
Shrinking Social Housing Stocks as a Barrier to the Eradication of Homelessness: The Cases of Germany, Finland, the United Kingdom and Spain

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➤ **Abstract** *This article is based on research aimed at reassessing the role of social housing in the 21st century. Beyond the debate among researchers, policy-makers and social organisations on the Housing First model of intervention for homeless people, or on measures to prevent evictions, the fundamental debate on the existence and expansion of the social housing stock has largely been abandoned. This research shows that public administrations are losing their capacity to address homelessness as a consequence of both the steady reduction of social housing stocks and their residualisation. In addition, the system of social housing provision still fails to cover certain kinds of homeless situations. Therefore, the article argues for a full rethinking of the social housing system, from planning, regulation, production and funding to the mechanisms of allocation, with the aim of incorporating new accompaniment systems adapted to the needs of tenants, thus ensuring the affordability, continuity, safety and adequacy of housing. A different social housing system is possible.*

➤ **Keywords** *Social housing, residualisation, comparative housing policy*

Introduction

From World War II to the present, housing policies in Europe have changed in terms of both goals and instruments. Housing has increasingly been understood as a market asset, and intervention by the public administration has shifted from the direct 'provision' of social housing to a focus on 'facilitating' access to housing market through counselling services or financial assistance. In parallel, there has been a shift from a generalist provision of social housing to broad sections of society to a focus on targeting aid to the needy (Sánchez, 2010). At the same time, in some countries, traditional models of homelessness intervention are being rethought or replaced by new models that understand housing as an essential factor in the pathways out of homelessness. Intervention models are being reoriented in order to relieve, stabilise and rehabilitate homelessness through temporary residential resources. This is a modern model based on preventing homelessness and providing prompt and non-conditional access to permanent housing with support services (Pleace, 2011).

From a social perspective, several factors are leading to an imminent scenario of a rising need for affordable housing: growing unemployment and, especially, long-term unemployment; persistent high levels of youth unemployment; the increasing risk of poverty and social exclusion in the EU (European Commission, 2013); and the recent refugee humanitarian crisis. In addition, at the European level, homelessness is a reality that in recent years has grown considerably in most countries (FEANTSA, 2012; Social Protection Committee, 2013). Consequently, in the current context the problem lies in the fact that, while housing is identified as key to the processes out of homelessness, the housing policies of EU Member States are not promoting social housing. Instead, they are reducing its weight relative to the overall housing stock, which, I argue, ultimately affects the ability of administrations to tackle homelessness with residential resources and generates dependency on the private rental sector. In turn, the private rental sector responds to the economic interests and dynamics of the housing market and is not necessarily oriented towards the fulfilment of the right to housing. This article relies on

previous research¹ on the access of homeless people to social housing in Germany, Finland, the United Kingdom and Spain. Our previous research examined the relationship between levels of homelessness and the size of social housing stock, as well as the impact of homelessness strategies, and barriers to social housing faced by those deprived of a home. Starting from this point, the paper focuses on social housing trends and their impact on social housing access for homeless people.

Social Housing in the European Framework

"Under EU law, the right to accommodation is a fundamental right guaranteed under Article 7 of the Charter that the referring court must take into consideration when implementing Directive 93/13", which relates to unfair terms in consumer contracts. A judgment by the Court of Justice of the European Union (Third Chamber) from 10 September 2014 puts it thus very clearly and sets a key milestone in the development of housing rights in Europe.² The judgment builds on jurisprudence from the European Court of Human Rights and adopts an approach deriving from the recognition of the right to housing assistance in Article 34 of the Charter of Fundamental Rights of the European Union, in Articles 30 and 31 of the Revised European Social Charter adopted by the Council of Europe, and in Article 25 of the Universal Declaration of Human Rights on the right to housing, as well as in the constitutions of many Member States (Kenna, 2011). In 2008, the Commissioner for Human Rights of the Council of Europe, Mr Thomas Hammarberg, shed light on the legal protection of housing rights and the related obstacles and gaps in implementation, with recommendations on how these rights are to be realised. One of the conclusions was that a national strategy for implementing housing rights in accord-

¹ This paper includes a part of its author's PhD dissertation, 'El acceso de las personas sin hogar a la vivienda social. Estudio de casos: Alemania, Finlandia, Reino Unido y España' [Homeless People's Access to Social Housing. Case Studies in Germany, Finland, UK and Spain] deposited at the Universidad Autónoma de Barcelona. At the methodological level, the dissertation was based on a qualitative and quantitative investigation to develop a comparative analysis, which used a case study methodology to select the four countries compared. This work involved conducting field research in each of the selected countries. We collected extensive information on the object of study, complemented with a total of 23 interviews with people related to the problem of homelessness (whose contribution is warmly acknowledged). Interviewees come from different backgrounds, including some with political and technical profiles in the administration, staff from social agencies and social housing providers, scholars and expert researchers, and homeless people who explained their life experience. All of them responded to structured interviews. This research is not free from important limitations in terms of comparison, definitions, multilevel agency or language problems.

