness, where homeless service providers would have a say in policymaking and the co-creation of funding programmes. In addition, the statutory responsibilities of cities need to be taken more seriously and authorities need to be more active in supporting homelessness service providers beyond the minimum statutory requirements.

We advocate a change in the funding scheme from project based funding, that often hampers stability and outcomes in discontinuity of service, to contract-based funding. In such a case, contracts may be revised every two years and would be signed for periods of seven years. In this way, service provides would have a more stable financial structure, and in turn could be more attractive to future employees that may increase institutional, and in turn, social sustainability of the providers.

With clear evidence of successful integration of young people experiencing homelessness into society through housing communities, CSOs can gain much more social recognition, visibility, and be better rooted in local communities. More local social and political organisations should be involved and take part of the responsibility for integration of this vulnerable social group.

Finally, we learn that European networking events and knowledge exchange provides a well needed support and training for service providers to improve their service and implement innovative solutions to integrate people experiencing homelessness into society. Homelessness as a structural problem is slowly gaining importance in the public discourse, and this momentum must be supplemented with better networking of CSOs and the use of available EU funds. We recommend further research on how to enable and build up network of local social organisations to enhance housing governance structure from the bottom-up, which would strengthen the position of CSOs in housing provision for the homeless. Furthermore, we stress an urgency to adopt the ETHOS typology of homelessness and to conduct a local level needs assessment for the emergency housing services, primarily for people experiencing homelessness and those living in insecure and inadequate housing.

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Strengthening Responses to Homelessness in Portugal: The Importance of Addressing Victimisation

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Abstract_ *Empirical evidence reveals that people experiencing homelessness face heightened vulnerability to victimisation, a factor that significantly influences pathways into, through, and out of homelessness and housing exclusion. Despite Portugal's substantial progress in tackling homelessness through integrated strategies, a literature review has uncovered that victimisation remains an underexplored dimension in both research and policy frameworks. This study delves into the critical need to integrate experiences of victimisation into prevention and intervention strategies, underscoring its role in exacerbating vulnerabilities and hindering social inclusion. It discusses Portugal's ongoing measures while proposing further steps to address existing gaps. Incorporating this dimension into research, policy, and practice will enhance the comprehensiveness of responses to homelessness, strengthen Portugal's position as a reference in evidence-based policymaking, and contribute to fostering a safer, more inclusive society. Furthermore, the European Platform to Combat Homelessness provides a crucial opportunity to promote international exchanges of knowledge and best practices, which can support Portugal in addressing these challenges while sharing its own insights and achievements to advance collective efforts to tackle homelessness across Europe.*

Keywords_ *homelessness; victimisation; vulnerability; social exclusion; public policies; Portugal.*

Introduction

A recent report estimates that 1 286 691 people in Europe are experiencing homelessness, whether sleeping on the street, staying in night shelters, or residing in temporary accommodation [1] (FEANTSA and Fondation Abbé Pierre, 2024). As stated in the report, this figure partly reflects an objective upward trend in homelessness in certain countries, but it also largely highlights improvements in the accuracy and scope of data collection. Nevertheless, there is still progress to be made in enhancing the comprehensiveness and comparability of data across Europe, as well as within countries, where inconsistencies in definitions, methodologies, and data collection practices often hinder the ability to accurately assess the scale and dynamics of homelessness and housing exclusion (Develtere, 2022; FEANTSA and Fondation Abbé Pierre, 2024).

In this light, the aforementioned figure conveys a limited conception of homelessness, capturing primarily its most visible and recognisable forms (Pleace and Hermans, 2020). These are typically the situations represented in empirical studies and those that enjoy the broadest consensus as operational definitions of homelessness (Baptista and Marlier, 2019). However, when we widen the scope and consider all possible manifestations and dimensions involved in homelessness and housing exclusion, it becomes evident that this social problem is far more extensive (see, for example, Eurofound, 2023; Eurostat, 2023; 2024a), especially in a context where 21.4% of the European Union (EU) population —equivalent to 94.6 million people— is at risk of poverty or social exclusion according to the latest data [2] (Eurostat, 2024b).

The growing availability of data, despite its limitations, has underscored the scale and urgency of homelessness and housing exclusion as pressing societal challenges with significant policy implications. This has catalysed a broader recognition of their significance and fostered a deeper exploration of the ways in which they are shaped by the complex interplay of structural, institutional, economic, sociocultural, and individual factors (Agulles, 2019). Against this backdrop, a steadily growing awareness of the critical importance of tackling homelessness and housing exclusion with responses that embrace their multifaceted nature has emerged. Such understanding has driven endeavours toward the development of comprehensive and integrated interventions designed to effectively address the root

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1 These are categories 1, 2, and 3 of the typology ETHOS Light, a version of the ETHOS typology (FEANTSA, 2005) developed for statistical purposes (FEANTSA, 2017a).

2 This figure corresponds to the AROPE (at risk of poverty or social exclusion) indicator, which refers to the sum of persons who are either at risk of poverty, or severely materially and socially deprived, or living in a household with a very low work intensity. Those who are in more than one of such situations are included only once (Eurostat, 2021).

causes, diverse expressions, and extensive repercussions of the phenomenon. Reflecting this pathway, on 16 December 2010, the European Commission emphasised the need for appropriate and integrated responses to both prevent and address homelessness and housing exclusion, framing them as a key element of the EU's social inclusion strategy. While the Commission's declaration represented a pivotal step in formalising and consolidating this approach at the European level, efforts to develop integrated strategies were already underway in some Member States. Notably, Portugal emerged as a pioneer among Southern European Countries with the enactment of its National Strategy for the Integration of Homeless People 2009-2015 [3] (Estratégia Nacional para a Integração de Pessoas Sem-Abrigo, henceforth referred to as ENIPSA —Instituto da Segurança Social, 2009—), the country's first national-level integrated strategy targeting this issue [4] (GIMAE, 2018). Later on, Portugal renewed its commitment on this matter with the approval of the National Strategy for the Integration of People in Situations of Homelessness 2017-2023 (henceforth, ENIPSSA 2017-2023) [5], which was extended until the end of 2024 (Resolução do Conselho de Ministros, 2024a). A new National Strategy for the Inclusion of People in Situations of Homelessness for the period 2025-2030 (ENIPSSA 2025-2030) has recently been approved (Resolução do Conselho de Ministros, 2024b).

As will be discussed throughout this paper, Portugal has made significant progress and demonstrated a sustained commitment to combating homelessness and housing exclusion, having implemented practices and policies and cultivated expertise that position it as a reference point for other countries. However, the complexity of the phenomenon calls for the consideration of additional factors that have proven to be relevant in the dynamics of homelessness and housing exclusion and, consequently, in pathways into, through and out of these situations. Among such factors, experiences of victimisation emerge as a critical dimension, often exacerbating the vulnerabilities of homeless individuals and hindering trajectories toward social inclusion. Nevertheless, victimisation remains underrepresented in

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3 The strategy was in effect until 2013, and work in this area was not resumed until 2016 (Grupo para a Implementação, Monitorização e Avaliação da Estratégia Nacional para a Integração das Pessoas em Situação de Sem-Abrigo 2017-2023 —Group for the Implementation, Monitoring, and Evaluation of the ENIPSSA 2017-2023, GIMAE—, 2018). An analysis of the evolution of the strategy and the reasons underlying its discontinuation can be found in Baptista (2013).

4 Concerning the drafting process of the strategy and the circumstances that favoured it, see Baptista (2009).

5 Estratégia Nacional para a Integração das Pessoas em Situação de Sem-Abrigo. Approved by the Resolution of the Council of Ministers (Resolução do Conselho de Ministros) n.º 107/2017, of 25 July and modified by the Resolution of the Council of Ministers n.º 2/2020, of 21 January. A detailed analysis of the context within which the new strategy was born, its new features, and their implications can be found in Baptista (2018).

most frameworks addressing homelessness. This article explores these issues in the context of Portugal, analysing how accounting for victimisation in prevention and intervention strategies can enhance the comprehensiveness and effectiveness of responses to homelessness.

The Evolution of Portuguese National Strategies to Tackle Homelessness and Housing Exclusion

As previously mentioned, the ENIPSA was not only Portugal's first national integrated strategy to address homelessness but also the first initiative of its kind among Southern European Countries. According to Baptista (2009), the strategy had the virtue of including the problem of homelessness on the political agenda in a context where public interest in the issue was only modest and had never been fully recognised as a public or political concern, thereby creating an opportunity for change.

The conception of a homeless person adopted by the ENIPSA followed the ETHOS typology (FEANTSA, 2005) and alluded to someone who, regardless of their nationality, age, sex, socioeconomic situation, and physical and mental health condition, was either roofless (living in public spaces[6], staying in emergency shelters[7], or residing in precarious locations[8]) or houseless (staying in temporary accommodation for people experiencing homelessness[9]). With respect to the latter, temporary accommodation facilities aimed at specific population groups in vulnerable situations (i.e., children and young people, elderly people, people with disabilities or with care dependencies, families, people with AIDS, individuals with addictive behaviours or substance dependencies, and victims of domestic violence) were excluded.

The subsequent strategies have preserved the core of the concept while broadening the 'regardless' clause to encompass additional factors. Specifically, the ENIPSSA 2017-2023 introduced racial or ethnic origin, religion, gender —replacing sex—, and sexual orientation. Building on this, the ENIPSSA 2025-2030 further expands the scope by including documentation status[10]and disability status, while

6 Spaces for public use, such as parks, metro/bus stations, bus stops, parking areas, promenades, etc.

7 "Any equipment accommodating immediately, free of charge and for short periods, people lacking access to another place to spend the night" (Instituto da Segurança Social, 2009, p.49).

8 "A place that, due to its conditions, allows for a public use, such as abandoned cars, stairwells, building entrances, abandoned factories and buildings, abandoned houses or others" (Instituto da Segurança Social, 2009, p.49).

9 "Facilities for the accommodation, for a limited period of time, of adult people lacking access to permanent housing that promotes their social integration" (Instituto da Segurança Social, 2009, p.49).

10 Importantly, the ENIPSA already specified that the concept included "all situations involving foreign nationals who meet all other conditions (…), regardless of their legal status in the country" (p.49).

also reverting to the previous formula by replacing gender with sex. It is worth noting that the ENIPSSA 2017-2023 also replaced the term 'homeless person' with 'person in a situation of homelessness', thus recognising that homelessness is not a permanent condition but rather "a situation that may characterise a specific phase in a person's life and which is intended to be transitional" (GIMAE, 2018, p.9).

As it can be observed, a narrow definition of homelessness has been adopted.[11] The ENIPSA indicated that this approach represents a compromise, balancing the need for a manageable, operational framework with the complexity of capturing all dimensions of homelessness. While this limited perspective poses certain challenges, the proposal to use a harmonised concept of homelessness at the national level across public and private agencies working in this field offers significant advantages, as outlined in the strategy itself. First, establishing a unified concept of homelessness is essential for ensuring consistent procedures and providing a solid foundation for developing effective intervention measures. This common concept also allows for systematic and accurate measurement of the phenomenon, enabling the collection of comparable and reliable data across different regions and over time. A shared understanding facilitates the development of coordinated strategies that address the full complexity and multidimensionality of homelessness, thus fostering a more complete and accurate view of this issue which moves beyond simplistic or reductive representations and promotes a deeper understanding of its diverse causes and manifestations. This, in turn, contributes to demystifying negative social representations that hinder the promotion of human dignity and the recognition of the rights of those affected, and ensures that resources are directed toward genuine needs. Finally, by relying on a European typology, this approach aligns with standards used in other countries, improving the comparability of data and sharing of best practices across borders.

The endorsement of a unified concept has proven to be widely impactful. A study carried out in 2018 yielded that 81% of the organisations which integrate the Local Councils of Social Action (Conselhos Locais de Acção Social or CLAS) and the Hubs for the Planification and Intervention on Homelessness (Núcleos de Planeamento e Intervenção Sem-Abrigo or NPISA) employed the concept introduced in the ENIPSA (Grupo de Trabalho para a Monitorização e Avaliação da ENIPSSA[12], 2020a). Even so, a recent report highlights ongoing challenges in the consistent application of the concept across local entities, noting that certain

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11 As will be discussed below, notably, the ENIPSSA 2017-2023 drew attention to key at-risk scenarios relevant to prevention (ENIPSSA, 2017), aligning with situations categorised as insecure or inadequate housing under the ETHOS typology (FEANTSA, 2017b). Consequently, even though a restricted definition of homelessness is used, a broader spectrum of situations is considered in targeted interventions.

12 Working group for the Monitoring and Evaluation of the ENIPSSA 2017-2023.

interpretations still diverge from the established definition, impacting data accuracy and intervention effectiveness (Secretaria-Geral do Ministério do Trabalho, Solidariedade e Segurança Social, 2023).

The ENIPSA was built on a human rights-based approach and adopted a person-centred perspective, establishing integrated measures for prevention, intervention, and follow-up. These measures, encompassing the coordinated mobilisation of all required services, the involvement of public and private entities, and the alignment with individual assessments and specific needs, were rooted in a recognition of the multidimensional and complex nature of homelessness. Notably, prevention was identified as a fundamental pillar of the strategy, focused on addressing the root causes of homelessness and reducing the risk of individuals entering or remaining in this situation.

The strategy underscored the critical importance of updated, systematic, and comprehensive knowledge on homelessness as a cornerstone for developing evidence-based responses that meet the real needs of people experiencing or at risk of homelessness, evaluating their appropriateness and effectiveness, and ensuring their adaptability to new scenarios over time. Moreover, this commitment to knowledge was regarded as instrumental not only in guiding interventions, but also in actively challenging and dismantling negative social representations that hinder the advancement of human dignity and the recognition of the rights of individuals undergoing processes of social marginalisation.

The human rights-based approach, the person-centred perspective, the emphasis on prevention, the consideration of the multidimensional and intersectional nature of homelessness, the promotion of coordinated action across sectors and governance levels, and the pursuit of rigorous, thorough, and up-to-date knowledge have not only remained central guiding principles but have also been significantly reinforced in subsequent strategies. Among the most remarkable advancements, the ENIPSSA 2017-2023, while maintaining a strict definition of homelessness, introduced a third category of at-risk situations to be considered in prevention efforts, thus broadening the scope of interventions. This expanded framework includes: individuals in shelters for victims of domestic violence; those residing in healthcare or other institutions for prolonged periods due to the lack of housing solutions prior to or following institutionalisation; people in correctional facilities who lack stable housing upon release or are at risk of losing it; those living in unconventional or unsuitable housing, such as caravans or precarious/temporary structures; individuals temporarily staying with family or friends in conventional accommodations due to the lack of alternatives; and those experiencing insecure housing situations following eviction notices (ENIPSSA, 2017). The incorporation of these situations, which align with the categories of insecure and inadequate housing outlined in the ETHOS Typology (FEANTSA, 2017b), contributes to recognising the diverse forms that homelessness and housing exclusion can take.

Building on this foundation, the new ENIPSSA 2025-2030 places even greater emphasis on prevention by prioritising the early identification of risk factors and the regular monitoring of social and housing vulnerabilities. This approach is supported by the planned implementation of an Integrated System of Alert and Prevention to address these risk factors and vulnerabilities. The strategy also reinforces inter-institutional mechanisms to prevent re-entry into homelessness and promotes collaborative, networked efforts among local entities and partnerships. Furthermore, it aims to foster a culture of prevention within organisations and communities by raising awareness and combating stigma associated with homelessness.

Another key principle of the ENIPSSA 2025-2030 is the participation of people experiencing homelessness in all stages of the strategy, from planning to evaluation. In this regard, Objective 3.3 of Strategic Axis 2 aims to ensure that every NPISA implements participation actions that engage homeless individuals. These initiatives are intended to foster their inclusion in community life and contribute to making sure that their unique perspectives and needs inform the development of effective and responsive solutions[13].

Homelessness in Portugal

The first series of national studies on individuals experiencing homelessness was conducted between 2004 and 2005 by the Institute of Social Security (hereinafter ISS). Since then, there has been a steadily increasing attention to this social issue, accompanied by a progressively more thorough approach to understanding and addressing it, as reflected in subsequent studies.

13 Importantly, in April 2024, the ENIPSSA 2025-2030 was approved, establishing the Technical Commission for Support, Monitoring, and Evaluation (Comissão Técnica e de Acompanhamento, Monitorização e Avaliação, CtAMA) as a replacement for the GIMAE (Conselho de Ministros, 2024c). The commission included homeless individuals as participants to ensure their contribution to the strategy's governance, thereby embedding their lived experiences into decision-making processes and increasing accountability. However, in December 2024, this version was revoked and replaced by the definitive strategy, which omits the commission and no longer incorporates specific mechanisms to formalise the participation of people experiencing homelessness.This removal represents a setback in efforts to ensure meaningful participation of homeless individuals in shaping policies that affect their lives.

With limited exceptions, initial works almost exclusively focused on the ‘roofless’ category of the ETHOS typology (ENIPSA, 2012; FEANTSA, 2020; GIMAE, 2017; Instituto Nacional de Estatística, 2012). The focus on data collection broadened with the implementation of the aforementioned Survey on Utilized Concepts and Local Information Systems, which first applied the ENIPSSA definition to gather information on the number of individuals experiencing homelessness as of December 31, 2017 (Grupo de Trabalho para a Monitorização e Avaliação da ENIPSSA, 2020a). One year later, the first wave of the Survey for the Characterisation of People in Situations of Homelessness [14] was conducted, marking the beginning of an initiative that has since been carried out annually. The most recent available data refer to 2023. An analysis of the annual results for the period 2018-2023 (Grupo de Trabalho para a Monitorização e Avaliação da ENIPSSA, 2020b; 2020c; 2021; 2022; 2023; GIMAE, 2024) reveals an upward trend in the figures, with a 117.2% increase in the population experiencing homelessness documented at the end of 2023 compared to the data recorded at the end of 2018. The statistics have been steadily increasing with year-on-year growth rates ranging between 12.2% and 21.9%, accompanied by a rising prominence of ‘roofless’ situations at the expense of the ‘houseless’ group: while the number of individuals in the latter situation has grown by 50% during the whole period, the figure for roofless people has escalated by more than 217%. In 2023, a total of 13 128 people were experiencing homelessness in Portugal, 58.7% of them in a situation of rooflessness and the other 41.3% in a situation of houselessness (see table 1). [15] Globally, 28% were women, and the remaining 72% were men. However, in the case of the situation of rooflessness, the proportion of women reached 32%, while for the situation of houselessness it was 23%. People experiencing rooflessness also tended to remain in this situation for longer periods, with the most common category being ‘between 1 and 5 years’ (24% of cases), compared to houseless individuals, for whom the category ‘up to 1 year’ was the most prevalent (37% of the sample). Furthermore, 10% of houseless individuals had been in this situation for 10 years or more, whereas this figure rose to 22% among those experiencing rooflessness (GIMAE, 2024).

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14 Inquérito de Caracterização das Pessoas em Situação de Sem-Abrigo.

15 It is important to note that two Censuses (XVI Population Census —XVI Recenseamento da População— and VI Housing Census — VI Recenseamento da Habitação—) were conducted in 2021, which considered the population experiencing homelessness. As in the 2011 Censuses, only people in situations of rooflessness were accounted for. However, this time, the scope was expanded to include individuals living in dilapidated or abandoned buildings or in natural shelters, such as caves (Instituto Nacional de Estatística, 2021; Lopes, 2021). Notably, despite using a seemingly similar operational definition, the 2021 Censuses reported a significantly lower number of people experiencing rooflessness in Portugal compared to the surveys (2 127 vs. 4 873) (Instituto Nacional de Estatística, s.f.).

Table 1. Results of the Survey for the Characterisation of People Experiencing Homelessness for the period 2018-2023

Year (data at 31st December)	Participation	People experiencing homelessness
2018	97.5% (271 of the 278 mainland Portugal municipalities)	**Total**: 6 044 • Roofless: 2 428 (40%) • Houseless: 3 616 (60%)
2019	91.4% (254 municipalities)	**Total**: 7 107 (+17.6%) • Roofless: 2 767 (39%) • Houseless: 4 340 (61%)
2020	98.9% (275 municipalities)	**Total**: 8 209 (+15.5%) • Roofless: 3 420 (41.7%) • Houseless: 4 789 (58.3%)
2021	99.6% (277 municipalities)	**Total**: 9 604 (+17%) • Roofless: 4 873 (50.7%) • Houseless: 4 731 (49.3%)
2022	100% (278 municipalities). Validated response rate: 98.6%	**Total**: 10 773 (+12.2%) • Roofless: 5 975 (55.5%) • Houseless: 4 798 (44.5%)
2023	99.6% (277 municipalities)	**Total:** 13 128 (+21.9%) • Roofless: 7 705 (58.7%) • Houseless: 5 423 (41.3%)

Source: prepared by the author based on data provided by Grupo de Trabalho para a Monitorização e Avaliação da ENIPSSA and GIMAE.

For a proper interpretation of the figures gathered throughout the preceding lines, we must ponder the challenges associated with accessing the population affected by homelessness and housing exclusion. In studies like the ones examined, there is commonly an overrepresentation of 'identifiable' homeless individuals on the streets or in institutions, as well as service users (Aldeia, 2012).

Homelessness and Victimisation

People experiencing homelessness as a particularly vulnerable group to victimisation

A number of studies conducted in diverse settings have consistently yielded that rates of victimisation among individuals experiencing homelessness are notably high and significantly surpass those of the population not facing this situation (see, for example, Ellsworth, 2019; García Domínguez and Vander Beken, 2023; Jasinski et al., 2010; Lee and Schreck, 2005; Leomporra and Hustings, 2018; Meinbresse et al., 2014; Newburn and Rock, 2005; 2006; Nilsson et al., 2020; Robinson, 2010). These rates increase significantly among those spending the night in public spaces (Nyamathi et al., 2000; Puente, 2023; Sanders and Albanese, 2016; Wenzel et al., 2000).

What factors may underlie this reality? From a broad perspective, as noted by Dahlberg and Krug (2002), violence is a complex phenomenon which results from the interplay of individual, relationship, social, cultural, and environmental factors. Nevertheless, while all social groups are susceptible to experiencing violence, not all are equally so, with some being particularly vulnerable. The United Nations Department of Economic and Social Affairs (2003, p.8) has defined vulnerability as "a state of high exposure to certain risks and uncertainties, in combination with a reduced ability to protect or defend oneself against those risks and uncertainties and cope with their negative consequences". Homelessness encompasses both elements, placing those who experience it in a disadvantaged position in relation to the satisfaction of their basic needs and the exercise and protection of their rights (Aldeia, 2014a; Sánchez Morales, 2010).

In light of this perspective, a substantial portion of the heightened vulnerability of this group to violence can be attributed to the living conditions inherent in homelessness, serving as victimogenic factors.[16] In this regard, the Lifestyle-Exposure Theory, formulated by Hindelang et al. (1978), appears as a uniquely fitting theoretical framework to address the victimisation experiences of people experiencing homelessness: the living conditions imposed by homelessness act as victimogenic factors by shaping risk-prone lifestyles, contributing to the perception of homeless individuals as convenient, desirable, and vincible victims, limiting their availability, and restricting their ability and willingness to turn to potential sources of protection (Puente, 2023). In the same vein, Gaetz (2004) argues that the social exclusion associated with this situation places homeless individuals in locations and circumstances that condition their capacity to adequately ensure their protection and safety, thereby increasing their risk of experiencing victimisation. In view of these observations, it can be concluded that any effort to eliminate violence against people experiencing homelessness must prioritise addressing homelessness itself, as implementing adequate preventive and intervention measures to combat homelessness would simultaneously mitigate or eliminate the factors that are closely associated with this situation and contribute to the heightened risk of victimisation faced by homeless individuals (Puente, 2023; Tyler and Beal, 2010).

Notwithstanding the above, it does not seem that the heightened exposure of these people to risky circumstances, stemming from the situation they are going through and its implications for all areas of their lives, constitutes the sole reason for their increased likelihood of experiencing episodes of victimisation. Finkelhor and Asdigian (1996) have suggested that some characteristics and attributes of indi-

16 Morillas et al. (2014, p.205) define them as "those factors that favour the victimisation of an individual; that is, the conditions or situations of an individual that make them prone to becoming a victim".

viduals increase their vulnerability to victimisation, independent of lifestyles. According to the authors, that is because such characteristics and attributes "have some *congruence with the needs, motives or reactivities* of offenders" [emphasis in the original] (Finkelhor and Asdigian, 1996, p.6). Since certain offenders are drawn to or react to certain types of victims or their characteristics, such victims are more vulnerable, a process that has been called 'target congruence'.

Among the specific ways in which this process increases the risk of victimisation, Finkelhor and Asdigian (1996) propose *target antagonism*, which refers to "qualities, possessions, skills, or attributes that arouse the anger, jealousy, or destructive impulses of the offender" (p.6). The situation of homelessness, given its associated stigma (Aldeia, 2014b), could represent one of such characteristics in hate crimes and incidents motivated by aporophobia. Aporophobia refers to the "rejection, aversion, fear, and contempt towards the poor, towards the destitute who, at least in appearance, cannot offer anything good in return" (Cortina, 2017, p.14). In a similar vein, in the framework of the Stereotype Content Model (Fiske et al., 2002; 2007), people experiencing homelessness constitute an extreme out-group characterised by a combination of low perceived competence and low perceived warmth, thus eliciting the worst type of prejudice: the contemptuous prejudice, which provokes emotional reactions of contempt, disgust, anger and resentment (see, for example, Robillard and Howells, 2023).

Based on the above, the boundary between violence against homeless individuals motivated by aporophobia and that which is not is often blurred. The distinction between opportunity and prejudice concerning this social group proves challenging, and likely, in most cases both dimensions play a role to varying degrees. Taking this into consideration, addressing this issue requires a dual approach: evidence-based strategies aimed at preventing and tackling homelessness and its associated risks, and broader efforts to drive social change. Social change must focus on deconstructing the stereotypes and negative social representations that foster aporophobia, promoting empathy, and recognising the inherent dignity and rights of individuals experiencing homelessness. Public awareness campaigns, educational programmes, and community engagement initiatives are essential to counter the stigma associated with homelessness and to build more inclusive attitudes. Furthermore, policy reforms should aim at reducing structural inequalities and fostering environments where homelessness is not just seen as an individual failure but as a societal challenge requiring collective action.

Impact of victimisation experiences in trajectories into, through, and out of homelessness

A growing body of literature underscores the relevance of addressing victimisation experiences when designing strategies to prevent and tackle homelessness and housing exclusion. Research consistently demonstrates how victimisation not only contributes to pathways into homelessness but also perpetuates and exacerbates the challenges faced by individuals while enduring homelessness. Understanding these dynamics is therefore crucial for developing comprehensive and effective interventions.

Victimisation and pathways into homelessness

Victimisation often plays a critical role in leading individuals into homelessness. Experiencing maltreatment during childhood has been strongly associated with an increased likelihood of adult homelessness (Liu et al., 2021). This includes earlier onset of the first episode, as well as heightened risk of repeated episodes of homelessness (Bassuk et al., 2001; Koegel et al., 1995).

Childhood abuse and an adverse home life are common in the backgrounds of people experiencing homelessness, particularly among women (Rodríguez-Moreno et al., 2021; Sundin and Baguley, 2015). These early adversities often lead to long-term consequences, including physical and mental health problems and problematic substance use later in life (Bassuk et al., 1998; Booth et al., 2002; Guillén et al., 2024; Liu et al., 2021; Rattelade et al., 2014; Wong et al., 2016), thereby having the potential to indirectly contribute to housing instability and homelessness (Aubry et al., 2012; Aubry et al., 2016; McVicar et al., 2015; Sullivan et al., 2000). Such experiences have also been connected to a heightened risk of victimisation among individuals experiencing homelessness (Edalati and Nicholls, 2019).

Domestic violence, particularly when perpetrated by the male partner, is another critical factor that directly contributes to homelessness among women. Studies consistently highlight its role as a primary precipitating factor for female homelessness (FEANTSA, 2019; Mayock et al., 2016). Many women remain in violent homes or return to their abusers once they have left due to the lack of housing alternatives (Marpsat, 2000; Mayock et al., 2015).

Victimisation during homelessness

For those already experiencing homelessness, victimisation further compounds their vulnerabilities. For instance, in a study involving individuals experiencing homelessness with serious mental illness, Lam and Rosenheck (1998) found that recent victimisation was significantly associated with longer periods spent on the streets and in shelters, as well as with diminished overall quality of life, during follow-up interviews conducted at three and 12 months after baseline. They also identified an inverse relationship between the number of victimisation types experienced and employment, with increases in victimisation correlating with fewer days worked. Importantly, the strongest predictor of victimisation at follow-up was having been recently victimised at baseline, suggesting a cyclical and reinforcing pattern.

Perron et al. (2008) complemented these findings by delving into the psychological impacts of victimisation. They found that non-physical victimisation was associated with higher levels of depressive symptoms. Additionally, they hypothesised an indirect relationship between physical victimisation and depression, mediated by perceived safety. Specifically, they suggested that physical victimisation may cause greater trauma, thereby exerting a stronger influence on how individuals perceive their immediate environment. This diminished sense of safety was proposed to exacerbate depressive symptoms. In contrast, non-physical victimisation, often normalised as part of life in the context of homelessness, was assumed to have a lesser impact on perceived safety.

Research has consistently shown that sexual violence is markedly prevalent in the life histories of women experiencing homelessness, with rates significantly higher than those observed among both homeless men and women in the general population (see, for example, Goodman et al., 2006; Heerde, et al., 2015; Jasinski et al., 2005; Moss and Singh, 2015). Evidence further indicates that the physical and mental health consequences of victimisation, particularly in cases of sexual violence, are often more severe for homeless women (Phipps et al., 2019; Tinland et al., 2018). These findings underscore the critical importance of integrating gender-sensitive approaches into the design and implementation of interventions to address the unique vulnerabilities and needs of women experiencing homelessness.

Additionally, substance use has been proposed as a coping mechanism for victimisation among individuals facing homelessness (Heerde and Hemphill, 2014; 2016). While this may provide short-term relief from the psychological burden of victimisation, it often perpetuates cycles of exclusion and risk, further entrenching individuals in homelessness.

All these findings reaffirm the critical importance of prioritising research on victimisation experiences among individuals experiencing homelessness. Such knowledge should inform the development of targeted, evidence-based interventions that address the multifaceted nature and intricate dynamics of this issue.

Prior Research on Victimisation Experiences of Individuals Affected by Homelessness in Portugal

A non-systematic literature review has been conducted on publications about homelessness in Portugal, with the aim of identifying works that have addressed episodes of victimisation experienced by individuals while in situations of homelessness, either specifically or within the framework of other approaches to the phenomenon. For this purpose, keywords in Portuguese 'sem-abrigo', 'sem abrigo' (homeless), 'sem tecto' (roofless), 'sem casa' (houseless), both independently and together with 'violência' (violence), 'vitimização' (victimisation) and 'vitimação' (victimation), as well as the English terms along with 'Portugal', were input into the search engines of various electronic databases: Google Scholar and bibliographic catalogues of the University of Porto library [17] and the municipal libraries of Porto. [18] The documents section of the ENIPSSA webpage [19] was also consulted. Additionally, experts from both the academic and the intervention fields were contacted, providing insights into homelessness and responses to it in Portugal, along with relevant publications. [20]

The initial search for works was conducted in February, March, and September 2020, during which both electronic resources and printed materials available in libraries in Porto, Portugal, were reviewed. Subsequently, this search was extended in time, focusing exclusively on electronically accessible publications, with updates carried out until December 2024.

The main finding was that research on this topic in Portugal is undeniably limited. Among all the consulted publications, only a few had addressed the experiences of homeless people with violence and victimisation, including the contributions of António Bento, Elias Barreto, and their colleagues in the context of their work, primarily in the area of mental health, with individuals living in the streets in Lisbon. First, these authors synthesised information obtained through interviews conducted between September 1994 and September 1995 by the Street Team of the Renascer Project [21] with 156 roofless people. They found that 55 individuals (47 men and 8 women) had been victims of theft or assault, accounting for 71% of the 77 known cases [22] (Bento et al., 1996). Similar figures were obtained in two subsequent studies with larger samples, a result of the team's ongoing efforts over time. Thus, 62% of the 511 people interviewed by the Street Team of the Center for Social Support of

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17 https://catalogo.up.pt/.

18 https://bmp.cm-porto.pt/bpmp.

19 https://www.enipssa.pt/documentacao.

20 They are cited in the acknowledgements section.

21 Promoted by Santa Casa da Misericórdia de Lisboa.

22 No information was available on this matter in 82 cases.

S. Bento (Santa Casa da Misericórdia de Lisboa) between September 29, 1994, and March 12, 1999 had experienced victimisation (Bento et al., 1999). The percentage reached 64% of the sample of 1 000 individuals who had been assisted by the team until 2002 (Cruz et al., 2002). The work carried out by these authors serves as an excellent example of a comprehensive approach to homelessness, acknowledging the importance of considering the multiple dimensions this social problem entails.

Focusing on female homelessness, Nobre (2021) conducted a qualitative study involving 34 women who were experiencing diverse situations of homelessness. The study examined, among other aspects, their encounters with victimisation across various contexts and stages of their lives, including their trajectories of homelessness. Concerning the latter, accounts of theft were particularly prominent. Some participants also reported having suffered episodes of sexual violence and instances of physical aggressions and verbal abuse. In a similar vein, Costa (2012) presented a case study of a women who had become homeless due to domestic violence and subsequently endured or witnessed, during her time on the streets, forms of victimisation akin to those identified by Nobre (2021).

Although identifying victimisation during homelessness was the primary objective, the literature reviewed also revealed insights into other forms of violence. As highlighted by Costa (2012) and Nobre (2021), domestic violence often serves as a precipitating factor for homelessness among women. For instance, nine out of the 16 participants in Nobre's study who reported experiences of domestic violence identified it as directly linked to their situation of homelessness.[23] Furthermore, Bento et al. (1996; 1999; Cruz et al., 2002) and Nobre (2021) both noted that experiencing or witnessing violence during childhood was a common element in the backgrounds of many participants.

Finally, Valério (2021) examined the impact of interventions based on the Housing First model on the safety, integrity, autonomy, and recovery of a representative sample of women experiencing homelessness who were survivors of violence. Unfortunately, only the abstract of this work was accessible at the time of this review.[24] A request for a full copy of this contribution was submitted, but it was not available by the closing date of this document.

Beyond the studies already cited, no further publications were identified that addressed the victimisation experiences of individuals affected by homelessness in Portugal, whether as a secondary topic or as the primary focus, as of the closing date of this document (December 2024).

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23 Another notable approach to female homelessness in the Portuguese context that discusses the link between domestic violence and homelessness can be found in Martins (2017).

24 The contribution is a Master's thesis.

Discussion and Conclusions: Integrating Victimisation Into Research, Policy, and Practice on Homelessness in Portugal

This study has underscored the significant, yet often overlooked, role of victimisation in shaping the trajectories of individuals experiencing homelessness and housing exclusion. Empirical evidence demonstrates that victimisation influences pathways into, through, and out of these situations. Histories of childhood abuse, domestic violence, and/or victimisation during homelessness are common among individuals experiencing homelessness, exacerbating their vulnerability and hindering their social inclusion. Recognising and addressing this dimension is therefore critical for designing strategies to prevent and combat homelessness and housing exclusion effectively.

Portugal has made substantial progress in tackling homelessness through comprehensive approaches like the ENIPSSA. However, the dimension of victimisation remains largely absent from research and policy frameworks. Integrating this perspective would enhance the effectiveness of existing measures by fully acknowledging the complex, multifaceted, and intersectional nature of homelessness.

Although a notable gap remains in understanding the prevalence and impacts of victimisation among homeless populations, it should be noted that Portugal has already implemented measures that, while not explicitly targeting victimisation, can contribute to reducing the risk or mitigating the impact of these experiences. Embedded in the ENIPSSA 2017-2023 and reinforced in the 2025-2030 strategy, these measures include:

- Community-based participatory approaches, as reflected in the work of the NPISA, which play a key role in identifying vulnerabilities and fostering prevention at the local level.
- Integrated support services that deliver coordinated responses to the complex needs of individuals experiencing homelessness.
- Permanent supportive housing solutions, emphasised through commitments to stable and long-term housing initiatives, such as Housing First programmes.
- Prevention and early intervention mechanisms, such as the Integrated System of Alert and Prevention proposed by the ENIPSSA 2025-2030, aimed at identifying risk factors and monitoring social and housing vulnerabilities, with the goal of ensuring timely and coordinated responses once implemented. Indeed, a key goal of Portugal's approach to homelessness has been to ensure that no one has to remain on the streets due to a lack of support (Instituto da Segurança Social, 2009; Conselho de Ministros, 2017; 2024b).

- Public awareness campaigns and educational initiatives aimed at challenging stigma, fostering empathy, and promoting societal responsibility toward homelessness. These efforts help create safer and more empathetic environments for individuals experiencing homelessness. Acknowledging that all individuals, regardless their characteristics and circumstances, are equally worthy of their rights being guaranteed, protected, and fully exercised, is certainly the foundation for preventing violence.

The relevance and effectiveness of these measures in enhancing safety and alleviating the effects of victimisation experiences within the homeless population have been documented in various international contexts (see, for example, Broadway et al., 2011; Goering et al., 2014; Johnson and Chamberlain, 2015; Panadero and Vázquez, 2022; Santos-Olmo et al., 2024; Zaykowski et al., 2019).

Portugal has thus made notable strides in addressing homelessness and housing exclusion through a holistic, rights-based, and person-centred approach. By combining prevention, rapid intervention, integrated support, and public awareness, these efforts reduce susceptibility to victimisation and alleviate its consequences among populations experiencing homelessness. This progress provides a solid foundation for further advancements. Building on these achievements, the following paragraphs outline key steps to address existing gaps and further integrate the dimension of victimisation into research, policy, and practice.

Filling the knowledge gap on victimisation

Possessing thorough and up-to-date knowledge about a phenomenon is crucial for understanding and addressing its complexities. The intersection between homelessness and victimisation remains an underexplored area in Portugal, as existing surveys and research initiatives fail to include victimisation as a focus of study or monitoring. To address this gap, future research should:

- Quantify the prevalence of victimisation among individuals experiencing homelessness in Portugal, investigate the associated risk and protective factors, and explore its intersectional dimensions. A first step could involve including specific questions about victimisation in the Survey for the Characterisation of People in Situations of Homelessness.

- Examine the role of aporophobia and societal stigma as drivers of violence and discrimination. In this context, studies by Miguel et al. (2010) and da Cruz (2018) revealed that a significant portion of participants in Portugal held negative views toward people experiencing homelessness.

