



# PRECARIOUS HOUSING IN EUROPE

*Working Paper 6*  
Homelessness



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Precarious Housing in Europe.  
Pushing for innovation in higher education.

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# 6 Homelessness

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In this chapter we introduce the concept of homelessness providing some historical background but focusing mainly on recent developments. The main emphasis is put on homelessness in EU countries though some examples from other regions are briefly discussed to give the reader a more general perspective. The chapter starts by introducing some of the most important definitions of homelessness used nowadays in Europe for the collection of statistical data and concepts of homelessness stemming from a human-rights perspective. In the second section we discuss the often ideologically laden arguments and debates about the causes and dynamics of homelessness. We then move on to present the most important programmes and policies addressing homelessness, which rely on different and sometimes incompatible approaches. In this section you will find also a case from Hungary related to the introduction of one of the most recent and innovative models for addressing homelessness called Housing First. The last section contains some important conclusions, a brief look into the possible future of homelessness, and a few takeaways and tasks.

## 6.1. What is homelessness?

In Paris of the early 2020s, Ahmed and his friend were very worried about plans to close the remaining public toilets with the argument that they are no longer necessary, leaving such facilities available only in places like McDonald's restaurants. Ahmed is one of at least 3,500 persons in Paris who at that time did not have their own place to use a toilet<sup>1</sup>. They are what is known in French under the acronym SDF (sans domicile fixe), i.e., persons without permanent residence, which is a kind of euphemism for being homeless. Being denied access to various amenities, some of which are today considered so basic that their presence is taken for granted, is among the most extreme manifestations of homelessness.

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<sup>1</sup> <https://www.youtube.com/watch?v=LKOXmISamb8>.

What Zakija, Said, Selam, Emanuel, Majda i Ali, Emilia, Khawlah i Yasim, Zalina and many others have in common is that they looked for a new home in Poland escaping from different parts of the world such as Iraq, Dagestan, Chechnya, Tajikistan, Russia, Syria, Eritrea, Ukraine. They have *left their homes and fled because their life was in danger or because they were under threat of violence*. Even before leaving their homes, they were already homeless according to one of the definitions of homelessness because they were living under constant threat of violence and intimidation. Their names and personal stories appear on the web page of the Polish project *Witaj w domu (Welcome Home)*<sup>2</sup>, which is featured as a good practice example on the web page of the European Commission<sup>3</sup>. Visitors to the project web page are invited to donate for a family of their choice so that a new home can be secured for them. The target amounts that *Welcome Home* strives to collect for each family are equivalent to 5-6 thousand euros in Polish zloty but for most only part of the sums have been collected. All the persons appearing on the web site can be described as refugees or asylum seekers. Poland, like many other European countries, has been criticised for not being particularly welcoming to this category of displaced persons, particularly to refugees coming from the Middle East and Africa, despite the fact that relatively few such refugees and asylum seekers reach Poland. By far the most challenging and expensive part of their reception is the provision of accommodation. Migrants form a large and growing group of the homeless in many European countries.

**Homelessness** represents one of the most precarious conditions in a person's life. There are many definitions of homelessness, ranging from those which refer solely to being roofless and sleeping rough, through to broader definitions that consider homelessness as a facet of wider housing insecurity.

There is no standardised definition of homelessness in the EU either, but the work done by the European Federation of National Organisations Working with the Homeless (FEANTSA<sup>4</sup>) comes close to producing such a definition in the typology of homelessness called ETHOS. The conceptual structure of ETHOS was founded on a thematisation of homelessness involving exclusion from at least one of three different domains – the physical, the legal, and the social (Edgar et al., 2004). ETHOS is not conceived as a hierarchy of living situations, instead all of these forms of housing exclusion should be thought of as interlinked (FEANTSA, 2006).

The European Typology of Homelessness and Housing Exclusion (**ETHOS**) includes four primary categories: a. *roofless*; b. *houseless*; c. living in *insecure accommodation*; d. living in *inadequate accommodation*.

The ETHOS typology looks at the adequacy of the accommodation independently of whether the tenure is secure. Yet, as discussed further in this chapter, the understanding of what constitutes 'adequate housing' in ETHOS is limited by comparison to definitions

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2 <https://witajwdomu.org.pl/wspieraj>.

3 [https://ec.europa.eu/migrant-integration/integration-practice/welcome-home-housing-support-refugee-families-poland\\_en](https://ec.europa.eu/migrant-integration/integration-practice/welcome-home-housing-support-refugee-families-poland_en).

4 <https://www.feantsa.org/en>.

of ‘adequate housing’ contained in some international documents, which present a broader understanding of the right to ‘decent’ housing.

Despite this, the ETHOS typology offers the broadest definition of homelessness of any practical policy relevance, which is to a large extent reflected in the data collection, policies, and programmes implemented by different, mostly developed, countries.

The four conceptual categories of homelessness within ETHOS are subdivided into a total of 13 operational categories.

*Table 6.1.: ETHOS typology - PEOPLE*

<b>Roofless</b>	<b>1. living rough</b>
	2. staying in a night shelter
<b>Houseless</b>	3. in accommodation for the homeless
	4. in Women’s Shelter
	5. in accommodation for immigrants
	6. due to be released from institutions (e.g. for youngsters without parents, correctional institutions)
<b>Insecure</b>	7. receiving longer-term support (due to homelessness)
	8. living in insecure accommodation
	9. living under threat of eviction
	10. living under threat of violence
<b>Inadequate</b>	11. living in temporary/non-conventional structures
	12. living in unfit housing
	13. living in extreme over-crowding

*Source: FEANTSA, ETHOS typology*

Operational categories 11 and 12 of the ETHOS typology overlap with situations of informal settlement, as they include living in structures that are not intended as places of usual residence or that are unfit for habitation according to national legislation or building regulations. Some of the examples given to illustrate insecure accommodation in the ETHOS typology also correspond to forms of informal settlement, i.e., occupation of dwelling with no legal tenancy, illegal occupation of a dwelling and occupation of land with no legal rights. The FEANTSA typology does not contain the category of unsuitability of housing which is much broader than inadequacy. Suitability can include aspects such as location or lifestyles. ETHOS also does not contain any explicit reference to unaffordability as such, which is a basic characteristic of precarious housing. The lack of affordability can result in a person becoming homeless due to having one’s rental contract terminated or losing one’s home due to re-possession. On the other hand, the concept of precariousness does not explicitly cover many life situations which are considered forms of homelessness such as living in some types of institutions (e.g. orphanages, mental health institutions, penal or other correctional institutions) or being due to be released from any of these.



Figure 6.1: Sleeping rough nearby the Central Railway Station of Sofia, Bulgaria



Source: Boyan Zahariev & Ilko Yordanov; Open Society Institute - Sofia

There are a variety of definitions of homelessness in the context of goals pursued by a specific housing policy that can be significantly different from statistical definitions, which may not always be easy to operationalize. Particularly understandings and perceptions of housing adequacy can vary substantially across countries in ways that are difficult to capture in definitions. For example, a Swedish report on homelessness remarks that interviewees from Bulgaria and Romania state that most citizens in their countries live in what in Sweden are considered to be poor conditions. Roma interviewees specifically point out that they have come to Sweden to escape poverty and discrimination (*Hemlöshet, 2017 – omfattning och karaktär, 2017*).

Despite its relatively wide-ranging scope, the ETHOS typology is far from being exhaustive. Other aspects of homelessness have been suggested that are not covered by ETHOS. Some notable elements broadly related to adequacy, which are missing in the definition developed by FEANTSA but are present in international documents on human rights include *location* and *cultural adequacy*.

*Location* as an element of adequate housing should allow access to employment, healthcare, education, childcare, and other social services. The access should be guaranteed in large cities and in rural areas alike. In addition, housing should not be in close proximity to sources of pollution such as industrial sites. *Cultural adequacy* refers to the way housing is constructed in relation to the cultural identity, livelihoods, and daily routines of the inhabitants (UN CESCR, 1991). These requirements put many potential constraints on the way housing can be supplied. In particular, it could make mass-scale standardised construction of public housing look inadequate, while there is no reason to treat them so under the ETHOS typology.

The other domains including legal security of tenure, availability of services, materials, facilities and infrastructure, accessibility, affordability, and habitability are covered in one way or another in the ETHOS definition of homelessness.

