Fitzpatrick, Suzanne; Johnsen, Sarah; Watts, Beth

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Appendix 1.
International Homelessness Policy Review - Detailed Country Profiles
## A. HOUSING AND WELFARE SYSTEMS

### A1. Housing system

| 1(a) Tenure breakdown | • Social housing – 16%  
| • Home ownership – 74%  
| • Private rented housing – 10%  |

| 1(b) Social housing - stock, trends | • Declining slightly in relative terms (i.e. as a % of stock), with 13% of annual housing construction comprising social housing  
| • Growing emphasis on various forms of subsidised part/shared ownership, usually considered part of ‘private ownership’ tenure  |

| 1(c) Social housing – landlords | • Predominantly local authorities, but also a small number of large housing associations  |

| 1(d) Social housing – demand | • Generally strong, and very strong in Helsinki and other metropolitan areas  
| • Some low demand in remote rural areas  |

| 1(e) Social housing - security of tenure | • Yes; no discussion of fixed-term tenancies  |

| 1(f) Social housing - eligibility | • How determined – national framework  
| • Means-tested – yes, maximum income limits apply  
| • Minimum income – no  
| • Any exclusions (groups/behaviour) – can be excluded on grounds of past behaviour, rent arrears, etc., with decision made by local authorities/other social landlord  |

| 1(g) Social housing – allocations | • Who determines - national framework  
| • Criteria – mainly housing need-based, but will also take into account other factors (such as arrears etc.)  
| • Income mixing – to some extent, in work of Y-Foundation, for example (see below)  |

| 1(h) Social housing – segments for vulnerable groups | • The ‘Y-Foundation’ - established in 1985 - is a nationwide, multi-sectoral partnership which buys small apartments dispersed in the owner-occupied stock and lets them to local authority social service departments, which in turn re-let them to (mostly) single homeless people. It owns 4,500 of these scatter flats across Finland  
| • These flats are usually let with regular (secure) rental agreements, but this does depend on the social services agency which has leased them  
| • Y-Foundation flats are not part of a ‘Housing First’ approach as they do not usually take people straight from streets/shelter – rather, these flats should be viewed as the ‘last step’ on a staircase model accommodating people who have been through transitional housing and judged able to cope in an independent tenancy (albeit that they do not have to be completely sober etc). This selection process partly explains the very low levels of evictions (fewer than 5% of these tenants have been evicted over the past 25 years  
| • Recently, Y-Foundation has also been involved in managing and building larger housing developments – flats congregated in blocks entirely owned by the Y-Foundation. Usually these developments have 20-25 flats, but the largest has 100 units and is operated in conjunction with the Salvation Army.  |

### A2. Welfare system

| 2(a) Type | • ‘Social democratic’  |

| 2(b) Characteristics | • Strong commitment to universalism in social security and public services  
| • Low levels of inequality and poverty relative to the UK, and also relatively low levels of unemployment (though now rising)  |

| 2(c) Impact of economic crisis on welfare arrangements | • None  
| • Finland is affected by the crisis to some extent, but its situation is ‘under control’, and they are comparatively well positioned to weather the economic storm  |
### B. HOMELESSNESS

#### a) Scale, nature and trends in homelessness
- Homelessness data, based on an annual snapshot survey in November each year, indicates that national programmes have been successful at reducing homelessness from almost 20,000 households in 1987, to around 8,000 by 2009.
- These figures include single people who are: sleeping outdoors/in shelters (1,460); in institutions with no housing to move onto (1,490); or staying with relatives/friends (5,200). They also include families (320) (all figures for 2009).

#### b) Profile of homeless population
- A typical homeless person in Finland is: single, male, over 25, urban dweller, native Finn, and staying temporarily with friends.
- Only 4% of homeless households are families. The law provides that no child can be homeless in Finland and this is strictly adhered to, and where family homelessness occurs it will be short-term. At an informal level this may sometimes mean the family splitting up/children being taken into care, but such practices are not systemic, and in most instances a ‘positive’ solution for the whole family will be found.
- Immigration to Finland is increasing, and there are currently incentives for rural areas to receive immigrants and integrate them into Finnish society. But these incentives run for only 3 years, and there is a concern that thereafter new migrants will migrate to metropolitan areas and homelessness may rise.

#### c) Rights to housing
- A constitutional ‘right to housing’ was introduced in 1995, but is unenforceable through the courts.

#### d) Other assistance to homeless people
- **Who funds?** – Central government, with match funding from municipalities involved in homelessness programmes. The Finnish Slot Machine Association also contributes. The combined amounts are very considerable: around a 200million Euro budget was allocated for the 2008-2011 national homelessness programme (see below).
- **Who provides?** – Direct service provision mainly by local authorities, though NGOs (such as Salvation Army) tend to own and run the traditional shelters.
- **Who receives?** – Focus is on single homeless men, and some women, many of whom have alcohol problems; but some specific focus on young homeless people too.
- **What is provided?**
  - Independent tenancies with support – both scatter site and congregated.
  - Traditional shelters – but are gradually being converted into ‘supported housing units’ with permanent tenancies (see below).
  - Prevention services – aimed at young people, people at risk of eviction, and people leaving prison.

#### e) Policy trends/developments
- Finland has had a series of programmes addressing homelessness stretching back until the late 1980s, and can boast a long-term reduction in numbers.
- But it was felt that these earlier programmes – focused on increasing access to housing – had not helped ‘long-term homeless’ people with substantial mental health and addiction problems (NB: ‘long-term’ = homeless for more than one year, or repeatedly within last three years).
- Thus in 2008 the Finnish Government launched a new national homelessness programme - involving 10 Finnish cities - to halve ‘long-term homelessness’ by 2011, and eliminate it by 2015. Key elements of the programme, which is said to be based on the ‘Housing First’ principle, are as follows:
  1. New build: at least 1,250 new housing units built specifically for long-term homeless people between 2008 and 2011 (in fact, probably around 1,600 units will be built by end 2011).
  2. Conversions: all traditional, dormitory-style shelters to be converted into small apartments (‘supported housing units’), with permanent tenancies (though sometimes with additional conditions attached). The aim is to completely eliminate temporary/transitional accommodation, aside from some very short-term crisis accommodation.
  3. Prevention: the main focus is expansion of housing advice services, eviction...
C. OUTCOMES

a) Impact on scale/nature/duration/experience of homelessness

- There has been a marked and relatively consistent long-term reduction in homelessness since the late 1980s
- This has been attributed to a) high quality government programmes; b) strong national economic performance, enabling high levels of spend on homelessness programmes; and c) reduced migration from rural to urban areas, allowing housing supply in cities to ‘catch up’ to some extent
- But progress in reducing long-term homelessness since 2008 is said to have been limited, and the 2011 target unlikely to be met in full, mainly because of ‘new’ people becoming long-term homelessness
- Long-term homeless people have been found in practice to comprise up to 45% of homeless population, as compared to the one third estimated at the outset of 2008 programme (though % defined as long-term varies significantly between cities and may be influenced by financial incentives for local authorities). Interestingly, original assumptions that this ‘hard-core’ would need constant support has been disproved in some cases, with more flexible support approaches now being pursued
- An evaluation of a ‘Housing First’ project with 15 residents in Tampere indicated substantially reduced use of social and health care services, generating annual savings of 220,000 Euros in total.