This research would be a key step toward fully understanding homelessness and developing effective, evidence-based interventions.

Embedding victimisation into policy frameworks and indicators

From a policy perspective, integrating victimisation into homelessness strategies is essential to ensuring their effectiveness. It plays a crucial role in breaking cycles of homelessness and improving long-term outcomes. However, while the first strategic axis of the ENIPSSA 2025-2030 focuses on the identification, prevention, and minimisation of risk factors associated with homelessness, it currently does not explicitly consider the role of victimisation in shaping the experiences of homeless individuals. Incorporating victimisation into the framework would also align with the goals of the third strategic axis, which emphasises monitoring, evaluation, and innovation in public policies to combat homelessness. Key policy recommendations include:

- Developing indicators to monitor victimisation in national and local assessments. These indicators should capture data on the prevalence, forms, and impacts of violence across different regions and communities, providing insights into national trends as well as local strengths and vulnerabilities. Furthermore, tracking reductions in victimisation rates and its impacts over time would allow for an evaluation of the effectiveness of measures implemented under the ENIPSSA framework. The information system outlined in the ENIPSSA 2025-2030 could support these efforts by centralising and standardising data collection, enabling consistent monitoring and informed decision-making.

- Including victimisation as a priority focus within prevention and intervention strategies. This is particularly relevant for initiatives such as the Integrated System of Alert and Prevention introduced by the ENIPSSA 2025-2030. Adapting this system to actively detect, follow, and address risks or episodes of violence would ensure prompt and coordinated responses, reinforcing its capacity to prevent victimisation and mitigate its effects.

- Recognising the human rights implications of victimisation and embedding them into policy frameworks. Aligning responses with the ENIPSSA's guiding principles of equality, dignity, and non-discrimination is essential. This involves ensuring that interventions directly address systemic inequalities, reduce stigma, and protect individuals from further harm.

Promoting societal change to address aporophobia

In line with the first and second strategic axes of the ENIPSSA 2025-2030 (the second focusing on the promotion of social inclusion and empowerment for full citizenship), addressing the roots of victimisation requires tackling societal stigma and discrimination, with aporophobia as a critical focus. Public awareness campaigns and educational initiatives, already included in the ENIPSSA framework, should be expanded to challenge misconceptions and emphasise the structural drivers of homelessness. Key actions include:

- Conducting research on aporophobia in Portuguese society to better understand its prevalence and impacts. Insights from this research could inform the design of public policies and awareness initiatives.
- Developing targeted campaigns to shift societal attitudes and foster empathy. These campaigns should challenge stereotypes, highlight the structural factors behind homelessness, and present evidence-based narratives to counter simplistic or stigmatising views.
- Engaging individuals experiencing homelessness in the design and delivery of awareness efforts, thereby promoting their inclusion, empowerment, and ensuring a more accurate representation of homelessness.
- Guaranteeing the dissemination of accurate and accessible information. Providing factual data that reflects the reality of homelessness can help counter misinformation, reduce stigma, and encourage evidence-based dialogue on the issue.

Fostering international collaboration and shared learning

Portugal's efforts to address homelessness through comprehensive and evidence-based strategies position it as both a recipient and a contributor in the international arena. By engaging in a reciprocal exchange of knowledge and best practices, Portugal can both learn from global experiences and share its own insights, particularly in the areas of prevention, rapid intervention, and integrated support systems. This mutual learning fosters a global perspective for tackling homelessness and housing exclusion and its correlates, enhances policy effectiveness across diverse contexts and strengthens shared responsibility in addressing these challenges.

The recent launch of the European Platform to Combat Homelessness —held in Lisbon in June 2021 [25], highlights the importance of enhancing cooperation among stakeholders. This platform promotes transnational exchanges and evidence-based policymaking (EAPN, 2021), creating a timely opportunity for Portugal to:

- Broaden its focus by integrating underexplored dimensions, such as victimisation and aporophobia, into its homelessness strategy.
- Share its own achievements and lessons learned from initiatives like the ENIPSSA.
- Adopt and adapt successful international practices to further improve local responses.

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25 Lisbon Declaration on the European Platform on Combatting Homelessness, 21 June 2021. Available at: https://ec.europa.eu/social/BlobServlet?docId=24120andlangId=en.

Concluding Remarks

Incorporating victimisation into the agenda to address homelessness in Portugal represents an urgent step toward more inclusive, effective, and human-rights-based policies. By prioritising research, embedding victimisation into policy frameworks, and challenging societal stigma, Portugal can enhance its response to homelessness while contributing valuable insights to global efforts to tackle this complex issue.

Ultimately, addressing victimisation not only acknowledges its prevalence but also underscores its profound impact, increases awareness, and conveys an unequivocal rejection of such behaviours, coupled with a steadfast commitment to undertaking the necessary actions for their eradication. In doing so, it contributes to ensuring the safety, dignity, and rights of homeless individuals while fostering a more just and inclusive society for all.

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Overcoming the Postal Paradox? A Policy Discussion Paper on the Right to an Address for People Experiencing Homelessness

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Abstract_ *Homelessness remains a persistent issue across Europe. Once a person loses their home, they are caught in a vicious circle of deteriorating living situations and face difficulties in a myriad of domains. Across Europe, losing one's home also means losing an address, and the administrative and social repercussions this entails. For this reason, the Homeless Bill of Rights – designed by FEANTSA and Housing Rights Watch, in which the rights of PEH are formulated- included 'The right to a postal address'. To date, several countries designed an alternative address registration to facilitate homeless and 'address-less' people's access to welfare rights and services. Yet, it remains unclear how such an alternative address should be designed, by whom, and for what purposes. By considering recent evidence, followed by an analysis of expert interviews, this paper explores said alternatives and critically reflects on their opportunities and shortcomings. This discussion paper contributes to the homelessness literature by going beyond a one-sided focus on 'the right to housing' to look into the complexity of human rights violations, by addressing, dissecting, and reflecting on the question what the 'right to an effective postal address' actually means.*

Keywords_ *Homelessness, postal address, social rights, administrative exclusion*

Introduction

Even though EU Member States pledged to jointly work toward ending homelessness by 2030 [1], homelessness persists. To date, people experiencing homelessness (PEH) still face a complex array of human rights violations, extending well beyond the fundamental right to housing. These violations encompass a wide range of human rights, including the right to an adequate standard of living, the right to life, the right to health care, and the right to social protection. With only six years to go, efforts have been made such as the European campaign to encourage cities in Europe to reaffirm their commitment to respect the rights of PEH. For this, the 'Homeless Bill of Rights' [2] was launched, created by FEANTSA and Housing Rights Watch (2017), consisting of 11 crucial rights for PEH drawn from European and International human rights law. Interestingly, this Bill highlights the importance of an address for PEH which can help in counteracting the violation of their rights. Concretely, the Bill includes 'the right to an effective postal address' (Art. 5), and states that "an effective postal address of last resort is needed for people who are homeless and require this assistance" (FEANTSA and Housing Rights Watch, n.d., p.1x).

The crucial role of an address for PEH in accessing their rights has been revisited more than once at the European level. In October 2019, representatives from the European Commission, European NGOs, and international experts of nine EU Member States came together to discuss challenges and good practices in providing adequate social assistance for PEH. Reported factors influencing their access are the lack of information on relevant rights and services, costly or complex application procedures, fear of being stigmatised, lacking trust in authorities or institutions, conditionality and benefit sanctions when not complying to requirements, and limited availability of services and administrative barriers, amongst others. Not having or losing a residential address is noted as one of the most significant barriers in their debate on accessibility (Crepaldi, 2019; European Commission, 2019).

Obtaining an address goes beyond the self-evident need for official correspondence. In several European countries, it serves as an eligibility requirement for accessing child allowance, unemployment benefits, pension, social housing, health insurance, or even a bank account, to vote, or to join a library. In fact, almost all rights and services relevant for this specific vulnerable population group are dependent on demonstrating a proof of address (European Commission, 2019).

1 As declared in the Lisbon Declaration on the European Platform on Combatting Homelessness. More information: https://ec.europa.eu/social/BlobServlet?docId=24120andlangId=en.

2 More information: https://www.feantsa.org/download/homeless-bill-of-rights-handbook306835778875312583.pdf.

Because of this, it serves as a fundamental part of our identity and our ability to participate fully in society (Robben et al., 2023a). This paper critically reflects on the importance of an address and on the Homeless Bill of Rights' call for an 'effective' postal address by exploring different address registration systems for PEH in Europe. It also examines the idea of a 'one-size-fits-all' approach in Europe to guarantee PEH' access to their entitlements.

Methodology

In this discussion paper, I first conducted a literature review in which I synthesised existing research on homeless and address-less persons, the barriers of accessing rights and services for PEH, and the importance of an address to overcome these barriers. Understanding existing knowledge and gaps was an interesting starting point to further discuss the findings by conducting expert interviews (Bogner et al., 2009). Twenty-five experts were then purposively sampled (Etikan et al., 2016), of which ten10 individuals eventually participated. Sampled experts were researchers, practitioners, policy makers, and other professionals with specialised knowledge or experience on the importance of an address for PEH, either in one or more European countries. Table 1 gives an overview of their functions and organisations, the countries of work and the timing of the interviews.

Table 1: Overview of respondents' profiles (2021-2023)

	Country	Function + organisation	Date + Timing
1	Austria	Professor at the University of Applied Sciences, Linz.	March 2021: 1h09
2	Austria	Managing director of BAWO[3]	June 2021: 1h02
3	Belgium	Researcher at UC Louvain	September 2021: 1h42
4	Croatia	Researcher (linked w/ Cost Action)	May 2021: 1h17
5	Finland	Researcher at Y-Säätiö[4]	September 2023: 1h02
6	Ireland/India	Joint founder of Addressing the Unaddressed[5]	July 2021: 0h48
7	Ireland	Head of Corporate Communications at An Post[6]	July 2021: 1h01
8	Italy	Jurist/collaborator of the association of Avvocato di Strada[7]	July 2021: 1h33
9	Slovakia	Researcher at the Institute for Labour and Family Research – organisation of the ministry of Labour (Slovak Republic)	July 2021: 0h56
10	United Kingdom	Founder of the ProxyAddress	August 2023: 0h55

The interviews followed a semi structured topic list: a general list of questions for each country, added with more specific questions on their own country's information on homelessness and address registration. Expert interviewing as a qualitative method is ideal to gather in-depth insights from individuals with specialised expertise of the matter of homelessness and address-lessness. Yet, given the purpose of this study is merely explorative – outlining various viewpoints, arguments, and recommendations- for the purpose of stimulating debate, findings should be interpreted with caution and may not necessarily be representative for all European countries.

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3 BAWO is the Austrian umbrella organisation for Austrian NGOs working in homelessness.

4 Y-Säätiö is a non-profit foundation focusing on homelessness and housing issues in Finland. More information: https://ysaatio.fi/en/.

5 Addressing the Unaddressed is a nonprofit social enterprise, providing unique addresses to people who live in dwellings of unplanned settlements. Their administrative office is located in Ireland, their work was mostly carried out in India (stopped in January 2024). More information: https://www.addressingtheunaddressed.org/.

6 An Post is the state-owned provider of postal services in Ireland. More information: https://www.anpost.com/.

7 Avvocato di Strada is an Italian NGO offering legal services to PEH, working in more than 50 cities across Italy. More information: https://www.avvocatodistrada.it/.

The Issue: The Postal Paradox

In many European welfare states, enrolment in the civil registry is a minimum prerequisite for accessing social benefits and services. This process of registration determines eligibility for various welfare provisions including child allowance, social housing, pension, unemployment benefits, banking services, and voting rights (Byrne, 2018; Golabek-Goldman, 2017). Originally established during the Napoleonic era for the purpose of classifying and monitoring the population, its purpose expanded with the growth of welfare states to identifying eligible individuals for welfare services. Said registration now acts as an entry point to state's support, and therefore as a mechanism for inclusion (those who are registered) and exclusion (those who are not) (Peeters and Widlak, 2018).

Not having a residential address, and thus not being registered, poses significant challenges for PEH – it leaves them trapped in a catch-22 situation that has come to be known as the 'Postal Paradox': without an address, homelessness persists because access to social rights and services is restricted (Byrne, 2018). All respondents showed agreement on the vital role of an address, as highlighted below.

> We were aware of the issues that for a family that becomes homeless… how difficult it is to maintain any semblance of any real normal life and normal routine without a permanent address. (Respondent, July 2021)

Or, as mentioned in Mask's (2020, p.250) 'Address Book': "The lack of a home address was crushing people's chances of ever getting a home again."

Let's elaborate on this. The purpose of an address is often stated as two-fold: it is a tool for location and for identity. It provides a specific geographic location for a residence – important for navigation and official correspondence, but also for emergency services to locate a person in need. Most of all, it has become an identity element of a very unique sort (Prescott, 2015). An address is often used for verification procedures: to distinguish you as a unique person when opening a bank account, applying for public services, conducting financial transactions, and therefore preventing mis-use or fraudulent activities. In this way, a verifiable address enhances credibility in interactions with official authorities.

Yet, classifications such as civil registries that are based on one's permanent residency are not naturally occurring systems – they are administrative databases created by governments to record and monitor events by their choice. The registry as such is not organically grown to be the basis for other institutions and public services, such as social housing or health care insurance. Policy choices shaped its importance and designed its eligibility criteria. For instance, in many European countries, there is an increased concern about mis-use of benefits and fraud preventions. Anti-fraud measures have become more popular, making a correct and up-to-date register indispensable. However important, the access to social rights and services for PEH is at stake. "The unregistered remain outside the formal system", the World Bank[8] states, because "without a legal identity, they cannot be formally employed, or taxed, and may be excluded from health, education, or social services". A correct registration ensures their legal access to welfare provision, financial transactions, participation in society (e.g., voting), and so on. Another tangible benefit is that an address prevents the exacerbation of stigma or discrimination they are faced with. "They need an address to maintain connection with society, but also with their own families. Some of them have not been in contact with their families for many years because of the stigma of having to use an address of a homeless charity" (Respondent, July 2021). PEH (amongst others, such as exchange students or mobile population groups) show the blind spot of the register's internal logic: being excluded because one does not fit the registry's criteria means being excluded from public services (Peeters and Widlak, 2018), which makes it difficult for governments to locate and reach out to them, but also for researchers to include them in their sample design leading to underrepresentation and underestimation of the homelessness issue (Glasser et al., 2014; Nicaise and Schockaert, 2014).

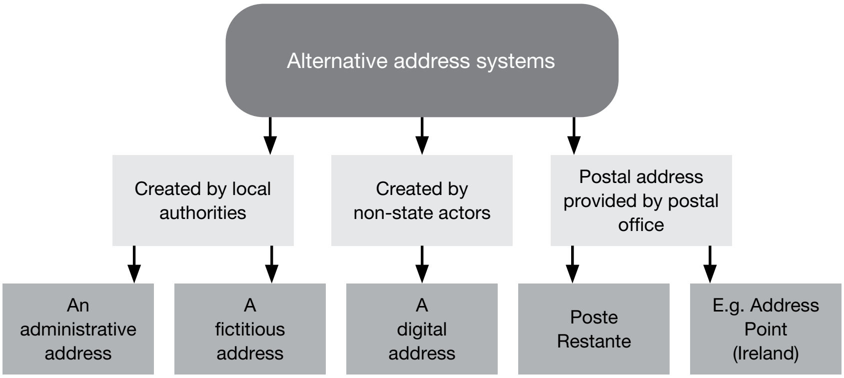
To overcome this postal paradox, several European countries provide an alternative address registration. In this contribution, I want to reflect on the possibilities of such an alternative address, on its pitfalls and challenges. When implemented effectively, it can bring about a win-win situation: it allows for PEH to (re-)integrate into society, for the administration to keep track of their (eligible) citizens/beneficiaries, and aiding scholars in keeping vulnerable persons on their radar for inclusion in further studies. However, if not implemented effectively, the implications of administrative exclusion are disproportionately profound: scholars- and our respondents- agreed that 'Without an address, you do not exist' (see also Robben et al., 2023a). "If you are not registered at a specific place, you don't have voting rights, the right to healthcare, social rights or even identity rights. If you don't have an address, from a legal point of view, you don't exist. You're a ghost" (Bennett, 2022). And so, even though such alternative addresses are no panacea to combat homelessness, it can prevent the exacerbation of their precariousness.

8 More information: https://blogs.worldbank.org/en/opendata/civil-registrations-and-vital-statistics-its-not-just-important-its-matter-life-and-death.

Countries' Efforts to Overcome the Postal Paradox

In this section, I will explore alternative registration mechanisms for homeless and address-less people. I will distinguish between four types: an 'administrative address' created by (local) state authorities, a digital address created by non-state actors, a fictitious street, and a postal address. Figure 1 gives an overview of these different types of address systems.

Figure 1: Overview of types of alternative address systems for PEH.



Type 1: Administrative Address – Created by Local Authorities

An administrative address combines its location and identification purposes. More than a postal address, it is an address that can be used for official administration. Applicants need to visit a public or private organisation (most of the time a local social service, an NGO, or municipality) who assesses, grants, and monitors such an administrative address, depending on if they (continuously) comply with certain requirements.

In Belgium, the so-called 'reference address' at a local welfare agency was specifically established for PEH to remain administratively 'anchored' in a municipality. PEH do not reside at this specific address, yet can use this when applying for a job, social housing, and so on. A similar system can be found in the Netherlands. Also provided by the municipalities – as well as by other organisations (who got the municipality's approval) – is their 'letter address'. Provided by every municipality, both practices require PEH to comply to formal requirements – and certain municipalities may impose additional eligibility criteria. By means of case-by-case judgements, claimants' specific circumstances are assessed. For instance, in Belgium, one needs to demonstrate they 'experience homelessness', for instance with a signed declaration of a shelter. In both Belgium and the Netherlands, providing proof of a local connection to the municipality is required as well. PEH need to indicate a long-term residence in a particular location, or a kind of connectedness to a specific community or municipality. Recent evidence suggests these conditions hamper the access for PEH to such an administrative address (Robben et al., 2023a, 2023b), and more so when certain municipalities do not consider temporarily living with friends or family (the so-called 'couch-surfers' or living doubled-up) or in temporary shelters as having a 'local connection'. Applicants are faced with a myriad of administrative burdens, ranging from such conditionalities to complex application forms. Robben et al. (2024) found that these burdens are specifically constructed by municipal policies to disincentivise the use of such administrative addresses, even though these are formal rights for persons without a residential address. Generally, the access to both administrative addresses are restricted due to administrative burdens (Robben et al., 2024) leading to a significant group that remains de-registered and therefore administratively invisible (Robben et al., 2023a). To illustrate, in 2018, almost 20 000 individuals claimed such an administrative address in Belgium (Rijksregister, 2023), and more than 50 000 did so in the Netherlands (CBS, 2019).

In France, PEH can apply for an administrative alternative address called 'domiciliation' at local social centres ('CCAS'), intercommunal centres ('CIAS'), town halls, or by (specifically for this) recognised NGOs. Again, a local connection is required – one needs to demonstrate they have a link with the municipality (or 'group of municipalities'), and they have to report once every three months. In theory, this requirement is relatively minimal: e.g., staying in the municipality on the date of application is deemed to be sufficient, or having family ties with someone who lives in the municipality. [9] In practice, however, civil society organisations repeatedly warned about its accessibility for PEH. The 'domiciliation' is refused because social services lack the financial resources or political will (Caritas France, 2020). Or even worse, certain social services overall refused to offer such a 'domiciliation', for instance because they 'fear to attract homelessness'. Several municipalities offer an alternative for PEH to apply for a 'domiciliation' at an NGO: in theory this can be a low-threshold option for some (e.g., those with negative experiences with social assistants), such NGOs also suffer scarce funding and high caseloads, and overall are reported to be poorly equipped. Interestingly, civil society organisations also question refusals based on discriminatory criteria (such as age or temporary living situations such as doubling-up), and so also in this practice, the local connection – and the increasingly conditional and stricter verification procedure to demonstrate such a local tie – hampers the PEH's access to fundamental rights and services (CNDH Romeurope et al., 2021). More than only a postal address, the

9 More information: https://www.service-public.fr/particuliers/vosdroits/F17317?lang=en.

address is recognised in France to be a way for “helping them to access their legal rights” (Caritas France, 2020, pp.24-25), and so in their report ‘Une Addresse Pour Exister’, nine civil society organisations recommend an adaption in the law to sanction municipalities who refuse the domiciliation or who impose discriminatory (and thus unlawful) criteria, more resources for those services that grant the ‘domiciliation’, and propose the ‘*garantir un accès facilité pour toutes et tous’.* Overall, it is said to make it as easy as possible for individuals experiencing homelessness to apply, with minimal administrative procedures and a guaranteed physical reception they can contact if they’d need support (CNDH Romeurope et al., 2021). Interestingly, the same recommendation was proposed in the Netherlands by de Nationale Ombudsman (2016) which led to a reform in January 2022: since then, municipalities are legally obliged to grant a letter address to those who need one.

Type 2: A Fictitious Address

A different type of address for PEH can be found in Italy. More than 19 000 people live on the Via Modesta Valenti[10] in Rome, yet, local residents would find it challenging to pinpoint the address. Certain Italian municipalities offer *via fittizie* or fictitious addresses – addresses which cannot be found on the map, but do hold a legal value. Like those with a residential address, this fictitious address makes them eligible for social assistance, social security benefits, an identity card, and gives PEH the opportunity to go voting. Originally, these addresses were established by the Italian Government to enumerate circus performers and traveling professionals. Individuals experiencing homelessness can apply for one at the municipality in which the person has a ‘dimora abituale’ – again, a long-term residence. In 2022, over 230 such fictitious addresses were registered, yet it is not a standard practice across Italy (Choi, 2022; Ioannoni & Paluzzi, 2023), and the application procedures or eligibility criteria vary depending on the municipality you reside in (Avvocato di Strada, n.d), as stated below.

> You need to prove that you are a homeless person and that you are in contact with social services or some homeless organisation. And what the municipality additionally asks is to provide documentation that proves the connection of the homeless person with local territory. So, maybe hospital papers or job contracts or maybe education… the fact of having studied in some school in that territory or having relatives in that territory. All this information is useful in order to get the fictitious address. (Respondent, July 2023)

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[10] Interestingly, this road was named after a woman experiencing homelessness who died in the city’s main train station in 1983, after emergency services continuously refused to help her (Bennett, 2022).

If a PEH applies for said address, the municipality is in principal legally obliged to create one – yet, in practice, they often refuse due to fear of facing financial consequences of every additional resident that could qualify for welfare services (Bennett, 2022). Alongside the local connection criterion discussed before, in Belgium and the Netherlands a fear of 'financial risks' also existed and the budgetary consequences for municipalities when granting an administrative address (see also Robben et al., 2024). Yet, civil society organisations, such as Avvocato di Strada in Italy, continuously put pressure on these actors to remind them of their legal obligations.

Type 3: A Digital Address – Created by Non-State Actors

Another type of address registration is a digital address, of which a first practice can be found in the UK. The so-called 'ProxyAddress' was created by an architect Chris Hildrey who aimed to connect PEH's need for an address to an unused addresses database. "There are approximately 30 million addresses currently within the UK, over 95% of which are residential. Over 500 000 of these are empty in England alone. Of these, over 200 000 have been empty for more than six months" (Hildrey, 2019, pp.152-153). Concretely, a ProxyAddress[11] makes a 'proxy' of a property's unused address – thereby giving access to an identity, and providing postal redirection for PEH. It involves only a minimum identity requirement (i.e., demonstrating their citizenship or their right to reside in the country). Postal mail sent to said ProxyAddress is being redirected by the Postal mail to their actual, current location or a collection point (for instance a post office, a PO Box, or a homeless shelter). The user does not need to change their ProxyAddress every time they move; they simply update their destination address (via the website, email, phone, text, or in person). Because of this, local authorities or other third parties are not expected to maintain a constantly updated database. If they do actually need information about their location, said parties can apply for this at the ProxyAddress database – and the users themselves can decide to grant or deny this information (Hildrey, 2019).

Interesting here is that the ProxyAddress elaborated on the meaning of a location, and ownership of an address. When establishing the initiative, the question was raised whether one can use the address of a property owned by another without their consent. Yet, it was confirmed that the address itself – created by the local authority, and the postcode created by the Royal mail – "does not constitute part of the ownership of a property; when you purchase a house, you do not purchase the address" (Hildrey, 2019, p.154). In its core, the ProxyAddress separates address and location. Hildrey gives the example of the UK post address of Santa Clause,

[11] More information can also be found on their website: https://www.proxyaddress.org/.

given each year to children to write him a letter. Even though his address is ‘Santa’s Grotto, Reindeerland’, its ultimate destination is elsewhere – and in fact, could be anywhere – depending on the existing redirection protocols. Another – maybe more relevant – example is given of the victims of the ‘Grenfell Tower fire tragedy’ in 2017 (in West London). The Royal Mail launched an alternative service provision so as to continue their postal mail: a ‘free mail redirection service’ [12] which could be arranged online, by completing a form or by calling a dedicated emergency line. By doing so, they recognised the vital role an address has during periods of instability (Hildrey, 2019).

A second practice are Google’s Plus Codes. It is an open-source API [13] which generates an address that is based on the longitude and latitude, and is displayed as a combination of letters and numbers, for instance the Eiffel Tower would be on the location 8FW4V75V+8Q. These unique digital addresses can be assigned to any location, and are navigable through Google Maps. NGOs, such as Shelter Associates [14] and Addressing the Unaddressed [15], partnered with Google to generate and assign said Plus Codes to those living in critical infrastructure for their residents to access, (mainly) emergency, social, and postal services (Mason, 2020). Alongside projects in India and the US, in São Paulo (Brazil), Plus Codes enable access to rural roads and properties in the countryside (Marinho, 2023a; Pathak, 2022). If states allow them to be used to access social and political rights and services, such digital addresses can be interesting for PEH. Nevertheless, there are concerns over non-state actors such as Google’s potential to track and store location data. Overall, this fits within a larger discussion about (digital) privacy, digital inclusion, data-driven surveillance, and the handling of personal data by tech companies (e.g., Gangadharan, 2017; Mervyn et al., 2014). Such privacy concerns are specifically necessary for disadvantaged groups such as PEH, who inherently inhabit a state of invisibility (Clarke et al., 2021; Gilman and Green, 2018).

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12 More information: https://www.gov.uk/guidance/grenfell-tower-fire-june-2017-support-for-people-affected#:~:text=If%20your%20home%20was%20affected,at%20the%20Curve%20Community%20Centre.

13 See https://maps.google.com/pluscodes/?sjid=10794399853655558082-EU.

14 More information: https://shelter-associates.org/plus-code/.

15 More information: https://www.addressingtheunaddressed.org/.

Type 4: Postal Address

A postal address adheres to the idea of an address as an accessible tool for everyone who needs to collect their postal mail. The only principle it leans on is that it needs a clear and standardised mean for mail delivery, ensuring reliability and accessibility for all recipients. In Ireland, the Irish postal service An Post introduced a free postal address service for PEH in 2019. Their so-called 'Address Point' provides an address that can be generated online, after which letters can be collected at a postal office of their own choice. More than 200 post offices participate (McMahon, 2019), and so when moving to another municipality, a new address can swiftly be generated that is linked to a different post office. PEH are only required to register and present the correct photo identification at the address, and so no local connection is required. An Post created this service in collaboration with local charities, both recognising the importance of an address.

> A lot of the homeless charities were willing to allow their address to be used by their homeless clients. But there was a stigma attached to that and many people did not want to be associated with the homeless charity. […] We were conscious that -as the National Postal Service- there was something that we could do. So we did a lot of research, directly with the homeless charities and also with people that were homeless. And we gathered a lot of information about that stigma- about what having an address would mean. (Respondent, July 2021)

Alongside minimal requirements and an easy application procedure, An Post also accounted for potential stigma or discrimination. For instance, addresses of local charities may be too recognisable, and therefore should not be used. Because there is a close collaboration with local charities, service providers, and local authorities, they can assist and advise clients in accessing this service. Another advantage is that it is not linked to civil registration, and so one does not need to be unregistered at one location to register in another one.

> Let's say the person is in an emergency accommodation when they sign up. And a few weeks later they move or are offered another accommodation in another part of the city. Then they do not need to tell anyone, there is no bureaucratic process. All they need to do is go back onto the site, start again, find a post office that's close to their new accommodation, click and start a new address. Obviously, they should go back and check at the original post office if there is any mail for them. But they don't need to deregister or anything. They just make a new address and continue on with their life. (Respondent, July 2021)

However, it is not available across Ireland – post offices in smaller rural areas may not offer such a service. It differs from an administrative address because it addresses the need for collecting correspondence, not the need for being registered. 'It's simply a mailing address', a correspondent (July 2021) states, "People ask if it can be used as proof of identity. So that it can be used for banking or other services. It certainly is used by people in applying for a job. But this [Address Point] was not designed to be proof of identity. We just want to provide a secure, dignified address they can use, that's what it is designed for". Moreover, compared to administrative addresses, postal services do not suffer immediate financial consequences if more people make use of this system. They do not work with municipal offices either, and so they are not restricted (e.g., in budget or staff) if the demand for said addresses may suddenly increase. It can be compared to a PO Box, albeit the latter is not free. Local organisations are aware of Address Point for PEH, and will redirect them if necessary. In 2020, more than 2 800 individuals made use of such a postal address in Ireland (O'Connor, 2020) – making up for only a fraction of the whole population. [16]

Another system that solely focuses on one's mail correspondence is 'Poste Restante'. It is a free postal service established for travellers, in which the postal service retains their mail until the recipient collects it. Even though its national implementations and popularity can vary, the concept of Poste Restante is recognised internationally and has been used widespread by travellers worldwide (Post Office UK, n.d.). However, it also requires a proof of identification – which remains a challenge for PEH, certainly those who are unregistered or undocumented. Citizens Advice (UK) therefore suggests relaxed ID requirements for such a Poste Restante for PEH (Byrne, 2018).

A 'One-Size-Fits-All' Solution? Elements of an 'Effective' Address for PEH

The range of different types of addresses raises two questions, which one fits best into the reality of PEH, and whether there is a 'one-size-fits-all' solution, or in other words, an address that addresses their need for mail correspondence as well as their need to access social and political rights and services. In a survey by Citizens Advice (UK) that examined the postal paradox, interviews with PEH and professionals in the homelessness sector as well as with Members of Parliament (MPs) were conducted. They found that four out of five MPs agree that a lack of a fixed postal address exacerbates their situation, and over half of them reported having difficulties in their constituency with accessing essential services if they do not

[16] The Irish Government publishes their statistics of PEH residing in emergency accommodation each month (see Irish Department of Housing Local Government and Heritage, 2024). For instance, in December 2020, 5 873 adults were sleeping in emergency accommodations.

have a fixed address. Citizens Advice proposed alternatives in their survey, such as a general PO Box or the Poste Restante system for PEH, of which more than 70% of MPs agreed with both recommendations (Byrne, 2018).

Another interesting study was the one by Marinho (2023b), who investigated the effect of providing a digital address on registration turnouts. In Brazil (as in many other European countries), lacking an address results in an inability to register for electoral purposes and, consequently, the inability to vote. By focusing on more than 250 unaddressed slum dwellers in Brazil, their field experimental survey offered them three solutions: 1) information to register online to vote, 2) providing a digital address by means of an algorithmic proof of address designed by a private agency (i.e., Google), and 3) idem, but then by a public agency (i.e., the Brazilian Electoral Court). They found all three options increased their registering and voting intentions. Interestingly, there was a tendency to trust private agencies rather than public ones. Such studies raise the question how such an alternative address for PEH should be designed, by whom, and for what purposes.

To increase the chances of an alternative address system being effective for PEH, several key elements need to be considered. First, its purpose needs to be very clear. It needs to be a legitimate alternative 'administrative' address that accounts for welfare eligibility and mail correspondence, or a postal mail address that solely allows for the latter. Nevertheless, the more functions this address has, the more eligibility conditions PEH need to meet. An administrative address in Belgium and the Netherlands requires applicants to demonstrate actually experiencing homelessness as well as a local connection, whereas a postal address provided by An Post in Ireland does not. The latter, however, "was not designed to be proof of identity" as a respondent states.

> Sometimes people ask about the Address Point address being used as proof of identity. So, that it can be used for banking or other services. It was not designed to be proof of identity. It's simply a mailing address. In some cases, social workers will assist the client in dealing with the bank or, you know, the social welfare department having it used as an official address for somebody. But it's not where they are living. It's made very clear. We didn't set out to solve all those problems. You know? If this can help, that's great. But we were just doing what we could do and that was provide a secure, dignified address. So that's what it's designed for. (Respondent, July 2021)

Such proof of identity, however, is necessary to access social and political rights and services. Administrative addresses do so, whilst simultaneously connecting applicants with local social services or municipalities that can offer additional support. Yet, in case of administrative addresses, such as those in Belgium and the Netherlands, a myriad of barriers restrict their accessibility – including conditions that PEH need to meet, complex applications forms, and administrative burdens (e.g., Robben et al., 2024; Robben et al., 2023b; Nationale Ombudsman., 2016). Moreover, its purpose needs to be clearly formulated for each actor involved. In Belgium, for instance, different actors regard this address as a stepping stone toward social assistance, legitimising them to impose additional (albeit unlawful) conditions, such as a weekly follow-up, applying for a job, or even addiction treatment. What social workers may then see as helpful nudges, can overall be a push too far – causing them to disengage from social assistance or avoiding care in general (Robben et al., 2023b). Moreover, not complying with the locally imposed conditions means a refusal or discontinuation of the administrative address, and leads to being un-registered, falling of the radar, and an exacerbation of their already precarious situation (Robben et al., 2023a).

A second element is that for PEH, it needs to be free of charge, and its application process needs to be simple, free from administrative burdens, complexity, and overall bureaucracy.

> The other thing about what was required and what would work best for homeless people was just that it needed to be really simple. It needed to take account of a nomadic lifestyle. It needed to take account of possible illiteracy issues or language issues. It had to be just as free as possible from bureaucracy or complexity. (Respondent, July 2021)

Third, the diversity within the homeless population should allow for a diversity in options. Whereas some individuals experiencing homelessness may benefit from social services, others may not, or may refuse their support, and merely need a postal address. Moreover, certain individuals may be in need of an address, yet do not meet the requirements that administrative addresses impose, for instance because they do not fit within their definition of homelessness (e.g., living doubled-up), because they fail to demonstrate a local connection, or because they face challenges exacerbated by the varying implementations of different local social services (see also Robben et al., 2023b).

> I am thinking of a case study, of a person who resided at Ostend [at the sea side in Belgium], but decided to move to Blankenberge [a neighbouring municipality] because his social network was there. It was a threshold to go to their local social welfare agency, but he made it. Or he thought he did, because he immediately went through a ceasefire of questions about him really being homeless, whereas the last welfare agency did not do so. They were so much more welcoming. (Respondent, June 2021)

In other words, all categories of PEH should be able to access the type of address they are in need of. Whether this is a postal address or an address provided by municipalities, NGOs, local shelters, or charities, and so on. The option(s) itself need to be locally known and well-documented so it is easily referable for other actors involved in the homeless sector. Moreover, it needs to be free of stigma: such an alternative address for PEH need not to be recognised by others.

> Of course, also that the address had to look like a regular, normal address. There was really little point in providing an address that was very obviously for homeless people. We would be reinforcing the stigma. (Respondent, July 2021)

A fourth element highlights the need for a discrimination- and stigma- free address. To ensure it remains free of stigma, the system needs to be constantly revised and reviewed. For instance, the Address Point in Ireland adds 'Caepel Lane' in its address line, so the postal offices know its for PEH. Whereas it may not be perceived as an out-of-the-ordinary street address now, it might be so in the future, and so evaluation is key.

A fifth 'elephant in the room' element – or at least so for municipalities and local authorities – is the prevention of potential fraud. An administrative address is used for official purposes, and is not an address where PEH should *live* – in many countries, that would require them to be registered on this location. In countries such as Belgium and the Netherlands, one's benefit level depends on their housing situation: single adults tend to receive higher levels than cohabiting adults. Yet, this principle can exacerbate PEH's living situations: out of fear of benefit cuts, sheltering a friend may be too risky (e.g., see Interfederaal Steunpunt Armoedebestrijding, 2018).

A last element is the general availability of the (different options of) addresses in different municipalities. PEH living in rural and urban areas should be able to access the type of address they are in need of, without experiencing thresholds. Cities and municipalities need to recognise – for instance by signing the Homeless Bill of Rights – that the provision of an address is a 'minimum minimorum' (Robben et al., 2023b) for PEH to be eligible for welfare benefits and services, and so there should be as few barriers and burdens possible.

Discussion

The postal paradox means that losing one's address can exacerbate PEH's living situation, hampering the access to rights and services, and can lead to (both administrative and social) exclusion. Drawing from the insights of experts and literature on alternative address systems, several elements emerge as crucial for designing a so-called 'effective' address for PEH. The homeless population, however diverse and heterogenous, does have common needs. Everyone should be able to fill in the required box of an address on important forms including applications for a job, social housing, and child allowance, amongst others. Not all persons, however, need or want additional social support provided by local social services. Overall, countries need to offer alternative options without too many barriers or burdens. Current practices, such as in Belgium and the Netherlands, expect PEH to meet requirements that are too difficult or do not take into account their reality, such as demonstrating their experience of homelessness and being 'locally connected'. This local connection appears to be a key anomaly: nation-wide access to the right to an address can be hindered by different local implementations. So, the focus needs to move away from the local to the national responsibilities. Interestingly, the Homeless Bill of Rights was designed specifically for cities, with the argument that this is the policy level 'close to citizens' that provides 'many of the services needed at the local level'. Yet, the Bill itself claims that even though they "have most of the policy and legal competence […] but they can't always end homelessness themselves" (FEANTSA and Housing Rights Watch, 2017, p.3). Whilst implemented locally, there needs to be a unified strategy that leverages both local insights and national competences to facilitate access to such an address.