² Judgment. <http://curia.europa.eu/juris/document/document.jsf?docid=157486&doclang=EN>

ance with international human rights instruments and recommendations should include “sufficient, accessible, affordable and appropriate social housing across Europe for those excluded from the housing market”.³

According to the European Commission (EC), housing policies are entrusted to each Member State, so the role of that institution is confined to ensuring fair competition and the enforcement of the rules of the internal market. For the EC, social housing is a service that provides an essential safety net for citizens and helps to promote social cohesion (European Commission, 2011). Access to services of general economic interest is one of the rights recognised by the Charter of Fundamental Rights of the European Union (Art. 36) in order to promote social and territorial cohesion within the EU (Ponce and Fernández, 2010). In Europe, social housing is considered a service of general economic interest. The EU's Court of Justice ruled, in its judgement of 8 May 2013 on the joint cases C-197/11 and C-203/11, that social housing constitutes a service of general economic interest. These cases addressed preliminary rulings by the Belgian Constitutional Court on fundamental matters related to the articulation and development of social housing policies in the European Union, including the consideration of social housing policies as non-economic services of general interest (Tejedor, 2013). The conclusion is clear and consistent with previous judgements: the Court of Justice rules that the public provision of social housing, either directly or setting up public service obligations in specific cases, are “a fundamental interest of society” and “constitute overriding reasons in the public interest” (ruling on the SHLM case, § 28 and 30, 1 February 2001).

In its resolution of 11 June 2013 on social housing in the European Union, the European Parliament emphasised that social housing policy must be considered an integral part of services of general economic interest, as it helps to meet housing needs. The resolution makes references to, among other things, the written declaration of 22 April 2008 on ending street homelessness and that of 16 December 2010 on an EU homelessness strategy, the final recommendations of the European Consensus Conference on Homelessness of 9 and 10 December 2010, and the resolution of 14 September 2011 on an EU Homelessness Strategy.

Each country defines its own system of social housing, enjoying wide leeway in creating the relevant criteria and conditions for access, the priority target populations, funding systems, regimes of tenancy, and the pertinent property or rental regulations. According to CECODHAS Housing Europe (the European Social Housing Observatory), despite the diversity of social housing systems in Europe, it is possible to identify common elements (Czischke and Pittini, 2007). All social

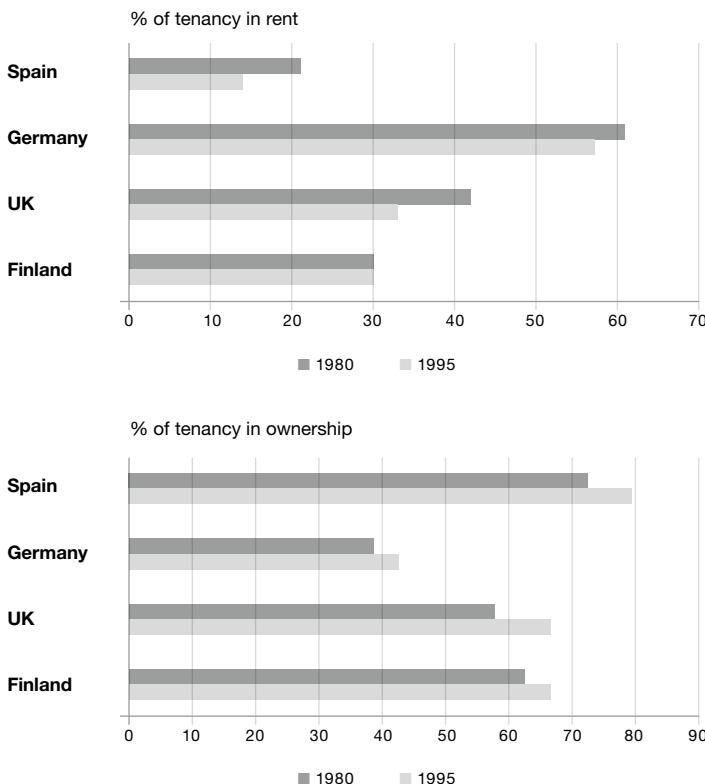
³ Commissioner for Human Rights (2008) *Housing Rights: The Duty to Ensure Housing for All*, CommDH/IssuePaper (2008)1 (Strasbourg: Council of Europe).

housing systems take into account the general interest in their mission; they are aimed at increasing the supply of affordable housing through the construction, management, acquisition or leasing of social housing; and they are oriented towards certain groups according to some criteria of need. Concerns with security of tenancy and housing quality are also common features of the different social housing systems.

The European Social Housing Observatory developed a classification showing the differences and similarities between social housing allocation systems in different countries. This classification distinguishes between a ‘universal model’ and a ‘targeted model’. In the first model, social housing is seen as public utility housing that belongs to the social welfare system, and it is intended to accommodate the whole population in affordable housing that complies with certain quality standards. In addition, the social housing system must regulate the trends of the market. The ‘targeted model’ of social housing assumes that the market is the main mechanism of housing allocation and those whose housing needs are not covered by the market will be granted the opportunity to apply for social housing. For the countries that develop a targeted model due to problems accessing the housing market, some focus on the provision of low or medium-wage units, targeted at the working population or middle classes unable to afford market prices. In other countries, the focus is on the most vulnerable or those excluded from the housing market, such as recipients of unemployment benefits and people relying on social welfare. Some countries combine both allocation criteria. Ghekière (2007) labels the first subgroup the ‘generalist model’ and the second the ‘residual model’. Beyond the differences in allocation systems, the size of the housing stock shows the relative importance of social housing systems within the housing policies of each country.

Reducing and Residualising the Social Housing Stock

From the early 1980s to the mid-1990s a change took place in the orientation and the conceptualisation of housing policy and the function of social housing. The construction of the economic and political project of the European Union led to: a) restrictions on the role of the state in strategic sectors such as energy, transportation, infrastructure and telecommunications; b) the promotion of privatisation and processes of deregulation of trade, the labour market and finance; and c) significant budget cutbacks in social spending. In particular, housing policy experienced budget cuts, the privatization of the social housing stock, and a change of political orientation to the promotion of property ownership as the preferred tenancy regime.