b) Overall strengths and weaknesses of Finnish approach/policy developments

- Strengths: Considerable resources and high quality services; housing-led approach; a genuine mindset that this problem can be solved
- Weaknesses: Shortage of housing, necessitating a move towards more institutionalised/congregate models of permanent accommodation; emphasis on long-term homeless may mean neglect of ‘new homeless’ people, and particular groups such as families and migrants

D. COMMENTS

- For a country with a population of 5.4 million, the scale of investment in homelessness programmes is very large
- Finland has evidently been successful in reducing homelessness, especially family homelessness, and this trend is based on reliable data collected over a long run of years
- Y-Foundation’s original approach offers an interesting model, providing affordable housing for (selected) homeless people spread throughout the regular owner-occupied stock, helping to avoid stigma and social segregation.
- However, note that ‘Y-Foundation’ was established because of reluctance of mainstream social landlords to house homeless people/ other very vulnerable groups (with similar issues apparent in, for example, Sweden, France and Germany, necessitating special segments of social housing or interest in ‘social letting agencies’). But its establishment does indicate a more ‘housing-led’ approach to tackling homelessness than in other social-democratic countries which tend to adopt a more ‘individual vulnerabilities’ perspective.
- The ‘Housing First’ strategy to reduce and eliminate long-term homelessness is ambitious, but the growing emphasis on a congregate accommodation version/conversion of shelters into supported housing is contentious. This is necessitated by the large number of additional units required over a relatively short period of time (up to 3,000 between 2008-2015) and difficulties of procurement in tight housing markets like Helsinki.
- The Finnish version of ‘Housing First’ is claimed to be cost-effective, but robust evidence is limited to one quite small-scale, ‘homely’ project where cost-effectiveness is likely be easier to demonstrate than in the larger, more institutional developments which have
required extensive physical renovations and high staffing levels.

- The Finnish case raises the question of how far the use of shelters and transitional accommodation can be reduced without the risk that at least some of the future ‘inflow’ of homeless people having no provision at all.
- While prevention efforts have increased in Finland, this element seems under-developed, e.g. no specific targets/monitoring on homelessness caused by evictions, leaving prison etc.

Sources


## A. HOUSING AND WELFARE SYSTEMS

### A1. Housing system

| 1(a) Tenure breakdown | • Social housing – 20%  
|                       | • Home ownership – 55%  
|                       | • Private rented housing -25%  |

| 1(b) Social housing - stock, trends | • Social housing is (unusually) growing in both relative terms (i.e. as a % of stock – 15% in 1990; 17% in 2002; 20% in 2010) and in absolute terms (in total number of units)  
|                                   | • Record levels of social housing construction in recent years – 40,000 completions in 2002, rising to 130,000 by 2010  
|                                   | • Policy commitment since 2005 to increase social housing, but production accelerated after 2007 protests (see below), and focused on social housing aimed at poorest groups  
|                                   | • (There is also a policy commitment to increase home ownership to 70%)  |

| 1(c) Social housing – landlords | • HLMs (public corporations providing ‘social housing at a moderate rent’) (92%)  
|                                | • SEMs (‘societies of mixed economy’ – public-private partnership landlords) (8%)  |

| 1(d) Social housing – demand | • Generally strong  
|                             | • Some low demand in medium sized towns dependent on a single declining industry  |

| 1(e) Social housing - security of tenure | • Yes  
|                                         | • Eviction procedures lengthy and expensive  |

| 1(f) Social housing - eligibility | • Who determines – State  
|                                  | • Means-tested – yes, there are maximum income thresholds in three geographic areas: greater Paris; rest of Ile-de- France; and rest of France. In order to focus social housing more closely on lower-income groups, measures were taken in March 2009 to: reduce the income ceilings by 10%; introduce a rental supplement for those on higher incomes in pressured zones; and review the tenancy right of those whose incomes were double the threshold in two successive years (except in ‘sensitive urban areas’).  
|                                  | • Minimum income – not in principle, but many landlords operate an informal minimum income rule (rent should be no more than 30% of household income); this practice is so widespread that many practitioners believe it to be a formal rule  
|                                  | • Exclusions (groups) - no, but nomination rights often used to favour local residents, particularly those already living in the commune in which the social housing is located  
|                                  | • Exclusions (behaviour) - not formally, but can be taken into account by nominators. Home owners are not eligible  |

| 1(g) Social housing – allocations | • Who determines: Government through nomination rights (30% - mostly those who are badly housed or poor); local authority through nomination rights (20%); employers paying 1% payroll tax (up to 50% nomination rights in large cities); landlords  
|                                  | • Criteria - various including need, ability to pay rent, type of household, date order, past behaviour  
|                                  | • Income mixing - in principle is part of official policy, but poor still end up concentrated on estates with bad reputations (esp. in Ill-de-France); social landlords are in strongly in favour of ‘social mix’ policies, as wedded to the ‘generalist’ notion of social housing. In certain areas, these social mix policies can discriminate against particular racial/ethnic groups  |

| 1(h) Social housing – vulnerable groups | • ‘Very social housing’ is a widely used expression but not defined in law. Is generally taken to mean two things, which are not necessarily related:  
|                                        | a) housing let via social workers or NGOs as lead tenants to homeless people or others with particular social difficulties. These sub-tenants may have lesser security of tenure than ordinary tenants, depending on the arrangement with social services/NGOs.  
|                                        | b) a special type of more affordable social housing called ‘PLAI’ with a lower income maximum (comprises 20% of all social housing). This is not inferior social housing, |
and is mixed with other social housing, though it is sometimes combined with special social support
• Specific enforceable rights for homeless and other groups now implemented under the ‘DALO’ (see below)

A2. Welfare System

<table>
<thead>
<tr>
<th>2(a) Type</th>
<th>• ‘Corporatist’</th>
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<th>2(b) Characteristics</th>
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<tbody>
<tr>
<td>• Highly regulated labour market</td>
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<td>• Strong earnings-related social insurance systems, with higher benefits (‘replacement ratios’) relative to the UK</td>
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<td>• Low levels of inequality and poverty relative to the UK, but relatively higher levels of unemployment (especially youth unemployment)</td>
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<th>2(c) Impact of economic crisis</th>
<th>• No impacts on welfare arrangements thus far</th>
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B. HOMELESSNESS