An 'effective' postal address brings about opportunities for all actors involved. In cases such as the Address Point in Ireland, it allows us to map homelessness in both urban and rural areas. Albeit guaranteeing privacy of the recipients, the data collection based on such addresses can allow for a rich dataset which is ideal for research, decision-making, and resource allocation. In the era of e-government or e-bureaucracies (Cordella and Tempini, 2015), a digital address is an interesting tool to further empirically investigate. However, the question is then raised if those who remain outside of the mainstream data flows are excluded (Gilman and Green, 2018). Moreover, surveillance of PEH is already known to come in many forms, such as intrusive background checks when in shelter admission, extensive and continuous surveillance if they are looking for a job, housing once they reside in these shelters, and they undergo highly personal questions when accessing social services including their health status, living situation, experience with domestic violence, amongst others (Gilman and Green, 2018). Such 'verification extremism' (see Bennett, 1994) can exacerbate their instability if they decide not to make use of social services due to too many or too strict requirements. The purpose of an alternative address thus needs to be transparent and proportionate: PEH's need for basic rights and services often trumps their need to avoid surveillance (Clarke et al., 2021), and consequently, this should be the focal point of policy decisions. Actively overcoming the postal paradox is essential, not just for those directly affected, but for society as a whole, otherwise PEH remain un-recognised, uncounted, and unaccounted for.

Moreover, the discussion can be expanded to asking the question: Why is an address a prerequisite to enjoying constitutional rights? Certain policies may experiment – and think outside of the box – such as Golabek-Goldman's (2017) 'Ban the address' proposal to encourage employers to remove the check box on applications about their home address. When studying the obstacles to the labour market that PEH face, she concluded that "the job application process disqualifies and discourages homeless persons from applying for employment (Golabek-Goldman, p.1790)". Many questions thus arise that would be suitable for further investigation, such as empirically examining the opportunities and challenges of different types of alternative addresses for PEH and examining experiences of PEH to access these addresses.

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Strategies for Measuring Homelessness in a Federally Organised State – The Case of Austria

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Abstract_ *The measurement of homelessness is a challenging issue, in particular in federally organised states. This is also true for the case of Austria, where the measurement of homelessness is located partly on the national level, and partly on the level of sub-national federal provinces. Social services for people experiencing homelessness vary in the nine Austrian federal provinces as far as funding arrangements as well as homelessness monitoring systems are concerned. Political engagement regarding this issue also varies considerably. Consequently, the current state of homelessness monitoring in the nine federal provinces, including data coverage and quality, is unclear. Against this background, this paper intends, first, to survey the measurement of homelessness in the multi-scalar welfare system of Austria. Second, it aims to develop suggestions for comprehensive homelessness measurement in Austria. With this purpose in mind, we have conducted 27 expert interviews and organised a workshop with stakeholders from national institutions, federal provinces, and social-service organisations. Accordingly, this paper provides a comprehensive overview of existing measurement practices, data sources, and data quality in Austria. Additionally, we have formulated three measurement models that address the different levels or scales of the federal state.*

Keywords_ *Measurement of Homelessness, Methods, Federal State, Federal Provinces, Austria, Homelessness Monitoring Models.*

Introduction

To combat homelessness successfully, the availability of comprehensive data on its extent and profile is a crucial precondition (Busch-Geertsema, 2010; Demaerschalk et al., 2018; Hermans, 2023). Homelessness is described as a heterogenous and elusive phenomenon (Lee et al., 2021). As such, generating reliable data is still challenging in many European countries. Fuzzy definitions and incomplete statistics, in combination with a high degree of hidden homelessness, often hamper the successful implementation of existing policy strategies. Consequently, the monitoring of homelessness became a salient issue on the European level: the ETHOS Light typology provides a new comparable standard for common definitions and measurement strategies (Edgar et al., 2007). Furthermore, the declaration of Lisbon and the foundation of the EPOCH-network in 2021, as well as an OECD workshop in November 2023 (OECD, 2023), highlight the political will to harmonise definitions and measurement approaches on homelessness to develop adequate strategies.

In Austria, the measurement of homelessness likewise remains challenging. The Austrian welfare state provides a comprehensive social-security and health system, but social services are largely funded and organised on the sub-national level (Dimmel, 2015). Consequently, the measurement and publishing of data on homelessness is mainly organised on the level of the federal provinces. Due to different funding and reporting systems, the depth and detail of available data and data reports vary considerably among the nine Austrian federal provinces. Only register-based data (in particular the Austrian Central Population Register; Statistik Austria, 2023) and the EU-SILC survey (BMSGPK, 2023) record data at the national level. As such, the current homelessness data landscape in Austria is patchy, displaying varying degrees of coverage of different regions and ETHOS Light types (BAWO, 2019a; 2019b).

Against this background and in the context of the growing commodification of the Austrian housing market (Musil et al., 2022), the overall aim of this paper is, first, to provide an overview of existing data on homelessness in Austria, with reference to the ETHOS Light typology. Second, we present three measurement models which consider the specific situation of the federally organised Austrian welfare system. For this purpose, we have conducted 27 in-depth interviews with experts at the national and sub-national levels, as well as with experts from research and social-service institutions. Furthermore, we have organised a workshop to discuss and evaluate existing data for each ETHOS Light type in Austria and to identify critical aspects of a national strategy to measure homelessness. Based on this, we have developed three models for measuring homelessness in Austria.

In this contribution, we discuss challenges and strategies regarding the measurement of homelessness in Europe in the following section. Then we provide an overview on existing measurement approaches and types of data relevant for this study, followed by a short description of the role of state organisations for the measurement of homelessness. After explaining the research methods used in this study, we present the current context of homelessness measurement in the federally organised welfare state of Austria. In the next section, we describe existing data and measurement practices in Austria on the three relevant scales of the social welfare system: the national scale, the scale of the nine federal provinces, and the scale of social-service organisations. We continue by presenting key principles for designing a measurement toolkit in Austria and, subsequently, we discuss three basic measurement models. Finally, we formulate policy recommendations for drafting a comprehensive monitoring strategy in a federally organised welfare state and draw final conclusions.

The Challenge of Measuring Homelessness: Homelessness as an Elusive Phenomenon

Measuring homelessness is described as a challenging issue, mainly for three reasons: First, homelessness is a heterogenous phenomenon, ranging from rough sleeping to insecure or inadequate housing, with many gradually differing forms ranging between these two poles (Daly, 1992). This variety is well mirrored in the six categories of homelessness included in the ETHOS Light Typology. Second, homelessness is a dynamic phenomenon, characterised by high mobility between its different forms, and by different pathways leading in and out of homelessness; consequently, homelessness is described as a 'moving target' by Lee et al. (2021). Finally, from a geographical perspective, the six types of homelessness show a high degree of spatial variation between urban and rural regions. This becomes apparent, as these types display different levels of visibility, particularly in rural areas (Demearschalk et al., 2019; Snelling, 2017). Also, people experiencing homelessness perceive their lifeworlds differently, according to their current housing status (Schnell, 2021).

Additionally, the phenomenon of hidden homelessness – e.g., persons living temporarily with friends or family (ETHOS Light 6) – complicates the comprehensive capture of homelessness data. These hidden populations are neither visible in public space, nor are they in contact with social-service institutions. They often do not even perceive themselves as being homeless. The recurring Austrian Survey on Living Conditions and Wellbeing (BMSGPK, 2023) estimates that around 69% of all people affected by homelessness in their lifetime can be allocated to ETHOS Light category 6. Although homelessness is often perceived as an urban phenomenon, empirical findings also point to a high level of hidden homelessness in rural areas (Snelling, 2017), which can be explained by a weak network of service institutions, a high level of social stigmatisation, and a limited supply of affordable housing (Cloke et al., 2000). In general, the share of hidden homelessness is estimated at up to 70% of the total homeless population (Eberle et al., 2009).

For effective data generation on homelessness, Pleace and Hermans (2020) mention two crucial aspects: first, the definition and delimitation of homelessness in its various forms ('Who counts as homeless?'), and second, the adequate statistical recording of these groups ('How can those who are homeless be counted?'). These aspects have become apparent on a European scale, as the European countries represent different national housing and welfare systems (Matznetter, 2002), wherein the types of homelessness are perceived and defined in different ways. The ETHOS Light Typology (Edgar et al., 2003; 2007) – which has become a European standard for the definition and delimitation of homelessness – made visible the differences in the perception, definition, and measurement of homelessness among European countries (Busch-Geertsema, 2010; Geyer et al., 2021).

Measurement Approaches

The adequate measurement of homelessness faces three challenges: the heterogeneity of the overall phenomenon, the problem of hidden homelessness, and the mobility of affected people among the different forms of homelessness. Against this background, it is widely acknowledged that a comprehensive measurement of the extent and profile of homelessness should rely on multiple data collection methods and data sources, addressing different dimensions of this phenomenon (Demaerschalk et al., 2018): the stock of households or persons affected by homelessness at any given point in time; the flow of households or persons that move between or into/out of different forms of homelessness in a specific time period; the prevalence of homelessness, measuring the number of people that have experienced homelessness over a certain timespan, and, finally, the incidence of homelessness or the number of people who have become homeless during a specific period of time (Hermans, 2023).

Considering that there are differences in the national definitions of homelessness, available data sources, and political interest in the overall topic, the applied measurement regimes also vary significantly. However, almost all national statistics on homelessness in the EU rely on at least one of four methods of quantitative data collection (Busch-Geertsema et al., 2014; Geyer et al., 2021): counts (street counts/

service-based counts), surveys, administrative data of social-service institutions, and public census or register data. The degrees of coverage of different forms of homelessness as well as strengths and weaknesses are discussed below for each method.

Counts include street counts, recording the number of rough sleepers, primarily in large cities, e.g., in Paris, Barcelona, or Brussels. Street counts are point-in-time-counts usually conducted during one night in the entire city, potentially including places outside the city limits that are of special interest to the homeless population (Drilling et al., 2020). In addition to rough sleepers, city counts usually also include certain groups of sheltered people experiencing homelessness, such as people staying in emergency accommodation or in transitional housing. Typically, city counts also include questionnaires, going beyond the mere counting of sheltered and unsheltered people experiencing homelessness. In contrast to this, service-based counts are conducted among a broad range of social-service institutions, reaching people in different ETHOS Light categories. They efficiently measure the extent and profile of homelessness, but rely on the network of service institutions and their willingness to take part in the surveys (Demaerschalk et al., 2018).

Quantitative surveys are based on representative statistical samples. Surveys are conducted at various levels, primarily at the national, but in federally organised countries, also at the sub-national level (e.g., Flanders Household Survey, Statistiek Vlaanderen, 2021). At the European level, the EU-SILC survey collects microdata in a module on housing difficulties and the prevalence of homelessness since 2018 (European Commission, 2024). These data provide comprehensive (and ideally comparable longitudinal) insights into the phenomenon of homelessness. Household surveys are also subject to certain shortcomings, such as the severe underrepresentation of rough sleepers or the inability to produce data on the current homelessness situation. In this context, Germany has recently taken an innovative approach by taking a representative sample of people experiencing homelessness in three stages in cities and municipalities throughout the nation to arrive at a reliable estimate of rough sleepers and individuals in concealed homelessness (GISS/Kantar Public, 2022).

Administrative data of social-service institutions constitute an efficient data source, based on information on service users. If personal data are available for individuals, these can also be linked to registry data. Some countries analyse administrative data, e.g., the systematic analysis of night-shelter data in Ireland (Daly, 2019), or national registration systems for monitoring homelessness in Denmark, Slovenia, and Hungary (Demaerschalk et al., 2018). In certain federally organised countries (e.g., Germany), regional authorities established a monitoring system that relies on administrative data (BMAS, 2022). The main weakness of this type of data source is described as the ‘service paradox’ (Hermans, 2023): density and quality of the service system have a strong impact on data output; people that are not entitled to use or are not in touch with social-service institutions are not recorded. Furthermore, regions with a weak network of service institutions are only mapped partially.

Register data are drawn from national censuses, which are conducted every 10 years in many countries, as well as from public registers, in particular the central population register. Central population register data are available in most European countries. These can be linked to other registers, providing comprehensive insight on socioeconomic structure, education, or the health situation of the population. As these data rely on individual registration, people in precarious housing conditions as well as people experiencing homelessness are often severely underrepresented in official numbers. As such, register-based data can only represent a minimum level of homelessness (Busch-Geertsema et al., 2014).

The Role of State Organisations for the Measurement of Homelessness

Methods for measuring homelessness not only differ in relation to different forms of homelessness (ETHOS Light types), but also in regional coverage. Some methods are applied on a national scale, while others are often limited to the regional scale. The following section demonstrates how the spatial range of measurement methods is often compromised by the spatial organisation of the state.

For instance, *register data* (mostly aggregated at the national scale in European countries) usually cover the whole country, as the central population register is centralised in many European countries, even if the registration of people experiencing homelessness might vary between (urban and rural) regions. However, some European countries, such as Germany, do not record people experiencing homelessness at all via the central population register. Furthermore, survey data also provide good spatial coverage on the national level, e.g., the EU-SILC survey. However, due to sampling size, survey data do not allow for comprehensive spatial differentiation, particularly in individual regions (European Commission, 2022). Additionally, in federally organised countries, surveys are also conducted on the sub-national level (e.g., Flanders; Demaerschalk et al., 2018).

Methods that rely on data provided by *social-service institutions*, e.g., via service-based counts or administrative data, show the highest variation of spatial coverage. In centralised countries such as Norway or Denmark, service-based counts are coordinated by independent research institutions on the national level (Benjaminsen et al., 2020; Dyb and Zeiner, 2021). The Danish 'mapping' is conducted in two steps (Benjaminsen, 2022): first, the identification of a broad range of relevant social-service institutions, followed by the inclusion of these institutions in a comprehensive survey of people affected by homelessness. According to the Danish mapping method, only a national research agency and social-service institutions are involved in the count. Finland, a centralised state, likewise conducts an annual survey based on administrative data, coordinated by the national 'Housing Finance and Development Centre of Finland' (ARA). Data are generated in 293 municipalities, collected from various service institutions, and forwarded to ARA (ARA, 2023). Regardless of survey design, a centralised agency conducts the survey on the national level in both cases, in cooperation with actors at the local scale – service providers and municipalities.

In federally organised states, the measurement of homelessness can be highly fragmented. For instance, between Flanders and Wallonia, register data are not comparable, as the two regions have different registration systems. Even within Wallonia registration systems vary (Demaerschalk et al., 2018). Beyond that, the federal structure of Belgium also hampers the implementation of a nation-wide service-based count. Although planned and coordinated by a national agency, the 'Centre for Care Research & Consultancy' (LUCAS; Mertens et al., 2023), service-based counts have been implemented in a 'bottom-up strategy', motivating and increasing the number of participating municipalities one after the other. Here, recurring counts in different municipalities result in steep learning effects and gradual improvements in methodology over time, even if national numbers are still missing. Street or city counts are furthermore usually organised on the municipal level, covering entire cities or certain districts (Drilling et al., 2020). Germany, on the other hand, provides a positive example of how the fractalisation of data generation in a federally organised state can be overcome by prescribing by law (1) an annual count of sheltered persons affected by homelessness, and (2) a biennial survey on persons experiencing rooflessness and hidden homelessness (BMAS, 2022).

Even if the case studies mentioned above represent extreme examples for data collection in centralised vs. federally organised states, they demonstrate that the degree of decentralisation (in particular of the welfare state) can have strong implications for the coverage of different forms of homelessness. In the following sections we will discuss the current situation and possibilities for a nation-wide, comprehensive measurement of homelessness in Austria. Against this background, we aim to answer the following research questions:

1. What is the current degree of coverage of different ETHOS Light categories by different data sources on the national, federal-province, and organisational level in Austria?

2. How can different measurement strategies be applied on a nationwide scale to obtain a comprehensive insight into the extent and profile of homelessness?

Methods

The main intention of this paper is to gain insight into existing data sources for measuring homelessness in the federally organised state of Austria and to develop a comprehensive nation-wide measurement model. For this purpose, we conducted broad desk-research to analyse the existing forms of measurement on the three spatial levels of the Austrian welfare system: nation state, federal provinces (sub-national level, 'Bundesländer'), and social-service institutions. First, it was essential to establish a knowledge base about how and to which extent homelessness is already measured by different entities at different scales in Austria. Second, we analysed the current coverage of different forms of homelessness, according to ETHOS Light, by various measurement techniques, including deficiencies in measurement.

Based on this, we conducted 27 expert interviews with stakeholders of national institutions (Ministry of Social Affairs, Statistik Austria), social welfare organisations in federal provinces, as well as social-service institutions. These interviews, which have been conducted in person (15) or via Zoom meetings (12) in October and November 2023, allowed us to obtain comprehensive insight into social-service systems for the homeless and current measurement techniques, which are organised in different ways in the nine federal provinces in Austria. We generated information on data quality, availability, and coverage of different forms of homelessness in different Austrian regions. In combination with our desk-research, the expert interviews allowed us to develop a catalogue of detailed information on the measurement of homelessness for the ETHOS-Light categories (Musil et al., 2024) on the one hand, and at varying spatial scales on the other hand: the national level, the nine federal provinces, and the network of social-service organisations, operating in the federal provinces, cities, and regions.

Based on these results, we designed an initial basic model for measuring homelessness, taking into account the spatial scales of the Austrian welfare system. In a next step, we invited 18 experts active on different levels of the welfare state – federal state, federal provinces, and social-service institutions –, as well as researchers. We organised (1) an in-depth workshop to discuss our basic model; (2) a world café (Freimuth and Barth, 2014) to reflect on the challenges of counting persons in each ETHOS Light category, and (3) an in-depth workshop on various crucial aspects of a nationwide measuring model, including networking and incentive systems, the role of federal provinces, national coordination, and data management.

Measuring Homelessness: The Case of Austria – A Conservative, Federally Organised Welfare State

Austria's welfare system can be described by two main characteristics: First, in Esping-Andersen's (1991) typology, Austria has repeatedly been classified as the ideal type of a conservative, familialistic welfare regime (Matznetter, 2002). Second, Austria can be described as a federally organised welfare state with a complex allocation of competences between the federal state and nine federal provinces ('Bundesländer'). As such, social welfare legislation and social housing policy are the responsibility of the federal provinces (Dimmel, 2015). In 2019, a new framework for social welfare legislation has been created by the central government to be translated into law in the federal provinces. However, only six of the nine federal provinces have adopted the new framework and enacted corresponding laws (Carinthia, Lower Austria, Salzburg, Styria, Upper Austria, Vorarlberg). Hence, social welfare legislation, which contains regulations on social assistance, social housing, and housing for the homeless, shows considerable disparities among the nine federal provinces (BMSGPK, 2024). This impedes a comprehensive overview of the landscape of social services addressing homelessness as well as its measurement in Austria.

As is the case with social-service legislation, the extent of social assistance payments as well as the system for their administration vary in each federal province (Dimmel, 2015). Social welfare usually covers direct payments to people experiencing homelessness in the form of social assistance, but it also covers the cost of housing, which is paid to housing institutions either separately for each person living there in certain federal provinces (subject-based funding: Salzburg, Vienna, Vorarlberg) or in the form of a yearly overall subvention paid to the housing institution, based on revolving funding agreements (object-based funding: Burgenland, Carinthia, Lower Austria, Styria, Tyrol, Upper Austria). The existence of these two systems, combined with different legislative backgrounds and varying interest in the overall topic of homelessness, implies that different data of varying quality are exchanged between social-service providers and federal provincial governments.

In addition to the fragmented legal framework, different funding systems, and varying practices of data collection at the sub-national level, data are also collected at the national level (federal state) and at the level of social-service institutions in federal provinces. On the national level, the Austrian Central Population Register ('Zentrales Melderegister') records every person taking residence in an Austrian municipality (Statistik Austria, 2015). This system also registers people experiencing homelessness and people living in housing institutions for the homeless. Moreover, on the organisational scale, social-service institutions, such as night shelters, temporary and long-term housing institutions, day-care centres, social advisory centres, social housing institutions, and organisations for medical and psychological assistance record data on their clients. These data are collected for different purposes and aggregated in different internal or external data management systems (BAWO, 2019a; 2019b). Finally, in the federal provinces of Salzburg and Vorarlberg, two umbrella organisations conduct yearly homeless counts among the extended social-service network (ARGE Wohnungslosenhilfe, 2022; Forum Wohnungslosenhilfe Salzburg, 2023).

Hence, data generation in the social-service system varies among the three spatial scales on the vertical axis, but also among the nine federal provinces on the horizontal axis. In the following, we provide an overview on existing data sources and the quality of data produced within the Austrian system of social services for people experiencing homelessness.

Current Data Sources on State, Federal Province, and Organisational Level

As indicated above, data is generated at different scales or levels in Austria, including the national, federal-province, and organisational scale. Furthermore, approaches to data generation, types, and quality of data vary in each federal province. Consequently, data sources are manifold, albeit fragmented, providing great potential for developing a unified approach to the measurement of the extent and profile of homelessness. Subsequently, we will describe different measurement techniques at different scales and we will summarise the results of our analysis on data coverage in the federal provinces in figure 1.

Figure 1: Coverage of ETHOS Light categories by different measurement techniques (ISR)

	Vienna	Salzburg	Vorarlberg	Styria	Upper Austria	Lower Austria	Tyrol	Burgenland	Carinthia
1	ACR ORG STW FPO	ACR ORG STW FPO Count	ACR ORG STW FPO Count	ACR ORG STW FPO	ACR ORG STW STC FPO	ACR ORG STW FPO	ACR ORG STW FPO	ACR ORG FPO	ACR ORG FPO
2	ACR ORG FPO	ACR ORG FPO Count	ACR ORG FPO Count	ACR ORG FPO	ACR ORG FPO	ACR ORG FPO	ACR ORG FPO	ACR ORG FPO	ACR ORG FPO
3	ACR ORG FPO	ACR ORG FPO Count	ACR ORG FPO Count	ACR ORG FPO	ACR ORG FPO	ACR ORG FPO	ACR ORG FPO	ACR ORG FPO	ACR ORG FPO
4	ORG FPO	ORG FPO Count	ORG FPO Count	ORG FPO	ORG FPO	ORG FPO	ORG FPO	ORG FPO	ORG FPO
5	ORG STW FPO	ORG STW FPO Count	ORG STW FPO Count	ORG STW FPO	ORG STW FPO	ORG STW FPO	ORG STW FPO	ORG STW FPO	ORG STW FPO
6	ACR ORG FPO	ACR ORG FPO Count	ORG FPO Count	ACR ORG FPO	ACR ORG FPO	ACR ORG FPO	ACR ORG FPO	ACR ORG FPO	ACR ORG FPO

Legend: light grey = extensive coverage, middle grey = average coverage, dark grey = reduced coverage, ACR = Austrian Central Population Register, ORG = Administrative data of social service organisations, STW = Steet work, STC = Street count, Count = Yearly service-based counts, FPO = Federal provincial organisations

National scale – the Austrian Central Population Register

The Austrian Central Population Register is kept by municipalities, recording every resident in their administrative area. People experiencing homelessness can be recorded as 'without permanent residence' (homeless) or as residing in a housing institution for the homeless via a list of corresponding institutions (institutional housing). These data are aggregated at the national scale and published annually by Statistik Austria (2022; 2023). In 2022, 19 450 people were recorded as homeless, with 11 701 people registered at least once in institutional housing, and 8 973 people registered at least once as acutely homeless. [1] This system generally covers people

[1] Persons switching between homeless registration and registration in institutional housing account for the sum of the two numbers being higher than the overall total. Double counts are avoided within the two registration types through applying a unique personal identifier.

in ETHOS Light categories 1, 2, and 3, largely neglecting the remaining three categories (BAWO, 2019b). Further shortcomings include the underrepresentation of certain subgroups (e.g., women, youths, illegal migrants, or the hidden homeless) or the conceptual exclusion of asylum seekers (BAWO, 2019a). Coverage via the Austrian Central Population Register depends on individual and institutional willingness to record clients, e.g., reflected in reduced coverage in Vorarlberg, where social-service organisations do not regularly register people sleeping rough or shelter users (ETHOS Light 1 and 2).

Scale of federal provinces

In each federal province, numbers regarding the activities, serviced clients, and use of budgets of organisations providing social services for the homeless are aggregated in a different form, according to two general funding principles: subject-based funding (funding for single clients via social assistance payments) and object-based funding (yearly funding for entire organisations or facilities), which have direct implications for data available at the federal provincial level.

Under *subject-based funding schemes,* all persons receiving payments for housing in homeless institutions are recorded with their full social security data. Hence, data regarding recipients, the amounts paid, as well as the institutions providing housing and other services, should be available at any time. Subject-based funding has been implemented in Vienna, Salzburg, and Vorarlberg. Depending on which organisations are attributed to the homelessness service network, persons in all ETHOS Light categories can be reached. Normally, ETHOS Light categories 2 and 3 are extensively covered, including detailed personal data of clients (see figure 1 FPO-coverage in Vienna, Salzburg, and Vorarlberg), while coverage of ETHOS Light 1, 4, 5, and 6 depends on the client's use of social services, social housing, and social advisory organisations, which usually makes it difficult to collect data on these groups on a reliable scale.

Object-based funding schemes are based on funding contracts between the federal provinces' departments of social affairs and organisations providing services or shelter for the homeless. The funded organisations are obliged to provide reports on their activities regularly, including information about the number of clients served. Anonymised, aggregated client data for entire years or quarters are then transferred to and analysed by federal provincial departments, forming the basis of future funding agreements. These data usually cover ETHOS Light categories 1 to 3 in varying degrees of detail, not however including personal data, except in certain housing institutions in Lower Austria (see figure 1). Additional data on persons in categories 4, 5, and 6 can be made available through social-service, social housing, and social advisory organisations. In aggregated form, these data are not suitable for providing a reliable account of the actual homelessness situation, since double counts cannot be avoided without using a unique identifier for each person recorded.

Scale of organisations

Organisational data sources comprise data recorded for administrative or documentation purposes by organisations providing services or accommodation for the homeless. In addition, network organisations, such as the 'Network Housing Assurance' in Upper Austria (Land Oberösterreich, 2020) provide multiple access points for people experiencing homelessness, with varying coverage in different regions and social strata. To access different service offers, under subject-based and object-based funding alike, clients usually have to provide personal data to the respective organisations. Hence, organisations' administrative data, recorded for internal or external (e.g., funding) purposes, constitute a rich source of data, potentially covering all ETHOS Light categories and most regions in Austria.

There are no systematic street counts in Austria; only Upper Austria reports on the numbers of rough sleepers (ETHOS Light 1) that have been reached via street work each year (Amt der Oberösterreichischen Landesregierung, 2022). In other cities with street-work activities, such as Vienna or Graz, data on the number of rough sleepers are not systematically recorded – hence, no reliable data can be provided.

In two provinces – Salzburg (Forum Wohnungslosenhilfe Salzburg, 2023) and Vorarlberg (ARGE Wohnungslosenhilfe, 2022) – central homeless network organisations conduct a yearly service-based homeless count. The counts, which have been held since 1995 and 2013 respectively, allow for following trends in homelessness numbers based on yearly results and for identifying changes in the size of sub-populations, although data collection techniques vary over time. Depending on the social-service organisations included in the count, persons in all six ETHOS Light categories can be accounted for, as reflected in figure 1. By including organisations in urban as well as in rural parts of the federal provinces, regional coverage can be expanded. Cooperation with provincial hospitals or social-service agencies can further increase the reach of the count (Forum Wohnungslosenhilfe Salzburg, 2023). Compared to the methods described above, ETHOS Light categories 4 to 6 can be reached more efficiently. This is reflected in the fact that a share of roughly 45% of all recorded persons in the Salzburg count can be assigned to these categories (Forum Wohnungslosenhilfe Salzburg, 2024).

In the following, we first describe three key principles for a comprehensive measurement that were formulated by the experts during the workshops. Then we outline three models for measuring data on homelessness in Austria based on these principles to potentially overcome the fragmentation of Austria's administrative landscape and collect data across different data sources and administrative scales.

Key Principles for Designing a Comprehensive Measurement Toolkit in Austria

Coordination and networking

As indicated by Demaerschalk et al. (2018), the design of a national measurement regime should be integrated into a nationwide homelessness strategy, providing a general framework for data monitoring and use. Coordination by a central state institution or an independent research institution is paramount for study design and a controlled nationwide rollout (Hermans, 2023). Additionally, federal provincial governments will take a more or less active role coordinating efforts for data generation and aggregation, according to their role in overall study design. Intense networking activities by local umbrella organisations will be essential for ensuring broad participation by social-service organisations. Furthermore, legal provisions at the national level need to be translated into federal provincial law to provide a consistent legal basis for data generation and data management. Necessary resources, such as funding, know-how, and personnel, need to be made available by the Austrian Ministry of Social Affairs to support local organisations and to ensure seamless implementation. This also includes technical and administrative infrastructure for data collection at different administrative levels of the welfare state. In order to maximise coverage of different ETHOS Light categories, it is paramount to broaden the network of social-service organisations taking part in a national measurement regime. By including, e.g., housing advisory organisations, debt counselling services, municipal housing agencies, hospitals, or penitentiaries, coverage in ETHOS Light categories 4 to 6 can be increased by maximising contact points for people in these groups.

Data management and storage

First, different types of data must be specified, including data items, format, expected quality, and levels of aggregation. The model proposed here for an Austrian homelessness measuring system should contain three data sources: (1) street or city counts, (2) administrative data of social-service organisations or data of an extended service-based count, and (3) Central Population Register data. To combine the three data streams, first, a decision about timing has to be taken to align data collection periods of data streams (2) and (3). Second, a personal identifier is to be applied to avoid double counts in these two data streams. Third, as street or city counts do not usually record clients' personal data, data generated in those counts cannot be combined with the other data sources identified above. They can, at best, supply a snapshot of the current number of people sleeping on the street in cities or regions willing to take part in street or city counts. A shared system for data collection, aggregation, and transfer across different data sources must ensure seamless rollout among all participating social-service providers at the organisational scale. After completing data collection, data ownership should be transferred to agencies at federal provincial or national levels, who should then aggregate data and control data consistency and quality. In a next step, data collected from organisations can be combined with Central Population Register data at the national level by introducing a unique personal identifier, avoiding double counts. Street or city count data can complete this picture, even if these cannot easily be combined with other data sources. In general, the system of data generation, aggregation, and transfer should be accompanied by detailed legal regulation on data ownership and data storage.

Data analysis and data use

After the collection and aggregation of data as well as the combination of data sources, pooled data should be provided to state entities or independent research institutions (to avoid political bias) for further analysis. Research interests of institutions on different national and sub-national scales can be addressed and relevant insights for policy design and evaluation can be derived at this stage. Key indicators for different ETHOS Light categories, social sub-groups, or relevant policies can be calculated, while insights can be generated for different cities, regions, or other spatial contexts. In combination with legal provisions for data generation and transfer, data ownership and use, as well as the communication of results, also need to be regulated. Regular evaluation and revision of techniques, procedures, and processes of measurement ensure the refinement of data generation approaches over time.

Three Basic Models for the Measurement of Homelessness in Austria

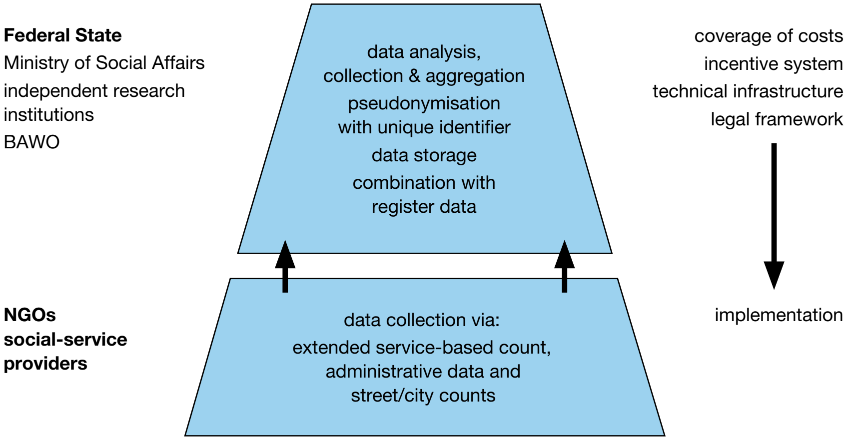
Centralised measurement model with nationwide rollout

In a centralised measurement model, an organising entity on the national level – a government agency or an independent research institute – should plan and coordinate data collection among the extended service network in all Austrian federal provinces (see figure 2). This involves the realisation of a homeless count or the harvesting of administrative data on the level of social-service organisations, the aggregation of data on the national level by the centralised organising institution, and the combination of collected data with Central Population Register data using a unique identifier. The competency to decide on administrative principles, technical realisation, and rules for data management and aggregation lies with the central organising institution, while the corresponding legal framework is to be passed by legislative entities at the national and sub-national scale.

Data on service users is directly sourced with the relevant organisations via a homeless count or the transfer of administrative data. Cooperation with national and regional umbrella organisations is paramount to ensure broad collaboration and participation in the social-service network. Participation on behalf of organisations can also be ensured by corresponding legal provisions. Data generated by organisations is directly passed on to the centralised organising entity, where it is checked for quality and consistency, and aggregated for different administrative levels (municipalities, regions, federal provinces, and the nation state).

After relevant adaptations of data and follow-ups on data collection have been concluded, organisation data should be pseudonymised using a unique identifier to combine it with Central Population Register data. By combining the two data streams, coverage of ETHOS Light categories and different regions in Austria can be maximised. In addition, street counts in selected cities can provide a snapshot of the number of rough sleepers, potentially including persons in different forms of accommodation for people experiencing homelessness in a city count. Subsequent data analysis is conducted by the central organising entity at the national scale. Hermans (2023) and Demaerschalk et al. (2018) suggest data analysis by an independent research entity to avoid political interference and potential bias. State organisations, such as Statistik Austria, the Austrian national information management institute, could also take this role. Detailed regulation on data ownership and data storage is to ensure the lawful long-term use of data. The rights to data use and the communication of results by organisations on different administrative levels likewise must be regulated in advance.

Figure 2: Centralised model with nationwide rollout (ISR)



A measurement process carried out by a central state agency or an independent research institute holds the advantage of unified management and decision-making, hence reducing possibilities for governments of federal provinces to interfere in the count. Legal provisions can be set out by national legislative bodies and translation into federal provincial legislation can potentially be bypassed. Centralised planning moreover facilitates interaction between research entities and legislative bodies, speeding up the planning process as well as technical and administrative implementation of the planned measurement processes. Disadvantages can include reduced potential for networking on the federal provincial level, or the possible exclusion of social services exclusively run by provinces (e.g., hospitals). Furthermore, as social-service organisations for the homeless are largely funded by federal provincial governments and are regulated via sub-national legislation, no legal basis for obliging local organisations to take part in the count exists ex ante.

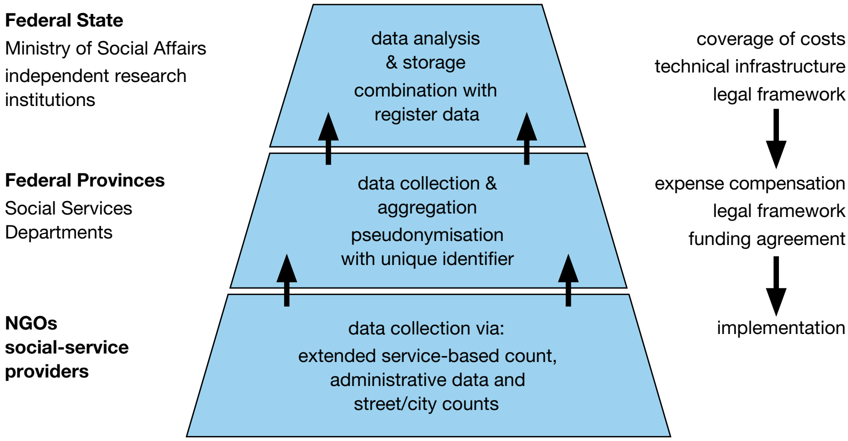
De-centralised model with nationwide rollout

A de-centralised model for measuring homelessness in Austria may similarly be planned and organised by a central entity on the national level (see figure 3). In this model, federal provincial governments serve as local partners who organise the data generation process in the network of social-service organisations via service-based homeless counts or the collection of administrative data. National and respective federal provincial legislation defines the role of organisations acting at the national, federal provincial, and organisational scale. Clear legal provisions map the data generation process at the organisational level, the transfer of data to federal provincial entities, the pooling and pseudonymisation of data, as well as the transfer of aggregated data to the relevant national bodies. In contrast to the first model, clear rules for data ownership, transfer, and storage need to be set out in national laws and translated into federal provincial legislation in this model.

For consistent and comprehensive data gathering at the organisational scale, federal provincial entities together with local umbrella organisations play a major role for ensuring broad participation in the social-service network. Additionally, social services or health services, run by federal provincial governments, should take part in the count to maximise coverage. As federal provincial governments fund large parts of these organisations' activities, data exchange can be included in revolving funding agreements.

After the data gathering phase, data must be collected by entities at federal provincial level, where it is monitored for quality, consistency, and completeness. Missing data can be followed up on and non-compliant organisations can be motivated to supply data. Pooling different data sources, a unique personal identifier should be applied at federal provincial level to avoid double counts. The pooled and pseudonymised data must then be transferred to entities at the national level, where data streams from federal provinces should be checked for data quality and consistency before being combined with Central Population Register data. Similar to the centralised model, a national government agency or an independent research institute should be tasked with data analysis. Data ownership rights and the rights to publication of results are to be set out in detailed legal provisions.

Figure 3: De-centralised model with nationwide rollout (ISR)



Ensuring cooperation of federal provinces can result in an even more extensive coverage of the local homelessness situation, because data generated by organisations providing services for the homeless can be combined with data from different institutions financed and run by federal provincial governments, such as hospitals and psychiatric wards. One of the risks of a de-centralised approach is possible non-participation by single provinces resulting in a partial national count. Another risk involves the effort for communication and coordination: With an additional layer of decision-making (federal provinces), complexity in the planning process can increase significantly. The willingness of federal provinces to participate is, hence, crucial for ensuring consistent outcomes and extensive coverage.