Figure 1: Tenancy Regimes: Property Ownership and Rental, 1980–1995

Source: Based on Boverket (2005)

As pointed out by Sánchez (2010), in the 1980s and early 1990s, European countries showed major differences in public spending on housing. For instance, the United Kingdom spent in excess of 3% of its GDP on housing while Spain spent less than 1%, and Germany and Finland spent roughly 1.4% and 1.5%, respectively. However, in the first half of the 2000s there was a convergence in public spending on housing, generated not by *increased* expenditure in less generous countries, but rather by shrinking levels of spending in the most generous ones.

In England, for example, monitoring reports show a significant reduction in economic support for homelessness policies (down 26% in three years), compounded by significant budgetary cuts due to the Welfare Reform Act, 2012 and the Localism Act, 2011; this has increased pressure on homelessness services at the local level (Fitzpatrick *et al.*, 2015). The reform of housing aid schemes such as the Local Housing Allowance and the Shared Accommodation Rate has exac-

erbated the difficulties of relocating homeless or low-income people through the private rental market. These aids related to the housing welfare system have been reduced by 46% over five years. Additionally, monitoring reports underline a consequential change in the Supporting People programmes; as their budget is no longer conditional on spending on specific projects, municipalities can allocate their budget at will.

In Finland, budgetary cuts have not directly affected services to homeless people or the PAAVO I and II national strategies, but in 2015 the new government initiated major cutbacks in social and health spending, which could indirectly affect support services related to the provision of housing to homeless people.

In the United Kingdom, a constant and common feature in all regions has been the reduction of the social housing stock, in particular stock belonging to local administrations. Scotland has, proportionately, a considerably larger social housing sector than England, Northern Ireland or Wales and is the only region where the share of social housing owned by local administrations exceeds 50% (Fitzpatrick *et al.*, 2012). In addition to the reduced construction of social housing, this also caused a significant transfer of social housing stock to housing associations (RSL in Scotland), not to mention the introduction of the so-called 'right to buy', introduced in the 1980s.

In Germany, as explained by Egner (2011), the rise to power of the conservative government and the implementation of neoliberal housing policies were not the only factors in the abandoning of social housing as an instrument of housing policy. In 1980, a political consensus was reached that the existing social housing stock was sufficient in light of the number of applicants, with the exception of some towns or metropolitan areas with higher levels of economic activity and bigger populations. The social housing system was considered flexible enough to cope with internal migratory fluxes between most rural areas and big towns. The number of neighbourhoods with concentrated social housing, where unemployment and immigration levels were high, expanded, and social housing became identified with vandalism and marginality in the collective imagination; these were the so-called 'social hotspots' (*Sozialer Brennpunkte*). As a consequence of these developments, the 1990s saw an intensification of the privatization of social housing, as most social housing stock owned by municipalities and cooperatives in East Germany was sold. In the former West Germany, hundreds of thousands of social housing units reached the end of the term during which they were subject to social restrictions, and all of them became part of the private rental stock, free from the usual mechanisms of price control applied to the rental of public housing (Busch-Geertsema, 2000).

In Spain, housing policy during the Francoist dictatorship was characterised by the promotion of ownership as an instrument of economic and employment policy, but also as a social control mechanism that eased governance: ownership generated dependency in terms of income needs, a higher level of local self-identification, a lesser degree of mobility, and a more ‘integrated’ society made up of owners. Consequently, the stock of public rented housing was privatised through programmes granting deferred access to ownership. This policy of selling social housing to its tenants resolved both the issue of complaints about the quality of housing, very common in working class districts, and management problems related to non-payment of rent, which was also very common and entailed no legal consequences (Leal, 2005).

In Finland, in the 1970s and 1980s, insurance companies and industrial enterprises developed rental housing, but they later sold most of their housing stock.

These policies were not developed in the same fashion or with the same intensity in all countries. For instance, in the United Kingdom, the right-to-buy policy led to an individualised privatisation of the social housing stock, whereas in Germany, social housing was mainly acquired by companies and organisations. During the 1980s, in a similar vein to the British right to buy, Finland introduced the possibility of purchasing a rental social housing unit if the owner agreed and the term of protected tenancy had ended. The selling price had to be set by the municipality and any profit margin had to be handed over to the central government. At the same time, housing construction loans shrank in the context of the economic crisis, so alternative residential solutions were sought, such as increasing the supply of private rental housing and introducing new tenancy statuses based on intermediate tenancies (ARA, 2005). During the 1980s and 1990s, housing policy shifted away from a focus on the provision of housing and responding to accommodation needs, towards a drive to facilitate access to housing for social segments unable to afford market prices, as well as excluded social sectors. Both private rental and social rental lost prominence as tenancy regimes, while ownership was promoted.