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<tr>
<th>a) Scale and nature of homelessness</th>
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<tr>
<td>• National survey indicates that in the second half of the 2000s, 133,000 people were homeless in France – 33,000 on the streets or in emergency hostels, and 100,000 in temporary accommodation for long periods</td>
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<tr>
<td>• Another 117,000 had found their own ‘solution’ by paying for a hotel room or staying with friends/relatives</td>
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<tr>
<td>• 2.9 million people living in overcrowded housing or homes lacking amenities</td>
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<td>• These figures are imprecise as to timescale etc. because they are patched together from a range of sources</td>
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<th>b) Profile of homeless population</th>
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<td>• Again, only a patchwork of sources provide data on people using a variety of accommodation services</td>
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<tr>
<td>• But it is clear that, as elsewhere, men form the majority of those on the streets, in emergency shelters or hostels, whereas there is a more even gender split amongst people staying temporarily with family and friends or in overcrowded or substandard dwellings</td>
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<tr>
<th>c) Rights to housing</th>
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<tr>
<td>• The ‘right to housing’ was introduced in the ‘Law Quilliot’ 1982 and has been ‘reaffirmed’ in various legislative Acts, most notably the ‘Besson Act’ 1990, all of which were unenforceable through the courts</td>
</tr>
<tr>
<td>• After a vociferous protest campaign in winter 2006-2007, ‘The Act Establishing the Enforceable Right to Housing’ (‘DALO’) was passed in March 2007, and profoundly changed the logic of the ‘right to housing’ in France, replacing the State’s ‘best efforts obligation’ with a ‘performance obligation’ (i.e. to achieve a result)</td>
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<tr>
<td>• A ‘negotiated settlement’ procedure was made available in early 2008, and then a judicial review procedure was introduced for priority categories (including homeless people) in December 2008 (from December 2012 this will also cover those whose time on the waiting list is considered ‘abnormally long’). The law punishes failure to allocate social housing to people considered a priority, so that a judge may order a State ‘Prefect’ to allocate accommodation to an applicant on pain of a daily default fine. Individuals thus have a legal remedy for the allocation of social housing, whereby the State has become the guarantor of its effective implementation.</td>
</tr>
<tr>
<td>• Despite passing of the DALO, FEANTSA successfully used the ‘collective complaints’ mechanism introduced under the Revised European Social Charter (1996) to challenge France’s implementation of the right to housing for all (under Article 31), particularly with respect to the most vulnerable members of the community</td>
</tr>
<tr>
<td>• There have been problems with implementation of the DALO – Prefects (the French State’s local representatives responsible for performance) have reported difficulties re-housing priority applicants, with a large number of rejections by social landlords on grounds of insufficient income or ‘social mix’</td>
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<th>d) Other assistance to homeless people</th>
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<tr>
<td>• <strong>Who funds?</strong> – Central government provides a specific grant to fund homelessness services; local authorities also fund some homelessness services for families with children</td>
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• **Who provides?** – direct provision is mainly by NGOs
• **Who receives?** – targeting is left to the discretion of local municipalities and charities
• **What is provided?**
  i) ‘Emergency shelter’ (in welfare hostels, communal night shelters, and more individualised provision) – intended to be immediate, low-threshold and short-term. Introduced from mid-1980s, with specific state budgetary support from 1993, to address what was perceived as a ‘social emergency’ in light of rise of economic crisis, mass unemployment and visible homelessness. Though meant to be temporary, emergency shelter services continue to account for a growing share of French homelessness provision
  ii) ‘Community reintegration accommodation’, introduced in 1953, with a broad supportive role aimed at assisting people to move on to independent living. Users stay much longer and in better conditions than those in ‘emergency shelter’ (in own rooms or sometimes in independent housing), but both sets of service users are required to engage in ‘socio-educational’ support to ensure their ‘fitness’ for housing.
  iii) ‘Temporary accommodation’, first introduced by some NGOs and/or local authorities in the 1980s and then, inspired by the London experience, the city of Paris from 2007, with a wider government programme introduced in 2009
• Dominant theme has thus been ‘linear progression’ to mainstream housing, but in practice is said to be a ‘revolving door’, with intermediate forms of accommodation proliferating and mainstream accommodation options retreating
• The 2007 ‘Reinforced Strategy for Persons Experiencing Homelessness’ (PARSA) (introduced in parallel with the DALO) was intended to mark a change in the management of temporary accommodation by: a) introducing longer opening hours in emergency shelters and abolishing time limits on stays; and b) entrenching the ‘continuum of care’ principle, instituting an indefinite stay service in temporary accommodation, and providing that all those leaving temporary accommodation must be given a housing ‘solution’

**e) Policy trends/developments**

• Despite these DALO/PARSA innovations in 2007, in November 2009 the French Government announced a ‘clean break’ with the existing system of homelessness provision, strongly influenced by a review of homelessness policies in the EU published by the sociologist Julien Damon
• This apparent paradigm shift was towards a ‘Housing First’ model (though the precise definition of Housing First being used was unclear) and away from the previous ‘staircase’ models (which emphasised emergency and temporary solutions, linear approaches and ‘fitness’ for housing)
• However, research has indicated that the ‘staircase’ model continues to be used in practice both locally and nationally, with the rhetorical emphasis on ‘housing readiness’ undimmed, together with continued growth in temporary accommodation provision. In practice, the new policy is a continuation of existing measures – such as the DALO and PARSAs – with some organisational innovations and a vague commitment to Housing First
• But there is a ‘national’ Housing First pilot in 4 cities, involving 400 homeless people with severe psychiatric problems, who have become sub-tenants in PRS (so ordinary housing but not an ordinary tenancy). Decision on whether to roll out will be taken in 2014

**C. OUTCOMES**

**a) Impact on scale/nature/duration of homelessness**

• DALO – 35,000 households had been rehoused as a result of the DALO by the end of 2010 (three years after the introduction of negotiated settlement and two years after the introduction of judicial review) - small numbers in the context of the 420,000 social housing allocations p.a. in France
• PARSAs - there has been a huge expansion in temporary accommodation provision in France in recent years (up over 40% in the past five years), but this upward trend
developments of D.

b) Overall strengths and weaknesses of French approach/policy developments

- Strengths – the relatively large (and growing) social housing sector provides scope for substantial policy interventions on homelessness. Also, as compared with many countries, the introduction of the DALO could be viewed as a strength given that it offers a legally enforceable right to housing. But its implementation has been far weaker than that of the statutory homelessness system in the UK.
- Weaknesses – the overall shortfall in housing supply, especially in affordable rental properties for low and middle income groups (particularly in the Ile-de-France region). Another fundamental problem in France is governance and (partial) decentralisation. The central State retains the duty to house (e.g. under DALO) but the power to implement lies primarily with the municipalities and social landlords over whom they have little control. This leads to incoherence, complexity, and lack of transparency in social housing allocations and other systems.
- Priorities for change - said to include an accessible social housing offer; increased transparency in allocations (e.g. via Choice Based Lettings models); and the need to improve governance arrangements so that responsibility is integrated with relevant competencies.