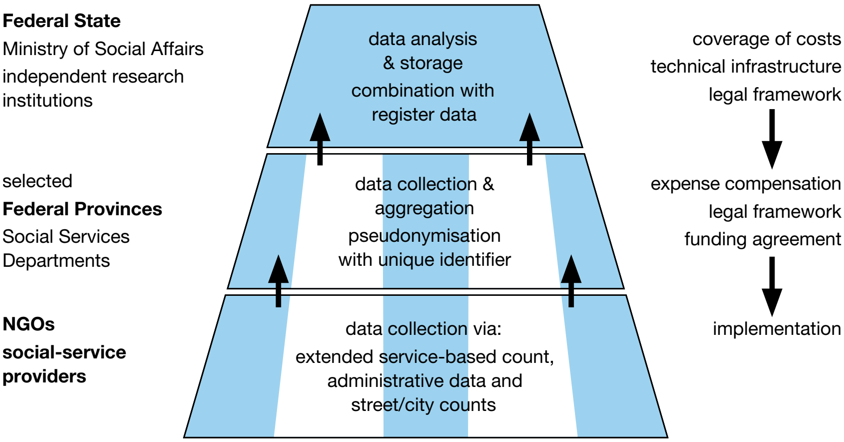
De-centralised model with partial rollout in some federal provinces

This third model takes potential resistance of governments in federal provinces and their ongoing non-compliance with social-welfare legislation into account (see figure 4). It is conceptually similar to the de-centralised model with rollout throughout Austria, but in this case, data collection is only carried out in federal provinces that are willing to participate. Planning and organisation are also executed by a national-level entity, while the necessary legal provisions for data gathering, aggregation, and storage have to be set forth in national and federal provincial law. Additionally, the role of participating federal provincial governments needs to be specified in detail. As in the nationwide de-centralised rollout, federal provincial organisations, local networks of social-service, health, and social welfare organisations, as well as umbrella organisations from the homeless sector ensure broad collaboration in the data collection process. Funding agreements between social-service organisations and federal provincial governments can provide the legal basis for consistent participation in the count.

Following the data generation phase, data should be forwarded to the respective federal provincial organisations to be monitored for quality, consistency, and completeness. Missing data can be followed up on and data sets can be completed prior to pseudonymisation and data pooling at the federal provincial level. Aggregated and pseudonymised data is then transferred to the centralised organising institution, combining it with central registry data and preparing it for analysis. Street or city counts can, again, complete the picture in selected cities or regions.

While the scope of a selective measurement approach is limited and comprehensive results can only be produced for certain parts of the country, the political willingness to contribute can be more pronounced in participating federal provinces. This may ensure closer cooperation between the network of social-service organisations and federal provincial entities, and positively affect results. Also, social-service organisations in certain federal provinces, such as Vorarlberg, Salzburg, or Vienna, dispose of detailed knowledge on data gathering and have established extensive methods for data collection and analysis. Close cooperation with these organisations can speed up the overall process of designing a measurement approach. A clear disadvantage lies in the continuing fragmentation of Austrian homelessness data, resulting in an incomplete picture on the prevalence and profile of homelessness. This can negatively affect the realisation of a nationwide harmonised strategy for combating homelessness. Exclusion from a unified measurement approach can moreover reinforce stasis in non-compliant federal provinces.

Figure 4: De-centralised model with partial rollout (ISR)



Policy Recommendations for Measurement Strategies in a Federally Organised State

In this section we want to derive a number of policy recommendations for the creation of a system for collecting homelessness data in federally organised states. The recommendations formulated here are the synthesis of results from the previously conducted expert interviews and the expert workshop. In a nutshell, recommendations are centred on the critical question of how different scales of the Austrian welfare state can be integrated into an overarching system for measuring homelessness.

First, it is paramount to **balance interests between actors and entities at different levels of the Austrian welfare state**. The strategic decision on how and to which extent governments of federal provinces should be involved in the overall design and implementation of measurement strategies can significantly influence outcomes. Responsibilities and competencies furthermore need be to carefully assigned to organisations on national and sub-national scales, according to the chosen measurement model. Accounting for power dynamics and potential conflicts in the design process can ensure seamless rollout and data collection during implementation. Finally, institutions at the organisational scale need to be included in the study design process to guarantee their support and participation. All this should be accompanied by an adequate allocation of financial resources, know-how, and personnel to enable swift implementation.

The motivation and involvement of stakeholders and institutions at the sub-national scale should lay the basis for subsequent networking activities, which are fundamental for **ensuring broad support by organisations in the social-service network**, including umbrella organisations, as well as organisations run and financed by federal provinces. As Hermans (2023) points out, creating awareness on behalf of federal province and regional entities can be a substantial step towards the realisation of homeless counts.

At the same time, **clear and comprehensive legal provisions on the national and sub-national levels** should clarify rights and responsibilities of entities at different scales in detail. Here, obligations to participate in the count can be defined in legal terms and eventually be combined with funding agreements. These legal provisions should include clear rules for data generation, transfer, ownership, and storage. Ultimately, rights to data use and the communication of results also must be specified in advance.

Rules and regulations for the entire data generation process, prescribed at the national level and applicable to all participating actors and entities at different scales, must also take into account different measurement techniques and their implementation in a multi-method design. The complexity arising from combining multiple measurement methods and data streams in different spatial and administrative contexts at different administrative levels of the nation state should be compensated for by a unified data collection system, including a common data format and seamless technical implementation, based on the necessary nationwide legislation underpinning a unified national homelessness measurement regime.

When involving organisations and governments of different federal provinces with different degrees of experience in measuring homelessness, **knowledge can be exchanged between federal provinces** with extensive expertise and those with little or none. This may also create awareness of the problem of existing homelessness and increase motivation to know more about its extent and profile.

Finally, any chosen measurement approach should form **part of a nationwide strategy to combat homelessness** that involves measurement and monitoring, the creation of appropriate services and housing offers, as well as an ongoing effort to end homelessness permanently. Here, the involvement of federal provinces, cities, and regions can incite new enthusiasm to re-think current approaches, re-formulate policies, and re-consider political standpoints. Hence, a common strategy to measure the extent and profile of homelessness can spark new interest in the overall topic of preventing and counteracting homelessness at multiple scales of the nation state.

Conclusion

The main aim of this paper was, first, to provide an overview of the current situation regarding the measurement of homelessness in Austria, and, second, to develop blueprints for a new, comprehensive measurement model.

In relation to the first aim, our analysis showed how the current extent and detail of data collection, including data quality, cycles of data exchange, and the number of involved organisations, vary significantly between different federal provinces on the one hand and different scales of the Austrian nation state on the other.

The amount and detail of data produced in federal provinces depend on (1) the willingness and interest of federal provincial governments to record data, (2) funding agreements underlying the data exchange between social-service organisations and federal provincial governments, and (3) means and methods used to collect and exchange data between different organisations and government entities. Our analysis revealed that subject-based funding agreements result in extensive coverage of and high data quality related to all recorded service users at any given point in time. In the case of object-based funding, it is aggregated and anonymised data on service users that is forwarded to federal provincial entities at predetermined intervals. Depending on funding agreements, different data in different qualities are recorded for different ETHOS Light types. The use of recorded data also varies significantly, ranging from detailed strategising for a large homeless population in Vienna, to the complete omission of homelessness in official social reports, e.g., in Salzburg or Burgenland (Amt der Burgenländischen Landesregierung Abteilung 6 – Soziales und Gesundheit, 2021; Land Salzburg, 2022). This demonstrates how political decision-making and data collection are entwined on different levels and how they lead toward different outcomes.

Additionally, different measurement techniques at different national and subnational scales of the nation state produce different types of data in varying quality. Current measurement techniques include (1) Central Population Register data at the national scale, (2) data on service users under subject- and object-based funding at the scale of federal provinces, and (3) administrative data, 'extended service-based counts', and data produced by street work or street counts at the organisational level. As described above and mentioned by Demaerschalk et al.

(2018), each of these methods entails certain strengths and weaknesses and covers different expressions of the ETHOS Light Typology. Ultimately, a combination of these methods in a multi-method design can maximise overall coverage and produce the most detailed results.

Regarding the second aim, we devised three models for measuring homelessness in Austria: (1) a centralised model with nationwide rollout, (2) a de-centralised model with nationwide rollout, and (3) a de-centralised model with partial rollout. The choice of model will ultimately depend on inherent contextual factors in different federal provinces, on the willingness of provincial governments to participate in the count, on the perspective and goals of the central government, and on the overall strategy for involving social-service organisations. However, coordination and networking, data management and data storage, as well as data analysis and data use have been identified as three main strategic areas that must be considered during decision-making on overall measurement strategies.

To summarise, the complexities arising from the fragmentation of the administrative and legal landscape in federally organised countries can be overcome by taking clear decisions on roles and responsibilities of stakeholders and entities at different national and sub-national levels. Involving relevant stakeholders at different scales according to the chosen overall measurement model can facilitate implementation and increase compliance during data generation. A clear legal framework for data collection, data aggregation, and data usage, taking into account the role of different stakeholders and organisations at different scales, will be paramount for the seamless realisation of a nationwide homelessness measurement plan. Overall measurement needs to be undergirded by adequate technical, financial, and human resources to be distributed between entities at different scales. By aligning legal provisions with the roles of social-service organisations and government entities, and furthermore with the overall model of measurement, compensation schemes, and data generation, and by carefully calibrating these with the interests of federal provinces, the fragmentation of data on homelessness in Austria can potentially be overcome, which could result in a tentative blueprint for other countries to follow suit.

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Mapping the Implementation of Housing First for Youth in Europe: Practices and Challenges

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Abstract_ *This article explores the deployment of the Housing First for Youth (HF4Y) model across various European countries. HF4Y, an adaptation of the Housing First approach tailored for young people, prioritises immediate access to stable housing without preconditions, alongside personalised support services. The study highlights significant variability in the implementation and fidelity to the HF4Y model across different contexts. Key findings reveal diverse strategies and success levels in addressing youth homelessness, influenced by local policies, financial investment, and the degree of national cohesion. The research underscores the critical role of sustainable housing solutions and collaborative efforts among stakeholders. It identifies challenges such as funding constraints, service coordination, stigma, and housing availability, calling for enhanced policy support, standardised methodologies, and sustained funding mechanisms to improve the HF4Y model's impact. The study concludes with recommendations for future research and policy development to better support youth experiencing homelessness in Europe.*

Keywords_ *Housing First for Youth (HF4Y); youth homelessness; policy implementation; Europe; Social Support Services; Sustainable Housing Solutions*

Introduction

Homelessness in Europe is complex and multifaceted, impacting diverse populations and presenting unique challenges across the continent. More countries are seeking for effective solutions to address homelessness, especially for individuals facing complex needs and vulnerabilities.

Housing-led approaches focus on prioritising stable, long-term housing as the primary solution for individuals facing homelessness, emphasising immediate access to independent housing in combination with supportive services tailored to individual needs. This model aims to bypass the traditional shelter-based or “staircase” systems that require individuals to meet specific conditions before qualifying for housing (Allen et al., 2020; Busch-Geertsema, 2013; Padgett et al., 2016; Shinn and Khadduri, 2020).

Housing First (HF) as a specific element of housing-led initiatives has been successfully established across Europe. This innovative model, prioritising immediate independent housing without preconditions, has been adopted within six European countries in 2013, reflecting modifications to accommodate local contexts and needs (Greenwood et al., 2013; Pleace, 2016). The HF model has grown significantly, more than doubling to include 19 countries by the end of 2018. This expansion is detailed in the report “Housing First in Europe: An Overview of Implementation, Strategy, and Fidelity, commissioned by the Housing First Europe Hub and authored by Pleace et al. (2019). Notably, the fidelity to the original Pathways model varies, highlighting the dynamic nature of implementing HF across different social and policy contexts.

After the positive results of HF in North America (Gaetz, 2017; 2019), a new HF model emerged in Canada that specifically aimed to target youngsters, Housing First for Youth (HF4Y). Gaetz (2017) explains:

> The adaptation of HF4Y is based on the understanding that the causes and conditions of youth homelessness are distinct from adults, and therefore the solutions must be youth-focused. HF4Y is grounded in the belief that all young people have a right to housing and that those who have experienced homelessness will do better and recover more effectively if they are first provided with housing. (p.1)

Targeted intervention measures for youth experiencing homelessness are essential, as this group faces challenges such as disrupted education, increased mental health risks, and instability that can impair healthy development (Morton et al., 2018). Providing specific support is crucial to breaking the cycle of homelessness and facilitating the transition to independent adulthood, thus helping to reduce long-term homelessness (Gaetz et al., 2013; 2021).

Review of the literature

Although the knowledge base regarding HF4Y is still in its early stages compared to HF for adults, there is a growing body of evidence indicating that HF is effective for young people (Blood et al., 2020; Lawlor and Bowen, 2017). Most research primarily originates from North America, particularly Canada. Within Europe, Ireland stands out as the only country with academic literature explicitly referencing HF4Y, as demonstrated by the work of Mayock and Parker (2023).

The lack of uniformity among European countries in both legislation and practice regarding the definition of "youth" and "homelessness" complicates cross-country comparisons (FEANTSA, 2020). The lack of a uniform range of age defined as "youth homeless" affects youth access to services and the specific policies and interventions they need (FEANTSA, 2020).

HF4Y, though still in its early stage in several countries, aligns with programmes that advocate a transformative paradigm, highlighting a comprehensive and integrated approach prioritising prevention and early intervention to effectively end youth homelessness (Mayock and Parker, 2023). In their study, Mayock and Parker (2023) demonstrate that research on youth homelessness is increasing, particularly regarding their experiences and the factors influencing youth transition out of homelessness. The importance of early supportive interventions emerges as critical, enabling young individuals to exit the assistance system, with secure and sustainable housing playing a crucial role.

In contrast, non-academic resources on HF4Y are notably well-established. This is particularly evident for HF4Y in Ireland and Scotland, as well as the efforts of the Housing First Europe Hub. Established in 2016 by the Y-Foundation (Finland) and FEANTSA (the European Federation of National Organisations Working with Homeless People), alongside over 15 partners, the Hub aims to end and prevent homelessness across Europe. Their mission is driven by promoting a shift in mindset and fostering systemic change through the HF approach. This includes advocacy, training, practical support, research, communication activities, and capacity-building efforts.

As Mayock and Parker (2023) note, HF services for youth were introduced in Europe in 2013, with implementations in the Irish cities of Limerick, Cork, and Waterford. In Scotland, the first HF4Y project was initiated by Rock Trust in 2017. Additionally, in France, the project "Logis Jeunes", which began in 2010, offers housing and personalised support plans for individuals aged 18 to 25 (FEANTSA, 2020).

In 2020, the first independent evaluation of the Rock Trust's HF4Y pilot project in West Lothian (Scotland) revealed that engaging with the programme directly led to positive changes in the lives of youth utilising the service during the two-year pilot period. This project, the UK's first HF4Y service exclusively for care leavers, demonstrated high fidelity and has been followed by implementations in other cities. Further evaluations in Ireland (Focus Ireland's projects; Focus Ireland, 2024) and the Netherlands (Housing First Netherlands) indicate positive outcomes across key domains, specifically in housing stability, educational re-engagement, and employment reintegration. The final outcomes of the HF4Y project in Spain, presented by Fresno Consulting during the event "Llaves para el cambio: Transformando el sistema de atención al sinhogarismo" [Keys to change: transforming the homelessness care system] on the 3rd and the 4th December 2024 in Madrid, substantiated the efficacy of the model, including its economic advantages compared to the traditional framework (Soluciones al Sinhogarismo, 2024). Gaetz (2014; 2014b; 2017) showed how this fidelity to the original model is linked to the collaboration among different partners. Understanding the social context and of young people is also crucial. Furthermore, both the project and the model have shown cost-effectiveness and benefits in both the short and long term compared to other similar projects (Gaetz et al., 2023).

Emerging evidence suggests a growing effort to engage in strategic initiatives aimed at challenging mental health and other statutory service providers, as well as system-led processes that tend to stigmatise and marginalise care leavers and youngsters with complex needs (Blood et al., 2020).

Currently, a comprehensive overview of HF4Y in Europe is lacking. This research addresses the pressing need to understand the diverse implementations of the HF4Y-models across Europe. This study aims to develop a comprehensive mapping of active projects, analyse their operational structures, and promote widespread knowledge sharing. The initiative seeks not only to catalogue the various applications of the HF4Y model, but also to identify best practices, encountered challenges, and adopted solutions across different contexts. Through a literature review, interviews with key professionals, and case analyses, this research intends to construct a comprehensive database that can serve as a reference for future interventions, research, and policies related to youth housing.

Methodology

Due to the limited amount of research conducted in this field, explorative research with a qualitative and inductive approach was considered essential and advantageous. The primary research questions of this empirical study were:

1. How broad is the HF4Y model diffuse in Europe?
2. How faithful are the projects to the original HF4Y model?

3. What challenges are faced by HF4Y service providers?

Based on the existing literature and insights from the Housing First Europe Hub, we used the following categories for our study: housing, cooperation, target population, support, and evaluation. These elements were examined to compare different implementations of the HF4Y model and national policies across European countries. The categories selected appeared in need of deeper investigation with the goal to inspire further research on this topic.

We opted for semi-structured interviews with professionals, and included questions related to the five core principles (Gaetz, 2017) of the HF4Y model. This approach aimed to address the second research question, which focuses on understanding professionals' understanding of these principles. The research employed a 'green' methodology—used here as synonymous with sustainable research—using online interviews (Howlett, 2021). This type of research is environmentally friendly since it minimises the cost of long-distance travel and because it allows research fields to be explored beyond local and national borders. The questions covered a range of relevant topics, including the implementation of the HF4Y model and the application of its fundamental principles; familiarity with evaluative tools and the methodologies employed for outcome analysis; the method of quantifying the impact generated by the project; the needs articulated by the organisation to enhance the effectiveness of the service provided; and the primary challenges faced. Further questions were formulated to more precisely explore the adaptation of the model's core principles to the local context, specifically focusing on the target population in terms of age, distinctive characteristics, and selection criteria.

The study sample comprised professionals (n = 16) in Spain, The Netherlands, France, Ireland, Denmark, and Wales, with different educational qualifications and roles. Participants were recruited by email through organisations through a range of sources, including training programmes, the Housing First Europe Hub network, FEANTSA's network, and the researchers' networks. The sample includes frontline social workers (case workers), programme coordinators, social services coordinators, and city council members, all of whom were involved in HF4Y projects at the time of the interview. Their involvement in HF4Y projects was confirmed by both an admission by the project coordinator and further verification during interviews focused on HF4Y core principles, which also included questions to explicitly identify the relevant projects.

A total of 20 professionals (n = 20) were excluded from the study. These individuals were based in Belgium, Norway, Iceland, Italy, Germany, and Finland. Although they responded to email correspondence and/or participated in online meetings to contribute local and national knowledge, they reported no direct or indirect involvement in HF4Y initiatives, such as through projects within their respective organisations. Furthermore, it should be noted that not all potential participants responded to the initial email invitations. In some instances, multiple follow-up emails were required to secure their participation. However, certain representatives from organisations recognised in Europe -in the grey literature- for their significant contributions to HF4Y implementation within the sector did not respond to the invitations. The HF4Y programmes included in this evaluation are spread across urban and suburban areas in six different countries, obtained after a preliminary phase of explorative interviews.

The HF4Y programmes included in this evaluation were distributed across urban and suburban areas and/or interviews, which reported the implementation of HF4Y initiatives without differentiation between well-established programmes and pilot or more recent initiatives. Although HF4Y implementations existed in other countries at the time of publication, beyond the six included in this study, these were excluded either due to non-participation or because they were still in an embryonic or developmental phase at the time the interviews were conducted. In addition, the analysed projects were at various stages of implementation, mostly in the 'pilot' phase with possible variation in the number of youngsters enrolled in the project and social worker involvement during the period of interviews. Each interview lasted approximately one hour. The language used in all interviews was English and some of the participants made use of emails to add pieces of information in a written way after the interview was conducted.

The sessions were not recorded to avoid creating additional barriers between the participant and the researcher since the interviews were already online and the non-verbal communication was reduced. In the last three decades, the generation of transcripts for in-depth interviews and group discussions has become an established practice that is often unquestioned (Lee, 2004). In certain situations, opting not to record can be considered the optimal approach, rather than being seen as a secondary or inferior choice (Rutakumwa et al., 2020). Data were collected through detailed notes taken during the interviews, which had a final sum-up section shared with the participants and interview scripts written directly after the interview. These data were systematically recorded in a unified paper log to ensure consistency and integrity in the information gathering process. Subsequently, to facilitate a rigorous and structured qualitative analysis, the recorded data were transcribed and imported into the NVivo software. This tool was utilised to encode the data, thus allowing for a systematic processing of the collected information. This methodological approach provided a robust foundation for thematic categorisation of the interviewees' responses and provided a solid foundation for qualitative analysis, in accordance with the prevailing academic standards for qualitative research.

Policy Context of the Implementation of HF4Y Model

This section examines the adoption of the HF4Y model across different countries and its implications for national policies. The focus is placed primarily on the countries where interviews were conducted. By exploring Ireland, Spain, France, Wales, the Netherlands, and Denmark, this study highlights how national policies, and local efforts work together to address youth homelessness. It reveals a range of strategies and varying degrees of success in tackling youth homelessness.

The adoption of the HF4Y model by most of the organisations reflects a proactive approach to combat youth homelessness must be contextualised within the broader policy frameworks in which these organisations operate. An examination of the role of these policies across different countries reveals the complex interplay between systemic approaches and grassroots interventions in the pursuit of alleviating youth homelessness.

The analysis of how different countries tackle youth homelessness demonstrates a variety of strategies and levels of success. France (Ministère de la Cohésion des Territoires et des Relations avec les Collectivités Territoriales, 2017; 2024), Denmark, Ireland, Northern Ireland (Northern Ireland Housing Executive, 2022), and the Netherlands have embraced the HF model in their national plans, while Spain (General Directorate for Family Diversity and Social Services, 2023) has yet to fully adopt. Ireland (Government of Ireland, 2021), England (Secretary of State for Levelling Up, Housing and Communities, 2022), Wales (Welsh Government, 2021), and Scotland (Scottish Government, 2018) place significant emphasis on youth homelessness. Other countries, however, include youth within general homelessness strategies without addressing their specific needs.

Local autonomy plays a significant role in the effectiveness of these strategies. In the Netherlands, decentralised implementation of HF4Y projects results in considerable variations across municipalities, whereas Denmark and France have more unified national plans aiming for consistency. There is a noticeable shift from emergency-based solutions to long-term, housing-oriented models; however, progress remains uneven. For example, Spain still relies heavily on emergency shelters, despite adopting some HF principles.

Financial investment is key to the success of these initiatives. Ireland and Denmark have made significant investments, while Spain's level of support remains less defined. Pilot initiatives, like Ireland's Supported Housing for Youth (SHY) programme, highlight the importance of innovative approaches to developing tailored housing solutions. Effective strategies often integrate housing and social policies to address underlying issues, as seen in Denmark's comprehensive approach.

From this analysis emerges the need for youth-focused policies, the importance of national cohesion, the shift toward HF models, the critical role of financial investment, and the value of pilot projects in refining strategies. Some progress is being made, but challenges persist in achieving consistent nationwide implementation and securing adequate financial support. It is evident that well-resourced, integrated policies are essential to effectively combat youth homelessness.

Table 1. Overview of Homelessness strategies in the 6 countries interviewed with HF4Y projects.

Country	Overview
Ireland	The Irish government's housing strategy for 2030, "Housing for All – a New Housing Plan for Ireland" (published in September 2021), outlines a nationwide approach to improving housing infrastructure, supported by substantial financial investment. The plan focuses on four key areas: Supporting Homeownership and Increasing Affordability, eliminating homelessness, increasing the delivery of social housing, and promoting social inclusion. As part of this strategy, a specific youth homelessness initiative has been introduced to address the needs of people aged 18-24, demonstrating a clear focus on young individuals. Central to this is the HF4Y model, which prioritises providing secure housing as a first step for young people facing complex challenges, including homelessness. However, the implementation of HF4Y is currently limited to localised contexts and has not yet been adopted as a fully national programme.
Spain	The "National Strategy for Combating Homelessness in Spain 2023-2030," published in June 2023, aims to address the shortcomings of previous plans, but does not explicitly prioritise youth homelessness or mention the HF4Y model – which is still implemented as pilot project. While the strategy includes young people experiencing homelessness within its general scope, it lacks a dedicated focus on their specific needs. The HF approach has made progress, reflected in efforts to shift toward a housing-oriented model, but this progress is not explicitly tied to youth. Additionally, the homelessness assistance system continues to rely heavily on emergency solutions. Local governments have implemented their own initiatives. Spain does not currently have a national youth homelessness strategy, and HF4Y is not embedded within the existing framework.
France	France's "Plan quinquennal pour le Logement d'Abord et la lutte contre le sans-abrisme" represents a national strategy aimed at tackling homelessness. It incorporates HF principles, focusing on immediate housing solutions alongside tailored support for specific subpopulations, including young people. While the plan addresses youth homelessness as part of its broader objectives, it does not constitute a distinct national youth homelessness strategy, nor does it explicitly embed HF4Y within its framework. This approach acknowledges the multifaceted nature of youth homelessness, linking it to broader housing and social policies.
Wales	In Wales, a national strategy addressing homelessness is in place, spearheaded by the Ministry for Housing and Local Government. This strategy includes significant financial investments aimed at improving temporary housing facilities and expediting transitions to stable accommodations. It explicitly addresses youth homelessness through initiatives such as the "rapid rehousing" approach, designed to minimise the time young people spend in temporary housing. Furthermore, the Welsh action plan incorporates input from individuals with lived experience of homelessness to inform and shape policymaking. While the strategy reflects broader HF principles, it does not explicitly reference a dedicated national youth homelessness strategy or confirm that HF4Y is formally embedded within it.

Country	Overview
Denmark	Introduced in 2009, Denmark's homelessness strategy centres on the HF approach, with key elements embedded into national legislation since October 2023. The 2021 political agreement aims to reduce homelessness and eradicate long-term homelessness by aligning housing and social policies. While the strategy acknowledges youth homelessness, emphasising alternatives to hostels for young people, it lacks a dedicated youth homelessness strategy or integration of HF4Y. Despite these gaps, the approach represents significant progress, offering hope for more sustainable solutions to homelessness.
The Netherlands	The Netherlands' National Action Plan on Homelessness incorporates the HF approach and acknowledges the importance of addressing youth homelessness. Although it does not explicitly reference a dedicated HF4Y model, the plan's focus on young people indicates a commitment to supporting this vulnerable group within the broader HF framework. The HF4Y model operates within local municipalities' autonomy, leading to significant variations in decision-making and implementation. The absence of a standardised national framework results in differing levels of commitment and resources allocated to youth homelessness. Local autonomy allows for tailored responses but introduces complexities in achieving a coordinated approach. This decentralised context can hinder the cohesive and widespread adoption of the HF4Y approach.

Results

The results obtained during the interview phase, as previously discussed in this article, are presented here according to the key categories outlined in the methodological section.

Table 2. HF4Y programmes and number of cities involved.

Country	Number of Unique HF4Y Programmes	Number of Cities Operating HF4Y Programmes	Age for HF4Y projects
Ireland	2	1	18*-26*
Netherlands	5	8 cities	16-27**
Denmark	4	4 municipalities in multiple regions	14*-25
Wales	9	6 Cities	18-24*
France	3	3 Cities (experimental projects)	18-25
Spain	2	2 Cities (experimental projects)	18-25

*With some exceptions

** It can vary depending on the single municipality

Note: It is important to acknowledge that certain countries, such as England, also implement HF initiatives aimed at addressing youth homelessness. However, these initiatives are excluded as they diverge from the HF4Y model examined in this study.

Target population

In analysing the characteristics of the so-called 'target population' a first important variable has been identified: age of individuals primarily defined as 'young adults' or included within the HF4Y projects. In our interviews, we observed heterogeneity in defining the age range, which, in some cases, encompasses minors and individuals over the age of 26. While there is a commonly recognised age range of 18 to 26, in one interview it was noted that "in our context, at a local context, our project says 18 to 26, but in other areas there's different dictations around what age group it is" it is also true that this this variability reflects the flexible nature of this 'variable', with exceptions observed. As emerged in some interviews: "If you're under 18, um, you are considered to be the responsibility of the two said child and family agency and have protection of the state. So, in theory, no young person under 18 should ever be homeless in Ireland."

This observation underscores how legislative frameworks influence the target population of HF4Y projects (national/local). It is worth noting that legislation on this matter varies from state to state, as highlighted in our interviews, and exceptions may arise in certain cases. It is crucial to acknowledge that both the legislative system and the social services and welfare policy frameworks play a significant role in determining the age at which young people can access HF4Y projects. Typically, this age aligns with the age of majority, as organisations face fewer challenges when the minimum age is set at 18, in line with existing legal and administrative structures. In many contexts, this approach facilitates the implementation of such initiatives, ensuring consistency with the regulatory frameworks and the broader social protection system. As highlighted in our interviews, exceptions are possible in some cases: "we've got young people who, by the very nature of the fact that they've been referred to the service means that they don't have very much social support or family support."

However, it is essential to recognise that legislation constitutes only one mechanism through which policy can be formulated and enacted. While some countries rely on legislative approaches, in other contexts, policy is articulated through comprehensive strategic frameworks. Furthermore, budget allocations and public expenditures not only serve as reflections of existing policy priorities but also function as pivotal instruments in shaping and defining policy directions.

Generally, young people who become part of HF4Y projects in Europe are those who, for various reasons, have already gone through traditional support channels and local social services without achieving positive results for various reasons. They also do not meet the access prerequisites for other services within the traditional scaled system. Others include young people who come out of the criminal justice system, have mental health disorders and are often already known to the reference services.

Finally, several organisations and projects have targeted individuals with mental health disorders who are often already known to healthcare services. They also focus on young people identified on the streets by healthcare professionals and social workers operating collaboratively. Overall, the criteria used to define the target population include the characteristics mentioned earlier.

Selection

The selection of young people, specifically those aged between 18 and 24 who are experiencing homelessness or are at high risk of homelessness, varies significantly in terms of the tools and methods employed. Vulnerability indices, like those utilised for adult HF services, are often employed. These indices typically consider factors such as mental health status, substance use, history of homelessness, and exposure to violence or abuse. Alternatively, the person's history and vulnerability are assessed during a series of informative interviews, which aim to gather comprehensive information about their background, current situation, and specific needs.

Depending on the geographical context, we identified different organisational structures and the participation of various professions and representatives of different public institutions. This involves collaboration among social workers, healthcare professionals, educational staff, and representatives from NGOs. This diversity is partly linked to the pilot project status of many HF4Y initiatives, which represents the majority at the time of interviews and this analysis.

In some cases, the initial screening is conducted by personnel from the national health service of the municipality. In two interviewed contexts, the initial selection process was conducted collaboratively between health personnel and social workers directly on the street. This street outreach approach allows for the identification and engagement of young people who might not access traditional services due to various barriers, ensuring that those most in need are included in the programme. The young people targeted by these projects often face multiple challenges, including, but not limited to, unstable housing, unemployment, mental health issues, problematic substance use, and limited access to education and healthcare. Many have experienced significant trauma and require comprehensive support to successfully transition to independent living. A significant proportion of the homeless youth population comprises migrants and LGBTQ+ individuals who face additional barriers such as discrimination and difficulties accessing social rights and services (McCann and Brown, 2021). However, our interviews did not reveal accurate data on LGBTQ+ individuals.

How is the support delivered?

In the domain of HF4Y projects, the primary objective is collaborative and sensitive engagement with individuals who have experienced significant trauma, requiring an approach rooted in trauma-informed care. The team works with young people from a trauma-informed perspective, recognising that they have experienced many negative events and need time to build trust. These young people, often referred to the service due to a lack of social or family support, require significant and ongoing assistance. The approach cannot be encapsulated in a rigid policy because each individual is unique. Operating under a care and case management model, the HF4Y initiative adheres to established protocols within the broader framework of homeless services.

The frontline project workers, specialised in youth and housing, act as case managers. The primary case managers collaborate with specialists to ensure tailored support services for each young person. When a young person faces issues such as problematic substance use, specialists are involved to provide the necessary support and help the individual access community services. This collaborative approach extends to other areas such as mental health, probation, and specialist educational services. The team encourages, but does not insist, that young people accept these supports, emphasising engagement through various methods such as in-person meetings, phone calls, and messaging apps. They also respect their need for space, allowing them to seek help during crises while striving to work proactively to prevent them.

Understanding that experiential learning is crucial for these young people, they support them as they navigate and learn from their experiences. The initiative aims to establish a coordinated and individualised approach, granting autonomy to young people by avoiding mandatory conditions. Caseload management maintains the recommended ratio of one worker to six youngsters, although variations may occur due to participant fluctuations and diverse needs. The overarching goal is to empower these young individuals by providing not only housing but also a sense of control over their lives, employing imaginative and flexible engagement strategies aligned with the principles of HF4Y.

The support delivered by HF4Y social workers is comprehensive and multifaceted, addressing the diverse needs of each young person. Social workers provide practical assistance, such as helping young people secure identification documents, access benefits, and navigate bureaucratic processes. They offer emotional support, creating a safe and trusting environment where young people can express their feelings and experiences. Social workers also facilitate access to healthcare services, including arranging medical appointments and ensuring continuity of care. They play a crucial role in helping young people develop life skills, such as budgeting, cooking, and maintaining a household. Additionally, social workers advocate on behalf of young people, ensuring their voices are heard in various systems, including legal and educational institutions. By offering consistent and reliable support, HF4Y social workers help young people build resilience, self-esteem, and the skills necessary for independent living. In summary, the core principles of HF4Y appear to exert a strong and consistent influence on the daily work of professionals. The youth-centred and unconditional approach is effectively implemented in practice, although there remains scope for further enhancement of the active social integration component.

Critical element of "housing" in HF4Y

"Housing is a challenge" was mentioned as most common first challenge during the interviews.

In the context of implementing HF4Y projects in several European countries, the provision of suitable housing emerges as a predominant challenge.

The HF4Y model is fundamentally centred on offering housing without imposing prerequisites and a broader range of support. Nonetheless, the scarcity of affordable and accessible housing poses a significant obstacle, which is exacerbated for vulnerable young individuals grappling with mental and social distress and experiencing homelessness. The existing inventory of social housing falls short of meeting the demand, often relegating young people to the bottom of waiting lists within conventional systems.

Moreover, effective collaboration between social services, local authorities, and other organisations operating in this sphere is notably lacking.

Consequently, organisations are frequently compelled to explore solutions in the private sector, which predominantly caters to a capitalist market and is often marked by inherent biases against the target demographic. Some organisations provide housing of their own, while others concentrate on innovating within the social housing sector and the private sector alike.

In other cases, social housing emerged as a key component in providing housing solutions, with significant uptake. Supported accommodation, including transitional housing, serves as the starting point for individuals embarking on their HF journey in some contexts, but isn't a common path. "We had the transitional, and what happened was it wasn't transitional because there was nowhere else for people to move to. Yeah. So, they couldn't move out, so it was holding up the transitional."

Interviews further underscore the intricate need for organisations and young individuals to access stable yet flexible housing options, thereby steering clear of the pitfalls of 'transitional housing' without renouncing the right to housing during temporary detention, "if the youngster could have, um, access to more benefits would be way easier to even find private accommodation instead of, uh, transition and reduce transitional accommodation."

Only part of the participants in the interviews noted the diversity of accommodations offered, including one-bedroom apartments, two-bedroom townhouses, and three-bedroom houses in suburban areas. They also acknowledged the challenges associated with transitional housing, which, rather than serving as a stepping stone, can leave young individuals in a state of insecurity, contributing to their ongoing trauma.

Social housing emerged as a key component in providing housing solutions, with significant uptake. Supported accommodation, including transitional housing, serves as the starting point for individuals embarking on their HF journey in some contexts, but isn't a common path. A notable challenge is that, since long-term tenancies are granted, the houses no longer remain with the project once the young person's tenure ends. "The idea is to acquire more properties each year, but the housing crisis has posed a considerable obstacle to this effort," said some interviewees.

As interviewees noted, the demand for housing often outstrips the available space, emphasising the pressing need for more accessible benefits to facilitate the acquisition of private accommodation as an alternative to transitional housing. The availability of such benefits is closely linked to government policies and funding, which vary by country.

Cooperation with housing associations

The collaboration among various service providers, both public and private, as revealed through interviews, displays a high degree of heterogeneity. The data shows how organisations implementing the HF4Y model have established diverse types of relationships and partnerships with local authorities, social services, organisations offering youth-specific services, and providers of housing, whether social or private. A positive local relationship, however, does not necessarily guarantee similar outcomes at the national level. Local agreements have facilitated better approaches to housing challenges and the creation of a more cohesive or cooperative service network, operating with greater systematicity. This is an example that emerged during the interviews associated to an umbrella organisation that facilitates relations among various involved partners, both private and public.

In connection with the concept of coalition, the notion of community has also emerged as playing a significant role in the reintegration of youngsters, such as those engaged in HF4Y projects, as highlighted in this interview:

> Whether they are coming from homelessness or not, they are actually contributing to creating and building the community and being a part of it. And also, they're very supported in actually what do you want to get out of the community and what do you need to be able to take part in the community activities.

Regular meetings with the municipality and other partners within the healthcare system "help us with that so that we're not the only ones making that decision. So that we're all involved, the funders are involved, and the key stakeholders, not just from a funding perspective but in terms of the roles they play in housing and health."

As mentioned earlier, in some contexts, collaboration is less effective, and the primary challenge is related to the fidelity to the HF philosophy and its approach in the practice of social work. Furthermore, the lack of systematic collaboration, i.e., with uniform structure and levels of cooperation, results in varying levels of institutional support, which, in turn, impacts relationships and operations among service providers.

Strong relationships within the coalition allow the programme to gain visibility more easily, facilitating collaboration with services operating within the traditional system, such as shelters, and establishing connections between HF organisations, young individuals, and private landlords, thereby providing them with greater assurances.

Some coalitions involve private organisations operating nationwide, offering a wide range of services accessible to youth involved in the projects. However, their connection with local public authorities varies based on the specific context, active policies, and established relationships.

It is important to underscore that the analysed contexts differ in terms of culture, politics, urban density, and geographic characteristics, which is also reflected in the various interviews conducted.

In conclusion, the challenge of housing accessibility, encompassing affordability and cooperation with housing associations, remains a crucial issue in the successful implementation of HF4Y projects. Addressing these challenges is essential to fully realise the potential of the HF4Y model in providing appropriate housing options for vulnerable young individuals.

Project's evaluation

At the European level, a comprehensive intervention assessment tool has been developed for the HF4Y programmes, widely acknowledged by all respondents. Nevertheless, its consistent and faithful application across all examined contexts remains a challenge. This study observes a prevailing practice among organisations wherein a prevailing practice among organisations of adhering to an annual evaluation process, encompassing both internal assessments and evaluations directed towards public entities—whether local or at higher levels— which serve as the primary financiers of the projects.

The methodology employed for project evaluation is closely linked to the contextual nuances, the key project stakeholders, and the political dynamics interwoven among them. Emphasis is placed on the capacity for housing sustainability and ongoing requirements, thereby determining the extent to which team support should be provided.