In national censuses of EU member states, common guidelines are used, which provide a definition of homelessness: This includes persons who do not usually live in either private or institutional households, distinguishing further between 'primary homeless' (roofless) and 'secondary homeless' (houseless) persons. This definition is both narrower and less detailed than that of ETHOS. The guidelines aim to ensure the comparability of census data among the Member States. However, they allow for a significant degree of flexibility for individual countries, noting that "homelessness' is essentially a cultural definition based on concepts such as 'adequate housing', 'minimum community housing standard' or 'security of tenure', which can be operationalised in different ways by different communities" (Conference of European Statisticians, Recommendations for the 2020 Censuses of Population and Housing, 2015, pp. 164-165). These guidelines are not binding and there is no agreement that Member States will use fully comparable tools, terminologies, and classification of homelessness. At the same time, it is equally hard to guarantee that researchers will receive, and follow, appropriate definitions in identifying homelessness during fieldwork (Drilling et al., 2020).

In 2018, the European Survey of Income and Living Conditions (EU-SILC) included an ad-hoc section on well-being, material deprivation, and housing difficulties (Eurostat, 2020). The sub-module on 'housing difficulties' include questions that refer to what would be considered situations of homelessness according to the ETHOS typology: i) staying with friends and relatives temporarily; ii) staying in emergency or other temporary accommodation; iii) staying in a location not intended as a permanent home; iv) 'sleeping rough' or sleeping in public space (ibid.). In addition, the questionnaire asked about the duration of each situation that has occurred, the reason for the housing difficulties encountered by the respondents, and the way out from each occurrence of housing difficulties. On average, 4% of the respondents reported some form of housing difficulties in the past, the most frequent being a temporary stay with friends and relatives. Tracing periods of homelessness is in line with the common understanding within state-of-art research of homelessness as episodes in an individual's life rather than a defining characteristic of an individual (Niemi & Ahola, 2017). The most frequent causes for housing difficulties were relationship or family problems (33.5%), followed by financial problems (20.2%). On average, 75% of respondents who experienced housing difficulties reported that these were over within the first 12 months. The exceptions to this were respondents in Bulgaria, Spain, and Slovakia, where housing difficulties persisted longer than a year for the majority of affected persons.

A review of the categories of the ETHOS-Light<sup>5</sup> typology is available from the European Social Policy Network, indicating which of the situations listed in this typology are included in the definition of homelessness used in each EU country.

From this review, it is easy to see that most definitions used in the European Union and some other European countries for statistical purposes or for the administration of homelessness policies are significantly different from the ETHOS-Light typology. Let's illustrate it with just a few examples. The most detailed definition (closest to the typology

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<sup>5</sup> European Typology of Homelessness Ethos and Housing Exclusion, <https://www.feantsa.org/download/fea-002-18-update-ethos-light-0032417441788687419154.pdf>.

of ETHOS-Light) seems to be those applied in Luxembourg (almost the entire typology), Greece, Spain, and Finland (Baptista & Marlier, 2019).

According to the Finnish definition, homeless people are individuals who: 1) are sleeping rough (mainly in emergency overnight shelters); 2) live in dormitories or in hostels, etc.); 3) live in various institutions for homeless people; 4) temporarily live with their relatives or friends due to a lack of own housing. They also include: 5) prisoners who have no proper accommodation when released from a penal institution; and 6) a catch-all category (“all other homeless people”). Finland therefore has a residual category, including all those who are considered homeless but remain outside the top five categories. The United Kingdom also has a relatively detailed definition containing two categories of homelessness: a) street homelessness and rough sleeping (Ethos category 1); and b) statutory homelessness. The latter includes most but not all ETHOS-Light categories (1, 2, 4, 5, 6, 11). The definition of statutory homelessness in Scotland is wider than in England, and there are also wider definitions of local authority duties to statutory and non-statutory homeless people in Wales than in England (Baptista & Marlier, 2019).

In many other countries, the definitions are limited to people who sleep outdoors (Italy, Malta), adding those housed in temporary shelters (France), or at most those who are immediately at risk of being left homeless in the very foreseeable future (Netherlands). There are also countries (Slovakia, Latvia) that do not use any official definition of homelessness at all, either for statistical or for policy purposes (e.g. social aid, social services, designing and implementing housing programmes, etc.) (Baptista & Marlier, 2019).

There are on-going attempts to develop a global homelessness framework, which ideally means the elaboration of globally relevant definitions and the collection of comparative data based on those definitions (Busch-Geertsema et al., 2016). Any global definitions necessarily have to be a small subset of the total sum and variety of definitions applied nationally and regionally, including only the most obvious and indisputable instances of homelessness, such as rooflessness and rough sleeping. One such proposal includes three categories: (1) People without accommodation; (2) People living in temporary or crisis accommodation; (3) People living in severely inadequate and/or insecure accommodation. The suggested global framework is essentially a subset of the ETHOS typology, which summarizes frameworks relevant to the countries of the European Union.

## 6.2 The right to housing

When we talk about rights in the strict sense, we usually mean rights enshrined in international and national law. Rights which acquire such a high level of recognition usually enjoy more attention from governments. Is a right to housing defined and recognised in international documents? The EU is perhaps rightly considered as one of the places in the world with the most developed social policy and system of social rights guaranteed in legal binding international documents and acts of national legislators. Some of the international instruments addressing social rights to which EU countries are



party actually involve a wider set of countries participating by their own will and merit in value-driven international organizations such as the Council of Europe.

The European Social Charter (ESC) is therefore seen as the *Social Constitution of Europe* and represents an essential component of the continent's human rights architecture. The Charter is a Council of Europe treaty that guarantees fundamental social and economic rights, which are also referred to as 'everyday human rights' related to employment, housing, health, education, social protection, and welfare.

The **right to housing** is covered in a quite succinct way in the Charter, apparently reflecting the challenges faced in producing a consensus around what constitutes acceptable housing, particularly in a context where such a right should be universally guaranteed to the citizens of those states that are the signatories of this international treaty.

The right to housing is the subject of Article 31 in the ESC. This right is not directly defined but instead the Parties to the ESC undertake to take certain measures designed to guarantee this right:

- (1) to promote access to housing of an adequate standard;
- (2) to prevent and reduce homelessness with a view to its gradual elimination;
- (3) to make the price of housing accessible to those without adequate resources.

The ESC has multiple other documents interpreting its content such as amending protocols and explanatory reports. These interpretative texts define 'adequate standard' as housing which is of an acceptable standard with regard to health requirements. It is of course far from clear what 'health requirements' are envisaged in this context, as there is not any recognised list of such requirement related to housing, although it is well-known that poor housing contributes to poor health in many ways. The concept of 'adequate resources' and lack thereof also poses some challenges. It is defined in the ESC in the context of access to health care. The definition says that a person lacking adequate resources is one who is unable to secure such resources either by his/her own efforts or from other sources.

The Charter of Fundamental Rights of the European Union (CFREU), which is a legally binding document enshrined in EU law, does not include the concept of right to housing. The CFREU only stipulates that the EU 'recognizes and respects the right to social and housing assistance so as to ensure a decent existence for all those who lack sufficient resources' referring to 'rules laid down by Union law and national laws and practices'. The definition of 'sufficient resources', similarly to the 'adequate resources' mentioned in the European Social Charter, remains unclear. In summary, we should take from this the challenges of defining these contested terms and their effects on policy, as national legislations differ substantially in how they address and define the 'adequacy' of housing and the means necessary to access 'decent' housing.

Further concepts related to adequacy such as *suitability* (*Recommendation of the Commissioner for Human Rights on the Implementation of the Right to Housing*, 2009) appear in documents produced by the Council of Europe in the context of monitoring the implementation of the European Convention on Human Rights and the European Social

Charter. Suitability appears to cover a domain that overlaps with adequacy, explicitly taking into account the suitability of surroundings, accessibility to and from places of work, as well as cultural suitability. The widely used and more practical concept of adequacy ignores the surroundings, either because the related aspects are not deemed essential or because asking governments to comply with them is considered too demanding.

There are also quite a few contested 'rights' that are claimed by philosophers, social scientists, activists, or social movements but have never been recognised by any state or in the framework of any international treaty. Claimed but contested rights include many extended rights to housing or akin rights such as 'the right to the city' as well as some environmental and green rights, which require that housing above and beyond its immediate functionality should provide equitable access to various amenities and resources. In a notable attempt to promote social justice a 'right to the city' was recognised in federal law in Brazil in 2001 (Friendly, 2013). This Brazilian experience seems to remain a unique experiment – a 'universal utopia' (Maricato, 2010) that deserves further study.