D. COMMENTS

- The French Government has recently tried to push social housing in the direction of ‘need’. This has mainly been at the level of rhetoric, although there have been some concrete measures (e.g. lowering maximum income threshold, expansion in PLAI social housing). But French social landlords are a powerful lobby against this, committed as they are to a ‘generalist’ conception of social housing (not least to protect their income stream).
- Social landlords and local authorities in France in practice still have a high degree of discretion in allocations, with central government enactments only weakly implemented, and nominations arrangements frequently moribund or ineffective. A significant amount of ‘filtering’ takes place even where nominations are ‘active’, with informal criteria such as ability to pay or promoting ‘social mix’ coming into play at the nominations stage.
- Often this discretion is used to exclude the poorest/most excluded groups from mainstream social housing, hence the need for both types of ‘very social housing’ outlined above.
- It also means that the twin official policy objectives of ‘the right to housing’ and ‘social mix’ are viewed as directly contradictory (especially as the latter is used by social landlords to divert not only low income people but also certain racial and ethnic minorities away from ‘sensitive areas’).
- The resistance by relatively autonomous social landlords to accommodating the ‘most needy’ has also meant that the DALO has not ‘bedded in’ to anything like the extent of the far more longstanding UK statutory homelessness system, and its impact on social housing allocations is evidently far weaker (for now). But it has started to change the terms of the social housing debate in France, introducing the notion that social rented housing (not private rented housing) is central to meeting the ‘right to housing’ and could be targeted on the ‘most needy’, with social support provided where necessary.
- It is interesting that the ‘Housing First’ concept has been adopted at the national level in...
France – especially so soon after the embedding of the ‘continuum of care model’ - but not yet clear what the practical impact will be, if any, as there seems no clear consensus in France on what Housing First means. A series of regional seminars debating the meaning of Housing First in the French context concluded in December 2011 without such a consensus being achieved.

Sources


## A. HOUSING AND WELFARE SYSTEMS

### A1. Housing system

| 1(a) Tenure breakdown | • Social housing – 5%  
|                        | • Home ownership – 41%  
|                        | • Private rented housing -54% |
| 1(b) Social housing - stock, trends | • Declining – almost no new general needs stock being developed and stock ‘converts’ to another tenure as subsidy repaid (see below) |
| 1(c) Social housing – landlords | • Social housing in Germany is about subsidy not ownership – comprises housing to which time-limited ‘social obligations’ (to let at below market rent and to allocate to those below an income ceiling) apply only until such time as the public subsidy used to develop it is repaid.  
|                        | • Recipients of these subsidies include municipal housing companies, regional government, other public bodies, insurance companies, churches, private individuals, private corporations, etc. |
| 1(d) Social housing – demand | • Highly variable - German housing market is slack and there is no overall housing shortage; only in some ‘boom’ cities in western Germany is there housing pressure, including on social housing |
| 1(e) Social housing - security of tenure | • High security of tenure. Unlimited tenancies are the rule; time limits exceptional |
| 1(f) Social housing - eligibility | • Who determines – general rules set by regional state governments, with federal government providing default rules only if states fail to set them (federal government has virtually withdrawn from social housing policy altogether)  
|                        | • Means-tested – eligibility based on a generous income ceiling – approx 40% of population below ceiling when it was last reviewed; if income rises, may be liable to pay rent supplement but this is seldom now implemented  
|                        | • Minimum income – no  
|                        | • Exclusions (groups) - generally no, but some local authorities (esp. in high demand areas) have a residence qualification  
|                        | • Exclusions (behaviour) - most states allow social landlords to reject applications on grounds of unacceptable behaviour; most landlords sign up to services that provide information on indebtedness; most do not accept people evicted for rent arrears or anti-social behaviour |
| 1(g) Social housing – allocations | • Who determines - generally at discretion of the landlord – some municipalities have nomination contracts but are in a weak position to enforce these  
|                        | • Criteria – traditional focus was on ‘respectable’ low paid workers; in recent years policy rhetoric has shifted towards meeting ‘need’, to improve targeting of subsidies, but this has been strongly resisted by social housing providers  
|                        | • Income mixing – yes, social landlords emphasise this and use it as a reason to resist housing-need based allocations system, even though spatial segregation is relatively low in Germany |
| 1(h) Social housing – vulnerable groups | • There is widespread exclusion of poorest and most vulnerable from the social rented sector  
|                        | • Another specific issue with respect to single homeless people is that most social housing is family housing, little of which is appropriate for single people  
|                        | • This has prompted a growth in NGOs (especially in large cities) since the late 1980s, establishing social rental agencies which secure properties and sub-let them to households with support needs. Importantly, this housing is let using normal rental contracts (and so is unlike the inferior tenancy terms used in, for example, the secondary housing market in Sweden). However, these developments are small-scale and new developments have slowed since the 1990s |
A2. Welfare System

2(a) Type
- ‘Corporatist’

2(b) Characteristics
- Regulated labour market and strong earnings-related social insurance systems designed to preserve labour-market based differentials, with much higher benefits relative to the UK
- But major (Hartz IV) reforms of labour market and social security shifted Germany somewhat closer to the flexible labour market and more residual welfare policies of liberal regimes like UK
- Still low levels of inequality and poverty relative to the UK (but both are growing)
- Direct payment of rent to landlords associated with the Hartz reforms may actually help to keep homelessness down

2(c) Impact of economic crisis
- No impacts on welfare arrangements thus far, with the earlier Hartz reforms the key policy shift
- Unemployment is actually falling in Germany – which is benefiting economically from Euro weakness – and some employment programmes have been cut as a consequence

B. HOMELESSNESS

a) Scale and nature of homelessness
- Homelessness has been falling: (approximate) national annual prevalence estimates indicate a 60% decline between 1999 and 2008; more robust regional data (from North Rhine Westphalia) confirms a downward trend
- But some signs of increase in specific areas (e.g. the prosperous cities of southern Germany and some ‘boom’ cities elsewhere)

b) Profile of homeless population
- The majority are single people (mainly men)
- The proportion of families with children has been dropping, and in some cities there are said to be no homeless families at all
- The number of homeless immigrants who are sleeping rough and/or using low-threshold services is rising, particularly in major cities

c) Rights to housing
- Police laws oblige municipalities to provide homeless people, who would otherwise be roofless, with ‘temporary’ accommodation. There is no time limit on occupation. These provisions are legally enforceable.
- For single people, the accommodation provided is usually in a hostel or shelter, but increasingly in supported housing too
- For families a self-contained flat is normally (though not always) made available. In some areas temporary accommodation for homeless families has been closed down, and thus municipalities are obliged to find immediate long-term solutions for these families, even in acute crisis situations (though refuges for victims of domestic violence exist as a separate system from homelessness provision)
- There are also legally-enforceable rights to support and advice for people in ‘special social difficulties’, with homeless people the key group targeted

d) Other assistance to homeless people
- *Who funds?* – German municipalities are the main funders as well as ‘enablers’ of homelessness services. In North Rhine-Westphalia only, there is a regional homelessness programme
- *Who provides?* – NGOs provide most services to single homeless people; there is more direct provision by municipalities for homeless families, and many municipalities run their own prevention services. There is now some (small scale) specialist provision by for-profit organisations
- *Who receives?* – policy interventions prioritise families, but there is also provision for single people. Decisions on eligibility and targeting are left to municipalities (so long as the legal entitlements noted above are fulfilled)
- *What is provided?* The emergency accommodation provided under the police laws (see above) tends to be of poor quality. But many municipalities also provide good quality ‘reintegrative’ services, including floating support for those in self-contained
accommodation. There is now a heavy emphasis on prevention services (particularly eviction prevention)