Noteworthy is the pivotal role played by participant-involved evaluations in shaping the narrative of their trajectory within the HF4Y programme. This process holds significance in identifying positive and/or negative shifts in needs after programme enrolment. The collaborative evaluation with participants contributes substantively to the nuanced understanding of the programme's impact, fostering a deeper comprehension of the evolving dynamics within the HF4Y framework.

Discussion

Building on the themes presented in the introduction and literature review, this discussion aims to synthesise the findings within the broader context of youth homelessness in Europe. The introduction outlined the pressing need for an immediate and stable housing approach tailored for young people, while the literature review highlighted the variability and challenges of implementing HF4Y across different national contexts. This discussion demonstrates how these initial insights align with the empirical findings of this study, underscoring both the successes and obstacles faced in implementing HF4Y in various European settings.

The analysis from the semi-structured interviews has illuminated the successful implementation of the HF4Y model in various European settings, illustrating its potential as an effective approach to combating youth homelessness. Nonetheless, the challenges such as funding constraints, coordination of services, stigma, the availability of housing, and evaluation practices call for sustained efforts and collective engagement to further strengthen the HF4Y initiatives. By fostering collaboration and providing targeted support, organisations like the Housing First Europe hub can play a crucial role in bolstering these initiatives and propelling Europe towards a more inclusive and compassionate response to youth homelessness. The findings underscore the importance of continual evaluation and knowledge exchange to enhance the impact and sustainability of HF4Y implementations across the continent.

The variation in housing policies and cultural contexts across European countries further complicates access to housing for youth experiencing homelessness. While some nations may have more robust social housing programmes, others may lack sufficient resources and support systems to accommodate the needs of young individuals experiencing homelessness. This complexity highlights the necessity for tailored and adaptable approaches in the implementation of the HF4Y model to address the diverse housing challenges faced by youth across different European regions.

Considering these challenges, the HF4Y model's focus on providing immediate access to stable housing becomes even more critical. By prioritising housing stability and offering support services tailored to the individual needs of homeless youth, the model can act as a potent intervention to break the cycle of homelessness and foster positive long-term outcomes.

Addressing the multifaceted issue of affordable housing requires collaboration among stakeholders, policymakers, and social organisations. Sustainable solutions may involve increasing investments in social housing construction, developing supportive policies for affordable housing, and advocating for the rights of vulnerable populations, including young individuals experiencing homelessness. By recognising and addressing the various housing challenges faced by homeless youth, societies across Europe can work toward creating a more inclusive and equitable housing landscape, promoting social well-being and stability for the younger generation.

The wide use of the HF4Y model by many participating organisations shows a proactive and forward-thinking approach to addressing the urgent issue of youth homelessness. However, a closer look reveals that the success of these initiatives is closely connected to the housing and social policies of each country. This underscores the important link between policy frameworks and programme results. This phenomenon is particularly evident in countries such as Ireland, Spain, France, England, Denmark, and the Netherlands, wherein the integration of HF or HF4Y policies has not only guided the strategic approach to addressing youth homelessness but has also profoundly moulded the contours and dimensions of the interventions themselves.

Table 3. Implementation of HF and HF4Y on local and/or national level.

Country	HF Implementation (National or Local)	HF4Y Implementation (National or Local)	Notes
Ireland	National	Local	HF policy emphasises immediate housing access.
The Netherlands	National	Local	HF4Y model operates at municipal level.
Denmark	National	local	HF policy emphasises the rights of homeless individuals.
Wales	National	Local	In Wales autonomy allows for different policies and HF4Y implementation.
France	National	Local	In France, HF4Y is experimental in three cities. HF4Y policy emphasises tailored responses.
Spain	National	Local	In Spain, HF4Y is experimental in two cities. HF4Y policy aligns with a push toward HF.

Conclusions

Our study clearly indicates that the deployment of HF4Y across Europe is characterised by significant diversity. This variance in implementation underscores the intricate web of challenges encountered by organisations and local bodies spearheading these initiatives. One of the main challenges is the pressing need for a paradigm shift in social and housing policies at the political level, a shift that is crucial for the facilitation of such programmes and for instigating a substantive transformation within the system.

The efficacy of the HF4Y model is supported by a body of scientific evidence, with its effectiveness predominantly documented within North American and Anglo-Saxon contexts. Despite this, the research highlights a notable absence of a cohesive and standardised methodology in the model's application, which is critical for its broader adoption and success. Presently, a significant proportion of the HF4Y initiatives are either in their pilot phase or reliant on finite funding arrangements. This situation presents considerable risks to the sustainability of these interventions over the long term and their consistent alignment with the foundational principles of HF4Y.

Moreover, this study has identified that the target demographic for these projects can vary significantly, influenced by local conditions or the specific aims of a project. The absence of uniform evaluation metrics across different European settings exacerbates the difficulty of conducting a comparative analysis of the HF4Y model's implementation and outcomes. Consequently, while the HF4Y model is recognised for its innovative approach to providing "social support" to youngsters, its application tends to be localised or regional, rather than uniformly national or European.

The challenges of ensuring housing and economic sustainability are evident and widespread, indicating a pivotal area for future policy development and research. Therefore, this research not only contributes to the academic understanding of the HF4Y model's application across Europe but also underscores the imperative for enhanced policy support, standardised methodologies, and sustained funding mechanisms. Addressing these needs is essential for leveraging the full potential of the HF4Y model in transforming the lives of young people facing homelessness, ensuring that the principles of HF can be a reality for all who require them.

Study Limitations and Recommendations for Future Research

In the context of this study, various challenges were encountered during the data collection phase through interviews, which inevitably affected the breadth and depth of the results obtained. These difficulties deserve to be disclosed to provide the reader with a clearer understanding of the intrinsic limitations of the research.

Firstly, the participant selection process presented challenges, primarily related to finding a sample that accurately reflected the populations under study. This dynamic was influenced by the limited availability of some organisations to participate in the research project, which slightly reduced the variety of perspectives and experiences gathered.

Moreover, the linguistic and cultural diversity among the countries involved presented a significant challenge. Despite efforts to mitigate these barriers and defining key linguistic terms related to the national (or state) context, it is possible that some important nuances were lost, potentially affecting the fidelity with which the testimonies were reported and interpreted.

Finally, the temporal constraints imposed by the research project's schedule, along with the early stage of some of the projects examined, limited the depth and range of the analysis.

At the conclusion of the data analysis session, several recommendations for future research were put forward. These recommendations include expanding the research to involve a greater number of European cities, involving other professionals and services, and conducting long-term monitoring of the participants to assess the long-term effectiveness of the HF4Y Model.

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Research Notes

Part B

"There's quite a lot of breakdown between services": Palliative Care and Supporting People Experiencing Long-Term Homelessness With Life-Limiting Illnesses in Dublin. A Qualitative Interview Study

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Abstract_ *People experiencing long-term homelessness have a younger age of death than the housed population. Deaths within homelessness include, but are not limited to, deaths from life-limiting illnesses. People experiencing homelessness encounter multiple barriers accessing health services which include barriers accessing palliative care services. The aim of this Research Note is to describe the experience of staff working with people experiencing long-term homelessness who are living with, or have died from, life-limiting illnesses, utilising semi-structured 1: 1 interviews. Eleven participants were recruited from four organisations in Dublin. Five overarching themes were generated: (1) challenges identifying palliative care need, (2) negative and positive experience of death of a service user, (3) identified need for external health and social care support, (4) need for service user focused care to*

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enable a positive death experience, and (5) concerns regarding supporting the increasing number of ageing people living within homelessness requiring palliative care.

Keywords_ *Palliative Care; homeless persons; health equity; social determinants of health; social care worker; inclusion health*

Introduction

People experiencing long-term and episodic forms of homelessness have substantially worse health status and a higher risk of death than the housed population (Aldridge et al., 2018; 2019; Lewer et al., 2019). Definitions of homelessness vary. O'Sullivan et al., (2020) caution researchers and policy makers to be cognisant that there are a variety of experiences of homelessness, particularly when considering the health needs of those experiencing homelessness. The European typology of homelessness and housing exclusion definition is frequently used for ease of comparison; this includes rooflessness, houselessness, insecure, and inadequate housing (Edgar et al., 2004). A typology of homelessness situations and duration was proposed by Kuhn and Culhane (1998) which describes homelessness within three distinct clusters; transitional, episodic, and chronic (long-term). Waldron et al., (2019) applied Kuhn and Culhane's (1998) methodology to the homeless service usage in Dublin between 2012 and 2016 and demonstrated that 78% of service users were considered transitional, 10% were considered episodic, and 12% were considered long-term homeless service users.

In Dublin, the standardised mortality rates for people experiencing homelessness are 3-10 times higher in men and 6-10 times higher in women experiencing homelessness compared with the housed population (Ivers et al., 2019). Homelessness is increasing in Ireland; the total number of people (adults and children) who have sought access to homeless accommodation nationally in January 2024 was 13 531, an increase by 237% since January 2016 (Department of Housing, 2024). These figures refer to the number of adults and children in emergency accommodation at a point in time and are not a measure of the numbers accessing emergency accommodation over a period of time.

A bimodal pattern of death is described among people experiencing homelessness; younger people experiencing homelessness die disproportionately from external causes and infectious diseases, and older people experiencing homelessness die from similar causes to the older housed population but at a younger age (Baggett et al., 2013; Fazel et al., 2014). Further, while people experiencing homelessness frequently die of preventable or treatable illnesses (Aldridge et al., 2019), some die from life-limiting illnesses and could benefit from palliative care (Conneely et al., 2021). The reported causes of death for people experiencing homelessness in Dublin are drugs and/or alcohol (38.4%), circulatory (20%), respiratory (13%) and gastrointestinal causes (7%), and cancer (5.1%) (Ivers et al., 2019). O'Carroll (2020) demonstrated a link between duration of homelessness and rising death rate, with a steep increase in mortality rates after 18 months of homelessness.

Palliative care is an interdisciplinary approach focused on preventing and relieving suffering, and improving the quality-of-life for patients facing life-limiting illness(es) and their families (World Health Organisation, 2020). A life-limiting illness is an illness which is defined as progressive, or the progress of which cannot be reversed by treatment (Scottish Parliament, 2010); examples include incurable cancer, end stage liver disease, and chronic kidney disease. For the context of this paper, in Ireland, end-of-life care is defined as care which is provided during the period when death is imminent, and life expectancy is limited to short numbers of hours or days (Ryan et al., 2014). In one study, at least 64% of people dying within homelessness in Dublin over the age of 60 died from an illness that could have benefitted from palliative care input (Conneely et al., 2021).

There are a growing number of studies exploring the role and experience of staff in accommodation supporting people experiencing homelessness living with and dying from life-limiting illness(es), and these are summarised in recent systematic reviews (Hudson et al., 2016; Sumalinog et al., 2017; Klop et al., 2018; James et al., 2023). Delivery of palliative and end-of-life care to people experiencing homelessness is complex; factors contributing to complexity include high rates of physical and mental health needs, substance use, lack of stable accommodation, barriers to accessing healthcare, and frequently a lack of biological family to provide informal care and psychosocial support (Hudson et al., 2016; Shulman et al., 2018; Klop et al., 2018). International research provides recommendations for some essential elements to be considered in the provision of palliative care for vulnerable populations, including people experiencing homelessness. Key concepts include a collaborative approach to care across services, trauma-informed care, person-centred approaches, additional training for staff, and harm reduction approaches (McNeil et al., 2012; Hudson et al., 2016; Stajduhar et al., 2019). Recently in a novel project, Armstrong et al. (2021a) demonstrated that integrating palliative care provision into services for people experiencing homelessness has both benefits and challenges.

The informal caregiver role of family is recognised in facilitating a person with a life-limiting illness to live and die in their preferred location (Addington-Hall and McCarthy, 1995; Morris et al., 2015). People experiencing homelessness frequently do not have family to provide to support with physical care needs such as washing, toileting and basic activities of daily living. In general, staff in accommodation for people experiencing homelessness cannot provide and are not trained to provide this caregiver role. Staff in homeless services come from a variety of professional backgrounds. There are frequently limited or no healthcare workers in homeless accommodation. This is an important factor when considering palliative and end-of-life care needs. To this end, the aim of this study is to describe the experience of staff working with people experiencing long-term homelessness who are living with or died from life-limiting illnesses.

Methods

Study design and setting

A contextual in depth qualitative interview study was conducted with staff employed within the homeless accommodation services in Dublin in 2017, at which time there were reportedly 3527 adults in Dublin accessing temporary, emergency, or short-term accommodation facilities (Department of Housing, 2024). Of note, those in long-term supported accommodation (> 6 months) are considered 'tenants' and therefore not included in the 3527 adults counted above.

Recruitment

Typical case purposive sampling (Etikan et al., 2016) was employed. Organisational approval was requested via an invitation letter and a participant information leaflet was provided. Following organisational approval, recruitment was performed via a contact individual within each organisation. The researchers did not approach individuals directly. It is unknown how many individuals within each organisation were approached. There was no specification on job role, gender, or duration of experience of the participants.

Inclusion Criteria: ≥ 18 years; currently employed within homeless accommodation services.

Exclusion Criteria: <18 years; volunteers.

The target sample size was estimated as 10-15 interviews based on recruitment from a single relatively homogenous sample (Guest et al., 2006).

Data collection

One interviewer (AC) conducted single 1: 1 semi-structured interviews. The topic guide for the interviews was informed by clinical experience of two of the researchers (AC/RMcQ) and a review of the literature. Field notes were made. Interviews were digitally audio recorded and transcribed verbatim.

Analysis

Interviews were analysed using contextual thematic analysis (Braun and Clarke, 2006). Themes were analysed with a view to both capturing the experience of participants and also to identify practical areas for collaboration and education. Line-by-line manual coding of the data was initially conducted by a single researcher (AC). To provide analytical rigour, sections of interviews were reviewed by the research supervisors (SM/KB) and consensus on coding achieved. AC generated initial themes. The themes were discussed and refined with SM, KB, and RMcQ. Themes and subthemes were reviewed, defined, and named. Analysis was informed by knowledge of palliative care and health services and structures, palliative care theories, and AC's clinical experience as a doctor. The analysis was also informed by the secondary aim of this study which was to identify areas for education and collaboration between palliative care and other services to improve access to palliative care and end-of-life care for people experiencing homelessness.

Results

Recruitment, participants, and interviews

Eleven organisations were approached to participate. Seven organisations did not take part (table 1). Eleven participants were recruited though four organisations (Table 2). Interviews were conducted between June and August 2017. All participants chose to complete the interview at their workplace during working hours. Median interview duration was 32 minutes (range 25 – 41). Median age of the 10 participants who provided their age was 32.5 years (range 26 – 38).

Table 1. Reason for organisation non-participation in the study

Reason for non-participation in study	n=7 organisations
Volunteer staff only (exclusion criteria)	2
Age range of service users 18-25 years – organisational decision to decline participation based on this	1
Expressed wish to participate but liaison individual within organisation did not coordinate interviews	1
No response to email or phone-call invitation	3

Table 2 Participant and Organisation Characteristics

Participant job specification	N=11
Social Care worker	3
Care Assistant	1
Project worker	2
Nurse	1
Service manager	1
Team leader	2
Deputy Manager	1
Participant gender	
Female	9
Male	2
Accommodation Type	
Supported Temporary Accommodation [i]	5
Long term supported housing [ii]	3
Multiple sites for one organisation	1
High support long term accommodation unit	1
Homeless accommodation services and projects	1
Drug and Alcohol Policy of accommodation	
Harm reduction model [iii]	8
Alcohol permitted. Illicit drugs prohibited	3
Gender of service-users	
Males only	1
Female only	0
Mixed	10

[i] Supported temporary accommodation is any accommodation for people experiencing homelessness where the duration of stay is maximum for <6 months.

[ii] Long-term supported accommodation is accommodation for people experiencing homelessness where placement can be >6months.

[iii] A harm reduction model when applied to substance misuse accepts that a continuing level of illicit drug and alcohol use is inevitable and aims to reduce adverse consequences of drug and alcohol use.

Findings

Overview

The term service user is used throughout to describe a person experiencing homelessness with whom the study participant (i.e., homeless accommodation staff member), has engaged with professionally. Five overarching themes were generated: (1.) challenges identifying palliative care need, (2.) negative and positive experience of death of a service user, (3.) identified need for external health and social care support, (4.) need for service user focused care to enable a positive death experience, and (5) concerns regarding supporting the increasing number of people experiencing homelessness requiring palliative care. Themes and subthemes are summarised in table 3.

Table 3. Summary of over-arching themes and sub-themes

Overarching theme	Sub-theme
Challenges identifying palliative care need	Difficulty recognising a life-limiting illness Unmet symptoms and care needs Uncertainty of disease trajectory and prognosis Malignant diagnosis being more recognised than non-malignant conditions as life-limiting Barrier to future care planning Perceived ability of medical staff to prognosticate
Negative and positive experience of death of a service user	Staff have experience of unexpected / sudden deaths Difficulty defining an anticipated death Service-users expressed wish not to die in hospital Negative and positive experiences of supporting the 'anticipated' death of a service-user Medication management as contentious issues Limited future care planning
Identified need for external health and social care support	misunderstanding of roles of staff in homeless accommodation by hospital staff poor communication and information sharing from health and social care staff, particularly with local hospital(s) e.g. discharge letters, medication updates positive experience of inclusion health service difficulty accessing to community health and social-care services both positive and negative interactions with specialist palliative care services
Need for service user focused care to enable a positive death experience	flexibility from organisation Individual flexibility from professionals Person-centred approach Recognition of service-user autonomy Duty of care towards other service users Conflict between wish to support service users wishes and limited ability to provide adequate care
Concerns regarding supporting the increasing number of people experiencing homelessness requiring palliative care	Rising numbers of people living in homelessness Aging homeless population Staff would welcome education and training opportunities in palliative care and end of life issues

1.) Challenges identifying palliative care need

Staff described struggles identifying that a service user has a life-limiting illness and in addressing their specific needs. This is compounded by uncertainty of disease trajectory and prognosis, particularly in non-malignant conditions. Having a cancer diagnosis was considered advantageous in accessing community services, the initiation of future care planning, and accessing specialist palliative care services.

> I mean 90% of our clients are terminally ill but we're focused on this woman because she has the diagnosis[cancer], she is one of the lucky ones that got a label (P8).

Participants identified that service users with life-limiting conditions have unmet symptom and care needs. Unpredictable disease trajectory and prognostic uncertainty was perceived as a barrier to future care planning. Unpredictable disease trajectory and prognostic uncertainty contributed to distress following death of a service-user when the death was not anticipated.

> …when I was on relief here we had a guy [service-user with chronic alcohol misuse] that passed away, he was on hourly checks but we checked him every half hour anyway. And he couldn't drink anything and he asked me for some ice-cream, and I went to get him some ice-cream, and when I brought it up he had died. So we got CPR going, got the defibrillator going, called the emergency services because he was still warm. (P4)

A common perception was that medical staff can and should provide an accurate prediction of impending death.

2.) Both negative and positive experience of death of a service-user
All participants had experienced the deaths of service users; the majority were related to drug(s) and/or alcohol overdose, or were sudden unexpected deaths. Many participants were not surprised by death. A few, but not all, participants had worked with service users who had an anticipated death in the context of a life-limiting illness. Many struggled identifying what an anticipated death is:

> It wasn't to our knowledge that he was dying. We knew he was really sick, like I had actually did a referral for respite for him and that because he was struggling to get to his [methadone] clinic every day. (P1)

It was the view that most service users who died of a cause other than overdose or suicide died in hospital. Hospitalisation was viewed as both positive and negative and sometimes simply necessary as no other support in the community was available. Hospitalisation was viewed as positive when the health of the service user improved. Frequently service users expressed a wish not to die in hospital:

> I do remember one particular girl who was chronic, chronic addiction both alcohol and heroin, and like by looking at her you know she was dying… her main thing was like "I do not want to die in A&E" and I remember the last time I put her in an ambulance and I looked at the member of staff I was on with and I go "she is not coming home this time"… she died in A&E… there were no services linked in at that point and I don't know who is to blame here, like maybe we should have been stronger advocates. But I also think because she was a drinker and because she was homeless I don't think the hospice saw her as what she was which was she was terminally ill. She was never going to recover from the disease that she had. (P8)

While participants report service users are reluctant to attend hospitals when they become unwell, in the majority of cases, this was not considered future care planning or an expression of wishes and preferences in the context of end-of-life decision making, rather participants interpreted it as the service user's aversion to hospitalisation. Only a small number of participants reported future care planning for end-of-life with their service users.

> One of them who passed away who signed a waiver saying he didn't want any medical intervention, he wanted to die in his home. So we had staff sit up with him for his last final days (P4).

All participants discussed their views on the provision of end-of-life care in homeless accommodation, but only those who worked in long-term homeless accommodation had first-hand experience. Participants acknowledged that some service users viewed their supported long-term accommodation within homeless services as their home, which influenced any decision to remain there for the end of their life.

Management and handling of medications was identified as a contentious issue. Organisations had different medication management policies. Some participants felt uncomfortable handling medications. Conversely others perceived that if staff had a more active role in medication-management, it could improve medication compliance. Identified solutions were the use of blister-packed medication; prompting by staff; lockers; and liaising with prescribers to avoid multiple medications throughout the day. The presence of medications with potential street value caused concern.

> For the people [service users] on a lot of medication like different ones have to be taken maybe three or four times a day, they [staff in the organisation] just don't have the capacity to deal with it and I would feel they'd have better health outcomes if we took that on, but we've been kind of told outright we're just not going there. (P6)

3.) Identified need for external health and social care support

Participants felt that hospital staff do not understand the limited nature of support available to service users within homeless accommodation, for example that assumptions are made that there are staff to provide assistance with personal care in homeless accommodation. Frustration was repeatedly expressed at the poor communication between hospitals and homeless accommodation staff. Participants report a concerted effort made to attend hospital appointments and emergency departments to advocate on behalf of service users, but that frequently there is limited communication directly from the hospital to staff in homeless accommodation services. Poor communication was considered a major contributor to overreliance on emergency services.

> There's quite a large breakdown from hospital care to the hostel, you know? We don't have the resources to provide care, even if it's like simple wound dressing and things like that (P11).

Some participants had experience interacting with an inclusion health service. This service was considered to improve guidance for staff in medication-management, the monitoring of health status of a service user, and gaining access to health services. Difficultly accessing community health and social care services was highlighted as an ongoing barrier in providing care in the community, in particular lack of access to personal care needs assistance in temporary accommodation. Others highlighted that there are individual health and social care professionals who are known locally for their pragmatic approach to providing care in the community.

Some participants had experience of local specialist palliative care team involvement in the care of a service user. They reported that the palliative care team supported the staff around end of life issues which contributed to perceived good deaths:

> The hospice were brilliant because she wanted to die in the home and she felt this was her home, in [name of organisation] and they were incredible because she was a real fighter like she you know really lived to the end and the nurses from the hospice and the doctors would come out and see her here and they were always at the end of the phone. (P7)

However, this contrasted with concern about lack of hospice bed availability, lack of access to specialist palliative care services without a formal diagnosis, and a belief that a person had to be imminently dying prior to referral to specialist palliative care services.

> When the hospice and doctors coming out and they're saying, 'no they're not there yet' you're taking that but when you look at the man and he's in the bed well you're saying, 'well how bad does he have to get?' and there's no care at night so where does this man fall like because he's totally falling between the gaps then you know. (P7)

4.) Need for service-user focused care to enable a positive death experience
Participants identified flexibility and individualised approach to care from staff in homeless accommodation, general practitioners, public health nurses, hospital teams, and organisational support as key factors when providing end-of-life care within homeless accommodation services. This was contrasted by a concern by participants about working outside of their remit.

> And definitely it caused huge upset and people [homeless accommodation staff] felt like they just weren't supported enough, it was one of the huge learning pieces for me actually but the staff felt like they just weren't clear enough on what they were supposed to do [in facilitating end-of-life care for a service user in homeless accommodation]. (P11)

While it was recognised that end-of-life care within homeless accommodation is challenging, there was a strong desire to respect the autonomy and wishes of the service users. However, participants expressed conflict between their desire to respect a service user's autonomy with concern for their health. Participants advocated for hospitalisation if they feel the service user's health care needs cannot be met within the accommodation services.

> He [service user with head and neck cancer undergoing radiotherapy] was given ((pause)) he had the option to maintain his independence and dignity and he took it. People say in hindsight that, look, he should have been in [local hospital], he shouldn't have had a choice to come back here. But at the end of the day he was given the choice to be independent and he took that. (P4)

An identified area of conflict was the ability of an organisation to balance facilitating the death of a service user with duty of care to other service users within the confines of limited resources. Furthermore, participants expressed concern that while a service user may wish to die within homeless services, that available care may not address their individual care needs.

> Like, you have got 22 other people that you're looking after behavioural issues, addiction issues, even simple things like trying to keep the house quiet so someone who is possible dying isn't disturbed and is getting a full night's sleep if they can. There are certain things we just can't control and yeah I think as a team we decided we have done as much as we could and that definitely someone could just be better at caring for her at that stage. (P8)

5.) Concerns regarding supporting the increasing number of people experiencing homelessness requiring palliative care

Participants all expressed significant concern relating to the rising numbers of people living in homelessness in Ireland, particularly the increasing number of older people with increasing health care needs.

> I can see a huge population of them [older homeless people], they're all, I've worked here for nearly 10 years, I've aged with them, you know what I mean but I'm looking at people who are my age and they're not doing as well as I'm doing because obviously there's huge things that have impacted on their health in their

> lives but I can see that gap coming… it's just not going to be suitable for them because you know the body has worn down, they're going to have huge health problems and they need that extra little bit of care and attention. (P9)

Participants welcomed education opportunities and discussion about the end-of-life care needs of people experiencing homelessness who are living with or dying from life-limiting illness(es).

Discussion

This is the first Irish study to explore in depth the experience of staff in homeless accommodation working with people experiencing homelessness who have life-limiting illness(es). Walsh (2013) previously reported on attitudes to dying in an elderly Irish homeless or previously homeless cohort. This study demonstrates that challenges persist in identifying palliative and end-of-life care needs of people experiencing homelessness. Deaths occur within homeless accommodation services, and while a common experience is unanticipated death, some, particularly older people living in homelessness, die from life-limiting illnesses (Conneely et al., 2021). An anticipated death can be supported with clear communication between health and social care providers, collaborative work, and a person centred approach. The findings of our study mirror many of the findings from a small but growing body of international research (Shulman et al., 2018; Sumalinog et al., 2017; Klop et al., 2018; Stajduhar et al., 2019; Armstrong et al., 2021b) and in doing so, demonstrates commonalities across health and social care systems. This supports the need for the development of an inclusion health approach to palliative care.

While this paper aimed to explore experiences and issues relating to life-limiting illnesses and palliative care, many of the experiences reported by participants relate to barriers accessing general health and social care services which echoes recent findings by Armstrong et al. (2021a; 2021b). It is accepted internationally that palliative care and general health care are not separate entities, and there is no defined point where general health care stops and palliative care begins (Hawley, 2014). Countries such as Ireland have adopted an integrated model of palliative care provision where palliative care is not dependent on prognosis and can be delivered at the same time as curative treatment (Ryan et al., 2019).

This study highlights some examples of where end-of-life care has been accommodated within homeless services with success through future care planning, collaborative work, and organisational support. This demonstrates the importance of a person-centred approach to care which is a recognised pillar of the palliative care approach internationally (Ryan et al., 2019). People experiencing homelessness with life-limiting illnesses fulfil the conceptual framework of complexity in palliative care as proposed by Pask et al. (2018). This conceptual framework extends beyond the familiar physical, psychological social, and spiritual domains of palliative care and includes how patients interact with family/professionals and how services respond to needs and societal perspectives on care. This concept of complexity is heavily reflected in our findings.

Considerations for Future Research

One finding of this study, which reflects findings in other studies (Hwang et al., 2001; Hakanson et al., 2016), was that some people experiencing homelessness report a fear of dying in a hospital, which may or may not be associated with an expressed wish to die in their accommodation. This requires further exploration. It is unclear if the expressed desire of some people who are homeless to die in their accommodation is because they had a strong wish to die there, or if they felt that they had nowhere else to go, bad experiences in acute hospitals, and the presence of fatalistic cognitions (O'Carroll and Wainright, 2019). It is an important consideration that refusal of place of care does not equate to refusal of care. Studies have demonstrated that frequently people who are homeless have erratic health-care utilisation (O'Carroll and Wainright, 2019), but despite this, when faced with life-threatening events, some have demonstrated a wish to pursue more aggressive medical interventions than the housed population (Norris et al., 2005). It should not be assumed that refusal of hospitalisation is an expression of wish to die in the community. This is further supported by a recent study where nearly one in three deaths of people who are homeless were due to causes amenable to timely effective health-care (Aldridge et al., 2019)

Strenghts and Limitations

A limitation of this study is the presence of recruitment bias as organisations staffed by volunteers were not included. In addition, it is not known how many people within each organisation were approached, or how they were approached to participate by their organisation. Another limitation of this study is its small size and limitation to one urban city; there were 11 participants, and while most homelessness in Ireland is experienced in Dublin, other cities and rural parts of Ireland were not included. A limitation of this study is that this is the first qualitative study conducted by the primary researcher; however, this was mitigated by the supervision of two experienced qualitative researchers who were involved in the analysis. An additional limitation of this study is that it does not contain the voice of people experiencing homelessness; however, this was beyond the scope of this study. A strength of this study is that the research question included practical aspects of service delivery.

Conclusion

Providing quality palliative and end-of-life care for people experiencing homelessness is complex. Staff within homeless accommodation services play key roles in supporting and advocating on behalf of people experiencing homeless who are living with or dying from life-limiting illness(es). Specialist teams, such as palliative care teams, can offer expertise and knowledge about end-of-life issues, and can contribute to improving care through collaborative work, communication, and/or through educational opportunities alongside other health and social care services. A flexible person-centred approach to care is necessary.

Ethical approval and acknowledgments

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How Do People Who Use Substances Experience Accessing and Living in Homeless Hostels? A Systematic Review

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Abstract_ *People experiencing homelessness often use substances. They may face barriers to reducing substance use while living in hostels. The review aimed to synthesise and assess the quality of existing qualitative research to address: How do people who use substances experience accessing and living in homeless hostels? Do hostels support or hinder behavioural change? Eligibility criteria were peer-reviewed, qualitative evidence from adults experiencing homelessness and substance use in the United Kingdom. Seven electronic databases were systematically searched. The Critical Appraisal Skills Programme qualitative checklist was used to assess the risk of bias. Interpretative meta-ethnography was used to synthesise reported findings. Eight reports were identified with 143 participants in total. Data collection was via semi-structured interviews and either thematic or framework analysis was used. Four third-order themes were developed: 1). Living in fear; 2). The power of human connection; 3). The need for emotional safety; and 4). The use of restrictive practices (subthemes: Rules take away choices; Infantilisation). The findings highlight people's need for physical and emotional safety to seek support that can lead to exiting homelessness and recovering from substance use. A lack of safety can perpetuate substance use and, in turn, homelessness. Thus, a core response to alleviate homelessness paradoxically perpetuates the issue for some individuals.*

Keywords_ *Homelessness; Hostels; Substance use; Qualitative; Systematic review; United Kingdom*

Background

Homelessness is an increasing problem in England, which has been associated with austerity measures that began in 2009 (Loopstra et al., 2016). For the purpose of the review, the Homelessness Reduction Act (UK Public General Acts, 2017) legal definition of people experiencing homelessness is used: People who have no home in the United Kingdom (UK) or elsewhere. This includes if the person has accommodation available, but it is not reasonable for them to continue to occupy it, for example, it is unaffordable, overcrowded, at risk of violence or domestic abuse, unsafe, in poor condition, or temporary and inadequate accommodation such as refuges or hostels. Recent data from 2022 shows the number of individuals facing homelessness in England is at least 227 000, a large increase from 207 600 in 2018 (Crisis, 2022). However, these statistics are likely to underestimate the accurate scale of the issue as it is unlikely to account for people who are 'hidden homeless' such as street-based sleeping or those who sofa surf (Crisis, 2022). 67% of those assessed as homeless or threatened with homelessness in 2020/21 were single adults and almost entirely single men, followed by single parents with dependent children, adult couples with dependent children, and adult couples without children (Crisis, 2022). Individuals may have long periods of time in and out of homelessness and experience an average of 3.5 interchanging types of homelessness per year, including street-based sleeping, staying in refuges, hostels, emergency accommodation, and accommodation such as sofa surfing (Office for National Statistics, 2023).

The wellbeing of individuals experiencing homelessness is considerably poorer than that of the general population, which can be both a contributing factor to and a consequence of homelessness (Homeless Link, 2022). Given the health inequalities experienced by this marginalised group, it is unsurprising that homelessness is associated with an increased risk of substance use in comparison to housed persons; 45% self-medicate with drugs and/or alcohol to cope with their difficulties (Homeless Link, 2022). This can include coping with previous trauma or being a way to manage the complex emotions of losing their home and access to treatment (Homeless Link, 2022; Carver et al., 2020; Parkes et al., 2021; Omerov et al., 2020). It is also notable that increases in opioid use are associated with austerity (Friebel et al., 2022).

Not all people experiencing homelessness use substances and patterns of substance use amongst people who are homeless are varied and changeable (Neale et al., 2022). However, the intersection of homelessness and substance use is associated with additional barriers, multiple exclusion (Fitzpatrick et al., 2011), and health inequalities (Aldridge et al., 2017). These include a higher rate of drug-related deaths, infections, and multiple morbidities (Advisory Council on the Misuse of Drugs [ACMD], 2019). Furthermore, stigmatisation and fragmented communication can lead to mistrust in services and exacerbate problems accessing health and social care services for those experiencing homelessness (McNeill et al., 2022). Individuals may also prioritise basic human needs, such as security and housing, over healthcare needs (Omerov et al., 2020).

Although existing systematic reviews emphasise the importance of improving access to healthcare (Omerov et al., 2020; McNeill et al., 2022), they do not focus on housing security. Despite ACMD emphasising the need for services and housing to be tailored to meet the specific needs of substance users who are currently experiencing homelessness, hostels remain the main form of accommodation provision for single people experiencing homelessness (Homeless Link, 2018). Although one of the oldest institutions for serving those experiencing homelessness (Busch-Geertsema and Sahlin, 2007), there is not a set definition of what constitutes a hostel as each hostel varies in entry criteria, size, length of stay, and cost (Shelter, 2023). Hostel provision varies across authorities and geographical areas, with the support provided often determined by available resources and the individuals being accommodated (Keenan et al., 2021). Hostels may be provided by organisations specifically commissioned by local authorities or by private/third sector organisations and private landlords not specifically commissioned and therefore not monitored or assessed for quality: The UK Government acknowledges that the quality of hostels varies 'considerably' and explicitly advises local authorities to be cautious when securing accommodation with non-commissioned providers (Department for Levelling Up, Housing and Communities [DLUHC], 2018).

This review therefore focuses on hostel accommodation, particularly for single adults. For the purpose of the review, hostels in the context of homelessness are defined as short-term, temporary accommodation, usually for up to two years. In the UK, this is typically shared accommodation with shared facilities such as bathrooms and kitchens (Centre for Homelessness Impact, 2022a). This is different to shelters, which are defined as beds provided in a shared space overnight to manage emergencies such as adverse weather conditions or domestic abuse (Centre for Homelessness Impact, 2022b). Other temporary accommodations include refuges and short-term housing tenancies (Shelter, 2024).

The purpose of the Homelessness Reduction Act (UK Public General Acts, 2017) is to place duties on local authorities to prevent homelessness by intervening at earlier stages, and to provide homelessness services to all those affected, and not just those considered 'priority need'. It included: 1) an enhanced prevention duty requiring authorities to work with people threatened with homelessness from 56 days rather than 28, and 2) a new duty to relieve homelessness by supporting households for 56 days to help them secure accommodation (DLUHC, 2018).

Despite its purpose, the Homelessness Reduction Act fails to recognise that many of these individuals also use substances and are thus denied entry into suitable accommodation due to strict regulations banning substances on the premises (Fakhoury et al., 2002). This may leave people more vulnerable and likely to use substances to cope, therefore trapped in a cycle of hopelessness (Gray and Fraser, 2005). Interventions in hostels can be infused with disciplinary and regulatory techniques that may undermine individuals' (re)development of autonomy (Mahoney, 2019). For example, hostels may have rules preventing residents from receiving visitors, imposing curfews, and preventing residents from entering each other's rooms (Homeless Link, 2018).

Current literature in the United States of America (USA) and Canada discusses the importance of housing for those who use substances but recognises the barriers often impeding this, including unaffordable housing costs, prior evictions, long waiting lists, and unsupportive judgemental staff (Bassi et al., 2020; Dashora et al., 2012; Waldbrook, 2013). However, a positive supportive network and friendship help to manage some of these difficulties (Bassi et al., 2020; Dashora et al., 2012).

The evidence base (e.g., Shulman et al., 2023; Watson et al., 2019) suggests that a supportive relationship between staff and residents is crucial in improving people's experience of accommodations, which emphasises the need for psychologically informed environments (PIE) and trauma informed approaches (TIA). Some evidence relates specifically to the needs of women experiencing homelessness (Bassi et al., 2020; Dashora et al., 2012; Waldbrook, 2013). PIE is a framework developed to guide services to meet the psychological needs of people accessing the services and those working within them (Keats et al., 2012). TIA is an approach that can be incorporated by services to improve staff awareness of trauma and its impact on individuals, with the aim to reduce further impact (Office for Health Improvement and Disparities, 2022). People experiencing homelessness who use substances and receive compassion and non-judgemental support from staff working in substance use services perceived that their substance use treatment was more effective (Carver et al., 2020). However, a systematic review found that due to the competing demands of the role, staff working in homeless settings often lack quality time with residents and struggle with building good quality relationships (Peters et al., 2022).

Importantly, the majority of studies included in existing systematic reviews (Carver et al., 2020; Peters et al., 2022) were mostly conducted in the USA or Canada, where hostels are run with different regulations and where there are differential patterns of drug use and drug-related deaths amongst those experiencing homelessness (Roberts et al., 2023). At the same time, living in hostel accommodation whilst using substances is likely to give rise to similar interpersonal challenges, regardless of the sociopolitical contexts, given combinations of insecure interpersonal attachment styles (Horácio et al., 2023), mental health difficulties (Shulman et al., 2023), and risks of exploitation (McMordie and Fitzpatrick, 2024). It is therefore important to synthesise literature surrounding people who use substances and access hostels in the UK to better understand specific needs, inform current UK policies and practice, and share any learning with policymakers and service providers in other countries.