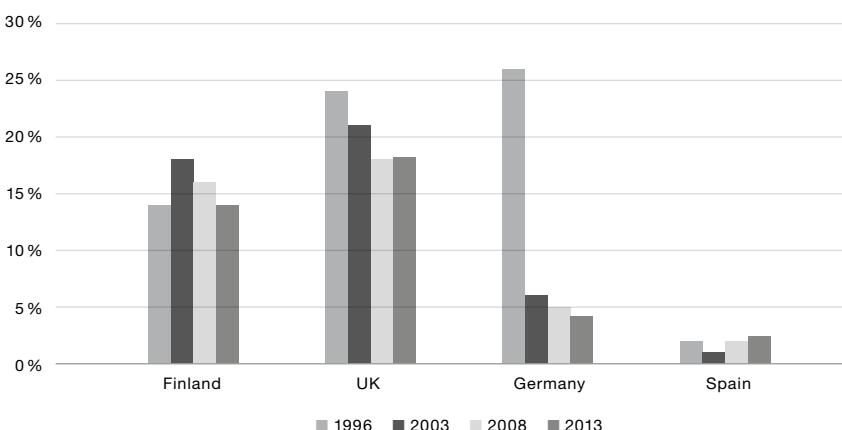
Changing tenures

Some of the structural patterns that have dominated housing provision systems since the beginning of the 21st century are now showing signs of change, mainly due to the impact of the latest financial crisis. The private rental sector is gaining momentum in countries where it used to enjoy less prominence, such as Spain and the United Kingdom, while Germany and Finland show a slight increase in ownership. The United Kingdom has gradually encouraged the private rental sector while continuing to reduce the size of social rental stock, in England, in particular; there, in 2014, private rental units represented 19.6% of the overall housing stock – the highest figure since 1961. In England, a new type of social housing is being

developed: ‘affordable rent’ below market prices. This could change the trend of the constantly reducing social rental sector that started in the 1980s, although this tenure type does not target the excluded or poor population.

In Germany, despite the prominence of rental as a tenancy system, ownership has been gaining ground. In 2001, the Housing Promotion Act (*Wohnbauförderungsgesetz*) brought about a paradigm change in housing policy. It has now shifted towards the rehabilitation of buildings and areas with a high level of social housing, while the new social housing allocation system focuses specifically on vulnerable groups. Since 2006, the federation has been devolving social housing policy powers to the *Länder* (federated states), although it has kept basic powers, such as the regulation of the rental market and the systems of residential aid. With the devolution of power, the *Länder* have become responsible for funding and implementing policies of promotion, conservation, renovation or sale of social housing. With this development, the federal government ceased collecting national social housing statistics, and there is now a lack of official data. The Federal Ministry of Transportation, Construction and Urban Development – in response to a parliamentary question by MP Caren Lay (Die Linke party) on the 31 July 2012 – reported that the number of social housing units at the end of 2010 amounted to 1.66 million in Germany as a whole (Cornelius and Rzeznik, 2014), representing some 4.2% of the total housing stock. This parliamentary question helped to uncover the fact that the German social housing stock had shrunk by 32.7% between 2002 and 2010.

Figure 2: Evolution of Social Rental, 1996-2013



Sources: Ghekière (2007); 1996 data by OVV (2009); Pittini and Laino (2011); Pittini *et al.* (2015)

Consequently, cross-national differences in the sizes of the social housing stock in 2013 are accounted for by the distinctive evolution of socio-political and economic contexts, leading to a dissimilar development of the respective housing provision systems. Regarding tenancy regimes, in 2013 ownership represented a majority in all the countries studied except Germany, where rental is still the main tenancy regime (54.6%). The Spanish case shows a disproportionate disparity between property and rental, as rental housing represents only 15.9% of the market, while in the United Kingdom and Finland this figure doubles (35% and 30%, respectively). If we make a distinction between private rental and social or below-market rental, we observe that Germany and Spain show very low levels of social rental (4.2% and 2.4%, respectively), while private rental dominates in both countries. Nevertheless, it should be noted that the German private rental market represents a share almost five times that of the Spanish one (50.4% vs. 13.5%) and is characterized by a greater degree of protection of the rights of tenants. In Finland and the United Kingdom, both sectors are balanced, although in 2013 in the UK, social rental was more prevalent than private rental (18.2% and 17.6%, respectively); in Finland, though, it was the other way around (16% for private rental and 14% for social rental).

Tensions in the rental market

It should be noted that nowadays, all four countries are experiencing tensions in the housing market, especially in the rental market. In England in September 2015, the annual growth rate of average private sector rents in London increased to 4.2% while rent levels were about twice the national average.⁴ Large towns and urban areas in Germany show a shortage of affordable rental housing. According to estimates by the DMB (Deutscher Mieterbund), in 2012 the housing stock fell short of the population's needs by 250,000 housing units,⁵ primarily in cities such as Munich, Frankfurt and Hamburg. Some cities, like Berlin, apply price control mechanisms to the rental market but also have a significant shortage of affordable housing "due to the expiration of the commitment clauses following repayment of the financing for subsidized housing" (Cornelius and Rzeznik, 2014).

In Finland, according to the conclusions of the study that evaluated the Programme to Reduce Long-term Homelessness 2008–2015 (PAAVO I and II), there is still a serious shortage of affordable rental housing, especially in the Helsinki area. Even though the social housing production supported by municipalities and the Y-Foundation has improved the situation in the Helsinki area, the shortage of suitable housing is threatening to undermine other aspects of homelessness work (Pleace *et al.*, 2015). In Spain in 2005, the construction of housing units exceeded

⁴ London Housing Market Report (2015) <https://data.london.gov.uk/housingmarket/>

⁵ DMB (2012) *Mieterrechte stärken, nicht abbauen*, Press Release, 6 December 2012.

that of France, Germany and the United Kingdom combined. Due to the 2008 financial crisis, many new housing units were left unoccupied, which – combined with the historical shortage of rental housing, the affordability crisis, difficulties in qualifying for a mortgage, low interest rates and historically low profitability rates – has led many investors to turn to housing, acquiring real estate and renting it out. Rental prices are growing significantly in Spain, especially in large cities such as Barcelona, which is currently the most expensive city to rent in.