### 6.3 – The challenges of measuring homelessness

When it comes to collecting data on homelessness, we must clearly distinguish between different types of data with radically different uses. First of all, we must indicate the data collected through point-in-time studies – for example used by FEANTSA and Foundation Abbé Pierre in their overviews of housing exclusion in Europe. In the latest overview following a year of the COVID-19 pandemic, the minimum number of homeless people sleeping rough or in temporary/emergency accommodation *on any given night* in the European Union was estimated at 700,000 persons (Serme-Morin & Coupechoux, 2021). These data are very valuable for assessing the situation related to homelessness but until this effort is integrated into official national statistics, data will not be systematically available at constant intervals. The special study carried out by Eurostat in 2018 was a step in this direction but remained 'partial and ad-hoc' (Serme-Morin & Coupechoux, 2021).

Statistical data on homelessness can be obtained from various sources, but quite often data collection is not systemic and comparability across time is questionable. There are no comprehensible, internationally comparable data on homelessness for at least two reasons: a) different countries even within the EU use a variety of definitions to identify and count their homeless; b) collecting data about the homeless is not easy. The homeless are one of the most difficult-to-reach social groups. Most surveys do not include collective households such as shelters and other institutions, and therefore, this methodology excludes most categories of homeless from survey data, particularly the roofless and those placed in temporary accommodation.

Various approaches have been used to collect information about people living in homelessness. One of the traditional approaches is to use available administrative data related to services used by homeless persons. For example, Dutch local authorities

initiated cross-sectional reviews to obtain accurate health and needs information on Homeless Service users. The latest UN-Habitat report also calls not to abandon the use of traditional forms of public outreach in order to include segments of the population in surveys, such as the homeless who do not have easy access to smartphones or internet connection (*World Cities Report 2020. Abridged Version, 2020*).

In the following section Nóra Teller (Metropolitan Research Institute, Hungary) gives an overview of the methodologies and practical approaches used in some EU countries to collect information on various categories of homelessness.

#### **Box 6.1: Methodological issues in homelessness research**

With the growing evidence about the linkages of several institutional and structural problems exacerbated by individual pathologies co-resulting in pathways into homelessness, the interest in understanding the phenomena and processes has resulted in a variety of research methods about homelessness (O'Sullivan et al., 2020). The effort to explain homelessness and right to housing requires as a minimum data about various social, economic, and demographic indicators, the availability of affordable housing, the social housing stock, housing subsidies and rent allowance, and benefit schemes. The phenomenon that has to be explained, however, seems to be less straightforward. Basic recurring questions are 'Who is seen as a homeless person?', 'What does home, and thus, homelessness mean?' These questions have a multiplicity of answers depending on the context.

Several attempts have been undertaken in order to overcome the heterogeneity of approaches to understanding the phenomenon of homelessness, and to develop a framework that is suitable for comparative research. In the European context, a cooperation of researchers and housing providers more than a decade ago<sup>6</sup> resulted in the so-far most influential reference framework which can serve as a methodological tool to empirically investigate homelessness. The European Typology of Homelessness (ETHOS) is based on the core idea that homelessness is a situation in which two out of three core domains related to housing and home are missing. The three domains are the 'physical domain' (physical quality of housing is not safe), the 'social domain' (there is lack of control by the individual over privacy and room for socializing), and the 'legal domain' (there is lack of tenure security, or housing is provided within an institutional framework). In order to simplify this rather complicated typology, the so-called ETHOS-Light was developed to match homeless living situations with so-called operational categories that may be counted with quantitative measurement methods.

While general research practice shows that the simplified framework covers more or less most homelessness situations in a variety of European countries, there are some divergences (Busch-Geertsema & Teller, 2021). For example, in some countries, young people who face rather different pathways into homelessness may be included as a specific group, whereas generally, counts focus on adults only; migrants or refugees may be regarded as homeless, while in other countries they are considered to be clients of migration services rather than social services. Furthermore, often women in refugees' or temporary shelters suffering domestic abuse are excluded from being counted as homeless, and so are children who are accounted for under child protection services.

Once the definition of 'who is homeless' is agreed on in a given research framework, the quantitative measurement of homelessness also has to be adjusted to what sort of figure the research is striving to produce. Shall it measure stock, flow, or prevalence, or shall it cover transitionally homeless people (those who rapidly exit and do not return to homelessness), episodically homeless people who have episodic bouts of homelessness, or chronically homeless people, who are generally long-term users of emergency services and/or rough sleepers (Kuhn & Culhane, 1998)? Given these analytical dimensions, the choice of the right data source and method is not easy. Importantly, it should be very clear to both the research community and the audience of any research which limitations the given method has, and what level of reliability it has when discussing issues of homelessness in a given city, region, or country.

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<sup>6</sup> See <https://www.dundee.ac.uk/geddesinstitute/projects/mphasis/>.

It is thus no surprise that existing practice is very rich in terms of what it aims to grasp, how it does so and for whom. A number of countries work primarily with registers of service providers, in others, single point in time, recurring, or even panel counts are organised, whereas in others one-off surveys aim to develop insight into what homelessness is, how it comes about, and what responses are provided for people living in this form of housing exclusion. For example, in the European context, register based data form the backbone of evidence about homelessness in Ireland, in Denmark, and also in France. Point-in-time surveys including focus on profiles are the primary focus of the recurring Hungarian data collection system and in the recently established Bratislava (Slovakia) survey. Head counts are key tools for the Brussels data collection. We have seen attempts of extrapolations from other quality of life and housing surveys and census data, like in Romania, to estimate the number of homeless persons (Fehér & Teller, 2016). In general, however, in most countries we can find a combination of all the above methods, supplemented by qualitative data on characteristics, as illustrated by the recent development in Switzerland. Some countries have up-scaled local counts to regional or national levels, like Germany. A recent publication on homeless counts in Europe describes a few important features of these data collection exercises that are normally organised at city level. The table below, originally published in Drilling et al. (2020), here with some updates, depicts the variety of methods and data collection tools, the frequency, and the coverage of counts across Europe.

Table 6.2: Homeless counts in Europe

City / Country	Year of first / most recent count	Periodicity / No. of counts until 2019	Methods used in the latest count	Data collection tools
Basel (CH)	2018 / 2018	none	- Point-in-time Interviews in the day-care centres - Spotlight street count: observation	- Questionnaire: users of services - Observation protocol: street count
Bratislava (SK)	2016 / 2016	none	- Point-in-time Street count: interviews - Service users count: interviews	- Questionnaire: people sleeping rough or at the night-shelters - Questionnaire: people in homeless shelters
Budapest (HU)	1999 / 2021	Annually (February)	- Survey, part of a nationwide data collection - Partly rough sleeper count	- Self-filled questionnaire for service users and people sleeping rough in contact with outreach teams
Brussels (BE)	2008 / 2021	Biannually	- Point-in-time Street count: observation - Registration data and point-in-time data: people in the accommodation for the homeless	- Observation protocol: street count - Interviews with visitors of the day centres 2 weeks before and on the day after the count

Dublin (IRL)	2007 / 2019 2011	Bi-annual Street Count  Quarterly	- Point-in-time Street count - Monitoring engagement: Housing First Intake Team (HFIT) gather demographic and support need data over time	- Ongoing engagement with individual rough sleepers - Monitoring: multiple interactions with an individual and store information in a Support System
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**Source: Drilling et al., 2020, p. 101**

For example, the evidence gained in the Hungarian context through the “February 3” point in time survey (which in 2021 was organised – in line with COVID related restrictions and the available conditions – as an online data collection), found that over the past few years there are close to 10,000 respondents covered in the survey, 60% of whom are aged over 50. In towns beyond Budapest, rough sleeping has risen – it is normally around 20-40% of all homeless people covered in the survey, and the figures show a large turnover of homeless people. This means that many people keep falling back into destitution, also due to the lack of social services and prevention. Over the past decade, the number of women and the share of Roma among homeless people increased too (Albert et al., 2019).

It is important to note that the “February 3” count is not a census – meaning that service providers and street social workers are encouraged to engage as many clients as possible, but participation is voluntary on both the providers’ and the clients’ side; hence, it provides information only about the actually responding persons as a sample of homeless people, not the full homeless population of Hungary. Neither does it engage with several ETHOS-Light categories like homeless people living temporarily in conventional housing with family and friends (due to lack of housing), and people living in institutions. For the remaining groups included in ETHOS-Light, given the long history and the close contact with people in shelters and also in shacks or living in squats, the outreach teams can achieve a response rate that is high enough to make the data reliable. The two uncounted groups are typical examples of difficult-to-measure groups, and they are also hard to be reached by homeless service providers.