Synthesising current evidence can inform a response to concerns that individuals who use drugs whilst homeless are at an increased risk of harm (ACMD, 2019) and that there is a need to improve outcomes for adults experiencing multiple disadvantages, including the combination of homelessness and substance use (DLUHC, 2021). ACMD (2019) recommend the involvement of people experiencing homelessness in the design and delivery of homelessness services. To the authors' knowledge, a qualitative meta-synthesis has not been conducted on how people experiencing homelessness who use substances experience accessing and living in hostels. Synthesising current qualitative research investigating the views of people experiencing homelessness offers a collective perspective to contribute to the design and delivery of services. Qualitative synthesis can contribute to new conceptual understandings of psychological knowledge on an individual and societal level (France et al., 2019).

Review aims

The primary aim of the review is to synthesise and assess the quality of existing qualitative research that explores the views of people who experience homelessness and use substances to answer the question: How do people who use substances experience accessing and living in homeless hostels? The secondary aim is to consider whether hostels support or hinder behavioural change in relation to either homelessness or substance use to answer the question: Do hostels support or hinder behavioural change?

Methodology

Reflexivity

In qualitative research, the position of the reviewers must be acknowledged as their position can inevitably shape what data is extracted and synthesised (Berger, 2015). To ensure good quality research, the review was conducted in line with the Preferred Reporting Items for Systematic Reviews and Meta-Analyses (PRISMA) guidelines (Page et al., 2020) and the eMERGe reporting guidance (France et al., 2019). The primary author is a Trainee Clinical Psychologist with an interest in this area. The second author is a Consultant Clinical Psychologist working within homelessness and substance use services. To reduce bias, the authors of the current paper had regular reflective discussions around their roles and preconceptions.

Eligibility criteria

Studies were included if they:

- Had participants above the age of 18 years, with co-existing current or previous experience of substance use (including all illicit substances and alcohol) and accessing or living in a homeless hostel
- Were peer-reviewed or examined at Doctoral level studies
- Used qualitative research methods, or mixed methods studies where the qualitative data could be extracted
- Were written in the English language
- Were conducted in the UK

Studies were excluded if they:

- Focused on hotel accommodation, such as the Everyone In scheme (Cromarty, 2021), given this was a temporary scheme during the COVID-19 pandemic and therefore not an accurate representation of the general experience of this population
- Included qualitative data that could not be extracted from the mixed methods studies (after an attempt to contact the first author)
- Were grey literature that was not empirical research, to ensure there was a minimum quality standard (Boland et al., 2017)

Searching

An initial scoping search was conducted to provide an overview of the literature available on the topic area. Based on the scoping search, the most relevant databases for the topic area were searched to identify all relevant articles pertaining to the review aims.

Searches were developed based on the four concepts of the review question: homeless; hostel; experience; and substance use. These were formed from the keywords in relevant pre-identified references and in collaboration with a specialist librarian. Search terms included a combination of free text words and the databases' index terms to help improve the accuracy of the search results.

Seven electronic bibliographic databases (Academic Search Complete, APA PsychInfo, Applied Social Sciences Index and Abstracts, CINAHL Compete, MEDLINE, ProQuest Dissertations and Theses Global, and SOCIndex) were searched between 30/06/2023 and 01/07/2023. There was no limit to the search date and no restrictions on the publication period.

Report selection

Following the systematic search of the literature, all results were exported and managed on Zotero, a referencing management software. Any duplicated reports were automatically removed and further manually checked by the primary author. The primary author screened the title and abstract of each report against the eligibility criteria, to determine relevance to the review aims. For reports that remained of interest, the primary author carefully reviewed full texts to determine eligibility. Due to the flexible nature of qualitative data, it can be expected that more full texts require reading to confidently ascertain eligibility, relative to reviews of quantitative studies (Boland et al., 2017). The rationale for the exclusion of articles was clearly documented.

With the remaining eligible articles, complementary searching activities such as hand searching the reference list and citation chaining were also performed to help find other relevant articles and ensure an appropriate balance of sensitivity and specificity. The search was re-run prior to the final analyses to identify any further eligible articles. All articles that met the eligibility criteria were retained for analysis.

Data extraction

The primary author extracted data for all eligible studies. All relevant data was clearly documented on a standardised Excel spreadsheet. Extracted data included study design, participant characteristics, data collection, data analysis, and key findings.

Quality assessment

In line with the design of all eligible reports, the qualitative studies checklist developed by the Critical Appraisal Skills Programme (CASP) (CASP, 2018) was used to appraise the strengths and limitations and assess the risk of bias of each eligible report. The CASP tool is the most commonly used and user-friendly checklist for qualitative evidence and is recommended by Cochrane and the World Health Organisation (Long et al., 2020). The tool was adapted to include criteria on the inclusion of the type of homelessness, hostel, substance use, service user involvement, and reflexivity. A score of 0 was given if the criterion was not met or not reported, 1 if the criterion was partially met, and 2 if the criterion was fully met. The overall quality score determined the strength of the contribution to the synthesis, ensuring that no articles were excluded. Both authors independently rated included reports and any discrepancies in rating were resolved through discussion.

Data synthesis

An interpretative meta-ethnography was the most appropriate synthesis (Noblit and Hare, 1988) as the primary aim of the review is not to simply summarise existing findings on people's experiences of accessing and living in hostels, but to interpret beyond the current findings and form a qualitative interpretation, along with the secondary aim of considering whether hostels support or hinder behavioural change in relation to homelessness or substance use. The synthesis followed the seven steps of meta-ethnography developed by Noblit and Hare (1988): Getting started; Defining what is relevant; Reading the studies; Determining how the studies are related by comparing and contrasting themes; Translating the studies into one another using reciprocal and refutational translation to then develop a line of argument to allow for a new qualitative interpretation or theoretical understanding; Synthesising translation; and Expressing the synthesis.

During these steps, first-order constructs (participants' interpretation), second-order constructs (authors' interpretations), and third-order constructs (reviewers' interpretations capturing first and second-order themes) were expressed (Schutz, 1972).

Results

Report selection

PRISMA guidelines were followed to record the results of the systematic search strategy (Figure 1) (Page et al., 2020). A total of 1 619 records were retrieved from the database searches, selected down to eight reports that met inclusion criteria. No further reports were identified from hand searching reference lists of included studies or completing a cited reference search of the eligible studies. Eight reports were thus included in the systematic review. Each is given a report number, listed in Table 1, and referred to throughout the results for brevity.

Study characteristics

Table 1 summarises the study characteristics of the included reports. Seven were journal articles (1,2,4-8) and one (3) was a doctoral thesis; all were published between 2008 and 2021. Although the total number of participants appears to be 253, it seems that reports 3 and 4 are focused on the same sample, and that reports 6, 7, and 8 offer differing analyses of data from the same samples. Given this, the total number of participants is 143. Overall, there were significantly more male participants; 106 males in comparison to 37 females. Reported ages varied; five studies (1,4,5,7,8) reported mean ages which ranged from 37 to 45, one (2) reported the median age which was 33, and two (3,6) reported age ranges which were between 21 and 55. The method of recruitment varied. All studies used interviews to collect qualitative data. To analyse the data, four used thematic analysis (1-3,6) and four used framework (4,5,7,8).

Quality appraisal

The quality appraisal is presented in Table 2. The quality of the reports ranged from the lowest score being 18 (6) and the highest being 26 (3) out of the maximum score of 26. Typically, a higher overall score reflects a better reported quality study. The highest scoring was the doctoral thesis (3), which is not surprising given the different restrictions in word limit in comparison to a journal, and hence the capacity to include greater depth of information. Therefore, the review overrepresents the reports with the highest reported scores (1,3,4,5,7) as they provide a wealth of first-order data. However, a higher quality report does not necessarily mean a better conducted study and, therefore, the poorer quality reports (2,6,8) are included with caution.

All reports included a clear statement of the research aims and used a research design appropriate to address the aims. All described how data was collected, the form of data, and the data was appropriate to the aims of the research. All reported the type of homelessness and hostels, however, some were more brief in their description of the hostel (2,6,7,8). All but one (1) reported the type of substance/s used. Interestingly, only the doctoral thesis (3) reported the researcher's epistemological position and considered the researcher's role and the relationship between the researcher and the participants. Only one published report (8) explicitly considered the researchers' role. This is surprising given the importance credible qualitative research places on researchers viewing their research with an epistemological stance and considering reflexivity and their own bias throughout the research process. Furthermore, only two involved service users in designing the study (1,3). Common weaknesses across the studies included a lack of service user involvement, explicitly reporting researchers' epistemological position, and the role of the researcher and their potential for bias. All reported how ethical approval was sought. All included participant quotes to support the findings, but one (1) did not provide any contradictory accounts of data and two only briefly mentioned this (4,6), suggestive of potential bias in the results presented. All reported a statement of findings, although some were more explicit in naming this (1,4,5,7,8). All studies discussed how their research contributed to existing knowledge and literature.

Figure 1. PRISMA flow diagram evidencing identification, screening, and inclusion of included studies

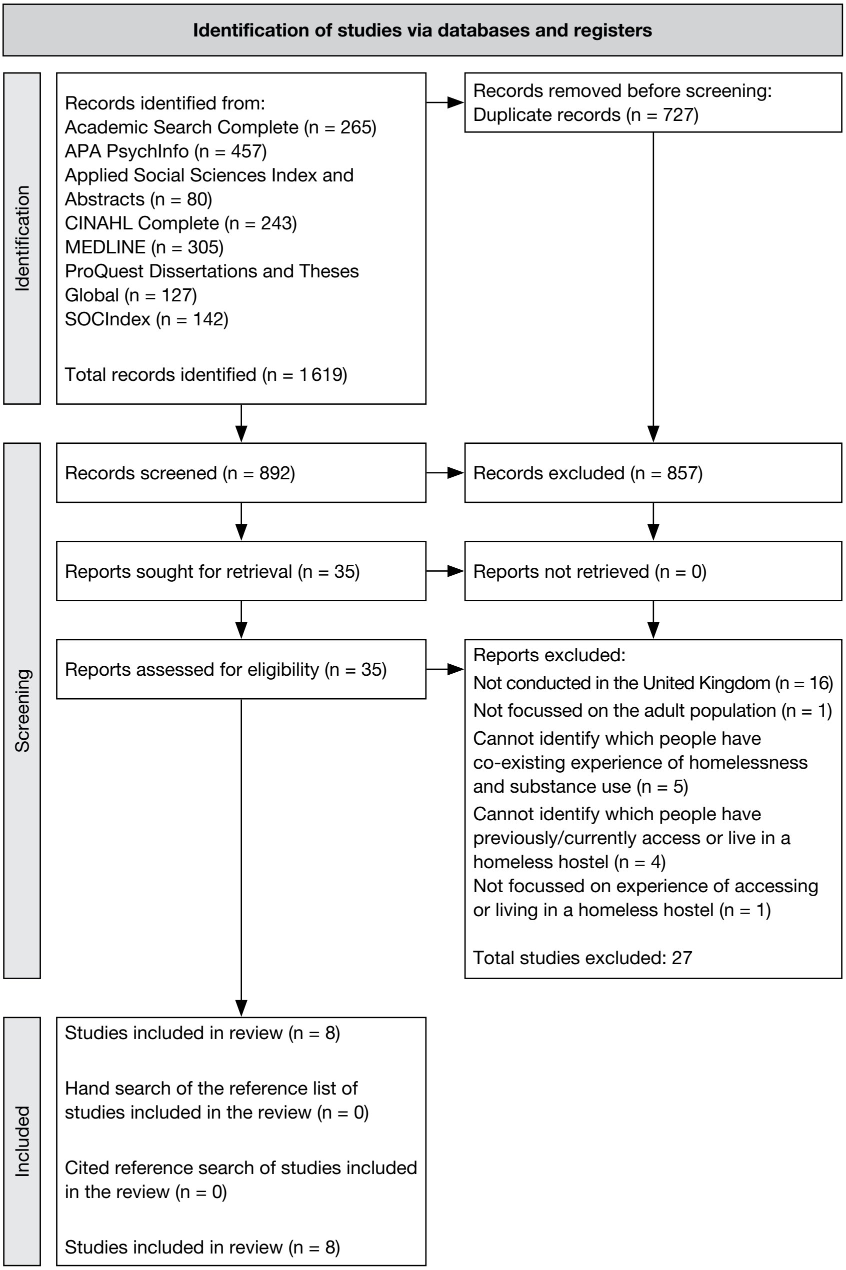

Table 1. Characteristics of studies included for review (n = 8)

Assigned Report Number	Authors [year], location	Aims	Qualitative data collection method	Sample	Recruitment	Data analysis method	Key findings
1	Armstrong et al. [2021], London, Kent, UK	To explore the support that hostel residents receive from hostel staff To explore residents' views on what may improve health and social care access for the residents at the hostel	Semi-structured interviews	15 people who were residents at one of the six hostels; 11 male, four female; mean age = 45.7	Residents at the hostel were approached by hostel staff	Thematic analysis	Stigma from external services led to receiving poor quality support. There was pressure to move on from the hostel despite being unwell. Staff provided positive support. Staff worked with an incomplete formulation which impacted the level of trust residents had in staff. Lack of in-reach services within the hostels.
2	Briggs et al. [2009], London, Bristol, UK	To explore the views of current injectors of heroin and crack on speedball injection (combination of heroin and crack in a single injection) and its association with health risks	Interviews	45 people who had injected heroin and crack within four weeks prior to the interview and who were or recently had experienced unstable housing; 34 male, 11 female; median age = 33	Through drug user networks in London and Bristol, and through a community-based drug service in Bristol	Thematic analysis	The risk of injecting in the public environment. The hostel viewed as a stable environment. The hostel viewed as a risk environment.

3	Irving [2008], Newcastle-upon-Tyne, UK	To explore the impact of living in private hostel accommodation on residents' human functioning	Semi-structured interviews	13 people who were or recently were residents at private hostel accommodation; 11 male, two female; age range = 25-55	Through local authority housing options team, fairer housing unit and regulatory services, homelessness charities, crisis-support services, criminal justice agencies and welfare, employment, and general advice services	Thematic analysis	Residents' reasons for accessing hostels. The impact of the condition of the property on residents' views of their life, bodily health (drugs and alcohol), bodily integrity, senses, imagination and thoughts, emotions, practical reason, and control over one's environment
4	Neale and Brown [2016], UK	To explore hostel residents' relationships to inform social network-focused therapeutic interventions	Semi-structured interviews	30 people who were residents at one of the three hostels and self-reported drinking and or/drug problems; 21 male, nine female; mean age = 38[1]	Reviewed bed lists and randomly selected individuals to approach, tried to ensure a mix of gender and different ethnic groups	Framework	Important characteristics of friendships were trust, honesty, and loyalty. Family-like friends were less likely to drink or use drugs. Other homeless friends and drug treatment friends supported each other.
5	Neale and Stevenson [2015], UK	To explore hostel residents' relationships in relation to their social and recovery capital	Semi-structured interviews	30 people who were residents at one of the three hostels and self-reported drinking and or/drug problems; 21 male, nine female; mean age = 38	Reviewed bed lists and randomly selected individuals to approach, tried to ensure a mix of gender and different ethnic groups	Framework	Relationships with family. Positive and negative relationships with staff and other hostel residents. Organisational issues such as the no-visitor policy made it difficult to maintain relationships with people in the community.

1 Sample the same as study 5.

6	Nettleton et al. [2012], South England, UK	To explore homeless drug users' use of emergency hostels To explore what strategies help and/or hinder sleep in hostels	Interviews	40 people who were residents at hostels and self-reported drug use; 29 male, 11 female; age range = 21-54[2]	Through Big Issue vendors, homeless day centres, harm reduction centres, satellite services, word of mouth, street and service user groups, and posters advertised	Thematic analysis	Hostels were not viewed as preferable to the streets. Drug-related activities, other residents, noise, and lack of privacy can prevent sleep.
7	Stevenson [2014], South Central England, UK	To explore hostel residents' views on their social needs To explore hostel residents' views on their relationship with hostel staff	Semi-structured interviews	40 people who were or in the past six months were residents at one of 56 emergency hostels and self-reported drug use; 29 male, 11 female; mean age = 37	Through Big Issue vendors, homeless day centres, harm reduction centres, satellite drug and housing services, word of mouth, the street, and service user groups	Framework	Positive and negative relationships with staff. Poor treatment from staff such as disrespect, feeling unheard, stigmatised, and unprofes-sional treatment. High resident turnover rate due to eviction. Lack of autonomy and privacy. Treatment of infantilisation.
8	Stevenson and Neale [2012], South Central England, UK	To explore hostel residents' views on intimate relationships	Semi-structured interviews	40 people who were or in the past six months were residents at emergency hostels and self-reported drug use; 29 male, 11 female; mean age = 37	Through Big Issue vendors, homeless day centres, harm reduction centres, satellite drug and housing services, word of mouth, the street, and service user groups	Framework	Organisational issues such as the no-visitor policy which made intimacy difficult. Lack of control over one's environment. Enforced separation due to hostel policies but the commitment and desire to be together. The benefit of relationships for support with reducing drug use. Relationship problems and risks.

2 Sample appears to be the same as the sample in study 7 and 8.

Table 2. Quality appraisal adapted from the Critical Appraisal Skills Programme (CASP) qualitative studies checklist

	Report Number							
	1	**2**	**3**	**4**	**5**	**6**	**7**	**8**
Quality criteria								
A clear statement of aims	2	2	2	2	2	1	2	2
Qualitative methodology appropriate to explore subjective experiences	2	2	2	2	2	2	2	2
Research design appropriate to address the aims	2	2	2	2	2	1	2	2
Recruitment strategy appropriate to the aims	1	2	2	1	1	2	2	1
Data collected in a way that addressed the research issue	2	2	2	2	2	1	2	1
Ethical issues taken into consideration	2	1	2	2	2	2	2	2
Data analysis sufficiently rigorous	2	2	2	2	2	1	2	2
Clear statement of findings	2	1	2	2	2	1	2	2
Value of the research	2	2	2	2	2	2	2	2
Type of homelessness stated	2	2	2	2	2	2	2	2
Type of hostel stated	2	1	2	2	2	1	1	1
Type of substance use stated	0	2	2	2	2	2	2	2
Service user involvement in designing the study	2	0	2	0	0	0	0	0
Total	23	21	26	23	23	18	23	21

0 (Criterion not met or not reported).

1 (Criterion partially met).

2 (Criterion fully met).

Higher overall score = A better reported quality report.

Results of Synthesis

Four third-order themes were developed: 1) Living in fear; 2) The power of human connection; 3) The need for emotional safety; and 4) The use of restrictive practices. Table 3 details the third-order themes and their relevant subthemes, and highlights which studies contributed to which theme. Third-order themes are presented with supporting participants' quotes (first-order themes). Third-order themes were developed using first and second-order themes. Reciprocal translation found many studies had similar themes across the studies. However, refutational translation found contradictory accounts within and between studies.

Table 3. Cross-comparison of studies (group findings)

	Report Number							
	1	**2**	**3**	**4**	**5**	**6**	**7**	**8**
Third order theme **Subtheme**								
Living in fear		*	*		*	*		*
The power of human connection		*	*	*	*			*
The need for emotional safety	*		*		*		*	
The use of restrictive practices								
Rules take away choices	*		*		*	*	*	*
Infantilisation			*		*		*	*

* The reports that contributed to each third order theme.

Living in fear

Participants across four studies described living in fear in hostels, particularly concerning physical safety (2,3,5,6). This included the fear of being stolen from by other residents for drugs, money, and food (2,3) and some viewed sleep as “risky” (6, p.323) and felt on edge within the hostel. There were some examples of direct threats to safety, for example,

> I was sleeping and he [resident] came in drunk and was kicking my door going “I am going to kill all your family” (5, p.481).

Additional indirect threats to safety were suggested. For example, having food stolen by other residents was said to contribute to deterioration in physical health; however, no participant quotations were provided (3). Overall, the authors infer that people living in hostels often do not have their basic needs of safety, food, and sleep met, and therefore, may not have adequate resources to begin their recovery process.

An exception to the majority of findings was that some people expressed gratitude for basic necessities within hostels, despite their poor physical conditions (3,6). Although from a poorer quality report, one participant compared the hostel to “heaven” (6, p.324). Another report (2) stated hostels provided safety for drug users to take drugs without the worry of time and space. One can assume that this provided a sense of control for substance users and allowed individuals to relax, rather than be concerned, for example,

> If you are outside or homeless you are more manic. It is more dangerous. You miss [the vein] and you are paranoid, you are vulnerable, you are open… if you have a place, then you can have a good gouch… chill out. It’s madness… you can relax because you know nothing is going to happen to you. (2, p.441)

However, this raises the author's concern of whether hostels are implicitly perpetuating drug use for some individuals. On the other hand, three reports discussed the possibility that people prefer to sleep on the streets rather than in hostels as people perceived hostels as more dangerous than public environments (2,3,5).

> I'd actually rather sleep on the streets than stay in a hostel… That's scary isn't it? The one way out [hostel] and you'd rather not choose it! The one way to move up in the world and you'd rather not go for it because it's worse than the options you've got already. (2, p.444)

Thus, it seems plausible to assume hostels offer a safe haven for some people, which may increase their drug use through creating more permissive environments. Most, however, seem to experience a high level of threat and vulnerability within hostels that inhibits recovery.

The power of human connection

Participants emphasised the power of human connection, particularly around the need to belong to a community with others who were in a similar position (2-5,8). People craved friendships with qualities such as good company, sharing things, and having daily contact, implying experiences of loneliness and the importance of acceptance and support within hostels (2-5). Residents did not have many belongings to share and often resorted to sharing drugs, which residents stated was a way to increase common interests and acceptance by others (2-5). However, people who were not previously taking drugs stated this encouraged them to then transition into drug use (2). Other residents (3) replaced drug use with alcohol, stating this was a way to cope with difficult emotions and low self-esteem, despite knowing the damage it caused to their physical and emotional wellbeing. It is suggestive that individuals who are lonely have fewer resources to rely on and crave more social connectedness, which is often achieved through shared substance use.

> You haven't got enough [money] for a drink, but I have!… You need drink, you need drugs, you know what I mean, it's a big circle. They could all sit round this table, quite merrily, 24 hours a day. (3, p.184)

In opposition to this, some residents (4) shared that they preferred to not have friends who did drugs as it tempted them to drink, use drugs, or commit crimes which caused additional stress, whilst others prioritised romantic relationships (5,6) and expressed this was to gain human connection.

The need for emotional safety

Emotional safety was a key theme across four reports (1,3,5,7), particularly around residents' relationships with hostel staff. Residents reported unprofessionalism from staff was associated with not feeling like a priority and feeling unheard, which negatively influenced the level of trust in staff and themselves (1,7). One report emphasised the importance of staff creating psychologically informed environments to help rebuild trust, in turn helping individuals to establish connections with others and improve their ability to seek support from services (1). Gestures such as staff listening to residents and treating them like 'humans' were connected to feelings of social inclusion that helped build trust in themselves and others, in turn leading to approaching recovery optimistically (1,7). However, two reports emphasised large caseloads and organisational pressures were barriers to staff building trusting relationships (1,7).

> The staff didn't, I don't think they didn't care, I just don't think they had the time to give the individual care that people needed, and the only time you ever got spoken to was if there was a crisis, you know, if you wanted to talk to your key worker you pretty much had to cut yourself up (7, p.137)

The use of restrictive practices

Rules take away choices

Reciprocal translation in all but two studies (2,4) identified people experienced difficulties with organisational rules, which led to participants feeling like they had no autonomy in the hostel. In one report (1), participants were found to be constantly living in fear of being evicted despite being unwell. Although this highlights the pressure placed on staff by commissioners to move people on after their agreed tenancy period, some hostels appeared to have more flexible management procedures, for example, "The manager here [hostel] took me back in because I wasn't that well, even though she knew I should have gone" (5, p.479). The same hostel had a 'no intoxication' policy, although most residents were understanding of this and shared that it meant "trouble generally stayed outside the building" (5, p.480).

However, difficulties arose when residents viewed organisational rules as depriving people of their basic human rights. For example, one participant shared that although room checks were mandatory, they were done spontaneously and without consent (7). Two of the highest quality reports (3,5) and one of the weaker quality reports (8) included participants' views on the 'no visitor' policy. If the policy was explained, people were generally understanding (3). However, when rules were forced upon people (3,8), residents stated they felt trapped and lacked social connectedness which hindered recovery. This suggests that it is not the rules themselves that are the issue, but the manner in which they are implemented.

> I'm a 34-year-old man… I should be allowed to have visitors whenever and however I want, and as many as I want, like anyone else in the house… I should have power over my own space… I mean I'm an adult… People leave hostels because of that (42, p.239)

Infantilisation

Connected to rules, four studies (3,5,7,8) shared that the lack of autonomy in hostels made people experiencing homelessness feel like they were being "treated like a child" (7, p.137). The lack of ownership within their care exacerbated feelings of frustration (7) and hopelessness (3). Overall, because residents felt reliant on others (3), it can be inferred that this reduced people's sense of control over their lives and recovery.

> I'm too independent to be in a hostel, prefer to do my own cooking and everything, and just not have people, staff try and treat you like a kid… because they've got the authority to stand there and tell you what to do (7, p.137)

Line of argument synthesis

The synthesis indicates that, for the majority of people, living in hostels is associated with not having their basic needs met and a sense of fear, both of which are likely to hinder recovery. In some cases, the fear of threat within hostels was so pervasive that sleeping on the streets felt safer. In contrast, hostels provided some people with safer environments in which they could use drugs, thus hindering recovery. Drug use was further perpetuated by a need for connection, belonging, and community, which was most easily accessed through shared drug use. Although there is a desire for staff to create emotional safety, there are organisational barriers to this, including workload pressures on staff and the implementation of rules in ways that were experienced as undermining autonomy, control, and connection with others. The contexts of hostels thus appear to limit the potential for behavioural change that can support recovery from substance use and homelessness.

Discussion

The aims of the review were to synthesise and assess the quality of qualitative research that can aid understanding of how people who use substances experience accessing and living in homeless hostels, and whether hostels support or hinder behavioural change in relation to either homelessness or substance use. The evidence overall appears to suggest that hostels hinder behavioural change, but through different processes for different individuals; for some through fear and lack of emotional safety; for others because drug use offers a source of connection and belonging in an environment in which drug use feels safer than on the streets. Such findings must, however, be interpreted with caution.

The evidence base is currently limited, with just five studies represented across eight reports. One study data (4) only contributed to one third-order theme and one study (6) was of poorer quality; therefore, these studies contributed less to the synthesis. It is also notable that two studies predate the introduction of austerity, and five reports were reported mid-way through austerity measures. Given austerity has been associated with increased homelessness (Loopstra et al., 2016) and opioid use (Friebel et al., 2022), the experience of hostels may have further changed since the studies were conducted. Alongside the potential negative impacts of austerity, there has been growing awareness of trauma informed approaches in homelessness services since Hopper et al.'s (2010) seminal paper. This may also have influenced the experience of hostels.

The findings are not surprising when interpreted in light of the existing literature. The current review found that hostel residents did not find their basic needs were met, which is likely to lead people to first prioritise basic human needs such as housing and security, before they are able to consider healthcare needs such as substance use (Omerov et al., 2020). One theoretical explanation is that when individuals feel unsafe, they are in a state of hyperarousal, feeling more anxious and hypervigilant, and, therefore, focus on survival instincts (Siegel, 1999). Given the connection between trauma and homelessness, hostel residents are likely to feel under threat more readily (Goodman et al., 1991), but there was also evidence of direct threats to safety within hostels. When people are under threat and feel unsafe, they are more likely to engage in self-destructive behaviours, such as substance use (Ogden et al., 2006). Individuals need to feel safe to be able to function effectively (Odgen et al., 2006) and it is also difficult for people to engage in recovery from substance use without safety in their housing (ACMD, 2019). Data within this review suggest hostels do not provide such physical safety and therefore likely hinder the behavioural change that can support recovery from substance use. It also suggests practice within the hostels included in studies was not in keeping with trauma informed approaches, which emphasises the need for physical and emotional safety (Hopper et al., 2010).

There are some inherent challenges for hostels in attempting to create safety for residents, given the likely need for rules to be able to do so. There is a risk that hostels become sites of discipline and regulation (Mahoney, 2019), which undermine autonomy, control, and connection with others. However, the findings indicate that explanation of policies and choice in care leads to increased acceptance of the rules. Rules are a core component of the psychologically informed environments framework and the way in which they are implemented, with psychological awareness, is vital to consider. This can also support recovery, as existing research shows when people experiencing homelessness are given choice, they perceive treatment for substance use as more effective (Carver et al., 2020). The review provides further support for the adoption of trauma informed approaches, which emphasise the need for choice, control, and autonomy (Hopper et al., 2010). This is in agreement with the Changing Futures Programme who advise services to be more flexible and adopt trauma informed approaches (DLUHC, 2021). It may be that more detailed research attention is needed focusing on processes through which hostel rules or policies are developed and implemented.

Whilst considering how to make hostels safer is one response to the findings of this review, another is to fundamentally reconsider continuing to collectively house individuals who are using substances or vulnerable to substance use. The congregate model refers to an arrangement in which people have a private room but communal facilities. Although there are obvious financial drivers to this, and potentially some social benefits in terms of people experiencing connection and belonging, it seems evident that for most individuals it hinders behavioural change in line with recovery. This may be a false economy, costly to both the individual and society. The findings of this review are consistent with Neale et al.'s (2022) assertion that, instrumental to enabling people to reduce substance use is the combined provision of unconditional shelter and basic amenities, together with pharmacological and psychosocial interventions, in a safe space where it is possible to avoid substances and other people using them.

The creation of emotional safety is also challenged by workforce issues. Unsupportive staff have been shown to be a barrier to gaining housing (Bassi et al., 2020; Dashora et al., 2012; Waldbrook et al., 2013). However, such unsupportiveness may result from challenges such as pressures from commissioners, high staff turnover rates, staff shortages, and burnout (Peters et al., 2022). Such conditions are likely to lead to create environments that are hostile to the aims of recovery and offer punitive responses and increased authoritarianism (Bloom, 2010). This is likely to give rise to the experiences found in the current review of restrictive practice and infantilisation, which not only hinder recovery, but may exacerbate substance use to cope with consequent emotional distress (Omerov et al., 2020).

It should be acknowledged that there were differences in experiences reported within and between studies. It is unfortunate that only two studies (Armstrong et al., 2021; Irving, 2018) incorporated service user involvement in designing the study. Since most of the studies were conducted, ACMD (2019) has recommended the inclusion of service users in the design and delivery of services. Should service providers follow this recommendation, it is possible that services will evolve in ways that address the need for safety and connection and move away from restrictive or infantilising practices. Involvement should consider issues of diversity and inclusion, for example, gender-specific issues (Single Homeless Project, 2023).

There are some limitations to this review and the reports included within it. These include the lack of discussion by researchers of their role and the potential for bias. However, most studies were of a similar quality and findings were mostly consistent across the different studies, with each theme showing up in at least half of the studies. The current authors also acknowledge a bias toward psychologically- and trauma-informed approaches that may influence the findings. However, care was taken to synthesise all report findings and not be selective. This review established methodological rigour by following PRISMA guidelines (Page et al., 2020) and the eMERGe reporting guidance (France et al., 2019).

Due to the differences in each study, such as the definition of homelessness used, the individual hostel regulations, and the overrepresentation of male residents, care should be taken when translating these results of the review. It is also noted that the specific UK socio-political context might have influenced people's experiences of living in hostels whilst using substances. However, the findings focus on the psychological experiences of fear, connection, and safety. These are likely to be shared human responses and needs when navigating homelessness and substance use. It is therefore hoped that the findings resonate outside the UK and can inform policy and practice.

To the best of our knowledge, this is the first review focussing on the voice of people experiencing homelessness in relation to hostel accommodation, substance use, and behaviour change. The review found that to best support people in hostels in recovery, physical and emotional safety is paramount. Therefore, this review recommends services carefully consider how to promote the recovery of people using substances whilst housed collectively with others using substances. This would include consideration of how to tailor psychologically informed environments and adopting trauma informed approaches based on the findings of this review. While the importance of relational support on the recovery process would be key to this, there also needs to be specific consideration of how 'rules' are introduced and implemented to develop environments that offer both safety and the potential to experience belonging without substance use being central to that experience.

There is some evidence that services can move toward psychologically informed awareness within limited resources (Buckley and Tickle, 2023). However, it is likely that consistent safety and support for recovery can only be optimally achieved if wider social systems support commissioning that allows for increased staff support and retention. Future research could consider the cost-effectiveness of investment in services to promote more rapid recovery from substance use and homelessness. This might include investment into hostels or, more radically, alternatives to hostel provision altogether, such as more widespread implementation of Housing First approaches (Baxter et al., 2019) for those experiencing both homelessness and substance use, or alternatives not yet considered.

Conclusions

The review found that the current qualitative evidence suggests hostel residents largely find hostels to hinder recovery from substance use and homelessness. This supports a move away from shared accommodation models. Recovery could be better supported through active work toward creating environments in which people can experience emotional and physical safety and connection to others that does not revolve around substance use. Work is required to implement rules without authoritarian and restrictive approaches, which is likely to be achieved only through attention to the needs of staff as well as residents.

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Registration

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Rejected: The Difficulties Faced by 'Failed' Asylum Seekers in the Accessibility, Adequacy, and Affordability of Housing in Malta

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Abstract_ *The status of a 'failed' asylum seeker carries several multifactorial implications on a legal and psycho-social level. This study examines the difficulties faced by 'failed' asylum seekers in accessing adequate and affordable housing in Malta amid the lack of eligibility for state housing benefits and an exorbitant property and rental market. The research design involved a qualitative approach based on narrative inquiry, whereby 'failed' asylum seekers were engaged in dialogue about the challenges they face in seeking adequate, accessible, and affordable housing along with interviews with key stakeholders involved in the development and provision of housing and migration policies and services. In addition, an analysis of current housing policies, schemes, and services was conducted to highlight their eligibility and exclusionary criteria for 'failed' asylum seekers. 'Failed' asylum seekers not only find it difficult to access adequate and affordable housing, but their legal status impacts their participation in all aspects of social life with various negative implications for wellbeing at both the individual and community level. The study provides a better understanding of the difficulties that 'failed' asylum seekers face when they try to access affordable and adequate housing and provides a number of policy recommendations to improve the lives of this marginalised group within Maltese society and address systematic inequalities and human rights violations.*

Keywords_ *asylum; housing; affordability; adequacy*

Introduction: The 'Rejected' Status: Implications on Wellbeing

Around 281 million people live outside their country of origin, many of whom were forced to leave against their wishes (Office of the High Commissioner of Human Rights (OHCHR), 2023). Leaving one's country of origin entails many risks. Asylum seekers endure traumatic journeys, including abuse and exploitation, and the loss of family and support networks. The reception system in the host country can also cause post-traumatic stress, leading to mental health challenges, suicidal thoughts, self-neglect, and depression and/or anxiety (AlRefaie and Dowrick, 2021). The asylum process is another stressful ordeal, leading to high levels of anxiety, insecurity, and fear, with 90% of rejected asylum seekers experiencing severe psychotic symptoms and reporting suicidal tendencies (Schoretsanitis et al., 2018). In addition, asylum seekers often face difficulties in accessing basic rights and services in the host country to lead a decent life. These difficulties and challenges are more acute for 'failed' asylum seekers.

'Failed' asylum seekers are individuals who, after going through the full asylum process (including appeals through the International Protection Appeals Tribunal), have had their applications rejected. Between 2021 and 2022, the rate of asylum rejections in Malta rose significantly (UNHCR 2022), leaving many applicants, particularly from Sudan (European council on Refugees and Exiles, 2023), with no legal protection, yet unable to return to their home countries due to humanitarian or diplomatic issues, especially in the absence of agreements with respective countries of origin for return and readmission. Consequently, these individuals remain in Malta without basic rights, excluded from essential services and social benefits, and trapped in a cycle of uncertainty (Jesuit Refugee Service Malta, 2010). Though they are granted an employment license, which is renewable every three months (Grech, 2021), they often encounter difficulties finding employment since they cannot apply themselves for a work permit, but depend on the employer's goodwill to do so, who are often discouraged due to bureaucratic hurdles (JRS and aditus, 2021).

Previously, Malta offered 'failed' asylum seekers with controlled regularisation recourse through the Temporary Humanitarian Protection New (THPN) (Identita', 2020), which in 2018 was replaced with the Specific Residency Authorisation (SRA). This policy became significantly more restrictive (Moviment Graffitti, 2020) as the Assisted Voluntary Return Programme was increasingly promoted to those whose renewal was rejected. The SRA was subsequently revised in 2020, with no new applications being considered after the end of that year though existing applicants could continue to renew their residency permits (Identita', 2020).

The 'Common Standards and Procedures for Returning Illegally Staying Third-Country Nationals Regulations' (Government of Malta, 2011) regulates the legal regime of return to countries of origin. Persons falling in this category, including 'failed' asylum seekers who do not possess a residency permit, are generally excluded from the social welfare system, including from emergency health care and "essential treatment of illness" (JRS and aditus, 2021, p.13). As acknowledged by the European Council on Refugees and Exiles (ECRE, 2005), when it comes to 'failed' asylum seekers, in most EU countries all kinds of support, including housing, are withdrawn. Once rejected, asylum seekers in Malta need to leave the open centres following the expiration of their agreement (Jesuit Refugee Service Malta, 2010). They are then expected to find accommodation within the community.

Increasingly restrictive regulations thus led to increased challenges for 'rejected' migrants to access adequate and affordable housing and shelter. In a context where the eligibility criteria of the social and affordable housing schemes offered by Malta's Housing Authority[1] are limited to Maltese or European Union citizens, persons holding international protection and those holding a long-term or SRA, face further challenges.

Amid an exorbitant property and rental market, 'failed' asylum seekers face exclusion from both adequate and affordable access to private dwellings and social housing (Hanley et al., 2020). Despite the provisions of the 'Residential Lease Act', which came into force in 2020 to provide transparency, stability, and security to those renting from the private residential market[2], racism and xenophobia remain strong barriers in accessing rental properties for asylum seekers and migrants. Maltese people are often reluctant to lease property to sub-Saharan Africans (NCPE, 2012). The absence of proper documentation can lead not only to discrimination by landlords in not leasing out to non-Maltese, but also to exploitation of tenants due to inadequate conditions. Unfortunately, people's rights are rarely met when it comes to renting in Malta. Rental prices are exorbitant, and many migrants end up renting shared accommodation despite its discomfort (Ribera-Almandoz et al., 2022). Due to high rent, it is also common that one opts for unsuitable living conditions. As a result, migrants have increasingly experienced homelessness and rooflessness, living in uninhabitable and overcrowded conditions such as stables and garages as long as they had a roof over their heads (Diacono, 2017). In the case

1 The mission of the Housing Authority is to "provide and sustain decent social and affordable housing" (Housing Authority, 2024, para.1). From the various schemes offered by the Authority, such as 'Social Housing', the 'benefits on privately rented dwelling', the 'Acquisition Grant', 'Social loan' and 'Tax reduction' schemes, the benefit scheme on privately rented dwellings is the only one accessible to 'failed' asylum seekers who have obtained the SRA. Those who do not have the SRA are ineligible for any scheme.