| e) Policy trends/developments | There has been a longstanding focus on homelessness prevention in Germany:
|                               | • 1987 – the German Standing Committee of Municipalities recommended that the resources and responsibilities for homelessness prevention, temporary accommodation, shelters and resettlement be concentrated in one central department. City of Cologne published analysis showing that preventing homelessness was seven times cheaper than temporary accommodation
|                               | • 1996 – Social Code provisions on the municipal assumption of rent arrears (usually via a loan to the debtor) were converted from powers into duties wherever there was an imminent threat of homelessness
|                               | • 1999 – a revised handbook on making administrative prevention efforts more effective was published, and programmes to reorganise and improve preventative services were developed in municipalities across Germany
|                               | • At present – most German municipalities run their own prevention services (focused on eviction/rent arrears); social ‘support in housing’ for formerly homeless people has expanded; NGOs provide the main support for single homeless people; the support needs of families, young people and women fleeing violence are mainly met by social services, youth welfare services and women’s groups

| C. OUTCOMES | • While national level data is weak, there has clearly been a significant drop in overall levels of homelessness, attributable in part to a slackening housing market/reduced inward migration, but also to targeted prevention policies
| a) Impact on scale/nature/duration of homelessness | • Family homelessness in particular has declined dramatically, and this is linked in part to the closure of temporary accommodation for homeless families (see above)
| b) Overall strengths and weaknesses of French approach/policy developments | • Strengths – the prevention services appear to have been highly successful, especially with respect to rent arrears, and have made a major contribution to the decline in homelessness.
|                               | • Weaknesses – lack of targeted measures on rough sleeping; declining access to permanent accommodation for marginalised groups (though various NGO projects are attempting to counter this)

| D. COMMENTS | • The concerted efforts made on homelessness prevention – particularly with respect to driving down rent arrears-related homelessness and family homelessness - has paid dividends in a clear downward trend
|                              | • The existence of the enforceable right to emergency accommodation helped to prompt this emphasis on pro-active homelessness prevention
|                              | • Note the very small size of the social rented sector in Germany, and also that, in common with a number of other European countries, the poorest and most vulnerable tend to be excluded from it.
|                              | • This makes ‘social mix’ policies highly controversial in the German context, as their overall impact is to exclude those in the highest housing need from social housing
|                              | • It has also prompted the development of, interest in, social rental agencies, in order to provide a route to resettlement for single homeless people (though there was stronger development in this area in the 1980s and 1990s than now). Bear in mind, though, that Germany has a much larger private rental sector than the UK and private tenants have security of tenure in Germany
|                              | • The concept of ‘Housing First’ has made little impact in Germany thus far. While a ‘housing-led’ focus on homelessness prevention, de-institutionalisation and ‘normalising’ of homeless people’s conditions as soon as possible is well established, the specific idea of taking people straight from the streets/shelters and placing them into mainstream housing is not. The expectation that homeless people should be ‘housing ready’ before being rehoused still holds sway
Sources


## A. HOUSING AND WELFARE SYSTEMS

### A1. Housing system

| 1(a) Tenure breakdown | Social housing – 11%  
| | Home ownership – 76%  
| | Private rented housing – 13%  |

| 1(b) Social housing - stock, trends | A shift away from construction of social housing to leasing and other arrangements with private landlords/owners:  
| | a) Social Leasing Scheme – idea is that housing associations manage and let excess properties in wake of property market collapse. But properties often in ‘wrong’ (i.e. remote) locations; most Irish housing associations are small and lack the infrastructure to take on this role; and some developers have been taking a ‘wait and see what happens’ approach and haven’t wanted to let stock go  
| | b) Rental Accommodation Scheme – is aimed at long-term rent allowance recipients (over 18 months) or those identified as having a long-term housing need. Local authorities negotiate with private landlords to enter into long-lease agreements (e.g. 10 years), with existing tenants allowed to remain in situ, or the property let to others in housing need. Owners receive 80% of market rent for the full lease period, regardless of vacancies, and local authorities take responsibility for collecting rent and filling vacancies. |

| 1(c) Social housing – landlords | Local authorities – dominant social landlords (67% of social housing)  
| | Housing associations – mainly small/locally based or specialist (33% of social housing) |

| 1(d) Social housing – demand | Demand outstrips supply  
| | But data from housing waiting lists highly unreliable as not actively managed by local authorities. In addition, people who receive ‘supplementary rental allowance’ (i.e. housing allowance for social welfare claimants who are private tenants) are required to register on waiting list for social housing, though seldom receive offers. This category accounted for 67% of those on waiting list in 2011 but many do not want local authority housing even if it was offered (as what they have is better). Local authority housing is seen as housing of last resort so there will be people in housing needs who do not register for it. |

| 1(e) Social housing - security of tenure | Yes  
| | No debate about fixed-term tenancies, but both right to purchase and succession rights are being actively debated |

| 1(f) Social housing - eligibility | How determined – national framework  
| | Means-tested – yes, and rents scaled to income up to an overall maximum (but income reviews not always implemented)  
| | Minimum income – no  
| | Exclusions (groups/behaviour) – ASB is main exclusion; arrangements to pay off rent arrears usually mean these do not bar access |

| 1(g) Social housing – allocations | How determined - national framework and guidance for local authorities; less direct control over housing associations, but 75% of their allocations are made to local authority nominations  
| | Criteria – ostensibly housing need system (points-based), but little data on allocations practice; single people get low priority relative to families (partly because lower scope for ‘points’ but main barrier is the lack of housing for single people)  
| | Income mixing – little income mixing in practice as overwhelming majority on social welfare; but ‘estate management checks’ run on potential tenants often exclude those with criminal convictions, leaving some single homeless men with private rented sector as their only option |

| 1(h) Social housing –vuln. groups | No special segment, but poorest quality often allocated to single homeless people |

### A2. Welfare System

...
### 2(a) Welfare regime

‘Liberal’, but with elements of ‘corporatist’ and ‘Mediterranean’ regimes, so effectively a ‘hybrid’

### 2(b) Characteristics

- Less ‘statist’ than UK, with a traditionally strong role for voluntary sector, the family and the Catholic Church
- May be viewed as a ‘laggard’ welfare state, with low social spending compared to EU15
- But there have also been ostensible commitments to poverty reduction and active labour market policies

### 2(c) Impact of economic crisis on welfare arrangements

- Welfare benefits (and homelessness spending) largely protected from public sector funding cuts thus far
- But December 2011 Budget increased the contribution welfare recipients have to make towards their rent in private sector, thereby reducing their after-housing-costs (minimum) income. Reductions were made to the housing budget which will potentially impact on homelessness services, as well as on social housing construction

### B. HOMELESSNESS

#### a) Scale, nature and trends in homelessness

- There have been significant improvements in the data available on homelessness over the last decade or so. Dublin in particular has strong trend data through the ‘Counted In’ assessments (which also take place in Galway, Limerick and Cork). These pointed to a decrease in homelessness between 2002 and 2005 but an increase in 2008.
- Rough sleeping in Dublin is measured separately through a one night count which has been on a strong downward trajectory since 2002, but increased from 60 in 2009 to 97 in 2011 (counts carried out in November each year).