In summary, often the lack of enumeration techniques is the reason behind the ‘exclusion’ of particular groups, that is, behind not including selected groups in the national, regional, or local homelessness figures. Moreover, in larger countries with multi-layered administrative systems and parallel research activities, definitions may also diverge according to selected studies and whether research findings should serve policy formation or legal development. Definitions may also change over time as the face and scope of homelessness may change in a given (welfare) state as well.

*Source: Nóra Teller, Metropolitan Research Institute*

## 6.4 Why and how do people become homeless?

For a long time, homelessness research and policy discussions have been focusing on debating the role of individual versus structural factors (Pleace & Quilgars, 2003). The debate has been motivated by a variety of arguments coming from various fields of research, along with having clear ideological and ethical underpinnings.

Homelessness has historically been correlated with many personal characteristics and individual circumstances such as mental illness or substance abuse (Johnson & Chamberlain, 2011). These arguments form the basis for a ‘person-centred approach’ to homelessness that tends to focus on the individual and their choices, circumstances,



and behaviours. Homelessness is also strongly correlated with conditions such as alcohol dependence and other health problems. In many such cases, the causal relationship is difficult to establish and can be two-way. It is very likely for example that mental illness especially in environments with inadequate support increases greatly the risk of homelessness; conversely homelessness and the feeling of insecurity that it brings can seriously aggravate the course of mental illness. The co-occurrence of homelessness with other social challenges has given the rise to a lot of research focusing on these subgroups of the homeless, which is also reflected in an increased tendency to target sub-populations of the homeless (Pleace & Quilgars, 2003). The development of some of the most widespread approaches to homelessness such as the *Staircase* and *Housing First* models (both discussed in detail later) was initially motivated by the need to address the housing needs of persons who were difficult to accommodate and keep in existing homelessness programmes. In order to avoid stigmatization, it is worth remembering that person-centred approaches often miss or minimize the roles of structural and systemic issues such as unemployment, housing deficits, or lack of welfare support (Tompsett et al., 2003).

Historically, there had been a tendency – more or less overt – in these approaches to homelessness to equate personal traits and circumstances with the direct causes of homelessness and, in doing so, to blame the homeless for their own situation. This finds its clearest expression in the linking of personal characteristics with the perceived moral failings of the homeless: a situation described as a ‘climate where homeless services revolved around the individual's admission of their personal pathologies’ (Wasserman & Clair, 2010, p. 21). It is important to bear in mind that such theories, far from being obsolete, have found their way into influential policies and approaches towards poverty and homelessness, despite the stigma they attach to homeless people. The requirements that beneficiaries of any programme should meet certain conditions fall into the domain of a broader theory of social welfare which expects beneficiaries to ‘deserve’ support in one sense or another. *Deservingness* is not necessarily specified in terms that blame the subjects of such services. It can incorporate a variety of other criteria such as ‘need’ but also arguments related to social justice such as reciprocity, equality, and universalism. Programme selection criteria are rarely formulated directly in these normative terms. Rather, they tend to specify a group of beneficiaries (e.g. a subset of homeless people) for whom the programme will have an effect, while leaving others aside. In the case of homelessness, putting too much weight on personal factors may turn out to be ineffective in practical terms along with being unjust. Trying to change people who have been subject to systematic and long-term disadvantages and injustices may be unlikely to produce the desired result and risks leaving untouched these systematic injustices (Pleace & Quilgars, 2003).

The most extreme approach which is often explicitly based on the assumption that the needy and the homeless in particular do not deserve support is the criminalization of homelessness. There is a long tradition of criminalizing homelessness, i.e. under categories such as begging or vagrancy. This is still the case in many countries around the world, outside Europe: Kalpana Goel and Richa Chowdhary discuss the example of India (Goel & Chowdhary, 2018). However, nowadays criminalization of homelessness is returning in different shapes to Europe as well. In part, through the drive to manage

and police public space in ways that excludes homeless and displaced persons. The development of ‘bum-proof’ benches for example (forms of street architecture that allow an individual to sit down but do not allow one to lie flat and sleep), demonstrates how public spaces are remodelled to be hostile to the homeless.

In Hungary, homelessness, or more precisely rough sleeping in public areas (e.g. in parks or underground areas), was criminalised in 2018, with the intention to get people into shelters. If people are still found by the police as rough sleepers, a fine can be imposed. In cases where individuals are unable to pay the fine, they can be taken into custody. However, the legislation and the penalisation of rough sleeping and homelessness only led to homeless people moving towards the outskirts of cities, resulting in losing their contact with social workers and support services (Albert et al., 2019).

Alongside criminalization homeless groups are often at very high risk of victimization, sometimes motivated by hate. Homeless people on the street are particularly at risk of becoming victims of (right-wing) violence (BAG Wohnungslosenhilfe, 2013).

There is another class of policy schemes focused on the individual beneficiaries’ behaviour that put focuses not so much on personal characteristics but on commitments for future action. A typical example in the field of housing support for the homeless is the *Staircase* model. The *Staircase* model requires people to demonstrate an ability to move from one level of accommodation to another by addressing lifestyle issues, particularly problematic alcohol use.

Structural explanations of homelessness include a large variety of factors related to the way society is structured and governed, the functioning of markets and specifically the workings of the housing and labour markets. In this sense, homelessness is intimately tied to the forms of precarity and precarious housing we have outlined in earlier chapters. In particular, homelessness can be influenced by deinstitutionalization policies, deregulation of the labour market, declining affordable housing options, changing family structures, wage levels, distribution of income and economic inequalities, patriarchal systems, gender relations, and discrimination among many other factors.

Poverty is indisputably among the main correlates of homelessness that forms a vicious loop of causality. It has been demonstrated that providing various types of cash benefits to poor households significantly reduces the risk of homelessness, as well as the duration of periods of homelessness (Haskett et al., 2014). One should bear in mind that affordability could mean different things in the context of different housing models and different policies. From a market perspective, affordability means affordable prices, affordable rents, and the availability of financial instruments to finance housing, as well as the ability to maintain housing and pay utility bills without overburdening the household budget. Outside market models, however, affordability is associated with offering a diverse range of subsidised housing, most often public housing.

All of these institutions and arrangements can lead to exclusion from housing of some groups defined by race, gender, or social standing. For example, if the heterosexual, nuclear family home is held up as the ‘emblematic model of comfort, care and belonging’ (Fortier, 2003, p. 115), this can lead to the exclusion of persons whose identity and way

of life does not conform with this model, including situations referred to as gendered citizenship, contributing to women's homelessness (Zufferey, 2017) and the homelessness of LGBTIQ people. In Europe one in 5 LGBTIQ people experience homelessness (Serme-Morin & Lamas, 2020). 'Gendered citizenship' is a term referring to the masculine bias at citizenship proving that citizenship is not a gender-neutral concept and is related to the gendered nature of housing disadvantage.

Homelessness has also been addressed from the point of view of governance, drawing inspiration from ideas of the school of New Public Management. Boesveldt analyses three key elements of a local governance arrangement: a). policy, consisting of policy-model, policy-goals, and chosen policy-instrumentation; b). structural aspects such as the level of allocation of responsibilities and means, and the composition of the policy network; c). the management style (Boesveldt, 2015). The governance perspective can incorporate policy-models into the aspects that can be changed but within the existing general social order. This stands in contrast to requests for an overall reversal and change of the very fundamentals such as the balance between private and public property in the housing sector or indeed the way in which housing is produced and provided. Institutional mechanisms put in place explain the expansion of services for roofless persons that has contributed to reducing their numbers but as a consequence of which many homeless persons ended up living permanently in shelters. This trend towards institutionalization of homelessness is observed in several European cities including Amsterdam, London, Copenhagen, and Glasgow (Boesveldt, 2015).

This long list of explanations naturally leads to the idea of *intersectionality* as a promising route towards the explanation of homelessness. Intersectionality in this context refers to the complex interaction between many personal characteristics and circumstances, and the socio-economic and institutional environment. The whole debate about homeless people having or not having control over their situation and being overwhelmed by structural factors has led to the establishment of the so-called "new orthodoxy", i.e., the analysis of homelessness that recognizes both individual and structural elements (Pleace, 2016).

## 6.5 Dynamics of homelessness

Recent research from OECD revealed that not being able to maintain adequate housing is mentioned as a concern by more than half of the respondents in OECD countries, which are mostly among the most developed countries of the world, although the topmost worries are falling ill, financial security in old age and long-term care (OECD, 2021). Households in the EU are most affected by pollution (14.9% corresponding to 33.2 million households), 15.5% of households lived in overcrowded conditions, 13.9% lived in damp housing, 10.4% experienced housing costs overburden (FEANTSA, 2021a).