2 This legal framework specifies the type and duration of lease contracts (Housing Authority, 2021).

of female 'failed' asylum seekers, housing becomes even more challenging, especially if they have dependent children. Since they have no social safety net to rely on, such as access to childcare, it is more difficult to find employment, therefore experiencing additional poverty and exclusion (Pisani, 2011). Women who are economically dependent on their husbands/partners often run into serious challenges if they decide or are forced to terminate the relationship. Many women have no alternative but to move to inadequate housing end up completely homeless (Baker et al., 2003) or live in situations of violence and abuse.

Thus, despite the fact that the right to adequate housing is a universal right, and crucial for socioeconomic integration (Ribera-Almandoz et al., 2022), 'failed' asylum seekers face tremendous challenges in accessing basic housing mainly due to racism, xenophobia, and issues of accessibility, adequacy, and affordability (Fondazzjoni Suret il-Bniedem, 2010).

In 2021, the Anti-Racism Strategy to combat xenophobia, racism, and other forms of intolerance was launched in Malta. The strategy aims to stimulate intercultural inclusion and confront systemic, societal, and individual racism based on the principles of equality, diversity, interaction, and participation (Government of Malta, 2021). The action plan, which also aims to tackle discrimination and racism in the housing sector through disseminating relevant information to property owners, providing training to estate agents, and developing a code of practice for this sector, was welcomed enthusiastically by human rights and migrant organisations. Yet, access to affordable and adequate housing remains a huge challenge to 'failed' asylum seekers.

Displaced, forced migrants who benefit from some form of protection and 'failed' asylum seekers have different rights to residence and social welfare, with eligibility determined by socio-legal status (Dwyer and Brown, 2008). According to Fox O'Mahony and Sweeney (2010), 'failed' asylum seekers are 'double displaced', being displaced from their country of origin, yet prevented from re-establishing themselves in the host country. This has an impact on both the micro and macro level, as apart from the individuals concerned, it impacts on social solidarity and cohesion at the community level.

Materials and Methods

This research study investigates the challenges that 'failed' asylum seekers face when they try to access housing in Malta. 'Failed' asylum seekers remain in Malta after their asylum claim is rejected, unable to return to their countries, living in a state of limbo, and uncertainty about their legal status. By examining the experiences of these 'failed' asylum seekers, as well as the views of key stakeholders, this study seeks to understand the disadvantages and limitations that arise from the lack of legal status in terms of securing affordable and suitable housing. Although there are a number of studies on homelessness and housing affordability in Malta, there is a dearth of research that relates to the housing challenges faced by ‘failed’ asylum seekers. The research aims to address this lacuna to raise awareness about the challenges faced by ‘failed’ asylum seekers, and hopefully lead to policy change.

On the basis of these objectives, the research design involved a qualitative approach based on narrative inquiry (Creswell et al., 2007), whereby ‘failed’ asylum seekers were interviewed about the challenges they face in seeking adequate, accessible, and affordable housing along with interviews with key stakeholders involved in the development and provision of housing and migration policies and services in Malta. Four ‘failed’ asylum seekers, three males and one female, hailing from Ivory Coast and Gambia, all of whom had been in Malta for over five years and whose application for asylum had been rejected more than two years before the interviewing process, were recruited for the research. Based on the notion that narrative inquiry not only enables individual stories to be heard (Creswell et al., 2007), but also offers a caring, relational, and healing process (Weiss and Johnson-Koenke, 2023), this approach was specifically adopted to understand the participants’ lived experiences through an empathic appreciation of their subjective interpretation of reality (Taylor, 2015). Within this framework, the value of narrative inquiry is “much more than the telling of stories” (Clandinin et al., 2007, p.21) since it aspires to instil within participants a sense of empowerment (Brailes, 2021).

Six semi-structured interviews were held with different stakeholders hailing from government entities, e.g., the ‘Foundation for the Social Welfare Services’ (FSWS)[3], the ‘Agency for the Welfare of Asylum Seekers’ (AWAS)[4], the ‘Housing Authority’[5], non-governmental representatives from a shelter for the homeless (YMCA Malta)[6], the ‘Migrants Commission’[7], and the Sudanese Community in Malta[8], with the aim of examining existing housing policies and services for migrants.

Apart from these qualitative interviews with stakeholders involved in the development and provision of housing policies and services, an analysis of current migration and housing policies, schemes, and services was conducted to examine their eligibility criteria and whether they intrinsically exclude ‘failed’ asylum seekers. This

3 Providing social welfare services with a focus on family welfare, children, and community wellbeing.

4 Responsible for implementing national legislation and policies for the welfare of asylum seekers.

5 Responsible for the provision of social and affordable housing for vulnerable groups.

6 Offering community and residential-based services for the homeless.

7 Religious entity providing socio-legal assistance to migrants.

8 Refugee-led organisation representing the Sudanese community in Malta.

triangular approach enabled a more holistic examination of existing housing and sheltering policies related to migration with a view to identifying gaps in policy and service provision.

This research was granted approval by the University of Malta, Faculty for Social Wellbeing Research Ethics Committee and adheres to ethical and data protection regulations, ensuring no harm to participants, informed consent, anonymity, and confidentiality of personal data. Thematic analysis was utilised focussing on how lack of legal status impinges on the protection of fundamental rights and difficulty in accessing adequate and affordable housing.

The research rests on the premise that dignified and affordable housing is a fundamental human right. Adopting a critical social theory perspective, the study attempts to dig beneath appearances by critically engaging with mainstream ideologies and practices (Harvey, 1990; 2022), with the aim of generating informed knowledge for effecting policy change. Hence, critical theory provides the space to question, deconstruct, and reconstruct the acquired knowledge, as well as to highlight the contradictions (Zeus, 2004).

Following the above introduction on the situation of 'failed' asylum seekers in Malta and the limitations faced in terms of accessibility, adequacy, and affordability of housing, the following section will look at the salient themes of the lived experiences of 'failed' asylum seekers from the study, whilst the concluding section will present a number of recommendations for further research and improved policy and service provision in the field.

Results: Living in Malta as a 'Failed' Asylum Seeker

The 'failed' asylum seekers interviewed for this research have been residing in Malta for a period of five to sixteen years and shared varied yet somewhat similar experiences. During the period that they were living in open or closed centres, they all lamented the lack of official guidance to find private accommodation, with many finding support from friends or acquaintances, and today they all live in rented accommodation. Isaac* recounts, that, in the beginning, he had a "tough challenge" because nobody wanted to give him a place, so he had to sleep in a shop for some time until he found a landlord who understood his situation and rented out his place to him. Henceforth, he stated that when the landlord tried to register the rental contract with the tenant's identity number, it was difficult as the document was not a Maltese residency identity card. Notwithstanding the 'Private Residential Lease Act', not all landowners are registering their property and the data collected during the interviews with 'failed' asylum seekers is evidence that there is a lack of awareness from the tenants' side about the procedure and their rights. Consequently, they accept all the conditions that the owner imposes since they are aware that they have limited options available.

Employment and Access to Bank Services

'Failed' asylum seekers in Malta struggle to find employment as their documents and working permits need frequent renewal. This renders their situation more precarious because employment is the only legal right they have, although it is also slowly being withdrawn according to the changes in policy of employment (2021).

Ibrahim*, in his late 30s and hailing from Ivory Coast, has been living in Malta for the past 16 years. He has been consistently employed since his arrival without any issues. He used to hold the status of THPN, but this was not renewed following his return to Malta from a trip to Africa due to gaps in his employment history arising from this journey. Because of this, his bank account has been closed, making it difficult to send money back home. Due to a change in policy and lack of awareness, he has missed the opportunity to apply for the SRA.

Similarly, Sandrine*, from Ivory Coast who has been in Malta for the past five years, states that people like her with a 'failed' asylum status find it hard to find stable employment. She adds that "if you are working with a company but without contract, they will withdraw the yellow book.[9] They will take it away from you." She continues that "you can find employers who are willing to employ you with a contract. But it depends on everyone's luck."

Malta's 2020 decision to change the Specific Authorisation residency policy left many people who would have qualified at a later stage stranded, leading to social exclusion and poverty, as it ruined their hard-earned integration efforts and excluded them from accessing their basic rights. According to YMCA and Migrants' Commission representatives, such policy has forced employers to either refraining from employing 'failed' asylum seekers or else employ them irregularly. This policy, which remains in force, raises concerns as it leads to marginalisation and exclusion.

According to interviewees, 'failed' asylum seekers encounter several other challenges. One that hinders peace of mind is the difficulty in accessing banking services such as opening a bank account. Having a bank account is key to accessing different financial services such as taking a loan. Isaac* stated that since he cannot have a bank account, he faces barriers to buy online or apply for an electronic point of sale for trade, thus hindering his enterprise.

9 Referring to Immigration Police document.

Transitioning to Community Accommodation

Asylum seekers need to leave the open centre once their stay is due, with a maximum length of stay of six months for single men and one year for women and families. Sandrine* narrates that, after a year, she needed to leave the open centre where she was residing although she was still an asylum seeker. She adds that "after that, I had to leave. I met someone, a friend, who helped me out. That friend is the one who really helped me because I couldn't find accommodation."

Another interviewee, Joseph* from Gambia, stated that he did not face many difficulties in finding a place to live after he left the open centre as an acquaintance helped him find accommodation. Because of the increase in rental prices, before he used to have his own room, while now he must share with someone else as he cannot afford renting on his own. Joseph* also stated that he deals with an agent to pay the rent for his current accommodation and has never met the landlord. He doesn't know whether the contract is registered with the Housing Authority and admitted reluctance to ask since he is afraid that if "I ask him now, maybe it will create complications."

The interviewees shared similar experiences regarding the lack of official support in finding alternative accommodation while transitioning out of open centres. Because they were not eligible for benefits or governmental rental subsidies, their only option was the private rental sector. Discriminatory treatment and high rent made it difficult for some to access housing. They found accommodation with the help of their acquaintances, emphasising the relevance of social capital. Some individuals fear facing repercussions if they inquire about their rights, so they choose to remain silent.

Vulnerability and Instability

'Failed' asylum seekers, lacking basic rights and facing constant rejection, may feel vulnerable and neglected. Participants expressed concern about the implications of this 'rejected' status which goes beyond accommodation. The lack of legal rights often leads to bureaucratic complications. Enduring such circumstances on a regular basis, besides frustrating, is also humiliating and has negative psychological repercussions.

Marco* explained that due to their status, 'failed' asylum seekers face even more difficulties in finding work and accommodation, and many end up feeling helpless, with no means to live independently. As Marco* argues, instability forces the individual to take paths that can worsen their situation, both health and legal-wise. This social distress often leads to substance abuse as a coping mechanism. Sandrine* confirmed that she sees a lot of people in Marsa “sleeping rough” and she finds it very sad and distressing to see them in such a state. Isaac* also mentioned the challenges faced in terms of travelling, adding that people in his position do not even have the option of leaving for a better life abroad.

Lack of Access to Adequate and Affordable Housing: The Implications

Due to the unaffordable prices in the real estate and rental market, groups of people, particularly ‘failed’ asylum seekers, are being excluded from adequate accommodation, especially in the absence of eligibility for government schemes.

As Sandrine* explained, her concern is that if “for example, a woman doesn’t have somewhere to go, if she’s in the street, that will only lead to bad things.” Living on a small densely populated island, problems of homelessness, substance use, and criminal activity in neighbourhoods become more conspicuous, making one feel uncomfortable and unsafe. The YMCA representative argued that people who are not enabled to work end up living in poorer and rougher areas of the community because that is what they can afford. As a result, “we are inadvertently creating ghettoisation.”

AWAS representative argued that if the system is setting up people to fail, it will also negatively affect the Maltese society in general, as ‘failed’ asylum seekers are made to feel rejected as human beings, impeding a sense of belonging and thus respect toward the society they are living in. According to the FSWS representative, the situation for asylum seekers has not improved but regressed throughout the years, with the main issue being the long waiting time for the ‘International Protection Agency’ to provide a decision on their asylum application. This prolonged waiting period causes undue emotional and social distress as asylum seekers are unable to plan their future, leaving them feeling angry, demotivated and dejected by the system and the country with nothing to lose, as their hope for the future dwindles: “Why do I have to show respect in the community when no one is interested in giving me a future. I don’t have anything to lose. I’m not interested. Here is not my future.”

The Migrants Commission’s representative argued that a case of a person experiencing homelessness who has been denied asylum is different and more complicated from that of other homeless individuals due to “legal issues… injustice issues… and… the issue of homelessness too.” The need to appeal the rejected status demands “legal services, to reopen the case, to fight that case”. Professionals often get stuck when they encounter such cases, with many of the stakeholders acknowledging the injustice in the way institutions are operating, particularly since homelessness remains illegal in Malta. It was also added that the legal nature of 'failed' migrants has led to challenges faced by welfare professionals, who then have to find alternative ways to give their support, despite the limitations created by the legal status and lack of entitlement to government benefits and services.

Discussion: A place One Can Call 'Home'

The findings provide insight into how 'failed' asylum seekers feel about living in a community that has created barriers for them to settle and build a rich and meaningful life. The study highlights the fact that lack of legal status leads to instability, not only in terms of accessibility to housing, but also to other essential rights, such as healthcare, employment, social security, and education. All of these have negative effects not just on the individuals but also on Maltese society at large. Following a brief discussion of the findings, this concluding section will give a brief overview of the main strengths and limitations of the study followed by recommendations for improved policy and programme implementation.

The EU's approach to migration, also reflected in Maltese national policy, is primarily focused on discouraging irregular migration by making irregular entry, stay, and return a criminal offense (PICUM, 2023). However, such policies create a hostile environment leading to marginalisation and increased vulnerability to exploitation and abuse. They also limit access to social protection and healthcare, worsening risks of poverty, homelessness, violence, ill-health, and exploitation (PICUM, 2023).

Structural inequalities, discrimination, systematic racism, and inadequate social safety nets are conducive to unsustainable living among marginalised groups (Ponio, 2023). As a result, 'failed' asylum seekers in Malta face significant housing insecurity due to their exclusion from social housing programmes, high costs in the private rental market, and widespread discrimination with the result that they often end up living in overcrowded or substandard conditions, and often face rooflessness. This housing insecurity is also faced by asylum seekers who are still awaiting decision on their protection status, though in line with the International Covenant on Economic, Social and Cultural Rights, European States are obliged to provide adequate accommodation for those whose status is still pending (Westendorp, 2022). The experience of homelessness, housing exclusion, and unstable housing can be incredibly stressful and isolating, which can worsen existing mental health conditions, precipitating maladaptive behaviour and coping mechanisms such as addictive behaviour and self-medication through substance use (Ponio, 2023).

The strengths of this research come from its triangular approach (Carter et al., 2014), converging the narratives of 'failed' asylum seekers with that of stakeholders. Whilst the focus of the study is on accessible, affordable, and adequate housing, 'failed' asylum seekers face many more challenges other than what was investigated. Moreover, the small sample size calls for caution in terms of generalisation and highlights the need for further knowledge creation in the field. Comparative research between those with 'failed' status and those who obtained international protection will provide further insight as to the impact of legality in accessing rights, especially in terms of living conditions and affordable and adequate housing. It is pivotal that research narrates the experiences of those mostly affected to help bring marginalised voices to the attention of policymakers. To establish a more just and equal society, policies need to be built from the people's lived realities, that is, from the grassroots (Ledwith, 2011).

Improved policy and programme implementation in the field demands acknowledging the original mission of social housing; to supply affordable housing to those who are most vulnerable and disadvantaged. Social housing in Malta has been created to provide assistance through different schemes for either purchasing a property or renting (Braga and Palvarini, 2013), yet, by excluding 'rejected' asylum seekers, it is failing to support those most vulnerable to homelessness and housing exclusion. Another important policy reform concerns the reinstatement of the 'Specific Residency Authorisation' or any other permit to regularise 'failed' asylum seekers' stay in Malta to enable access to basic rights, including health care, employment, and housing amongst others. Reduction in the waiting time in issuing residency cards and renewals will help to reduce social distress. Change is also pivotal in the asylum assessment procedures adopted by the 'International Protection Agency'. The agency needs to be more aware of the political and cultural realities of the countries where asylum seekers are coming from and decisions regarding status decision to be expediated. Moreover, AWAS, as the national agency responsible for the welfare of asylum seekers, needs to broaden its services to support all migrants, regardless of their status. Further resettlement options need to be considered for those who wish to explore better opportunities elsewhere, as well as improve on voluntary return programmes to make them more humane for those considering return to their home country. Greater emphasis needs to be placed on awareness regarding the realities that 'failed' asylum seekers face. This would increase public understanding of migration trajectories and reduce racism and xenophobia, whilst promoting inclusion.

Although this research was targeted toward adequate, affordable, and accessible housing, it is evident that the main issue surrounding the status of 'failed' asylum seekers is primarily of a legal nature, impacting not only the individuals concerned, but society in general. These legal issues lead to marginalisation and ostracisation in all aspects of society. Poor mental and physical health, precarious employment, inadequate shelter, racism, and poverty are all problems that 'failed' asylum seekers face due to bureaucratic barriers and lack of proper status.

It is hoped that this research increases awareness about the challenges faced by 'failed' asylum seekers while advocating for policy changes that would enable them to live a stable life, including being able to live in a place they can call home – a place that provides a sense of stability, security, and wellbeing.

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Homelessness Strategies in Europe – A Review of the Literature

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Abstract_ *The research underpinning this review was written in the context of the European Platform on Combatting Homelessness (EPOCH), against the backdrop of the global housing crisis. Moreover, in the past two decades homelessness strategies were developed around the world, including in Europe. This literature review aims to present what is known to us to date regarding European homelessness strategies. It maps the different facets known as part of any homelessness strategy, including implementation, governance, prevention, temporary and permanent long term housing, monitoring and evaluation, etc.*

Keywords_ *Homelessness, Strategy, Policy, Literature review*

Introduction

Rapid population growth combined with growing urbanisation outpace adequate and affordable housing worldwide (United Nations Statistics Division, 2019). A growing number of European countries report overrepresentation of some ethnic minority populations in their homeless population (Baptista and Marlier, 2019). Meanwhile, according to research, there is growing awareness that migration may have become a structural factor of homelessness (Hermans et al., 2020).

In her political guidelines for the next European Commission 2024-2029, President of the European Commission Ursula von der Leyen (2024), expressed the urgent need to "address the housing crisis facing millions of families and young people" (p.18). This housing crisis is the context in which homelessness strategies were

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developed during the past two decades: mainly in northern and western European countries, while the eastern countries seem to have lagged behind (Benjaminsen and Dyb, 2010; Baptista and Marlier, 2019). In the Lisbon Declaration on the European Platform on Combatting Homelessness of 2021, all signatories, including all European Union (EU) Member States (MSs) agreed "to launch this platform and to work towards the ending of homelessness by 2030" (for more information about the European Platform on Combatting Homelessness (EPOCH); see also Leterme and Develtere, 2023).

This declaration was developed on the basis of some prior decisions and tools, including the European Pillar on Social Rights, the European Parliament Resolution of 24 November 2020 on tackling homelessness rates in the European Union, and the European Parliament Resolution of 21 January 2021 on access to decent and affordable housing for all.

The European Commission Work Programme of EPOCH for 2022-2024 states that national, regional, and local authorities will:

- Promote the **prevention of homelessness, access to permanent housing and the provision of enabling support services to the homeless**, which could, amongst others, be done by:
  - **Developing and adopting strategies** for the eradication of homelessness, according to the principles enshrined in the Declaration (European Commission, 2022, p.6).

A Review of the Literature: Homelessness Strategies

> Strategic planning to address the problem of homelessness internationally has become more common as the service sector has grown more sophisticated, and as social policies in the area have become more expansive and detailed. (Pleace et al., 2015, p.23)

After United States (US) local governments failed to address homelessness properly, a 1996 paper spoke about planning a homelessness strategy as an innovation providing a continuum of homelessness care for prevention, emergency relief, and long-term care (Berman, 1996).

Recently, the Organisation for Economic Co-operation and Development (OECD, 2024a) defined homelessness strategies "as policy documents setting out targets and actions to tackle homelessness, requiring links across policy sectors" (p.1). Strategic planning may also be defined as "a deliberative, disciplined approach to producing fundamental decisions and actions that shape and guide what an organization (or other entity) is, what it does, and why" (Bryson, 2011, pp.7-8). A definition of strategic frameworks describes "agreed goals and long-term plans that focus efforts of stakeholders towards desired outcomes" (United Nations Economic Commission for Europe, 2021, p.6, Table 1).

Planning is not enough. For its success, a plan should be implemented, so it does not end up simply on someone's office shelf. If it does not stay on the shelf, a strategic plan which is designed by and with multiple stakeholders may help to alleviate homelessness (Lee et al., 2021).

According to the United Nations Economic Commission for Europe (2021), policies for affordable housing should address four topics for planning and implementation to be effective:

1. housing governance and regulation;
2. access to finance and funding;
3. access and availability of land for housing construction; and
4. climate-neutral housing construction and renovation.

As housing systems are dynamic and change over time, governments need not only to plan and implement strategies effectively, but also evaluate them whilst adapting them to conditions that change over time.

Note that policies for affordable housing should not be dealt with as interchangeable but rather possibly including homelessness policies.

Homelessness Strategies in Europe

There have been at least two decades of discussions regarding homelessness strategic planning in Europe. The European Federation of National Organisations Working with the Homeless (FEANTSA) (2010) published a handbook for policy makers, which includes its policy toolkit, that tried to give some guidance for developing a homelessness strategy. Further, FEANTSA's magazine summer issue of 2015 dealt with different aspects of homelessness strategies. Benjaminsen and Dyb (2010), as well as Pleace et al. (2015), offer reviews of homelessness strategies that were relevant at the time, while O'Sullivan (2022a; b) and O'Sullivan et al. (2023) provide some up-to-date information about some of these strategies.

Further, there are some documents dealing with homelessness strategies in specific states and regions. Most of these examine existing strategies, whilst some others deal with their absence. Some examples include papers about **Portugal** (Baptista, 2009; 2013; 2018, Ferreira Martins and Ferreira, 2015; Fitzpatrick, 2010), **Portugal**

and Ireland (Baptista and O'Sullivan, 2008), **Ireland, (**Baptista et al., 2022; Gavin, 2010), **Finland** (Kaakinen, 2015; Pleace, 2017; Tainio and Fredriksson, 2009), **Spain** (Baptista, 2016; Bezunartea, 2022; Rodilla and Lopez, 2023; Ruiz Bautista, 2010), **Poland** (Olech and Rogozińska, 2010; Wygnańska, 2009), **Norway** (Edgar, 2006; Halseth et al., 2022), **Denmark** (Benjaminsen and Kamstrup, 2010; Skovlund Asmussen and Maini-Thorsen, 2022), **Czechia (**Dutka, 2022), **France** (Uhry, 2015), **Germany (**Maretzki, 2022), **Greece** (Pertsinidou and Soulele, 2015), **Hungary** (Bakos and Ghyczy, 2010), the **Netherlands** (Hermans, 2012), **Serbia** (Cirkovic and Terzic, 2010), **Sweden** (Sahlin, 2015), **Scandinavian Countries** (Benjaminsen and Dyb, 2008), **Flanders** (Beyers, 2015; Hermans, 2017), **Wales** (Dalton, 2022), and **Scotland** (Anderson, 2007; 2019). Further, there are 35 national reports which are part of the 2019 study of national policies by the European Social Policy Network (ESPN).

Norway and Finland seem to offer very good examples – though not the only ones – of dealing with homelessness in Europe. In Norway, the State Housing Bank (Husbanken) has had a crucial coordinating responsibility for implementation of the national strategy (Edgar, 2006). A Husbanken analysis recently noted that "the reduction in the number of homeless people is a result of national cooperation and a long-term integrated strategy for housing and support services" (Halseth et al., 2022, p.21; see also the whole FEANTSA Magazine spring issue that deals with national homelessness strategies). Many strategies were drafted in the past two decades in the EU. However, this did not happen in all EU Member States, and not in all regions of the Union.

Key Events and Documents Underpinning European Union Homelessness Strategies

Some important events and documents may be spotlighted in relation to EU homelessness strategies in the last two decades. These will be noted below and include 1) The Consensus Conference (2010); 2) A study of national policies by the European Social Policy Network (ESPN) (Baptista and Marlier, 2019); and 3) The Lisbon Declaration on the European Platform on Combatting Homelessness (2021):

1. The Consensus Conference on Homelessness took place in Brussels in 2010. It was an event of the Belgian Presidency of the Council of the EU and sought to establish an evidence-based consensus on how to advance in tackling homelessness in Europe. The outcomes of this Conference include very extensive documents, of which we would like to present here only briefly. Some European Journal of Homelessness papers also exist that delineate, as well as examine and critique, the Conference (see some contributions in the 2011 Special Section on the European Consensus Conference on Homelessness in Volume 5, Issue 2 of the Journal).

The Conference jury concluded that homelessness strategies can both prevent people from becoming homeless and ensure quick provision of long-term solutions for those who are experiencing homelessness. The Jury further expressed a need for an ambitious EU homelessness strategy that would frame the development of Member States' national and regional strategies and enhance progress in the fight against homelessness (European Consensus Conference on Homelessness, 2010).

Bearing in mind the question of whether an EU strategy on homelessness should exist (see Fitzpatrick, 2011), the Conference jury recommended some elements for an EU homelessness strategy. These EU level elements may also be relevant for the development of national and regional strategies (see European Consensus Conference on Homelessness, 2010, pp.22-24).

2. The study of national policies by the European Social Policy Network (ESPN) was published in 2019. Experts from the ESPN were asked by the European Commission to examine evidence, policy approaches, and overall strategic frameworks addressing homelessness and housing exclusion and assess their effectiveness. The outcomes of this request include a synthesis report (Baptista and Marlier, 2019) and the 35 national experts reports mentioned above.

Like the Consensus Conference conclusion, ESPN experts also spoke of an EU homelessness strategy, mentioning the European Parliament's resolutions from 2011 and 2014 urging the European Commission to develop such an all-encompassing EU strategy that could support Member States in their fights against homelessness. In 2013, the Commission called on Member States to develop national strategies, as part of the EU Social Investment Package (Baptista and Marlier, 2019).

Baptista and Marlier (2019) report that 16 Member States have national, regional, or local homelessness strategies. Key elements include housing-led and/or Housing First services, prevention, monitoring, funding, and multi-level and multi-sectoral governance structures which enhance cooperation in policy and delivery. Finally, they note some systemic causes which limit trajectories out of homelessness and housing exclusion. These include lack of affordable housing, poverty, unemployment, as well as insecure employment, and problematic social protection – including low levels of welfare benefits. When attempting to develop a homelessness strategy, it is worth consulting the synthesis report's recommendation to countries as well as EU level recommendations (Baptista and Marlier, 2019, pp.18-22).

This is also the place to reiterate the European Pillar on Social Rights, the European Parliament Resolution of 24 November 2020 on tackling homelessness rates in the European Union, and the European Parliament Resolution of 21 January 2021 on access to decent and affordable housing for all

3. The Lisbon declaration on combatting homelessness, signed on 21 June 2021, launched EPOCH – the European Platform on Combatting Homelessness – in the context of which this paper is written.

Key Issues and Points of an Effective Homelessness Strategy

Below we elaborate on various issues that are relevant for an effective homelessness strategy, as these arise from the literature.

Legal Framework

> Ending homelessness is not possible without a sufficient legal framework to support the implementation of homelessness strategies. The European Social Charter already provides a strong foundation for national legislation. (Kaakinen, 2010, p.38)

The legal framework for action against homelessness is important for any related strategy. In Norway, for example, it was built based on the Social Services Act (1991) within the framework of a national housing policy, in which municipalities were encouraged to develop strategies for providing housing support (Edgar, 2006).

A Human Rights Approach to Homelessness

A legal framework with an effective and human-rights-based approach to realising the right to housing for people experiencing homelessness should be reflected in a strategy based on these principles. Finland's constitutionally enshrined programmatic right to housing, together with its homelessness strategy, offer a progressive realisation of the right to housing, even if this right may not be enforced through the courts. Another different example is Scotland's legal right to housing, which is enforceable through the courts (DesBaillets and Hamill, 2022).

The International Convention on Economic, Social and Cultural Rights enshrines the right to housing. Article 11 (1) recognizes "the right of everyone to an adequate standard of living for himself and his family, including adequate food, clothing and housing, and to the continuous improvement of living conditions" (United Nations, 1966, p.4). While abiding by a human rights approach to homelessness, the unequivocal mission is to end it – as housing is a human right. This should not remove the responsibility of managing homelessness and doing the best we can with anyone currently experiencing homelessness until we achieve our mission (for more information about a human rights approach to homelessness, and a wider range of international legal instruments to achieve the right to housing, see Housing Rights Watch).

Note that even though we specifically mention and elaborate here regarding the right to housing, human rights go beyond housing to include other rights like dignity, freedom from degrading treatment, and others.

Mission, Objectives, Targets, and Goals

Strategies, as well as academic and other professional literature, are full of possible strategy objectives, targets, and goals. Having examined many strategies and a great volume of the relevant professional literature, our evaluation is that the **mission** of any homelessness policy is to **provide people experiencing homelessness with decent healthy lives and wellbeing.** We presume that different documents confuse these terms – mission, objectives, targets, and goals, and allow for this confusion here. In order not to obscure anything with a possibly vague mission, and make proper government intervention possible (see Coyle, 2024), we propose below a detailed tier-based plan based on the literature where, for the sake of this paper, the mission is at the top, served by the primary and other objectives, as well as targets and goals.

Based on this assessment we can conclude here that in 2024 it seems that an agreed **primary objective** of a homelessness strategy that would enable the mission mentioned above is to **end homelessness;** (the jury of the Consensus Conference called for ending homelessness to be the long-term goal underpinning an EU homelessness strategy – European Consensus Conference on Homelessness, 2010). The **secondary objectives** to support ending homelessness should include the **delivery of long-term permanent housing,** and the **prevention** of homelessness (see the relevant sections below: especially *permanent long-term housing solutions* and *prevention*). Within this framework **one important target** of a strategy that may serve as an indicator to determine how successful we are in achieving the strategy's objectives should be to **reduce the number of people experiencing homelessness** (see for example Benjaminsen and Dyb, 2010, regarding success measurement of strategies in pp.133-134). **Another target** may be to **reduce the time that people experiencing homelessness spend in temporary accommodation before they go on to permanent accommodation** (see the relevant sections below: especially *permanent long-term housing solutions* and *ending homelessness*)**. Two main goals** that may support the main objective are the **collection of data** – including homeless counts (regarding these issues see Develtere, 2022; Hermans, 2024), as well as to **shift from emergency shelter as the predominant response to homelessness toward the provision of adequate levels of long-term, permanent housing-led, including Housing First, services,** while building more such permanent housing opportunities (see for example Boone et al., 2021).

Collaboration is Key – From Development to Implementation and Beyond

> Homelessness will not disappear completely because of a collaborative strategic plan's design, but much headway can be made towards strategically and collaboratively alleviating this social ill. (Lee et al., 2018, p.374)

As an 'intractable' (Eide, 2022), 'wicked' (Brown et al., 2012) social problem, homelessness should be granted "an innovative, collaborative, government-led response" (Lucas and Boudreaux, 2024, p.146). As no stakeholder can solve it on their own, a strategic plan designed by and with multiple stakeholders was noted as the factor that may help alleviate homelessness (Lee et al., 2018). The collaboration among manifold stakeholders has been shown to be crucial for the success of a homelessness strategy. This is true for the different stages of the strategy – from the development stage all the way through to implementation, as well as monitoring and possible adjustments to the strategy. Research regarding Finland and Norway shows that collaboration is the infrastructure upon which strategies are developed and implemented (Edgar, 2006; Halseth et al., 2022; Pleace, 2017).

Relevant stakeholders may include different tiers of government at central, regional, and local levels, as well as quasi-governmental and non-governmental agencies, that undertake strategic planning that involves a multi-person effort supplying many different types and degrees of inputs (Edgar, 2006; Lee et al., 2018; Pleace, 2017). One specific stakeholder group which has been shown to be crucial in this strategic process are experts by lived experience of homelessness (Dalton, 2022; Pleace, 2017).

Implementation

> Once plans are launched, communities can struggle to sustain the momentum needed to do the actual long-term work of implementation. (Buchnea et al., 2021, p. 25).

Some plans simply stay on someone's office shelf, as not all plans are actionable (Lee et al., 2018); they may end up as a mere 'paper strategy' (Owen, 2015). For the development stage to not end up as an end in itself, implementation should be at the heart of a homelessness strategy from the outset. Even when a homelessness strategy has already been developed, often there is little guidance about factors contributing to its being that strategy which constitutes lasting positive impact and change. This is sometimes due to lack of resources and knowledge that are needed for the implementation stage (Buchnea et al., 2021). Manifold stakeholders are also part of the implementation stage of any strategy, and there is growing awareness of the need to address complex problems arising at this stage (Benjaminsen and Dyb, 2010).

Although a strategy may be developed and lead at the national or regional level, implementation is mostly coordinated and enacted by lower levels of government, which themselves involve more new stakeholders for the implementation stage (Benjaminsen and Dyb, 2010; Buchnea et al., 2021; Edgar, 2006). Success and failure may be determined by a "complex interplay of responsibilities, resources, organisation and social practices at the local level, including the structural context of the availability of affordable housing" (Benjaminsen and Dyb, 2010, p.136). Therefore, great attention needs to be given to implementation so that all the resources that were put into the strategy are not lost. Obviously, adequate funding is a condition of successful implementation, as may be seen in the 'funding' section below.

Governance

Effective implementation is based on improved governance. Most papers written about homelessness strategies include mention of the proper governance mechanisms needed in their implementation.

> Three elements prove to be particularly useful in improving governance in the area of homelessness and housing exclusion where responsibilities are shared between different levels of government and NGOs: *leadership* by the main public authority in charge of homelessness and housing exclusion policies; *participation* and consultation of relevant stakeholders in policy design and implementation; and *consensus* on the agreed strategy (Council of Ministers, 2010, p.83).

There is a strong voice that one single agency should take the lead on any homelessness strategy (Edgar, 2006; Martin et al., 2023), or agencies (Pleace, 2017). These agency or agencies need to get involved and form agreements with a wide range of stakeholders inside and outside government (Edgar, 2006; Martin et al., 2023; Pleace, 2017). This was found to be imperative in all nine homelessness strategies analysed in two different European welfare regimes (Benjaminsen et al., 2009).

Robust political commitment is crucial to a successful strategy. The varied political and institutional stakeholders need to commit and take upon themselves shared responsibility for the development and implementation of the strategy (Baptista and Marlier, 2019; European Consensus Conference on Homelessness, 2010) (for more information see also the 2009 issue of The European Journal of Homelessness dealing with governance). As ending homelessness is unlikely to be achieved in a single political term, political commitment needs to be able to withstand changes in government (for example, the unique Danish agreement regarding homelessness among political parties inside and outside of the government).

Funding

> Successful policy needs to be backed by sufficient financial resources and eradicating homelessness is no exemption (Ivanković Knežević, 2024).

"We have strong empirical evidence which shows that ending homelessness is possible, it is realistic, it is ethically justifiable, and it is also economically viable" (Kaakinen, 2010, p.38). ESPN experts report some positive as well as problematic points related to the funding of homelessness strategies in 35 examined countries. Some of the positive points include significant investment in permanent housing, adequate financing mechanisms, and increased budgets and funding. Some of the barriers to adequate funding were found to include reductions in funding of course, as well as absence of funding mechanisms within the strategy, short-term financing models, and threats to national-level funding due to the end of international financial support (Baptista and Marlier, 2019).

Policymakers have a responsibility to develop adequate strategies that include proper mechanisms enabling access to finance and funding (United Nations Economic Commission for Europe, 2021). Claiming this responsibility, the Directorate-General for Employment, Social Affairs and Inclusion (DG EMPL) in the European Commission and the Council of Europe Development Bank (CEB) are co-leading a dedicated working group on access to finance, set up in May 2023, in order to implement the *workstream on funding* as part of the European Platform on Combating Homelessness (Ivanković Knežević, 2024).

Data Collection

> The planning and implementation of measures that aim to eliminate homelessness is not possible without reliable basic information based on research and an understanding of homelessness as a phenomenon. Regular revision of policies is necessary and most effective with a sound understanding of homelessness. (Kaakinen, 2010, p.36)

Data collection is at the core of successful homelessness strategies as all the literature we examined shows. In addition to the Finnish example cited above (Kaakinen, 2010), which includes a firm commitment to collect measurable and reliable data about homelessness and available housing options, the Danish and Scottish strategies also share this commitment. In both cases, governments adapted strategies to reflect research findings and data collection, thus making their strategies more successful (Jones and Archer, 2015). Further, in 2022, the German Federal Government undertook their first enumeration of people experiencing homeless (see https://www.destatis.de/DE/Themen/Gesellschaft-Umwelt/Soziales/Wohnungslosigkeit/_inhalt.html; regarding homelessness data collection at the

EU-level see Hermans (2024) as well as the full special edition of the European Journal of Homelessness regarding measuring homelessness in Europe, Volume 14, No. 3 from 2020).

Ending Homelessness

> As an unequivocal conclusion drawn from the Finnish experiences it can be stated that eliminating homelessness is an entirely feasible and realistic objective. It requires persistent, systematic work, which is not possible without an extensive political consensus ranging from the national to the local level. Building an extensive political consensus is not self-evident, it requires strategic initiatives where the active role of relevant state officials and NGOs is crucial. Political legitimacy also prepares the way for the acquisition of financial resources. Moreover, eliminating homelessness is not even a major economic cost if we consider the financial savings that result from the elimination of homelessness. (Kaakinen, 2010, p.36).