#### b) Profile of homeless population

- Heavily concentrated in Dublin area, especially rough sleeping (around two thirds of all recorded homelessness in Ireland is in Dublin)
- Predominantly single people, majority are men
- Relatively small proportion of families
- Growing number of foreign nationals sleeping rough (9% of rough sleepers in 2005 to 38% in 2008)

#### c) Rights to housing

- No constitutional or statutory rights to housing
- Was an attempt made to introduce a statutory right in 1988, inspired by the Housing (Homeless Persons) Act 1977. While this was unsuccessful, it did achieve a clear (and broad) definition of homelessness and imposed responsibilities on local authorities to assist homeless households
- ‘Rights resisters’ in Ireland fear the ‘juridification’ and legalism of enforceable rights, which they argue direct power and resources into the hands of the legal profession and away from service provision. Such rights may create obstacles for those trying to manage scarce resources, and there is scepticism about whether, in the Irish context, rights would in practice lead to an ‘empowered citizenship’. Better policy implementation, regulation and monitoring are viewed as a higher priority (though some feel that a move towards a rights-based approach may make sense over time)
- Rather than an adversarial and individualistic ‘rights’ approach, a ‘Social Partnership’ approach is said to define policy making in Ireland, whereby government, employers, unions and NGOs negotiate a strategic consensus on economic and social policy. This Social Partnership has now ‘collapsed’ in the light of the economic crisis, but the ‘consensual’ style of policy making is likely to persist

#### d) Other assistance to homeless people

- **Who funds?** – Central government. Funding reached record level in 2009 and has been relatively protected even in current financial climate (thus far); but may now fall after December 2011 Budget (see above)
- **Who provides?** – service provision mainly by NGOs, though Dublin City Council directly provides a number of services. As Ireland is less ‘statist’ than UK, NGOs have traditionally been powerful players. Influence of the Church in ‘social thinking’ has declined dramatically in light of recent scandals, but legacy remains in a large and diverse church-linked NGO sector. State now, in principle, has more leverage over NGOs through funding, regulation, service-level agreements etc., but practice is inconsistent
- **Who receives?** – Ireland has a broad 'official' definition of homelessness in the 1988 Act (see below) which is very similar to the UK statutory definition – i.e. encompassing all those who have no accommodation which they can reasonably be expected to occupy, or who are living in emergency accommodation without the means to secure reasonable accommodation for themselves. But most action on homelessness is focused on people sleeping rough and in emergency/temporary accommodation.

- **What is provided?** 'Two tier' system has been described in Ireland at present, at least with respect to policy aims:
  - Dublin: moving away from ‘linear’ model based on temporary and transitional provision, to a ‘normalisation’ model based on short-term emergency accommodation + long-term housing (but note points below about slow implementation)
  - Rest of Ireland: while Dublin approach is *national* policy, linear model continues to dominate thinking elsewhere

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Ireland has had a number of important homelessness initiatives over past two decades or so:

- **1988 - Housing Act 1988** – remains cornerstone of Irish homelessness policy, and empowers local authorities to respond to homelessness in a number of ways: by housing people who are homeless, by funding NGOs, by providing advice and assistance, and by providing financial help to access the private rented sector.

- **1996 – Homeless Initiative established** covered only greater Dublin region, but first attempt to improve strategic implementation of homelessness policy and crucial catalyst for change.

- **2000 – *Homelessness: An Integrated Strategy*** (there were also complementary youth and prevention strategies published in 2001 and 2002 respectively). Established ‘Homeless Agency’ in Dublin, and local ‘Homeless Forums’ elsewhere, all as statutory-voluntary partnerships. Articulated a ‘continuum of care’ model for homelessness services – outreach services; sheltered, supported and transitional accommodation; move-on accommodation; and prevention for at-risk groups. The aim was to move people as quickly as possible into long-term housing, with support as necessary.

- **2006 – an independent review of impact of 2000 National Strategy**, together with an unprecedented level of consensus across statutory and voluntary sector on homelessness, and growing public expenditure in this area, formed basis for development of 2008 Strategy

- **2008 – *The Way Home: A Strategy to Address Adult Homelessness in Ireland, 2008-2013*** (supported by Housing Act 2009 which put local Homelessness Forums and Homelessness Action Plans on a statutory footing). This Strategy has three core objectives:
  1. ending long term homelessness by 2010 (= eliminating occupation of emergency homeless facilities for over 6 months)
  2. the elimination of the need to sleep rough by 2010
  3. preventing the occurrence of homelessness as far as possible

- **2009 - The local Dublin strategy – *Pathways to Home (2009)*** – is being described as ‘radical’, but many of the key elements were present in earlier plans. It envisages a shift away from traditional transitional services (a ‘linear’ model), towards short-term emergency accommodation + permanent housing (with support where necessary) (a ‘normalisation’ model). There is still to be ‘supported temporary accommodation’ in Dublin, but maximum residence will be 6 months. Long-term housing is to be provided in social housing or via leasing arrangements with housing associations or private landlords. Also includes a small ‘Housing First’ pilot for the most entrenched rough sleepers, moving them straight from the streets into housing with support, with, crucially, no pre-conditions about engagement in treatment services.

- **2011** – in *Programme for Government 2011* the new Irish Government said that it will adopt a Housing First approach to ending long-term homelessness across Ireland, but
unclear what is meant beyond a vague commitment to moving people into settled housing as quickly as possible
- At present - the optimism and consensus of 2006 has dissipated, and slow rate of implementation blamed on: difficulties in securing the 1,200 long-term units required to resettle those currently in temporary accommodation (though there are differences of opinion on reasons for this); changes in personnel/lack of institutional memory; unwillingness by some NGOs to accept need for change/possible obsolescence of their services in the phasing out of the transitional model.

C. OUTCOMES

<table>
<thead>
<tr>
<th>a) Impact on scale/nature/duration/experience of homelessness</th>
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<tr>
<td>• Monitoring and evaluation poor. This is best demonstrated by the fact that it seems unclear whether the 2010 targets have been met or not (it is seems likely that they have not, but there is a reluctance to say so). This is in contrast to earlier Dublin and national strategies which were subject to external evaluation.</td>
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<td>• The earlier positive downward trend in scale of homelessness, which was fairly modest, has been attributed to an enhanced strategic focus, particularly in Dublin, and substantial increase in homelessness funding. Others argue that the reduction in 2005 was almost entirely due to the reversal of a dramatic increase in homelessness amongst families/couples which had occurred between 1999 and 2002.</td>
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<tr>
<td>• It is only with respect to rough sleeping that there has been a significant reduction and this is viewed as attributable to the provision of more appropriate services and ensuring that emergency shelters don’t refuse to accept drinkers, drug users, etc.</td>
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<td>• The recent increase in homelessness/rough sleeping is in large part attributable to migration, but is also viewed as symptomatic of the failure to implement policies effectively.</td>
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<td>• There is a perception in some quarters that there have been insufficient returns for the major amounts of money that have been invested.</td>
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<th>b) Overall strengths and weaknesses of Irish approach/policy developments</th>
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<td>• Resources for homelessness are reasonably high (at the moment) and strategic policy development has been positive.</td>
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<tr>
<td>• But policy implementation is weak and standards of transparency, accountability, monitoring, and data collection are all poor. There was said to have been a significant improvement in these areas after 2000, but a decline more recently.</td>
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D. COMMENTS