In the European Union, FEANTSA and the Foundation Abbé Pierre estimate that in 2018-2019 the number of homeless people sleeping rough or living in emergency or temporary accommodation was 700,000, which represents a 70% increase in a decade (ibid.). However, much of the available data were collected in a way that requires some disclaimers related to the reliability of the conclusions. For example, some data were collected during a specific week or even a specific date which casts doubt on their overall

validity, whilst the lack of a common definition of homelessness and a standardised statistical European framework also affects how comparable this material is across different national contexts (Serme-Morin & Lamas, 2020).

Data on the situation in the EU also point to an increase in homelessness over the second decade of the 21<sup>st</sup> century following the Global Recession, which was triggered precisely by a collapse of heavily financialised housing markets. The debt and financial crisis which started in 2007-2008 has contributed both to increasing informality and homelessness, thereby creating feedback loops of precariousness as outlined in earlier chapters.

According to the 2020 European Index of Housing Exclusion, worsening of housing exclusion overall has been observed over the last ten years in the countries most severely affected by the economic crisis, including Greece. One in ten households spent over 40% of their income on excessive housing costs in the EU in 2018, 4% experienced severe housing deprivation, with unfit housing conditions remaining a harsh reality for those exposed to them, particularly in Eastern European countries (FEANTSA, 2021b). Children were found to be particularly vulnerable to housing exclusion, while young people with activity limitation were more likely to be overburdened with housing costs.

There could be many reasons for the increasing rates of homelessness in any dimension of the ETHOS typology. A diminishing public housing stock due to privatization (turning public housing into cooperatives) is one of the possible drivers for homelessness. This leads to *gentrification* of areas with public housing – a process that took place even in countries such as Sweden that used to serve as a role model with large public housing sector and housing programmes.

Gentrification is a term first used by Ruth Glass in 1964 in reference to the process of taking over and revitalizing the degraded housing resources in the London Borough of Islington by its middle-class owners. Ruth Glass discerned the impact of the improved living conditions in the gentrified area on ownership conditions, the appreciation of prices of land and houses, and changes in the social class structure (Forys, 2013). When it comes to gentrification, displacement of low-income groups is the other side of the coin which can have many adverse social consequences. Gentrification can influence homelessness indirectly through higher property prices and rents increasing the risks of evictions and displacement for economic reasons (Forys, 2013). Some critical theorists have construed gentrification as involving processes of “un-homing”, which transcend the mere coming (immigration) and going (outmigration) of residents (Edelman, 2020, p. 426, 432).

Starting from the late 1970s and during the 1980s and beyond, extensive neoliberal reforms were carried out, first in the US and the UK, and later across developed countries in Europe and elsewhere. Rolling back many public services and the commitments of the welfare state were part of the policy agenda including the privatisation of the housing stock in public ownership primarily by selling it off to tenants (Harvey, 2005). Expenditure on housing and community amenities on average represents only 0.5-0.6% of the GDP in the EU over the 2010s, which means that housing does not rank among the topmost priorities in developed countries despite the fact that it appears to be a primary concern for many of their citizens.

The austerity policies imposed during the global economic crisis of 2008 also have a direct effect on the ability of central governments and regional authorities and municipalities to provide housing services. Austerity in combination with the economic crisis has a particularly strong impact on cities, which some describe as austerity urbanism (Peck, 2012; Tonkiss, 2013). Austerity policies have reinforced trends that have been observed in previous decades, such as the transfer of responsibilities to lower levels of government and the suspension of national programs to save public funds and reduce taxes (Peck, 2012; Mayer, 2013).

Austerity urbanism, combined with the loss of housing due to the inability of many urban dwellers in different parts of the world to service their mortgages, has sparked a wave of protests, especially in some Southern European countries. Some see this as a crisis from which neoliberalism will not be able to escape, but protest movements have gradually subsided in the second decade of the 21<sup>st</sup> century, and neoliberalism in urban and housing policies in particular continues to generate new ideas despite losing part of its ideological appeal. In these terms, neoliberalism persists as a highly adaptive form of governance, with some arguing that neoliberal ideas ‘mutate’ as they shift into new markets, cities, and states (Callison & Manfredi, 2021).

The restructuring of the economy accompanied by labour market reforms and the increasing "flexibility" of employment have contributed to gentrification and the concentration of households who have ended up on the losing side of massive socio-economic change in Western Europe. In the German case, these driving forces came in the shape of structural crises in coal and steel industries and the so-called Hartz reform on the labour market of the early 2000s, the 4<sup>th</sup> stage of which included a significant reduction of unemployment benefits. These processes have led to rising housing precariousness due to inability to meet housing costs including maintenance costs and deteriorating living conditions (Müller, 2012).

Recently, short-term rental practices promoted by platforms such as Airbnb, HomeAway, Flip Key and Booking.com also have the potential to affect availability and affordability of housing across Europe, including Southern and Eastern Europe (Balampanidis et al., 2021). As demonstrated by the example of Athens, processes of displacement are also gradually unfolding, following the impact of these processes on long-term rental rates (ibid).

Some have argued that informal, second-hand contracts depending on contacts rather than meeting strict eligibility criteria were common in public housing – especially the well-located and with good quality – and that the tenants in inner city public housing anyhow were middle-class people (Andersson & Turner, 2014). However, more recent studies in Sweden have confirmed that conversion of public rental housing into privately-owned housing cooperatives has indeed contributed to gentrification by changing the composition of inhabitants to more educated and younger persons (Andersson & Turner, 2014). The most attractive public property in terms of its tax value is usually the first to be converted. Conversion is only part of ideologically-driven changes in a broad set of policies including social transfers and taxation which have shifted housing away from national programmes to decisions made by local governments. Elsewhere across the EU similar processes have taken place to a varying degree. Despite recent decrease in the



public housing stock, Sweden remains one of the countries in the EU with the smallest registered increase in homelessness of +8% from 2011 to 2017 (FEANTSA, 2021).

Sweden with its large and accessible public housing sector has been long considered a success story for all those who saw many social risks in the commodification and financialisation of the housing markets. In Sweden from the late 2000s, housing legislation has been gradually moving towards increased marketisation, i.e., by municipal housing companies' price-leadership function in overall rent-setting (Christophers, 2013). Starting from the early 1990s with the conversion of public rental housing into market-based cooperative housing, inner city Stockholm has further gentrified. Some researchers hypothesise that at the same time suburban parts of the city experienced residualisation (the inhabitants becoming poorer in relative terms) in the non-converted public housing properties (Andersson & Turner, 2014).

In the early 2010s, massive profit-driven renovations took place in public housing built in the late 1960s and early 1970s as part of the so-called Million Programme (Miljonprogrammet). Renovations were deemed a "technical necessity" and led to the forced displacement of many public housing residents due to significant rent increases (Baeten et al., 2017). Rent hikes in public housing were justified in this case on the basis that they were required to cover the costs for renovation and to reflect the higher value of the property. Both explanations resort to market principles ignoring the social functions performed by public housing. Even for the residents who ultimately managed to cope with the rising housing costs and avoid displacement, the whole process is a source of uncertainty-driven anxiety and precariousness. Whilst at the same time, the displacement of some former residents disrupts and fragments communities and social networks built up over decades of living together. Despite that, Sweden still remains the country with one of the largest share of public housing in the world.

In the Eastern part of Europe, many residents of neighbourhoods built to house workers in declining industries faced the choice between long-term unemployment or migration. Their privatised apartments were not very attractive either for renting or purchase, and many remained vacant in buildings that were difficult to maintain by a decreasing number of inhabitants.

In parallel with industrial decline in the capital cities of some former socialist countries (Poland, Czech Republic, Bulgaria) municipal housing was also steadily declining since the first years of transition to market economy. It is interesting to note that sometimes the selling off of older municipal housing, which is typically of lower quality but better located, went in parallel with the construction of new municipal housing. Prices at which privatization occurred were typically many times lower than the market price and decided arbitrarily by municipal councils. Anecdotal evidence shows that in many cases tenants may have cashed in substantial capital gains due to the purchase while at the same time, the municipalities were left with fewer means to address the needs of other homeless persons (Tsenkova, 2014).

