Profiles of Homeless People without Legal Residence in the Brussels-Capital Region

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Abstract_ *Brussels has a long tradition in collecting data on people experiencing homelessness (PEH), including undocumented people. Therefore, this case can serve as an inspiration for other European countries so that detailed and objective data can support informed discussion and tailored interventions for undocumented PEH anywhere. The target group is elucidated through a profile analysis based on the new surveys conducted during the Brussels homeless count of 2022. This survey made it possible to obtain a larger range of profile data.*

Keywords_ *Homelessness, migration, undocumented, Brussels, homeless counts*

Introduction: The Invisibility of Undocumented People Experiencing Homelessness in Brussels

Undocumented people are an important subgroup among people experiencing homelessness (28,5% in our sample). But because they are generally assumed by the government to have left the territory, they are rarely discussed in politics and in the media. For the same reason, they do not appear in official databases. Despite their numerous presence in various European countries, including in the Brussels-Capital Region, they thus stay invisible. The debate on solutions for them is also very polarised and therefore often generalised, and more preferably avoided. But without solutions, they will remain homeless, which impacts themselves, the homeless sector and the local area. This Research Note aims to provide objective data to support informed debate and tailored interventions. Undocumented people experiencing homelessness are not a homogeneous group. Therefore, solutions

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cannot be one-size-fits-all. Migration stories vary by the situation in the country of origin, and personal factors influencing the undocumented and homeless status in Belgium also play a role. Also, profiles are often stereotyped. The idea that we are talking about young, healthy single men must be challenged. This Research Note, therefore, explores the question: Who are the undocumented homeless people? To answer this question, we use the Brussels-Capital Region as a case study. This quantitative research sheds light on who the homeless undocumented people are in the Brussels-Capital Region, for whom we have data. In the near future, these results will be supplemented and improved, among other things, by conducting qualitative research as well.

Relevance

Finding sustainable solutions for undocumented homeless migrants is challenging, but starts with knowing who they are. Hermans et al. (2020) noted that, although the lack of accurate data on homelessness among migrants was first raised in 2002 in Europe, 18 years later, Belgium was still without detailed data. This was despite recalls at an European level. For example, in 2010, the *European Consensus Conference on Homelessness* urged the Commission to study the link between migration and homelessness, including its extent amongst non-nationals, and its impact on the homelessness sector. It is called to analyse the different options to respond to the findings, (Vandenbroucke et al., 2010, p. 24). Later, in 2021, the Lisbon Declaration was signed by the EU-member states and supporting organisations such as FEANTSA. Its ambition is to end homelessness by 2030. The signatories reaffirmed the need to understand how homelessness affects different groups, including migrants (European Union, 2021). Still very recently, researchers Haj Ahmad and Busch-Geertsema (2024) addressed migrant homelessness in the EU, but confirmed that no reliable data exists on undocumented migrants. As for Brussels, the relevance of research has been confirmed in the Masterplan to end homelessness by 2030, written by almost all Brussels social stakeholders. The document stresses the impact on the Region of homelessness among undocumented and regularising migrants (Bruss'help, 2024).

Learning Opportunity for Brussels and Europe

The 2024 EU homeless count teaches us that undocumented people are still not always included in the local censuses (Hermans et al., 2025). This is often the case because they are not considered a responsibility of the government level that oversees the country. The Brussels-Capital Region decided not to follow this approach, which seeks to analyse this group and to learn from this. Also, Brussels has over 16 years of experience collecting data on homelessness (La Strada, 2008). In 2022, a nationally harmonised questionnaire replaced the previous one, and data collection was expanded.[1] This revealed previously unavailable insights. Many cities have no data collection or are starting up, and therefore might want to learn from this expertise. Thanks to its experience and a strong local network, Brussels achieves high participation in its homelessness count. For example, in 2022, some of the Public Centres for Social Welfare (PCSW) joined. PCSWs are centres on a municipality level that offer different types of social aid (financial, legal, medical, etc.). This gave us some insight into undocumented people experiencing homelessness who did not stay in conventional dwellings such as squats or with third parties, and thus covered all the Ethos Light categories. Apart from Belgium, only the two participating cities from the Netherlands to the European count (Nijmegen and West-Friesland) and Košice (Slovakia) managed to do so, but their samples of undocumented people were too small for an analysis (a maximum of 24 people in Nijmegen).