- The past few years is presented as a major period of transition in Ireland’s approach to homelessness, starting in Dublin, but the reality of change in service provision is difficult to judge. There certainly is a shift away from ‘linear/transitional’ models towards more ‘normalising’/Housing First’ approaches at policy/strategic level, but it is not yet clear how far this will go in practice and what exactly the current Irish Government means by ‘Housing First’. The historical precedents are not promising, given that much of what is now being presented as radical has been present in policy frameworks since 2000, yet the number of people who have moved out of homelessness is said to be negligible.
- The Irish have explicitly rejected a ‘rights-based’ approach to meeting the needs of homeless people, fearing the legalism and adversarial implications. However, while their ‘Social Partnership’ model has been argued by some to offer a more consensual way forward, note the slow progress in implementation of change and acknowledgement of need for a more directive approach with NGOs in particular. Moreover, you could argue that ‘Social Partnership’ and ‘rights’ approaches are not in fact alternatives as the former relates to the governance of policy-making processes, and the latter to one particular (albeit intermediate) policy outcome.
- The ‘rights’ discussion in Ireland also has to be seen in the context of low levels of transparency and accountability in public policy implementation, whereby effective regulatory and monitoring frameworks may reasonably be viewed as a higher priority than individual rights. On the other hand, some might take the view that a rights-based
approach may help to foster improved accountability, transparency, etc.

- The role of the NGOs is interesting: traditionally in Ireland it would be the role of the NGO sector to hold public bodies and government to account, but this hasn’t happened in relation to homelessness. Some commentators view NGOs as a barrier to progress, and greater state control over their activities as progressive. Thus there’s an appetite to move towards a more ‘top down’ model, with clearer leadership of the voluntary sector (in terms of monitoring, licensing, etc.)
- The (expanding) private rented sector has been argued to be a good option for meeting the needs of single homeless people in particular, but this needs to be seen in light of the greater level of regulation and security offered in this sector in Ireland than in the UK.

Sources


### A. HOUSING AND WELFARE SYSTEMS

#### A1. Housing system

| A1(a) Tenure breakdown | • Social housing – 4%  
|                        | • Home ownership – 67%  
|                        | • Private rented housing (unsubsidised) – 29% |

| A1(b) Social housing - stock, trends | • Net decline in public housing (in large part because of HOPE VI demolitions, see below); continuing modest additions to other forms of social housing (see below)  
|                                    | • A dwindling supply of affordable rental units for low-income households across all tenures is an important part of the broader context for homelessness in the US (between 1995 and 2005, roughly 2.2 million low-cost rental units were lost)  
|                                    | • 7 million very low income American households pay more than 50% of their income in rent (a 20% increase between 2005 and 2010) |

| A1(c) Social housing – landlords | • Three main types:  
|                                | - public housing  
|                                | - privately owned federally-subsidised housing  
|                                | - Low-Income Housing Tax Credit (LIHTC) funded housing  
|                                | • Only public housing is ‘permanent affordable housing’; landlords of homes built under the other two forms of funding cease to be bound by obligations to let on affordable terms after a specified period (sometimes as little as 15 years) |

| A1(d) Social housing – demand | • High or very high  
|                              | • Only 25% of households eligible for subsidised housing/rental assistance receive it |

| A1(e) Social housing - security of tenure | • No  
|                                        | • Fixed-term, renewable tenancies the norm |

| A1(f) Social housing - eligibility | • How determined – national framework sets rules for projects that are federally-funded  
|                                 | • Means-tested – yes. Income threshold for public housing generally targets extremely poor households (30% of area median family income); LIHTC tends to house the ‘working’ rather than ‘workless’ poor. Rents are set at 30% of gross household income, until tenant’s income rises above level at which this proportion would exceed relevant market rent  
|                                | • Minimum income – no, but sometimes de facto, e.g. 3 months rent saved  
|                                | • Any exclusions (groups/behaviour) – people with felony drug convictions |

| A1(g) Social housing – allocations | • Who determines: locally determined  
|                                    | • Criteria – mainly based on date order  
|                                    | • Income mixing – not generally a federal priority, though the HOPE VI programme pays for demolition of public housing and its replacement with mixed income/tenure housing; the ‘Moving to Opportunity’ demonstration programme facilitates the relocation of poor (mainly Black and Hispanic) households from high-poverty neighbourhoods to lower-poverty neighbourhoods (with some new evidence demonstrating clear positive outcomes on obesity and other health indicators); new subsidy programmes make some provision for income mixing |

<p>| A1(h) Social housing –vulnerable groups | • Public housing is targeted on the very poorest groups (though since 1997 local authorities have had greater discretion with the removal of the ‘federal preference’ for targeting solely the very poorest groups, in an effort to weaken extreme concentration) |</p>
<table>
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<th>A2. Welfare System</th>
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<td><strong>2(a) Welfare regime</strong></td>
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| **2(b) Characteristics** | • Highly deregulated labour market and an emphasis on means-tested benefits paid at low levels  
• Individual states determine the generosity of welfare benefits, but generally very weak protection, e.g. time limits on income maintenance benefits for families with children; waiting lists operated for ‘Section 8’ housing allowances  
• Far lower levels of social spending than Europe, particularly on families with children  
• Very high levels of inequality and poverty relative to Europe, though historically lower levels of unemployment |
| **2(c) Impact of economic crisis on welfare arrangements** | • US foreclosure crisis central to credit crunch/global recession  
• Helped prompt new emphasis on homelessness prevention measures within US (see below)  
• Public assistance roles are again rising and food stamp use has risen dramatically (50 million Americans are now in receipt of food stamps)  
• No cutbacks in mainstream welfare protection (as yet): in order to receive additional federal funding for Medicaid under the American Recovery and Reinvestment Act 2009, and in order to offset increased demand during economic crisis, states were debarred from narrowing eligibility criteria during the recession. But this programme expires in 2012 and many states are already talking about tightening eligibility  
• While ‘entitlement programmes’ have remained intact for now, ‘discretionary programmes’ have been badly hit by austerity measures. Housing programmes, particularly capital expenditure, has suffered disproportionately (a 20% total cut in Department of Housing and Urban Development programmes), with only targeted homelessness programmes escaping cuts |