In some of the ex-socialist countries, the homeless face a situation which is close to being a denizen without citizenship and civil rights. This situation is sometimes rooted in the history of homelessness but sometimes is a completely new phenomenon induced by policies implemented by countries of Central and Eastern Europe at the time they

were already members of the EU. Different mechanisms have been at play in the post-socialist era in Central and Eastern Europe which may have contributed to an increase in housing inequality. In particular, privatization and restitution have fuelled problems of affordability as tenants of former municipal housing were driven away from their homes by new private owners (Górczyńska, 2018). Privatization and restitution dramatically decreased the social housing stock and have revived the phenomena of homelessness and squatting. While squatting and homelessness did already exist in the former communist countries, they usually remained unrecorded and unpublished. As the social housing stock was large and available, even when these problems occurred, in the majority of cases they were only temporary (Giteva et al., 2014). However, even in the post-communist period in Romania, Hungary and other Central and Eastern European countries, squatting reportedly remained limited, despite the difficulties to assessing its scope (Hegedüs & Horváth, 2014).

Among former socialist countries after the collapse of the communist regime, Poland stands out with the most rapidly implemented and radical pro-market reforms, including deregulation and privatization. Like in other former socialist countries, state and municipal housing have been privatised at market prices. This led to a sharp reduction in the number of homes for rent. Housing ownership promotion policies face new challenges to affordability related to housing shortages, and hence rising prices that make buying homes very difficult for most households. This puts municipalities under enormous pressure in connection with the constitutional commitment to providing social housing. In Warsaw, in the segment of social housing offering the lowest rent and aimed at the poorest sections of the population, there is a huge shortage, and a long waiting list.

Similar waiting lists exist in other former socialist countries under the influence of almost the same processes of privatization and reduction of the social housing stock. In Bulgaria, this is combined with a lack of housing benefits, except for a very limited number of people accommodated in social housing. After joining the European Union, Bulgaria had the opportunity to build some new municipal housing from European funds. These were typically pilot projects that were not part of a systemic effort to address insufficient supply of affordable housing. Part of the newly built units were offered at rents not much below market price. The shortage of municipal housing significantly limits the ability of municipalities to accommodate people in emergency situations, as well as households that live in unregulated housing or very poor conditions.

In Russia, the very term used to designate the homeless (*bomzh*) is an acronym used by the state apparatus and the police (Russian militia) meaning a person without permanent address (*propiska*), which is required to exercise most citizen rights, including access to health, social services, and benefits (Höjdestrand, 2009). In today's Russia, obtaining a passport remains as difficult as in Soviet times, and many homeless persons are without personal IDs (Kuzmenko, 2009). In Bulgaria, legislation introduced in the early 2010s requires a person to either have a habitable property or permission from a landlord to obtain a permanent address. Persons without a permanent address cannot apply for an ID card and cannot access social services, including services which are meant to address homelessness. By 2020, this has led to an increase in the number of

persons without personal IDs – especially among the homeless and in informal settlements. Persons with no permanent address have no option to register at an administrative address, e.g. of a municipal service or an NGO. Technically, persons without IDs should automatically be considered homeless under the ETHOS typology as they cannot legally conclude contracts for renting or purchasing property and cannot have any legal deeds registered to their name. Permission to obtain documents without having a permanent address can only be granted by a municipal committee working on a case-by-case basis under untransparent rules. A coalition of NGOs has launched a campaign to change the existing legislation.

## 6.6 Policies addressing homelessness

Article 25 of the Universal Declaration of Human Rights adopted by the UN in 1948 states that everyone has the right to a standard of living that is adequate for their health and wellbeing, including access to food, clothing, housing, and medical care. From this perspective, the homeless are denied a fundamental right.

For a long time, homelessness was assumed to be identical with houselessness and housing was therefore perceived as the only solution (Zufferey, 2017). Obviously, such a narrow definition fails to grasp multiple perspectives on what a home means. A home means much more than a house or a roof. As it was discussed in the previous sections, definitions of homelessness are far from standardised, even when it comes to collecting statistical data. They are even more divergent in the context of actual policies implemented around Europe and the world by diverse agents including governments, regional authorities, and non-for-profit organizations to name just the most important ones. It is not possible to provide an overview of housing policies and programmes even within a schematic typological framework. In this section, we will cover two policies in the field of housing – the **Staircase Model** and the **Housing First** (HF) approach. This overview allows a comparative perspective, as HF tends to challenge a lot of assumptions underpinning previous approaches to housing support. This makes HF a debated topic with a lot of arguments and abundant empirical evidence and research on its impact.

### 6.6.1 The Staircase Model

In most of the EU countries where a systemic policy addressing homelessness exists, the social welfare system for responding to homelessness is structured around a housing model in which homeless service users demonstrate their ability to move from one level of accommodation to another, either as part of the rehabilitation process or by acting in accordance with the targets that have been jointly laid down. This model is known as the **Staircase Model**, based on a **gradual approach**. The end goal of the staircase model is independent living – no different than rival models using a substantially different approach such as the Housing First model.

In the Staircase Model, service users must participate in a rehabilitation process and cooperate with the service staff in reaching certain jointly agreed targets. A key idea in the staircase model is to avoid dependency and try to bring the service user to a stage where s/he can start living independently without needing further support. The model

requires the users to demonstrate discipline and a firm determination to resist substance dependence. Other needs are not catered for before a person commits to observing the rules of the programme s/he is involved in.

This gradual approach has been universally applied throughout the Nordic countries, especially in Sweden. Some studies suggest that a high proportion of long-term homeless people have problems with alcohol and/or other drugs (Tainio & Fredriksson, 2009). Not behaving in accordance with defined standards and expectations means almost certainly that a person would be excluded from a service (Tainio & Fredriksson, 2009).

## 6.6.2 Housing First approach

### *HF concept and overview*

There are various ways in which a change in programme philosophy can be justified. This can be done on ideological or ethical grounds, e.g., by insisting that it is fair to provide housing to someone in need without imposing any requirements. But most often evaluation of a programme is focusing on questions of effectiveness framed in behavioural terms, i.e., whether the programme actually leads to better individual and social outcomes. The innovative Housing First model, which first appeared in the US, challenged all aspects of conventional wisdom about homelessness embedded in previous approaches: it challenged their basic assumptions and founding principles, as well as their implementation logic and claims for efficiency.

Housing First was developed in the early 1990s in New York by Sam Tsemberis and was first implemented by not-for-profit organization founded Pathways to Housing founded in 1994 (Wikipedia, 2022). Currently across the US there are many organizations bearing this name, which promote, research and develop the HF model. The first users involved in HF were persons with mental health problems living on the streets, staying in shelters or discharged from psychiatric hospitals. The HF model was gradually expanded to include other categories of users and was adopted widely across the US.

Prior to HF it was believed that beneficiaries of housing-support programmes should not be offered much choice but must adapt to whatever is offered to them in terms of accommodation and care. The grounding principle of HF is that the first support measure for the homeless should be the *unconditional* provision of housing. This immediately puts HF in sharp contrast to any program that applies selection criteria based on personal characteristics or circumstances or makes support conditional on commitments and discipline. In particular, the HF approach ignores considerations of social acceptability of behaviour such as alcoholism and substance abuse, as the very idea of social acceptability is deeply related to theories of moral deservingness.

The idea behind HF is that in order to put an end to homelessness, we need to provide homes. Housing is not the goal or end point here rather, it is the first step on the way back to society. Beyond this simple principle lies a host of additional programme elements that can vary widely across contexts. It is not easy to outline all elements that

are truly essential to the Housing First model as there are a variety of approaches appearing under the heading “Housing First” implemented in different countries. Comparing all different variants, the only element in common is indeed the immediate catering for the housing needs of the beneficiaries without imposing any preliminary requirements.

Already at the end of the 2010s, HF was one of the most thoroughly researched approaches to tackle homelessness with some state-of-art experimental studies that are hardly available for many other housing programmes. The Housing First appears to be a promising model for extending housing support to homeless people facing multiple deprivation. Despite that, some have argued that there is a need for an even more detailed analysis of the elements required in successful ‘housing first’ solutions (Tainio & Fredriksson, 2009).

The HF model supports housing for some groups of homeless that have been considered very difficult to serve and have actually been excluded from many existing housing programmes. The HF model has both theoretical underpinnings and consequences that contradict a lot of the mainstream wisdom concerning housing (Dunn et al., 2013). The HF model was initially known as the Consumer Preference Supported Housing Model (CPSH) (Dunn et al., 2013). The main principles of the HF programme included placement in housing units scattered within communities, rather than concentrated in dedicated social-housing buildings where beneficiaries of supported housing have the chance to live independently. Sobriety and participation in treatment for alcohol abuse or mental illness is voluntary (Dunn et al., 2013). By contrast, under the previous philosophy on which housing support was based both in Europe and the US, participation in treatment programmes and abstaining from alcohol and substance abuse were included as strict conditions. This new approach to mental illness is key to addressing the housing problems of psychiatric patients, as under other approaches they were left with no support or relegated to specialised institutions. Beds in psychiatric hospitals and clinics are not a place that persons with mental illness can recognize as home (Wireman, 2007). This also applies for temporary shelters where sleeping can be difficult especially for people with mental illness. Living as a tenant in mainstream housing is the only option that provides a firm ground for independence and recovery (Wireman, 2007).