Changes in social housing allocation

The recent evolution in housing provision systems shows important variations in the systems of social housing allocation. In the four countries studied, social housing systems target those who cannot satisfy their housing needs through the conventional housing market, although they differ in how they do this. Finland has taken steps to transform its social housing allocation from a generalist to a universal system; for instance, economic requisites have been dropped. However, within the framework of the national strategy against homelessness (PAAVO I – PAAVO II) and in the context of shrinking social housing stock, priority access for long-term homeless people has led to a growing trend of residualisation of homelessness policy.

Germany has opted for a generalist model of social housing, where the eligibility of people or cohabiting couples is mainly based on maximum income thresholds. Conversely, the United Kingdom, while traditionally oriented towards a residual system targeting the most vulnerable groups, has recently introduced some new social housing types: rent for so-called ‘affordable rental’ is more expensive than social housing but this housing type is targeted at population segments unable to afford market prices. Germany also provides for the direct allocation of social housing by municipalities to the most vulnerable groups. The promotion supports low-income households in particular, as well as families and other households with children, single parents, pregnant women and elderly, homeless or other needy persons.

Nevertheless, in the context of a sharply reducing the housing stock, the residualisation trend is worsening. In Spain, the so-called ‘officially-protected housing’ policy (*vivienda de protección oficial*, VPO), which favours ownership, could be categorised as a generalist rather than a residual model. Bearing in mind that, in Spain, social housing means rental VPO, it could be said that social housing has been traditionally oriented towards the most vulnerable groups, as protected rental housing is especially used to relocate specific groups. It should be noted that Finland, Germany, and the United Kingdom specifically consider homeless people a priority group for access to social housing, while in Spain this priority group is diluted among the different types of cases channelled through the social services. In Finland, the provision of social housing to homeless people has also experienced a certain degree of residualisation because, of all homeless people, priority has

been given to those in a situation of chronic street homelessness. In Germany and England, although both countries have an instrument of priority allocation for homeless people at the municipal level, their chances of accessing social housing are scarce, especially if they live alone.

Table 1: Systems of Social Housing Allocation, 2003-2013

	ALLOCATION CRITERIA		
	Universal	Targeted	
		General	Residual
SIZE OF SOCIAL RENTAL HOUSING	> 20%		UK
	15% > 20%		Finland
	10% > 15%		
	5% > 10%		Germany
	0% > 5%		Spain

Source: Based on Ghekière (2007); Pittini and Laino (2011); Pittini et al. (2015)

In short, we have witnessed severe reductions in social housing stocks – with the exception of Spain, which had started from a very low base. In all of those countries, we can identify a trend of residualisation in the systems of social housing allocation. The declining social housing stock in the countries studied is used to deal with emergency and urgent situations. As housing stocks shrink, situations of need are exacerbated and spread across very different social groups. In this context, administrations prioritise emergency situations. Such residualisation of the social housing stock shifts priority to new emergency situations, while some forms of homelessness, especially street homelessness, remain unaddressed.

Obstacles to Social Housing for Homeless Individuals

Twenty-three expert respondents from the four countries selected were asked to outline the pathways to social housing that their respective country would offer to someone with the following characteristics (a ‘typical case’): a homeless person, male, older than 40 years of age, living alone on the streets and unemployed for years, in severe need of social aid to address problems related to mental health or drugs or alcohol abuse. This methodology had already been used in other research on homelessness, which supports its validity (Pleace *et al.*, 2011). The following table synthesises the barriers detected in each country studied for the aforementioned typical-case. ‘Yes’ means this item represents a barrier; ‘No’ means it does not; and ‘Partial’ means that the item needs clarification, as it depends on the particular case.

Table 2: Obstacles to Social Housing for Homeless People (as defined in the typical case)

OBSTACLES FOR STREET HOMELESS PEOPLE (CASE TYPE)		UK	FINLAND	GERMANY	SPAIN
Structural	Ladder approach	Partial	No	Yes	Yes
	Public housing scarcity	Yes	No	Yes	Yes
	Administrative status	Yes	Yes	Yes	Yes
Institutional	Local ties	Yes	No	No	Yes
	Income limits	Yes	No	Yes	Yes
	Debtors lists including rent debts	Yes	No	Yes	No
	Already occupies a housing resource	Partial	No	Partial	Partial
Relational	Anti-social behaviour	Yes	No	Yes	Partial
	Social mix	Yes	No	Yes	No
Individual	Person suffering from drug abuse or mental health problems	Yes	No	Yes	Yes

Source: compiled by the author

The table above shows that Finland is the country where our case type meets the fewest barriers. As the ‘typical case’ involves a chronically homeless person, he or she actually falls into the very category targeted by the national homelessness strategies PAAVO I and II. Consequently, the homeless person in a typical case can be granted social housing or a social housing unit with support services directly and as soon as possible. In the other countries, the person in a typical case would face difficulties accessing social housing. It should be mentioned that, as an exception, in Scotland the homelessness legislation establishes that someone in our typical case *would* be covered and entitled to access social housing with support services. However, the prevalence of the ladder approach prevents the direct access of homeless people to social housing in Germany, Spain and England. In the Spanish case, there is no consensus on the stability of the resources that can be accessed by homeless people living on the streets, and a treatment-first approach is applied. The Catalogue of State Social Services only includes temporary resources for homeless people, and the scarcity of social housing makes access to housing units a privilege vis-à-vis other vulnerable groups.