Strategies should aim to eliminate, as far as possible, the bottlenecks between temporary and permanent accommodation, thus striving to solve the problem of homelessness rather than manage it (Edgar, 2006). 'Managing' homelessness includes reactive solutions, often targeted at the most extreme manifestations of homelessness and focused mainly on temporary accommodation and emergency interventions, keeping people experiencing homelessness within the 'homeless system'. Whereas ending homelessness is a realistic objective (European Consensus Conference on Homelessness, 2010).

There will always be people who become homeless – because of, for example, natural disasters, fire or flooding, arriving in a new area, or fleeing violence. Homelessness strategies should incorporate measures to prevent homelessness while ensuring solutions for those who end up experiencing homelessness. It is important to understand that in the foreseeable future there will always be a need for emergency services. However, these services should be the gateway to permanent accommodation within a reasonable time frame (European Consensus Conference on Homelessness, 2010). In the eradication of homelessness, a balance should be found between the prevention of homelessness and the excellent services provided to those experiencing homelessness, as long as it is impossible to stop the in-flow (Kaakinen, 2010). Finally, when aiming to practically end homelessness it is not enough to perfect our services, which may rectify other systems' failures while keeping people housed. Rather, we should ensure we end the conditions that allow the perpetuation of homelessness across multiple systems (Gaetz and Buchnea, 2023).

While striving to end homelessness it is important to note that the cycle has gone from managing, to solving, to managing and solving homelessness.

Prevention

To decrease the need for managing homelessness and to make a big step toward solving and ending homelessness, prevention emerges as a crucial element of 35 countries' homelessness strategies (Baptista and Marlier, 2019). Preventing homelessness includes the reduction of evictions (Benjaminsen and Dyb, 2010; Council of Ministers, 2010; Kaakinen, 2010). A former Dutch strategy focused on evictions and people leaving institutions as main triggers of homelessness (Hermans, 2012). According to the evaluation of the Finnish strategy – which may be considered as an example of successfully tackling homelessness at the strategic level (Pleace, 2017) – prevention needs to identify people at risk of long-term and recurrent homelessness (Kaakinen, 2015).

The provision of affordable housing and reducing poverty may be the most crucial interventions to prevent homelessness (O'Sullivan, 2022b). In this respect, mainstreaming homelessness by including housing issues within the strategies of other policy areas such as housing strategies and anti-poverty strategies may be useful (Edgar, 2006; O'Sullivan, 2022b). In any case, homelessness strategies must be prevention-oriented in order to enable proper trajectories towards ending homelessness (Mackie, 2023; see also Gaetz, 2020).

Permanent Long-Term Housing Solutions: Housing-Led Approaches Including Housing First

Many OECD and EU countries promote Housing First and other housing-led approaches for people experiencing homelessness (OECD, 2024a). A Norwegian strategy seminar document includes the agreement of all seminar participants that Housing First is a desirable approach, and that the length of time that people stay in temporary accommodation should be shortened to eliminate bottlenecks between temporary and permanent accommodation (Edgar, 2006). Almost two decades on, the Norwegian Husbanken analysis states that the long-term strategic work that took place during this period focused more and more on cooperation across welfare provision fields, as well as management levels between ministries and municipalities, and was always underpinned by the housing-led approach (Halseth et al., 2022).

In their 2010 literature review of homelessness strategies, Benjaminsen and Dyb found the Housing First paradigm in almost all countries and their strategies. Further, the successful Finnish strategy has been based on Housing First (Kaakinen, 2015), and ESPN experts reported in 2019 an increasing shift toward housing-led and Housing First services in integrated strategic frameworks, with a growing presence in Europe of housing-led services, including Housing First (Baptista and Marlier, 2019). Respondents to the research questionnaire in Szeintuch (2024) stated that 87% of EU strategies include Housing First (95).

"By letting evidence 'guide' policy, proponents [of Housing First] argue, the only obstacle becomes something like 'political will' needed to fund that policy to fruition" (Lucas and Boudreaux, 2024, p.163). While this may be true to some extent, researchers argue that this is questionable. Maybe the failure to end homelessness is due to other factors, such as Housing First evidence not being as conclusive as it may seem, definitely not for all homelessness populations (Lucas and Boudreaux, 2024).

Further, others caution that while Housing First ethos and general principles are key and should inform all dimensions of an effective homelessness strategy, it may not be enough for a functional strategy. The challenges they note to its success include "lack of housing supply, inadequate access to mental health, health and social care systems, and a welfare system that cannot meet the costs of adequate housing and prevent after housing cost poverty" (O'Sullivan et al., 2023. P.47).

Finally, it should be noted here that the

> Finnish applications of the Housing First model are not particularly faithful to the original American model. The most important issue in the Finnish homelessness policy has been loyalty to the most important principles of the Housing First philosophy, which are permanence of housing, the principle of harm reduction and the right of the customers to make choices with regard to support services. (Pleace, et al., 2015, p.13)

Time Frame

In 2015, the UN's Agenda for Sustainable Development pledged to end poverty in all its forms everywhere (Goal 1) by the year 2030. It also pledged to make cities and human settlements inclusive, safe, resilient, and sustainable (Goal 11), while ensuring access for all to adequate, safe, and affordable housing and basic services and upgrading slums (11.1). Having noted these UN Sustainable Development Goals, the Lisbon Declaration signatories agreed to work toward ending homelessness by 2030. Since then, some European homelessness strategies have adopted this time frame. Generally, it is a common practice to attach a time frame to a strategy.

However, a word of caution is in order here: time frames may be important and so is the commitment to end homelessness in European Member States by 2030; however, as the Finnish example shows us, even successful endeavours may take substantial time, including potential failures of not reaching their set goals in the exact given time frame.

At one time, the Finnish Government set the target of eliminating long-term homelessness in Finland entirely by 2015 (Kaakinen, 2010). As we know, although the numbers have decreased, there are still people experiencing homelessness in Finland in 2024, and the current end-date for eradicating homelessness in its strategy is 2027 (see Kaakinen, 2023).

This word of caution is against the frustration that we may encounter when nearing 2030 if the homeless population does not equate to zero in all Member States. As the Finnish exercise shows us, it is essential to maintain a long-term commitment and to adapt, even if specific goals are missed. Otherwise, there is a risk of generating frustration and losing political commitment.

It is important to bear in mind that the objective of ending homelessness has been playing an important role in guiding thinking and action, and at the same time has become a widely accepted, socially important, and worthy cause. Further, the international literature shows that striving toward ending homelessness is an economically sound investment (Kaakinen, 2023).

One may encounter advice to “give the ‘ending homelessness’ talk a rest” (Eide, 2022, p.150). However, we believe that while maintaining a human rights approach to homelessness, as delineated above, we do not have the privilege to do this.

Monitoring and Evaluation

The jury of the consensus conference called for annual or bi-annual reporting on progress (European Consensus Conference on Homelessness, 2010). The ESPN synthesis report called upon countries developing homelessness strategies to enact efficient monitoring and assessment tools and ensure regular reporting mechanisms (Baptista and Marlier, 2019).

An example of the need for monitoring was lately portrayed by an Auditor General’s report on chronic homelessness in Canada, which found that the government agencies responsible for the homelessness strategy “did not know whether their efforts improved housing outcomes for people experiencing homelessness or chronic homelessness” (Auditor General of Canada, 2022, p.7, 5.22). Even though it spent about 1.36 billion Canadian dollars between 2019 and 2021 (40% of the total amount committed to the programme), the lead government agency “did not know whether chronic homelessness and homelessness had increased or decreased since 2019 as a result of this investment” (5.23). Further, the audit found that another lead agency could not account for the beneficiaries of the strategy’s implementation, and finally it suggested there was minimal accountability for reaching the strategy’s target. As a result, the Standing Committee on Public Accounts (2023) of the House of Commons in the Canadian Parliament made recommendations to ensure that the Office of the Auditor General's recommendations are adequately followed, and that those organisations which were audited provide progress reports to the committee.

It seems there are no formally established and standardised impact evaluation methodologies for homelessness intervention programmes, particularly in the European context. Further, it seems there is no consensus on the best outcome variables that would measure homelessness interventions (Rodilla et al., 2023).

When monitoring and measuring results and the impact of a homelessness strategy, quite a few issues may be checked. Some examples of such indicators include the numbers of people experiencing unsheltered homelessness, households in hostels, evictions, repeat homelessness, people supported to independence, and people sustained in independence, as well as the number of people who were prevented from experiencing homelessness and the duration of homelessness (Munslow, 2010).

Clear and realistic objectives, targets, and goals may serve as a useful monitoring tool. These may be adjusted as needed (European Consensus Conference on Homelessness, 2010; Edgar, 2006; Hermans, 2017). In any case, a robust theoretical framework is crucial for an effective evaluation (Rodilla et al., 2023).

Mutual Learning and Transfer of Policy Between Countries

The Lisbon Declaration signatories acknowledge

> The need for European policy support and coordination to promote progress, notably through mutual learning and support to collaboration. (p.4)

"Municipalities, regional authorities and national governments routinely search for inspiration and solutions to their policy challenges abroad" (Blanc et al., 2023, p.749). On the one hand, policy transfer can be an excellent trigger for innovation and learning. However, on the other hand, there are drawbacks to policy transfer, including governments trying to legitimise domestic decisions by considering the transfer a 'silver bullet' in addressing domestic policy failures.

EPOCH Practice is EPOCH's mutual learning axis and aims to enable mutual learning and policy transfer, including regarding homelessness strategies, between EU Member States.

The first and most important lesson we can learn in Europe, and hopefully transfer from Finland as a Member State, is that ending homelessness is a feasible task. Speaking of drawbacks, transfer of homelessness policy from Finland to other contexts is not necessarily straight forward due to factors such as Finland's size (with a population of less than six million people) and it being a rich country (Pleace, 2017).

Having highlighted the need for caution in the consideration of effective policy transfer from one country to another, the Norwegian seminar participants advocated homelessness policy transfer while noting the possible constraints of this endeavour, such as different forms of governance, structures of the housing market, profiles of homelessness, as well as resources that should underpin any homelessness strategy, that may influence the varying quality of such strategies in different countries (Edgar, 2006).

Finally, in the context of EPOCH, the European Commission invited the OECD to produce a policy toolkit that will help Member States to develop their own homelessness strategies (Leterme and Develtere, 2023). As the OECD includes Member States of its own, the scope of which is wider than that of the EU, this toolkit's influence transcends that of the EU (see OECD, 2024b).

Non-European Examples of Homelessness Strategies

With over two decades of developing homelessness strategies, European countries have a lot to give through international mutual learning and policy transfer outside of European borders. They may also benefit from non-European homelessness strategies and their development processes. Some examples are delineated below.

One such relevant country is **New Zealand**. A New Zealand parliamentary report advanced in 2016 the creation of a national strategy to end homelessness, stating "many local government organisations already have these and they are effective at ensuring there is concerted action to reduce homelessness" (New Zealand Parliament, 2016, p.13). The creation of this strategy was one of the recommendations of this document. The Aotearoa/New Zealand homelessness action plan was published in 2019. The first phase of the plan (2020-2023) aimed to prevent and reduce homelessness.

In neighbouring **Australia,** there have been a couple of national strategies – in 1992 and 2008. In 2024, the Government is developing a 10-year national housing and homelessness plan with state and territory governments (Commonwealth of Australia, 2023a). At the end of 2023, the consultation stage was over and a summary report of the consultations was published, as a step on the way to publishing the plan (Commonwealth of Australia, 2023b).

The **Canadian** 10-year homelessness strategy Reaching Home, which was launched in 2019, was also developed through extensive community and expert consultations (see Gaetz and Redman, 2019). It aims to reduce chronic homelessness nationally by 50 percent by 2028. The programme's directives detail the funding mechanism and eligible activities.

It seems that structural constraints pose barriers to developing and implementing homelessness strategies at the federal level in the federative constructs of Canada (DesBaillets and Hamill, 2022) and Australia (Martin et al., 2023). The **US** is another federal government that built a federal strategy. All In: The Federal Strategic Plan to Prevent and End Homelessness, which was published in 2022, aims to reduce homelessness by 25 percent by 2025.

The US Federal Government, through the United States Interagency Council on Homelessness (USICH), has been acting in the 21st century to prevent and eradicate homelessness. It has been doing this whilst initiating and leading what would become a global trend of moving from the linear model to Housing First, which lies at the forefront of the US Government's mission to end homelessness. It may be argued that this mission was set due to a combination of the rise of Housing First and the onset of the 2009 global financial crisis, while historically, US federal homelessness strategies revolve around three main areas: funding increases, Housing First prioritisation, and strategic revisions (Lucas and Boudreaux, 2024). While in the US the lack of affordable housing has been found to be the main driver of homelessness, its supply was found to be a primary solution to it (Batko and Culhane, 2023). A paper dealing with the homelessness strategy of the US state of Utah may also be found (Svedin and Valero, 2020).

A European Union Homelessness Strategy

> The Commission [is called] to propose an EU Framework for National Homelessness Strategies. (European Parliament resolution of 24 November 2020 on tackling homelessness rates in the EU (2020/2802(RSP)), Item 8)

Over the years there have been quite a few calls for an EU homelessness strategy that would underpin Member States' national and regional strategies. The European Parliament called for it in 2008, while the network of independent experts on social inclusion of the European Commission asked for such a strategy in 2009. These calls propose that an EU strategy would focus on data collection, monitoring, and mutual learning. A similar call came from the Committee of the Regions in 2010, emphasising the role of local and regional authorities (Spinnewijn, 2010).

According to the jury of the Consensus Conference,

> An EU strategy on homelessness should go beyond monitoring and reporting, and deliver a package of activities to support the development and sustaining of effective national/regional homelessness strategies. In accordance with the key elements of national/regional strategies set out by the 2010 Joint Report […], this means promoting integrated approaches and good governance; building

> capacity for data collection within Member States; developing and promoting knowledge and best practice in relation to housing-led approaches; promoting quality services; and developing EU level responses to the growing problem of homelessness amongst migrants. (European Consensus Conference on Homelessness, 2010, p.23)

The jury goes on to set out the mechanisms to achieve this.

The ESPN synthesis report also calls for the development of an EU approach

> To support Member States in ending homelessness, in line with the principle of subsidiarity, and informed by a set of key principles: knowledge sharing and transnational exchange, research and innovation, a common reference framework, and appropriate funding. (Baptista and Marlier, 2019, p.22).

Following the Consensus Conference jury, ESPN experts also called upon the EU to develop a homelessness action plan that takes migrants into consideration.

Finally, on 13 December 2023 the European Economic and Social Committee called on the European Commission to

> Draft a proposal for a new multiannual work programme as soon as possible and in close collaboration with all stakeholders, making use of the European Social Fund Plus and the European Regional Development Fund to fund housing solutions for homeless people.

Conclusion: An Integrated Approach

> Ending homelessness is only possible in the context of an integrated approach encompassing all relevant policy areas such as social policy, housing, health, employment, education, training, and migration etc. This includes taking account of the gender dimension of homelessness in the context of gender mainstreaming. (European Consensus Conference on Homelessness, 2010, p.12)

Housing, which arises from this literature review as a crucial facet of any solution to homelessness, cannot and should not stand alone. This is especially true when, whilst striving to achieve an end to homelessness, it must still be managed as there are still people experiencing homelessness.

Homelessness strategies should incorporate an integrated approach that brings together all relevant fields (European Consensus Conference on Homelessness, 2010). Such fields may include **health, mental health**, **social care and assistance**, **welfare, unemployment, education, skills, migration, and criminal justice systems** – including **criminalisation** and **imprisonment** (e.g., Benjaminsen and Dyb, 2010; Edgar, 2006; Hermans, 2012; Maretzki, 2022; O'Sullivan et al., 2023; Pleace, 2017; Skovlund Asmussen and Maini-Thorsen, 2022; United Nations Economic Commission for Europe, 2021). These add onto the key issues discussed above including prevention, temporary accommodation, and permanent long-term housing solutions.

We will end this literature review by posing some questions laid down by Benjaminsen and Dyb (2010) regarding the organisation of complex interventions:

> How are problems of coordination among different service providers and institutional systems – social services, health services, criminal services, housing authorities, etc. – tackled locally? Do the national strategies provide new initiatives for handling such issues? Are new requirements set in the case of people leaving institutions such as hostels, hospitals or prisons? Are services for the homeless integrated into mainstream social services or are there parallel support systems? Does the extent of municipal responsibilities make a difference? How do the national strategies deal with such issues – and what lessons can be learned from comparative research at the local level? (pp.136-137)

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Book Reviews

Part C

Mahito Hayashi (2023)

Rescaling Urban Poverty: Homelessness, State Restructuring and City Politics in Japan

Hoboken & Chichester: Wiley.

This book analyses the exclusion of homeless people from public spaces that results from class antagonism between the housing class and homeless people. It does so by focusing on sociocultural actions that condition the survival of homeless people and are set by policymakers, police officers, housed citizens, the homeless, and activists/volunteers. The analysis is firmly positioned within the debate on state rescaling put forward by advocates of regulation theory. The influence of state rescaling on the exclusion of homeless people is observed through three avenues: the national state, public spaces, and urban social movements.

The methodology applied in this book is called ‘regulationist ethnography’ (p.45) by Hayashi, which requires the researcher to act as both a theorist and an ethnographer. Empirical data were collected from 2001 to 2009 in two municipalities in Kanagawa Prefecture, Japan: Yokohama City, which houses the Kotobuki district, one of Japan’s largest day labourer districts, and Hiratsuka City, an outlying city with a large homeless population. This study focuses on two time periods: the mid-1970s to the early 1980s, when state rescaling occurred as a reaction to the increase in homeless people in and around inner cities, and the 1990s to the 2000s, when state rescaling occurred as a reaction to the emergence of large numbers of homeless people over a wide geographical area.

Hayashi argues that during the post-war growth period, nationalised spaces of poverty regulation emerged “as a national scaffolding for societalisation that made possible the unification of class divided society into a (slightly more) cohesive locus for capitalist civilisation” (p.258). However, when spaces of ‘privacy’ within public spaces that were created by homeless people emerged, they became a major disruption of this societalisation, prompting new regulatory codes to reserve various public spaces for the housing class. Hayashi also emphasises that homeless people are active actors in the reworking process of public spaces. He demonstrates that through placemaking, places for pro-homeless and homeless-supporting work can be created; through communing, urban use values can be opened up to support the lives of homeless people; and through translating, social movements can be broadened beyond the historical niches of poverty.

These arguments are developed in four parts: part one introduces the theoretical framework and sets it in the context of Japan. The national state is recast as a developmental state that channelled resources toward economic development, while its underdeveloped welfare state enabled the persistence of 'working poor'. The developmental state also affected public spaces, which were mainly managed and regulated by neighbourhood associations formed by housed citizens. This by a hyperconformist societalisation shaped environment proved to be a difficult ground for homeless activism; therefore, it usually blossomed only in the inner cities.

Part two turns to the national state by tracing the history of nationalised spaces of poverty regulation in post-war Japan. It focuses on crises and the regulatory dynamics they trigger, which are characterised by a considerable degree of power of the developmental state. This is followed by a discussion of the rescaling of public spaces using ethnographic evidence from Hiratsuka City. It focuses on the antagonistic interests of the housing class and homeless people that emerge in the form of new regulations for public spaces and attempts of homeless people to give themselves a 'prohegemonic' appearance to continue living in them. Subsequently, the analysis is expanded to the recycling businesses done by homeless people to earn a living. It discusses the emergence of new regulations to prohibit and criminalise these recycling businesses and the failed attempts by social movements to challenge them. Hayashi concludes that these new regulations seek to preserve the hegemonic housing class against desocietalising tensions caused by homeless people in public spaces.

Part three discusses the counter-regulatory geographies of social movements. In the beginning, it employs the concept of habitat to analyse the different groups that engage with homelessness and their placemaking activities in Yokohama City's day labourer district, Kotobuki. There, the weakened disciplinary grip of urban regulation allows social movements to divorce, declass, and autonomise themselves from the hegemonic class. Next, through the concept of commoning the issue of homeless people's right to the city is discussed. Homeless people managed to gain new access to urban use values that had been circumscribed to the housing class by destabilising and changing their rules, norms, and forms. The necessary repertoires of commoning cultivated by the activists in Kotobuki developed together with the rescaling of regulatory spaces. Finally, the analysis is broadened by shifting the focus to social movements in outlying cities newly affected by homelessness. Through the concepts of brokerage and translation, it demonstrates how the strategies and language of placemaking and commoning that originated in Kotobuki influence social movements in these outlying cities. Activists managed to modify and translate the inherited sociocultures of local Christian churches and extend Kotobuki's human and nonhuman resources to new cities.

Part four briefly turns to topics and issues that emerged after the late 2000s. These involve the activist encampment that reframed the discourse on poverty on a national scale during the New Year holidays of 2008/2009, the strengthening of workfarist policies through the introduction of a 'second safety net' and the revision of public assistance in the 2010s, and the impact of the COVID-19 policy on homelessness. Finally, Hayashi emphasises the possibility of loading new meanings and ontologies on political economy concepts to critically reappraise Western concepts, the importance of urban political economy for contemporary research on subalterns, and the influence of urban parameters on contemporary homelessness.

Because of the ethnographic account of a day labourer district in Japan, this book stands alongside several other ethnographies published in English (for instance Fowler, 1996; Stevens, 1997; Gill, 2001). However, it is distinctive in two ways. First, the collection of empirical data is outstanding. On the one hand, ethnographic data was collected about homeless activism in Kotobuki, which discussed a 40-year period. This long time span enables a detailed account of the development of homeless activism in accordance with state rescaling. On the other hand, data from areas outside of Kotobuki in outlying cities was also collected. This allows rare glimpses into the activities and issues of social movements that developed outside of Japan's day labourer districts around the issue of homelessness, but also reveals how they relate to better-established social movements and can profit from their experience.

Second, because of the book's deep engagement with Marxist theory, it claims relevance beyond the literature on day labourer districts and homelessness in Japan. While it contributes particularly to regulation theory, it employs a wide set of theories developed by Western academics. For instance, Brenner's (2004) 'state rescaling', Lefebvre's (1970) 'habitat', and Gramsci's (1992) 'translation' are applied in the analyses. In this sense, it skilfully connects ethnographic findings from Japan with the wider debates initiated by Western academics.

However, this strong focus on Western theory also has a downside: it channels attention away from experiences of homelessness and state rescaling in Japan. One example is the discussion about the Act on Special Measures concerning Assistance in Self-Support of Homeless People, which was enacted in 2002 and led to the opening of self-help assistance centres to cultivate homeless people's self-support capabilities and integrate them into the labour market. By labelling this policy "workfarist program" (p.96) Hayashi gives readers the impression that this is a new approach and in line with the Western literature. However, the policies enacted by municipalities in Japan's day labourer districts have focused already in the past on work support and blurred homeless people's access to citizenship and public assistance (Kiener and Mizuuchi, 2018). In this sense, the 2002 Act was in line with policies implemented during the heyday of the developmental state.

Further, the deep commitment of this book to theory-making focuses mainly on how theories that were developed based on Western experience can be adapted to Japan. For instance, when Lefebvre's 'habitat' is conceptualised for the analysis, first a specification based on a literature review is provided, and subsequently attuned to the Japanese context. In this vein, first "spaces of habitat" (p.165) are defined as public spaces that become 'normal' through shared patterns of material-semiotic consumption of the housing class. After that, it is clarified that in Japan, 'spaces of habitat' have a highly unsatisfactory level for the everyday consumption of the housing class, because of the priority the developmental state gave to industrial development. How this specific Japanese experience can improve our understanding of 'habitat' is not discussed. Despite Robinson's (2006) call for a "parochializing [of] Western knowledge" (p.261) is referenced in the book, attempts of meso-level theory making are hardly reflected in the conclusions Hayashi is drawing. By doing so, he missed the precious chance to critically engage with Western theory, which could highlight its limitations or establish competing theoretical approaches.

In particular, this book addresses an audience interested in critical urban and capitalist studies. Issues related to policy, poverty, social movements, and (re)scaling dynamics are discussed in these fields. It can meet the interests of readers from a wide range of disciplines, such as geography, sociology, economics, political science, urban planning, and social work. However, background knowledge is often taken for granted, and the arguments reach a high level of complexity, making this book a demanding read.

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Ines W. Jindra, Michael Jindra, and Sarah DeGenero (2022)

Contrasts in Religion, Community, and Structure at Three Homeless Shelters

New York: Routledge

In both Europe and North America, faith-based organizations have historically been a bedrock of service provision to people who are experiencing homelessness. As early as 1826 in Scotland, the Glasgow City Mission offered homeless individuals a meal, a church service, and a bed for the night. Nearly 200 years later, faith-based organizations play a significant role in the provision of homeless services across both North America and Europe. Inez W. Jindra, Michael Jindra, and Sarah DeGenero, in their book *Contrasts in Religion, Community, and Structure at Three Homeless Shelters*, examine different ways in which these institutional spaces integrate corporeal assistance with religiosity through a comparative case study of three US shelters. In doing so, they are interested in the different roles that religion can play in homeless shelters to "help people get their lives back on track" (p.18).

The three shelters they study take three different approaches to how they manifest religion in their respective ministries, in what the authors term *faith-permeated; faith-affiliated;* and *faith-background* orientations. Jindra et al. (2022) adapt these types from Sider and Unruh's (2004, pp.119-120) broader typology, and Jindra et al.'s descriptions are brief and vague. Faith-permeated shelters, for example, "take religion very seriously and integrate it fully into the daily life of the organization" (p.15). Beyond this, it is consistent with their description to cast faith-permeated shelters as the most pedigreed of the three types, with a focus on spiritual conversion and psychological rehabilitation that traces back to the original Glasgow mission. Gospel missions such as the pseudonymous "Grace Ministries" that Jindra et al. profile performed domestic missionary work in the Hobohemias and Skid Rows of the 20th century and remain fixtures in homeless landscapes as they provide meals and shelter in tandem with the pursuit of conversion and rehabilitation of those to whom they minister. Jindra et al. go into no further detail on specifics of the theology underpinning either Grace Ministries or faith-permeated shelters more generally, but it is again safe to apply elements from elsewhere, this time from Rooney's (1980) ethnographic study of missions on skid row, where a key tenet of gospel mission theology is how "the sphere of individual responsibility is stressed

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to the point of eliminating social reality" (p.908) and where "an individual's sinful life can be altered only through a transformation of grace by accepting Christ as one's own personal Savior" (p.909; see also Stivers, 2011; Fagan, 1987).

Even in faith-permeated shelters, the bundling of evangelism with material assistance manifests itself in different ways. Here Rooney (1980) gives us one extreme, in which missions provide needed sustenance at the cost of subjecting supplicants to a faith-imbued judgment that frames homelessness as a state of sin and casts blame upon the individual for their predicament. In a decidedly more positive contrast, Jindra et al. (2022) frame Grace Ministries' mission as a "therapeutic community" where residents are "enveloped in a strongly religious setting" (p.43). This provides a structure and a community in which residents can "[connect] life path events to the descent into homelessness" in working toward attaining "personal transformation" (p.62). By all indications, both extremes (and many more cases in between) exist in the still-flourishing contemporary gospel mission movement (Fagan, 1998), but Jindra et al. make no mention of how representative their depiction of Grace Ministries is to a more general type.

The individualised orientation of faith-permeated shelters also colours much of Jindra et al.'s (2022) analytic approach. In Chapter 3, Grace Ministries' service philosophy and the authors' means of analysis both hold that exiting homelessness is a function of a largely introspective process. Much of the Grace Ministry case study consists of interview summaries that highlight the misfortunes and traumas that the informants experienced on their paths to homelessness. These interviews also become the basis for the authors' evaluations of the extent to which the informants "made sense of their life histories" (p.78), took up the "religious toolkit" made available at Grace Ministries, and then "could start changing how they talked about their lives" (p.78). Following this 3-step trajectory became the benchmark by which the authors judged their informants' success in successfully engaging with the Grace Ministry programme.

The authors proceed to lay out their analysis in almost psychoanalytic terms, operationalising successful programme participation as recognising past missteps and rebuilding both self-identity and community. Jindra et al.'s (2022) outcome of interest, the degree to which people grasp and alter their trajectory, gain insight, and take steps to improve their situation (e.g., pp.77-79), reflects a measure that is both vague and intermediate, with an uncertain relationship to successfully exiting homelessness. How valid the outcome measures presented in this chapter are for exiting homelessness to a stable, affordable, and permanent living situation is not explored, and the informants are presumably still temporarily housed in the facility when the chapter ends. Instead, the authors, like Grace Ministry, seem to assume that internalising psychological healing measures in a community built upon faith will resolve homelessness.

The second case study, presented in chapter 4, is of a facility referred to as House of Hope, where the authors apply their biographical analysis to what they term a "faith-affiliated" setting. Faith-affiliated homeless programming proliferated after the rise of contemporary homelessness in the 1980s as a means for churches and other faith-based organisations to address homelessness in a manner that both speaks to the faith-based imperative of ministering to the poor and enables collaboration with more secular aspects of local homeless services systems. Such programming is typically ecumenical or interfaith, and structured so that volunteer groups from participating religious entities could perform essential service tasks in which they interact with the service recipients. Faith-affiliated organisations focus on more material goals such as obtaining housing and employment, with faith manifesting itself not in an evangelical context but in the community support that is extended to the service recipients. "Rather than the religious content, the explicit culture at House of Hope homed in on self-sufficiency" (Jindra et al., 2022, p.117), and the authors identified individual traits such as "a sense of independence, agency, and having an idea of where one wants to be in the future" (p.116) as key indicators of what they considered successful programme completion. It is unclear whether such traits predispose residents to programme completion, or if program participation builds a resident's capacity for self-sufficiency.

Chapter 5 contains the final case study, a portrayal of a shelter Jindra et al. (2022) generically calls Respite Center. This is a "faith-background" shelter in that, while owned and managed by a faith-based organisation, demonstrates "little active religiosity" and is otherwise indistinguishable from a secular shelter. The median stay is one month, and after 45 days most residents must pay for further lodging. Of the three types of faith-based shelters, this one is most apt to meet its residents where they are at. In contrast to Grace Ministries and House of Hope, Respite House's intake screening is more inclusive, and residents have the option of whether to engage with the shelter's programmatic elements and case management services. This means that residents can use Respite Center for a variety of ends including short-term respite; waiting while applying for disability assistance or subsidised housing; or pondering their next move in an episodic odyssey of short-term living arrangements. Residents were most appreciative of the "practical help" (p.141) they received at Respite Center, but the authors fail to consider this and instead scour the interviews they collect for signs of insights gained into past experiences and concrete steps taken to improve current situations (p.126). As a result, the authors bemoan the missed opportunities for deeper understandings of biographical trajectories that might have been gained had various residents stayed at a more explicitly religious shelter such as Grace Ministries.

Ostensibly, the authors lay out this book as a comparative study of different approaches taken by faith-based organisations toward providing shelter. However, this structure is incongruous with the authors' inordinate focus upon the biographical elements of homelessness as experienced and recounted by the interviewees at all three shelters. The interviews provide much material for making connections between current homelessness and life events going all the way back to childhood. The researchers further comb these interviews for narrative indications that the interviewees are engaging with this material, and that they are using shelter programming, in whatever fashion it is presented, as a tool for initiating change. In this fashion, the authors align themselves with the faith-permeated approach taken by Grace Ministries.

This near-exclusive individual focus overshadows any institutional insights the book provides. Their claim of acknowledging "the immense role of structural conditions contributing to homelessness" (p.161) notwithstanding, many readers will decry the absence of any consideration for the role that structural elements play in facilitating homelessness or the role that housing plays in resolving homelessness. It also begs questions pertaining to whether shelters are better suited to be reclamation projects or conduits for expediently regaining permanent housing. A two-year stay in a religiously oriented community setting, as is the norm at Grace Ministries, comes at a high cost and no assurance that Grace will be any more effective than Respite Center, where roughly half the residents exit within about a month, in facilitating even initial steps out of homelessness (see p.18). This does not keep the authors from concluding, without any apparent support from their data, that Grace's approach of compulsory programming and accountability is superior to the more flexible arrangements of the Respite Center. Continuing in this vein, they assume an academic bully pulpit to assert that shelters should be places of "human flourishing" as they summarily dismiss, in one sentence, the effectiveness of a Housing First approach (see p.160) despite a vast literature attaining to the ability of this approach to facilitate successful housing outcomes (Woodhall-Melnik and Dunn, 2016).

Ultimately, this book is more about religion and spiritual transformation than about homelessness. This becomes apparent in the final part of the book's concluding chapter, which features two key assertions. First, Jindra et al. (2022) contends that "religion is often a positive force" (p.162) in a homeless context. The book indeed shows how shelter, as modelled by Grace Ministries, can act as a spiritual and therapeutic community and thereby help people experience substantial personal transformations. They also contend that faith-based organisations can "[help] people take steps to overcome episodes of homelessness" (p.163). However, there is simply no evidence presented in these case studies that shows how any inherent feature of religion facilitates people's literal exit out of the shelter. Taken together, they show how homelessness becomes a way to religion but fail to show how religion offers a way out of homelessness.

Postscript

A unique opportunity to explore some of the questions left unanswered in the book presented itself when one of the reviewers (Metraux) assigned the first chapter of Jindra et al.'s book in the undergraduate course, "Nonprofits in Civil Society," that he was teaching in Spring 2024, and had the directors of two Delaware faith-based shelters present to the class. This mini-panel, recorded with the participants' permission, kicked off with a summary of Jindra et al.'s three institutional profiles, after which, in an informal validation of sorts, the panellists were asked whether any of these profiles fit the organisation they run. Rev. Tom Laymon, Director of Sunday Breakfast Mission, a gospel mission affiliate, acknowledged, "yeah, we're very faith-permeated" and explained, "we offer a relationship with Christ but no one can be forced to become a Christian." Tyler Shade, who directs Family Promise of Northern New Castle County, held the faith-affiliated description as a "generally fair" portrayal of Family Promise insofar as "religion only permeates our organization so much as our families would like it to. It doesn't permeate the programming in any way."

Despite both organisations being oriented toward the Christian faith, the two organisations have very different understandings of homelessness in a way that Jindra et al. did not explore. This difference comes out in the respective views Shade and Laymon have on Housing First, the predominant approach to addressing homelessness in North America and Europe. Essentially, Housing First prioritises the provision of housing before any requirements or stipulations for other services (Padgett et al., 2015). Shade embraces this approach: "Our agency, we're what's known as a Housing First agency… The main reason we focus on housing first is the belief that when you're experiencing homelessness, you have a lot going on. Maybe you don't have employment. Maybe you have a substance abuse issue, but your number one concern for most people coming through our doors is housing." Laymon offers a counter perspective: "It's not only my experience but the experience of 300-400 rescue missions across the United States that we actually talked more about Housing Next than Housing First because… our understanding of the homeless [is that] 95% have gone through substance abuse and mental illness and have broken all their relationships… they're not there because the resource isn't available… As substance abuse grows in our society, the number of homeless are growing." Jindra et al., as mentioned earlier, are dismissive toward Housing First and thereby miss an opening to explore how the different types of faith-based shelters rest their programming on different conceptions of homelessness.

Laymon and Shade also talked at length about community, a topic covered by Jindra et al. albeit in a limited way. Community is an essential facet of both organisations' missions, but the way each pursues community is another key difference between the organisations. Laymon portrays the Sunday Breakfast Mission as a place to rebuild relationships:

> You see in the article that I wrote [Laymon, 2023] that our understanding of homelessness is about the cutting of relationships and building community; it is the restoring of those [lost] relationships. Most of the people we deal with are considered by society as outcasts, unwanted folks by the majority of society. What we do is invite them in. And say we want to – as I tell our volunteers at Thanksgiving – we want to love on them. We want to love on these folks. And so, we begin at the very first to bring them in and begin to build one relationship that's the one with us and all of our staff and volunteers.… Oftentimes, our substance abusers need to establish a new set of friends and build, and then they need to have the right relationship with an employer, a right relationship perhaps with education, and the right relationship with the government.

Laymon's view of community is consistent with Jindra et al.'s depiction of Grace Ministries, and this rebuilding theme fits well with the therapeutic framework they use to present their case studies.

Jindra et al. try to apply this rebuilding framework more generally to all three cases they present, and in so doing fail to consider alternative conceptualisations of community such as the one that Shade describes in the mini panel. "I think," Shade stated, "at Family Promise, the community building really is focused and centered on being that social capital and being that family for people that don't have family that are willing and able to assist them in their time of need." Instead of rebuilding relationships, Shade speaks more about supplementing relationships and uses the concept of social capital, of connecting people with members of various local congregations who can act as resources and supports, as the basis for community. Alternative conceptualisations of community, whether centred upon social capital or something else, are unavailable in the book, although they would present a better fit for framing community in a facility such as House of Hope, or as a counterpoint for assessing community as they observed being practiced at Grace Ministries.

Finally, Shade and Laymon spoke to what their programme participants took with them after they exited the shelter, a key question for both faith-permeated and faith-affiliated models both in terms of regained housing stability and retained faith and personal well-being. It was also a question that we noted went unasked in the book. Neither Laymon nor Shade stated they specifically track how faith conversions impact programme participants once they leave, but their answers again highlight the different approaches that Sunday Breakfast Mission and Family Promise take. According to Laymon:

> 75 to 80 percent of our graduates don't return to a lifestyle, drugs, alcohol, jail, or homelessness. And we do attribute a lot of their success due to a newfound or now-found faith. We do attribute it to that. We do find that those who do go through and complete our program, oftentimes it is because they've identified with the Christian faith that we're teaching, and that's why they're continuing. But not all. I'd say maybe 5%, basically, say 'Very interesting. I'm going to take the principles and use it elsewhere'.

Shade takes a different approach based upon social capital:

> We have our standard intake packet, and it's usually questions like, what's your income situation, what led to this problem? Points on basic various info that we track on to help monitor our outcomes in the family themselves. But we don't ever ask somebody, what's your religious affiliation? They come through our doors and likewise, when they leave, that's not something we ask either.

This postscript highlights some key structural aspects of faith-based shelters that, were they included in the book, would have increased the book's appeal to readers interested in what faith-based shelters can offer in addressing homelessness, while still engaging the audience drawn to this book from a religion-oriented perspective. Shade and Laymon, who did not know each other prior to this mini panel, were able to frankly and respectfully lay out their differences, with an implicit acknowledgment by each that there was room for both organisations in addressing homelessness. We are careful to present Laymon's and Shade's perspectives without judging their relative merits, and in a way that leaves the topics in their dialogue that are covered here open for more thorough exploration. Finally, this postscript underscores how a more deliberate focus on the institutions themselves, rather than on the individual faith journeys recounted in the book, could have better elucidated the diverse ways in which institutional religion and homelessness mix.

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European Observatory on Homelessness

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