Housing First is not underpinned by the assumption that changing beneficiaries’ behaviour first will then change outcomes such an assumption present in other programmes is implicit recognition that the homeless have done something wrong and could be blamed for their situation. Removing this assumption has many implications for the way the beneficiaries are treated: providers were found to treat differently their beneficiaries depending on the programme they implemented. Service providers within HF models display more client-orientedness, i.e., greater endorsement of consumer values and less endorsement of systems values. They also tend to be more tolerant to abnormal behaviour provided it did not result in harm to others (Henwood et al., 2014). In addition, the right to privacy is given much more priority in the Housing Programme, which can be described as essentially non-interventionistic and unintrusive. In many contexts, privacy could be an important aspect of feeling at home. Many types of shelters offered to the homeless have settings that exclude privacy. One of the explanations for



the apparent success of many HF programmes is that individuals who use substances or engage in disruptive behaviour may be more easily housed in private apartments. In collective settings, disruptive behaviour directly affects others, precisely due to the lack of any possibility of privacy (Gulcur et al., 2003). Despite not focusing on behavioural change the Housing First model does actually bring about positive change in consumer behaviour, as documented by case studies (Watson et al., 2013).

The HF model has often been criticised for not putting enough pressure on recipients addicted to alcohol or drugs to participate in various programmes for treatment of substance abuse, thus reducing the chance of better outcomes for them. Studies have found that the motivation to change is the best predictor of positive outcomes of a HF programme for beneficiaries with addictions (Collins, 2012). Motivation to change is a multidimensional psychological construct which represents one's openness to change one's own behaviour, and can change over time. While motivation to change cannot be influenced by imposing formal requirements, it can be elicited and supported by personal contact with the beneficiaries, which indicates that the HF model works best when combined with suitable forms of personalised support available on demand.

In the US, the Housing First approach has been demonstrated to outperform other approaches, in particular The Continuum of Care programme, which similarly to the Staircase approach in Europe, made treatment and sobriety prerequisites for housing. Participants who were randomly assigned to the "Pathways to Housing" program were housed earlier and spent more time stably housed than those in Continuum of Care programs, which made treatment and sobriety prerequisites for housing (Gulcur et al., 2003).

It has been shown that project-based HF intervention in Seattle in the US has led to a significant decrease in the rate of criminal behaviour of recipients who used to have a criminal record. Project-based HF included the provision of immediate, permanent, low-barrier, supportive housing without any requirements for abstinence from substance abuse. A study found that HF exposure was the most important predictor of decreased subsequent jail time in a population of formerly chronically homeless individuals with alcohol problems and extensive criminal records (Clifasefi et al., 2013). In some HF pilot projects around Europe, beneficiaries who had contacts with the criminal justice system in the past were also involved (Glasgow, Amsterdam). In some places (Amsterdam) positive results were reported, though not subject to rigorous proof, assuming that a calmer life and financial stability were conducive to getting over a difficult past (Busch-Geertsema, 2013). More about the specifics of the **Housing First model in European countries** will be discussed in the next section.

### *Housing First in the European Union*

In the 1960s many countries in Europe that had any structured policy for addressing homelessness used to adhere to a system in which homelessness was associated mainly with alcoholism and/or unemployment understood primarily as personal problems. Nowadays it is well understood that trajectories into and out of homelessness are much more complex, involving a lot of structural issues on the labour and housing

markets, the availability of a variety of public services and personal characteristics that interact with the context. The solution was typically found in institutions and temporary shelter homes. In many cases, the homeless were placed in relative isolation from the rest of society – an approach which has led to the institutionalization of the homeless.

Housing First came to Europe after it had already undergone significant testing in the US. A significant body of research had accumulated indicating encouraging results across US and in a variety of contexts (Busch-Geertsema, 2013). While it is still early to say that the overall balance has tipped in favour of Housing First compared to other models such as the Staircase Model, not to speak about countries where no systemic policies to address homelessness exist. The systems addressing homelessness in some Central and Eastern European countries have been defined retrospectively as being based on the staircase paradigm.

In Europe, the Housing First model (as developed by Pathways to Housing) has been tested in environments with various welfare regimes, i.e., in Amsterdam, Copenhagen, Glasgow, and Lisbon, among others (Busch-Geertsema, 2013). Although many pilots in the EU broadly followed the principles set by the original programme of Pathways to Housing, fidelity has never been the main focus, it was neither pursued nor were fidelity tests conducted. In some cities such as Budapest, the programme implemented under the brand Housing First actually deviated significantly from the original one (Busch-Geertsema, 2013). In many respects, European models bearing the name Housing First can be considered innovations in addressing homelessness on their own right. The many adjustments of the programme are sometimes called a 'programme drift' in response to contextual specifics (Busch-Geertsema, 2013). Implementation can differ in many important aspects: the availability and use of social housing or private rental housing, the duration of support and whether it has time limits at all, the availability of cash support and other services.

Implementation of Housing First in Europe has also appeared to contribute to the reduction of severe destitution among the homeless. A Spanish study using a control group found very high housing retention rates 18 months from the start of the programme among participants in Housing First, high satisfaction rates, and a significant decrease in the number of persons who could not meet their basic needs, such as skipping meals or being unable to bathe. The arrival of the HF model in Spain has been quite late, starting with pilots in 2014 (Herrero et al., 2021).

One term sometimes encountered in the assessment of programmes such as HF is 'fidelity', which refers to the way a model is reproduced in different settings. *Fidelity* refers to whether a replicated model is true to the original or has significantly deviated. If the original model has been subject to testing and collection of evidence for a long period of time, the careful replication of all programme features increases the chance of achieving similar results elsewhere. The fear is that 'fundamental philosophy and principles may become 'diluted', thereby reducing programme effectiveness (Housing First England, 2019, p. 5).

If some components of the original model are not present or are significantly modified, this may imply that we are dealing with a different programme and a different approach. When HF is combined with other types of support, questions of congruence also arise,

meaning that the different components must be compatible with each other and reinforce their effects. The spread of the Housing First paradigm in Europe, as with any other sophisticated social programmes, also raised some concerns about *fidelity* but in general European versions of the HF paradigm have had their own distinctive features.

European Housing First models tend to involve a broad set of stakeholders at grassroots level. For example, one of the features of the Finnish Housing First paradigm has been the co-creation at grass-roots level of homelessness services. Finnish-style co-creation takes place by inviting former beneficiaries as ‘experts-by-experience’ into social welfare organisations. Experience-based input is quite empowering and valuable for policy design (Meriluoto, 2018). Similarly, in the Hungarian case of implementing Housing First, giving voice and publicity to homeless persons living in poverty works as a way of empowerment and supports advocacy for wider policy change. Intensive social work is a core component of this Hungarian programmes run by an NGO; unfortunately, due to systemic deficiencies in public services, often this is the only service available, which greatly diminishes the capacity of the program to make a real and sustainable difference.

The next section presents a pilot experience of introducing the Housing First model in Hungary.

**Box 6.2: Piloting the HF principles in Hungary in the context of an inadequate homeless care system**

**Figure 6.2: One-night shelter in Hungary**



Source: Vera Kovács, From Streets to Homes Association

The system is based on three-levels of service provision: street social work and crisis-intervention, one-night shelters, and temporary shelters where people can stay for 1+1 years. One-night shelters (Fig 1) are divided by gender and there are only a very limited number of places where couples or entire families are able to move in together, or even bring in their belongings with them.

This problem also affects temporary shelters: there are very few places that offer more than a small cupboard or locker to store personal items, so people are not able to have their own furniture and devices which leaves them in a hard situation if they were wishing to move out into independent housing.

**Shack-building**

Shack-building actually provides better living conditions for dozens if not hundreds of people than the homeless care system (Fig 1, Fig 3). Shacks are built in and around Budapest, and other bigger cities,

In Hungary, there are probably several thousand people spending most of their nights outside, all year round. Yet in many cases, the official state-funded homeless care system provides shelter of such bad quality or with restrictions on households to move in together that many people are not able to use its services.