This is consistent with the evolution of chronic homelessness levels in each country. In Finland, the long-term or chronic homeless population fell by more than 1,000 individuals between 2008 and 2014 (32%) as a result of the PAAVO I and II strategies. In the Scottish case, the Housing (Scotland) Act 2001 and the Homelessness (Scotland) Act 2003 expanded the rights of street homeless people, introducing new obligations for local administrations. In Scotland, the number of street homeless people was reduced by more than 1,000 people (49%) between 2009/2010 and 2014/2015. The number of long-term street homeless people was also considerably reduced from 2009 to 2012, but increased slightly (35 individuals) in 2013 and 2014. This is not the case in England, where in 2014/2015, 7,581 people were found to be sleeping on the streets of London, amounting to a 16% increase when compared to the previous year. From 2010 to 2014, England saw an increase in homelessness due to new cases, relapses into homelessness and cases of people living on the streets for more than two years. Between 2005 and 2012, the homeless population in Spain showed a 4.8% increase. Moreover, individuals lacking accommodation of their own for more than three years (as a share of the total homeless population) surged from 37.5% in 2005 to 44.5% in 2012. This trend is reinforced by increases in street homeless people, as detected in night counts in Barcelona, Madrid, Zaragoza, Bilbao and Donostia.

For all countries, people interviewed for this research mentioned the scarcity of social housing as a problem when it comes to addressing the needs of homeless people, although in differing senses. In Germany, the scarcity of social housing is reducing the responsiveness of municipalities in cases of an imminent loss of residence and the subsequent need for rehousing. Consequently, the bases of the

prevention system are being weakened. In Finland, top priority is given to granting access to social housing or to housing units with support services to long-term homeless people. Consequently, our case type would enjoy priority access to the necessary residential resources. Our interviewees have stressed that the other categories of homeless people (in particular, the 'temporarily living with friends or family' category), as well as a sizable part of the population as a whole, are affected by the inability of government to provide a sufficient stock of affordable social housing, especially in the Helsinki metropolitan area. In England, the private rental market has become a revolving door. On the one hand, this is the first instrument used to respond to the public duty to aid legally recognised homeless people. On the other hand, the required minimum contract term of six or 12 months implies that the end of the term leads to the filing of an application for social housing as provided by the law. In the case of Spain, social housing scarcity is structural, as this country has never enjoyed an extensive social housing stock, thus exacerbating the same problems faced by other countries, both in the rehousing of cohabitating couples being evicted, and in terms of providing accommodation for homeless people. There is also the problem of managing social housing in Spain, where there are no operators with such a long-standing tradition and nationwide presence as the Y-Foundation in Finland, the Housing Associations and the Registered Social Landlords in the United Kingdom, or the German non-profit companies.

All four countries studied currently show a severe shortfall of affordable housing, which the housing market fails to provide. An expansion of the social housing stock is unlikely in Germany and the United Kingdom, because, in political terms, both countries have mostly abandoned the very notion that social housing is necessary, and the current context of post-real estate crisis and budget cutbacks do not offer a different prospect for the coming years. Furthermore, it is known that the problem does not lie only in the scarcity of social housing, but also in the fact that there is no country where the supply of social housing matches the needs of the demand side. In Finland, Spain, the United Kingdom and, to a lesser extent, Germany, social housing is perceived as expensive. Often, social housing units have been built according to high quality standards and in low-demand areas, resulting in a social housing sector that out-prices the local market.

In the United Kingdom, especially in England, there is a shortage of accommodation for homeless people living alone and for large families, which represents indirect discrimination: in some cases, because of the very social condition of the potential beneficiaries, in others because the problem has a greater impact on certain cultural or ethnic minorities with higher birth rates. In Germany, the system of assistance to homeless families is completely focussed on providing them with permanent accommodation, but there is also a lack of small single-occupancy dwellings for single homeless individuals; these are insufficient and scarcely meet

demand. In Finland, through the programmes and strategies against homelessness from the 1990s, small social housing units were built and some shelters were transformed into housing units with support services, adapted to individuals living alone. In Spain, the Ombudsman (Defensora del Pueblo) presented a report in 2013, according to which there were at least 10,179 empty social housing units ready to be occupied immediately.

It is worth noting the role of the administrative status of individuals as a structural barrier. Immigrants with irregular administrative status or without permanent residency would be excluded from social housing in all countries. In both Finland and Scotland, if the person in our typical case had an irregular status, he or she would not be able to access social housing. Only foreigners with refugee status or having been naturalised would be able to access social housing. Nevertheless, there are some grey areas in terms of private action. For instance, in Spain a housing unit is sometimes owned by a social entity, which can grant accommodation to an individual or family with irregular status, with the goal of working on the different supports necessary: language, training, employment, housing, administrative status... In England, however, such a practice would be illegal, as in August 2015 the Government announced amendments to the Immigration Act to punish owners who do not carry out the required checks before renting a home, or who do not evict irregular immigrants.

The quantitative shortage of social housing leads, in all countries studied, to the development of selective criteria to limit the targeted population. In most cases, social housing is allocated to cohabitating couples with low incomes and no (or limited) assets that also belong to one or more of the following categories: disabled, families with children, single-parent families, people over 65 years, or young people. However, all countries show a trend towards the residualisation of the social housing stock while at the same increasing their own responsibilities in terms of other residential situations in the ETHOS typology, such as those of homeless people, female victims of male violence, evicted people or people living in overcrowded or substandard housing. In England, though, since its allocation system has traditionally been residual, there is a tendency towards expanding social housing to reach groups with economic problems, although not those with social problems. Nevertheless, all countries exclude some categories of homeless people from social housing.