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<th>B. HOMELESSNESS</th>
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| **a) Scale, nature and trends in homelessness** | • Annual prevalence – more than 1.59 million people spent at least one night in an emergency shelter or transitional housing programme in 2010, a slight increase from 2009  
• ‘Point-in-time’ (’stock’) – the number of people experiencing homelessness on a single night was almost 650,000 in January 2010, a slight increase since 2009  
• This point-in-time figure includes 250,000 ‘unsheltered’ people (on the streets, sleeping in cars, or in tents, etc.), comprising:  
  - 200,000 single people (thus half of all homeless single in the US are ‘unsheltered’, many of whom will literally be living on the streets)  
  - 50,000 members of families with children (there are no children sleeping on US streets, but there are many in living in campsites etc. As long as they attend school, and their health and safety is not judged at risk, they will not be taken into care even if living long-term in a tent)  
• California, New York, and Florida account for 40% of the total point-in-time homeless population |
| **b) Profile of homeless population** | • The following groups have a disproportionate risk of homelessness:  
  - African-Americans  
  - men between the ages of 31 and 50  
  - people with ‘disabilities’ (including mental health and substance misuse problems)  
• Around one third of people in homeless accommodation are members of families with dependent children. These families are often headed by younger African-American women with young infants (and no reported support needs)  
• Single people in homeless accommodation are more likely to be white men, over 30 years old, with reported support needs  
• Most people who use homeless accommodation stay for a short period of time |
### c) Rights to housing
- No federal rights
- In New York City only, there is a legally-enforceable right to shelter for both single people and families who have absolutely nowhere else to go. The entitlement usually amounts to a place in a shelter for single people and to a self-contained unit for families
- It has been argued that, rather than providing stable housing for homeless people, the right to shelter in NYC has instead led to the creation of the largest and most expensive emergency shelter system in the US

### d) Other assistance to homeless people
- **Who funds?** - There are major federal funding programmes administered at county level (25% of all homelessness assistance expenditure), with this federal funding outweighed by private funding (30%), and state and local government funding (45%)
- **Who provides?** – the service providers are mainly NGOs
- **Who receives?** – depends on specific programme, but broadly speaking all those defined as ‘literally homeless’ are eligible for relevant programmes, but supply does not always meet demand. Key priority in recent years has been the ‘chronically homeless’, but there is a new emphasis on at-risk groups (see below)
- **What is provided?** – since 1994 federal funding has been disseminated via local ‘continuums of care’ which seek to provide: outreach services; emergency shelter; transitional housing; and ‘permanent supportive housing’. However, there has recently been a shift towards a more preventative and housing-led approach (see below)

### e) Policy trends/developments
- The homeless service system in the US has grown massively since the early 1990s, largely because of federal leadership and funding following the passage of the Stewart B. McKinney Homeless Assistance Act 1987. The ‘continuum of care’ approach developed in the mid 1990s was an attempt to co-ordinate the ad-hoc array of services that had arisen in response to a growing homelessness crisis
- Since 1999, at least 30 per cent of relevant Federal funds have been devoted to ‘permanent supportive housing’, with a ‘Housing First’ approach – combining rapid access to permanent housing subsidy with ongoing support services - underpinning the 10-year federal plan to end ‘chronic homelessness’. There is now robust evidence that Housing First programmes are effective (and cost effective) in facilitating high levels of tenancy sustainment amongst homeless people with complex needs (evidence on health and other outcomes is more mixed).
- However, concerns remain that the ‘continuum of care’ model has evolved in many areas to create a ‘parallel’ or ‘proxy’ welfare system, prolonging homeless episodes and isolating homeless households from mainstream services. Partly in response to the recession, policy in the US seems now to have shifted in a more preventative, ‘housing-led’ direction:
  - In May 2009, the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH Act), a reauthorization of the McKinney-Vento Homeless Assistance Act, established the goal of ensuring that homeless households should be returned to permanent housing within 30 days. It renamed the Emergency Shelter Grant programme the Emergency Solutions Grant (ESG), and eligible activities were extended to include more prevention and re-housing interventions.
  - The Homelessness Prevention and Rapid Rehousing Programme (HPRP) was launched with $1.5 billion allocated in the American Recovery and Reinvestment Act 2009 to prevent at-risk individuals and families from becoming homeless, and to move homeless households into permanent living situations as quickly as possible. The services offered include a short-term (up to 18 months) rental subsidy, financial assistance for moving costs, deposits, utility payments, and housing relocation and stabilization services. Attempts to make this time-limited HPRP funding permanent have been partially successful, with relevant resources absorbed into the ESG, but funding has been made available for homelessness prevention amongst veterans
- It has been argued that these two Acts represent a fundamental shift in US homelessness policies, away from shelter and other traditional homeless services, towards a focus on stable housing + community-based mainstream services.
**C. OUTCOMES**

| a) Impact on scale/nature/duration/experience of homelessness | • Targeted homelessness assistance programmes have clearly had a significant impact, with a 30% decrease recorded in chronic homelessness between 2005 and 2009, though this downward trend seems now to have slowed  
• Prevention is a much more recent focus in the US, and less evidence is available as yet on the effectiveness of the measures now being taken, though initial outcomes from the HPRP appear promising |
| b) Overall strengths and weaknesses of US approach/policy developments | • Strengths – the scale, sophistication and rapid growth of the targeted homelessness assistance programmes (though the necessity for programmes on this scale could be considered a weakness).  
• Weaknesses – the highly restricted welfare safety net, together with an acute shortage of affordable rented housing, leaves a large proportion of the poor population vulnerable to homelessness; the ‘institutionalisation’ of homelessness in a ‘parallel’ welfare state; a lack of focus on prevention, until recently |

**D. COMMENTS**

| Comments | • The high level of family homelessness in the US – associated with low rates of family benefits - is especially striking as compared with countries like Finland and Germany, where homelessness amongst families with children has been reduced to very low levels, and virtually eliminated in some areas  
• There is strong evidence from the US that subsidised housing rather than support services is critical in ending family homelessness (echoing survey findings on statutorily homeless families in England)  
• Significant reductions in levels of chronic homelessness demonstrate the potential effectiveness of highly targeted homelessness assistance programmes for those with the most complex needs  
• But the insularity of homelessness ‘continuums of care’ demonstrate the dangers of isolating homeless people (particularly those with few support needs) from mainstream systems and ordinary housing  
• Specialist programmes like Housing First and other forms of permanent supportive housing have provided useful models for Europe – particularly for ‘chronically’ homeless groups – and their influence derives in large part from the robust evaluative evidence base available in the US  
• The perverse impact of the New York right to shelter – which has arguably contributed to the perpetuation of homelessness rather than its alleviation – demonstrates the importance of rights-based frameworks being focused on settled rather than temporary solutions  
• Federal and community-level policy-makers are said now to be persuaded of the merits of a prevention-orientated model, with attitudes having changed dramatically in the last couple of years. While particular providers may be resistant to changes which threaten their programmes, and prevention-focused work comprises only a fraction of current activity, that fraction is set to grow as the paradigm shift takes root  
• The impact of the current economic crisis on the employment prospects of young adults from ethnic minorities (nearly 30% of whom are now unemployed) has prompted concerns about a similar ‘cohort effect’ as occurred in the late 70s/early 80s recession, when the crack cocaine epidemic combined with high rates of unemployment to create a severely disadvantaged generation of young black men who remain the core group of ‘chronic homeless’ in the US today. This is prompting calls for targeted assistance to those whose disrupted childhoods are evidenced by substantial interaction with criminal justice or child protection agencies as teenagers |
Sources