**Figure 6.3: Shack-buildings in the vicinity of Budapest**



Source: Vera Kovács, From Streets to Homes Association

and arguably are not much different to housing forms of segregated Roma settlements in North-eastern Hungary, which are considered examples of housing poverty, rather than homelessness.

Shack-dwellers in many cases are able to work, and also to deliver basic household maintenance tasks. In Budapest, there are various street social services which do outreach to shack dwellers. Yet as the homeless care system lacks sustainable solutions for homeless couples and households, the street social service is mostly limited to crisis intervention.

“From Streets to Homes Association” (FSHA) uses an alternative approach to tackle street homelessness. *The Association* published a book on the life of shack-dwellers living around the Eastern and Northern parts of Budapest, mostly in reforested post-industrial surroundings.

The book was based on interviews with shack dwellers. Their life stories show that it sometimes takes a lot to move out from society. It can be dangerous, it can be dehumanizing, and it can cut people off from ways back into society, too.

In many cases, people who later become shack-dwellers have suffered previous traumas, especially abandonment in childhood. The ever stricter criminalization of homelessness left shack-dwellers at a risk of not being able to reach out for help.

**Figure 6.4: Shack-dweller around Budapest**



Source: Vera Kovács

**Figure 6.5: Hungarian shack dweller**

#### *The Housing First response*

Since 2012, FSHA have been helping homeless persons to move into affordable rental housing, especially renovated municipal flats. FSHA combines housing for rough sleepers with advocacy for making affordable housing provision a national policy. FSHA was part of the introduction and promotion of new, cooperation-based social work methods, and the Housing First approach for Hungary.

FHSA renovates vacant, run-down municipal apartments with the help of volunteers, as well as the participation of the homeless families who are then able to move into the apartments as tenants. Besides that, FHSA is also in the process of setting up a social housing management agency to utilize privately owned vacant housing for affordable housing provision.

FSHA both handles municipality owned, and privately owned apartments. Ownership of the apartments is not affected by the renovations, in both cases FHSA cooperates with owners based on a long-term agreement on the usage of apartments, which includes subletting, or choosing tenants. Renovations are funded mostly from private sources but FSHA is also working with municipalities on local housing policies, where municipal resources are involved as well.

Rents are based on the financial capabilities of tenants' households and are normally between 20 and 50 percent of market prices. If a tenant fails to pay, FSHA first offers social work and debt management but terminating the contract is also a final option. Yet 90+ percent of tenants in the programs are still living in their homes.



**Figure 6.6: FSHA clients**



Intensive social work is a fundamental part of the process, in which stable housing is considered the first

*Source: Vera Kovács, From Streets to Homes Association*

step in social reintegration. The goal is to help clients who hardly would have got any other chance to exit homelessness, retain their housing in the long run, and be able to cover their bills on time. Identifying employment opportunities is also essential, as some of the beneficiaries have no regular income upon moving into their new housing.

*The story of Molnár Péterné*

FSHA believes that participation is a key to their work. Their first tenant Molnár Péterné grew to be an activist at one point of her life. She is also funding member of FSHA, her story was broadcasted on nationally broadcasted media. Giving voice to the people affected by social problems is an important part of FSHA's theory of change.

She had spent way more than a decade in her self-built shack in the Terebes Forest in Eastern Budapest. This is one of the most abandoned and dangerous areas of the city, yet there are more than a hundred homeless people living there.

**Figure 6.7: Molnár Péterné in front of her renovated**



*Source: Vera Kovács, From Streets to Homes Association*

In 2012, the local municipality was willing to “clear the area” and that would have included demolishing the huts of the homeless people living there. It would have affected about 20 people. Molnár Péterné was one of them. She was by then close to drawing her pension, with impaired vision. Yet, she decided to fight. “The City is for All” homeless advocacy group put her in contact with social workers. Social workers and activists including fellow homeless persons helped her to go on nationally broadcast media and the activists assisted her in advocating for fair treatment. The shacks were demolished without proper legal processes even before informal building was established as a criminal



offence. Advocates argued that this was obviously discriminative, and that no municipalities would have dared to try to implement this process in any other case of illegal buildings, asserting that because these were low-income residents the municipality has no hesitation in demolishing their properties. Molnár Péterné, with the help of The City is for All and FSHA proved herself right: finally, she received tenancy of an old, abandoned municipality owned house that was actually ruined at the time. Activists and volunteers helped the Molnár's family to renovate it and they live there ever since. They are still living in a level of poverty that is hard to imagine for most of Budapest inhabitants.



FSHA believes that this story validates the use of a Housing First method in Eastern Europe.

Source: Vera Kovács, *From Streets to Homes Association*<sup>7</sup> – Hungary

## 6.7 The future of homelessness

Over time, the very notions of what homelessness are changing. The change is mainly in the direction of including more and more life situations in the definition of homelessness. The 20th and 21st centuries have witnessed changing perceptions of homelessness and creating new indicators to measure the various new manifestations of homelessness. International actors who have made homelessness part of their agenda have become increasingly active. It could even be argued that in the 21st century, international organizations and supranational associations have emerged as the main drivers for creating definitions and collecting statistics on poverty.

Attitudes towards the homeless and understanding the causes of homelessness are also changing. The most common understanding today is that homelessness is due to complex interactions between individual characteristics and structural features of the environment. Such an understanding is at odds with a long tradition of moral condemnation or even criminalization of homelessness. Changing attitudes towards the homeless and shifting theories about the causes of homelessness lead to the establishment of new practices and services for the homeless. At the end of the 20th century, innovative models were born, such as Housing First, which provided housing to the homeless without any preconditions, that is, without requiring them to behave in certain socially acceptable ways in order to earn their right to housing. This new approach is no doubt rooted in empirically validated understandings of human motivation and behaviour. But at the same time, it is based on the belief that housing is an inalienable right.

Despite progress, innovative models such as Housing First still occupy a small niche among homelessness policies, even in the Global North, where they are most prevalent. In the Global South, powerful economic and demographic processes have left many

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<sup>7</sup> Additional Information about From Streets to Homes Association is accessible at: [www.facebook.com/utcarollakasba](http://www.facebook.com/utcarollakasba) and [www.utcarollakasba.hu](http://www.utcarollakasba.hu).

governments and other actors struggling to provide even basic services such as shelter for the homeless. In times of economic crisis or political transformation, homelessness at least in some periods is increasing even in some of the most developed countries in the world.

A recent collection of essays by lead researchers in the field of homelessness focused on the possible transformations of this acute social phenomenon in the near future. The essayistic visions cover a large spectrum of possible worlds including the eradication of homelessness in the very near future through the upscaling of innovations such as Housing First, the creation of brand-new service models and complete cessation of evictions (Lassy & Turunen, 2019). The very idea that within a decade something decisively different will happen with a social phenomenon that has existed for millennia is very audacious.

Homelessness will very likely remain a social and economic reality and a hot political topic for quite some time. It will enjoy the unwavering attention of pragmatic technocrats while providing fresh inspiration for utopian and dystopian visions of the future.

## At a glance

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### Key points

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- Being homeless has changed over time by including new situations and circumstances. Previously homelessness used to be equated to rooflessness.
  - New definitions of homelessness have been developed in the EU covering an increasing number of countries.
  - In Europe attitudes towards the homeless are also changing gradually over the last several decades. Moral blaming and criminalization gave way to more tolerant attitudes.
  - Understanding about the causes of homelessness is also changing to include many circumstances related to the social environment and policies. Previously homelessness was explained primarily by personal traits of the homeless.
  - Data on homelessness remain difficult to collect in a systemic way. In the EU the bulk of data is still collected through occasional surveys rather than by official statistics.
  - Rates of homelessness have been decreasing historically. However even in the most developed countries there are still periods when homelessness is rising.
  - From a global perspective there is little indication that homelessness may disappear any time soon.
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### Start thinking

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- Use some of the sources listed in the 'Learn more' section below or other relevant ones of your choice to present different perspectives on what causes homelessness. Try to think in what way these perspectives differ.
  - Look for some words or terms describing homelessness or forms thereof in English or another language you know. What do these words reveal about views on homelessness? What kind of feelings, attitudes, values, do they display? What understandings of homelessness do they omit?
  - Which do you think are the strengths and weaknesses of various existing explanations/theories concerning the observable trends in homelessness?
  - Think about a concrete case of a homeless person or family that you know about from your personal experience or that you have heard or read about. Reflect about the circumstances that have made this person or a family homeless. Is there a way out of homelessness for them?
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### Learn more

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Have a look at our corresponding e-module: <https://mdl.donau-uni.ac.at/push/mod/page/view.php?id=101>

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