The typical case profile used in this research represents street homeless people who do not normally belong to the populations targeted by social housing policies. Other non-priority sectors include those living in temporary dwellings, such as emergency shelters or transitional housing with specialised services, as it is assumed that they already have a roof over their heads. In Finland, however, as

these groups are the target of national strategies, they do, in fact, enjoy priority access. Living on the streets does not qualify a person for social housing, not even in Finland or Scotland, which have relatively comprehensive legislation or policies on the housing rights of the homeless; thus, additional institutional criteria have to be met. In the Finnish case, for example, the very fact of prioritising long-term street homeless people directly affects the resources available to address the homelessness of people staying in the homes of relatives or friends (and who, in fact, make up the main category of homeless people in the country). That is, the pressure of political priorities is transferred to the entities that provide social housing, whose ability to address other types of housing needs is hampered by their limited resources. Systems of social housing allocation often show a certain reluctance to accommodate our typical case, as his or her characteristics are related to housing management problems. The main barriers blocking the access of homeless people to social housing are the minimum or maximum income thresholds, local ties, debtors lists or recorded misconduct.

In all countries, having some income is a prerequisite to accessing social housing. Regarding the homelessness profile defined by the typical case, this includes benefits from pensions or minimum income schemes or, very simply, people deprived of any kind of income. In Spain, interviewees are aware of this reality and that setting up a minimum income threshold can lead to exclusion. In Germany, however, all social housing applicants must have a certificate (the WBS) issued by the local administration to prove their income does not reach a certain threshold; this is the only element of public control. From the point of view of social housing providers, chronic homeless persons in need of comprehensive support services are very costly in economic terms and hardly yield any profit (we must keep in mind that such profit might be used to repay the loans contracted to fund the construction or purchase of the housing unit).

In England, the requisite of having local ties is being used to hinder applications for social housing: nowadays, an individual can certify ties to the community through a job contract or family ties in the area (except for members of the military). In Spain, to access social housing one must be registered as a local resident; how strictly the criteria for local registration are interpreted in terms of access to housing and health services depends on the municipality, so it may well be that access to social rental housing takes a minimum residency of one to three years.

In Germany, the UK and Finland, with sizable rental sectors, inclusion in a debtors list or having a record of misconduct constitute significant barriers to social housing. Interviewees explained that there is some reluctance to house certain groups expected to cause trouble, so access is only possible (but not guaranteed) where support or supervision by a social entity is available.

In Finland and Germany, urban planning laws that aim to increase social cohesion and are also used to avoid rehousing certain homeless individuals in certain neighbourhoods or communities, in order to avoid a concentration of poverty; in the case of some German social housing providers, financial incentives are used instead of legal instruments. Finnish urban planning policies intended to prevent segregation and the concentration of poverty require 20% of housing projects to be reserved for social housing.

In turn, social housing in the UK and Germany is associated with areas of high unemployment, soaring crime rates, antisocial behaviour and buildings in poor condition. In this sense, interviewees referred to tensions between housing or urban planning laws and the goals of homelessness policies. On the one hand, allocating chronic homeless individuals with high support needs to 'normalised' communities may lead to new conflicts and to some neighbours leaving the area or the building, while on the other hand, placing chronic homeless persons in impoverished neighbourhoods can hamper the pathway out of homelessness.

In summary, we observe that the person in our typical case will face fewer barriers to social housing if he or she belongs to a group that has been defined as a priority. However, given the scarcity of social housing, belonging to a priority group does not guarantee access to social housing, regardless of the country. In practice, prioritising some groups over others creates permanent competition among them for social housing. Research has shown that there are inequalities in accessing social housing, which are rooted in the dominant social conception of poverty and homelessness. The barriers generated as a result are misplaced, as homeless people do not form a homogeneous group. Rather, this is a problem that needs to be approached as a housing situation.

Conclusion

This research draws attention to the privatisation and reduction of social housing stocks, as well as their residualisation. Traditionally, it has been considered that public intervention in the housing sector is determined by a country's approach to the welfare state itself, and that public intervention will take place in the case of market failures or rigidities that prevent the population from meeting its housing needs. However, in the 21st century, the main role of the state is that of an agent active in the commodification of public goods and the creation of new markets, allowing private economic and financial sectors to maximise profit as quickly as possible. In this sense, the role of the state has been to ease access to housing through economic aid that supports the market, rather than the direct provision of social housing. The neoliberal offensive has consisted of cutting public spending on housing, reducing levels of social housing production, promoting the sale and privatisation of social housing stocks, easing speculative processes in real estate, and promoting a profit-driven rental and ownership sector. In turn, this process has strengthened the role of the financial and banking sector in the housing provision system. As a result, many people are experiencing housing exclusion and homelessness, given their inability to afford housing prices, either in terms of rental or ownership.

We have pointed to the scarcity of social housing as a general problem. The larger the social housing stock enjoyed by a country, the greater its freedom to address the homelessness situation. Regardless of this, there are formal barriers to social housing (income, residence or registration requirements) as well as informal barriers (the desire to avoid poverty concentration, discrimination, debtors lists or models of intervention on behalf of street homeless people) that exacerbate the difficulties faced by homeless people looking for social housing. The scarcity and residualisation of the social housing stock is leading to 'competition' among people affected by different homelessness processes, which in turn penalises those in the worst situations of exclusion.

This paper concludes that facilitating and permitting the access of homeless people to social housing with support services actually has a direct impact in the reduction of homelessness levels. However, we have shown that barriers remain preventing certain homeless segments from accessing social housing. The countries studied have different definitions of homelessness and different levels of homelessness, social housing stocks of different sizes, and different strategies or policies with varying priorities. Nevertheless, those in certain forms of homelessness always face significant barriers in obtaining social housing, in particular,

street homeless individuals. We have also shown that inasmuch as some homeless groups are given priority in the distribution of social housing, others have seen their chances of access decrease.

Nevertheless, the right to housing is recognised in European regulations and it must be preserved, respected, protected and implemented, but in a ‘progressive’ way – that is, with a focus on goals rather than results. The fact that administrations do not consider housing rights an obligation with respect to results does not mean, not in the slightest, that public authorities do not have to do everything they can to realise those rights. Consequently, we have to introduce new notions, such as the social function of ownership, and conceive of social housing as a service of general interest for the public. Social housing is part of a wider policy of the structural prevention of homelessness, oriented towards primary prevention (social housing for the population in general), secondary prevention (specific measures targeted at populations at risk of losing their home), or tertiary prevention (targeted at those who have already lost their home and need immediate rehousing, or intended for the integration of people experiencing street homelessness on a frequent or chronic basis). Therefore, a full rethinking of the social housing system – from planning, regulation, production, allocation, consumption, taxation and funding – is required, with the goal of incorporating new accompaniment systems adapted to the needs of tenants, thus ensuring the affordability, security of tenancy, safety and adequacy of housing.

› References

- ARA (2005) *Housing Finance for All: Learning from the Finnish Model* (Helsinki: Housing Fund of Finland).
- Boverket (2005) *Housing Statistics in the European Union 2004* (Sweden: National Board of Housing, Building and Planning.).
- Busch-Geertsema, V. (2000) *Housing Policy in Germany – Response to Questionnaire Provided by Angelika Kofler*, ICCR, Vienna Working Paper for EUROHOME-IMPACT Project (Bremen: GISS).
- Cornelius, J. and Rzeznik, J. (2014) *TENLAW: Tenancy Law and Housing Policy in Multi-level Europe Project*, National Report for Germany (Brussels: European Commission).
- Czischke, D. and Pittini, A. (2007) *Housing Europe 2007. Review of Social, Co-operative and Public Housing in the 27 EU Member States* (Brussels: CECODHAS Housing Observatory).
- Egner, B. (2011) Housing Policy in Germany: A Best Practice Model?, *Friedrich-Ebert-Stiftung – Briefing Paper Shanghai* Jan. 2011, No. 4.
- European Commission (2011) *A Quality Framework for Services of General Interest in Europe COM/2011/0900 final* (Brussels: European Commission).
- European Commission (2013) *EU Employment and Social Situation: Quarterly Review* (Luxemburg: European Communities).
- FEANTSA (2012) *On the Way Home? Monitoring Report on Homelessness and Homeless Policies in Europe* (Brussels: FEANTSA).
- Fitzpatrick, S., Pawson, H., Bramley, G. and Wilcox, S. (2012) *The Homelessness Monitor: Scotland 2012* (London: Crisis).
- Fitzpatrick, S., Pawson, H., Bramley, G., Wilcox, S. and Watts, B. (2015) *The Homelessness Monitor: England 2015* (London: Crisis).
- Ghekière, L. (2007) *Le développement du logement social dans l'Union Européenne. Quand l'intérêt général rencontre l'intérêt communautaire* [The Development of Social Housing in the EU. When Public Interest Meets Community Interest]. (Paris: Dexia Editions).
- Kenna, P. (2011) *Housing Law, Rights and Policy* (Dublin: Clarius Press).
- Leal, L. (2005) *La política de vivienda en España* [Housing Policy in Spain], Documentación Social, nº 138 (Madrid: Cáritas).

OVV – Observatorio Vasco de la Vivienda (2009) *Políticas de fomento de la vivienda de alquiler en Europa* [Policies to Promote Rental Housing in Europe]. (Bilbao: Departamento de Vivienda, Obras Públicas y Transportes).

Pittini, A. and Laino, E. (2011) *Housing Europe Review 2012: The Nuts and Bolts of Social Housing Systems* (Brussels: CECODHAS. Housing Europe Observatory).

Pittini, A., Ghekiére, L., Dijol, J. and Kiss, I. (2015) *The State of Housing in the EU 2015* (Brussels: Housing Europe Observatory).

Pleace, N. (2011) Exploring the Potential of the ‘Housing First’ Model’, in: N. Houard (Ed.) *Loger l’Europe Le logement social dans tous ses Etats: Le logement social dans tous ses Etats*, pp. 177-186 (Paris: La Documentation Française, MEEDDM/DIHAL).

Pleace, N., Teller, N. and Quiggars, D. (2011) *Social Housing Allocation and Homelessness – EOH Comparative Studies on Homelessness* (Brussels: FEANTSA).

Pleace, N., Culhane, D., Granfelt, R. and M. Knutgard (2015) *The Finnish Homelessness Strategy: An International Review* (Helsinki: Ministry of the Environment).

Ponce, J. and Fernández, G. (2010). Derecho urbanístico, derecho a la vivienda y personas sin hogar. Nuevos desarrollos y perspectivas en España a la vista de las novedades europeas en la material [Urban Law, the Right to Housing and Homeless People: New Developments and Perspectives in Spain in View of European Developments in this Area], *Revista de Derecho Urbanístico y Medio Ambiente* 255 pp 39-78.

Sánchez, M.T (2010) El coste de la política de vivienda [The Cost of Housing Policy], in: J. Leal Maldonado (Ed.) *La política de vivienda en España*, pp.299-346. (Madrid: Editorial Pablo Iglesias).

Social Protection Committee (2013) *Social Europe: Current Challenges and the Way Forward: Annual Report of the Social Protection Committee 2012* (Brussels: European Commission).

Tejedor, J. (2013) *La política de vivienda social como servicio social de interés general en Europa* [Social Housing Policy as a Service of General Economic Interest in Europe]. [on-line]. Available at: www.administracionpublica.com/vivienda-social-europa/ [30.11.2016].