Brussels as a case study

According to Turner (2016, p. 681), undocumented people belong to *"a group of people who reside permanently in a foreign country, but enjoy only limited partial civil rights"*. Therefore, they are not visible in official databases. We often do not know whether they have left the country, and they usually do not want to be found. Estimates of the number of undocumented people in Belgium are rare, often outdated, and figures differ widely: from 85 000 to 200 000 people (Roberfroid et al, 2015; van Meeteren et al, 2007; Debruyne and Geldof, 2021). They include individuals who move between different countries (Graas and Lelubre, 2023). In April 2023, Surkyn et. Al. (2023) published a study in which they estimated the number of people without legal residence based on extrapolations from the number of deaths in Belgium between 2012 and 2016. They concluded that about 112 000 irregular third-country nationals live in Belgium, 52 000 of whom are in the Brussels-Capital Region. For unregistered irregular Schengen citizens, the ratio was reversed: 217 000 for Belgium, of whom 10 000 are in Brussels (Verhaeghe, 2023)[2]. This is the most recent known estimate made for Belgium and Brussels. This means that on January 1st, 2018, 10.54% of the official Belgian population resided in the Brussels-Capital Region (Statbel, 2018), compared with 18.84% of the Belgian undocumented population according to Surkyn et al.

1 The questionnaire is identical to the ones systematised in Flanders and Wallonia by KULeuven and UCLouvain as part of their censuses.

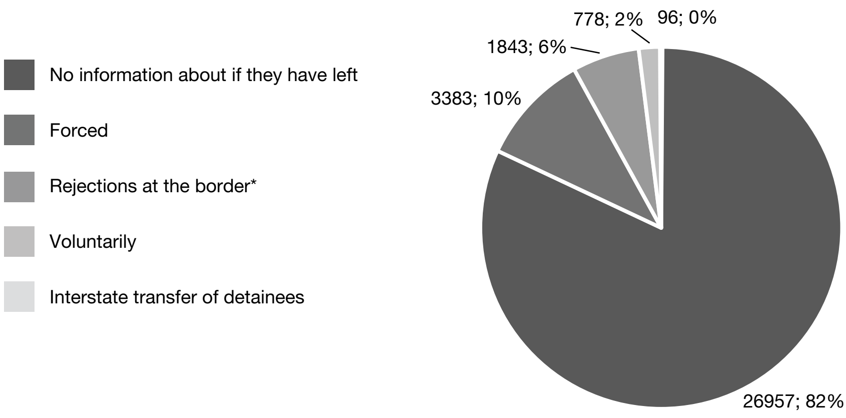
2 More information: MISAFIR: Population estimates and social composition of unregistered populations of the Brussels-Capital Region. Only the figure for the whole of Belgium was published in: "Migration and mortality: What do we know?"(Bircan et al., 2023)

When studying homelessness, similar difficulties are encountered. People experiencing homelessness are not always registered, and not all of them are easy to count or to obtain more information about. Yet we know that many people find themselves at the intersection of being homeless and being undocumented. On January 25, 2023, the coordinator of the homelessness sector in the Brussels-Capital Region, Bruss'help, calculated the percentage of undocumented people in almost all the emergency centres for homeless persons. On that day, 54.28% had no legal residence permit. This highlights that homelessness cannot be ended without taking them into consideration. It also shows that Brussels is an excellent place to study this target population.

Why are there Undocumented People (in Belgium)

Accurate data about the number of people who enter and leave Belgium does not exist. The only information available is that, according to the Belgian Foreign Affairs Service, in 2023, 33 057 orders to leave the territory were issued. This can mean that people have received multiple orders. In that same period, 6 100 official removals took place (Algemene Directie Dienst Vreemdelingenzaken [Department of Immigration] 2023, p. 4 and 2024, p.3):

Figure 1 - Number of orders to leave Belgium and the number of actual removals from the territory in 2023



** This means that foreign nationals and asylum seekers rejected at the border are returned to the country they came from." (Algemene Directie Dienst Vreemdelingenzaken, 2023, p.18)*

When interpreting Figure 1, one needs to consider that people do not always leave the territory within 30 days. They might do so in another year. Also, some will appeal against this decision. Some people also leave more than once within this period.

The reason why people stay was explained by Geert Devulder, from the Belgian service, who is responsible for the execution of the migration policy, explained why people stay (VRT, 2019): (in case of forced return) *"Many countries make it difficult to provide the necessary travel documents, especially if the person does not apply for them himself."* The nationality of the person must also be proven(De Windt and Temmerman, 2019). According to Ine Lietaert, professor from the University of Ghent, it is challenging for these countries to reintegrate people, especially large groups (De Windt and Temmerman, 2019). Thus, negotiations with them are necessary, which can be difficult. Furthermore, the policies their leaders pursue can sometimes be questionable on a human rights level (Vluchtelingenwerk Vlaanderen, 2023 Human Rights Watch, 2023; Amnesty International, 2024).

"If the foreign national requests the travel documents […], they will always be provided", Devulder confirmed. So once the decision is made, voluntary return is more effective. But when someone receives a negative decision in Belgium, he or she will be ordered to leave the territory within 30 days. This *"causes a panic reaction"*, professor Lietaert concludes, and *"then there is no mental space left to make such a life-determining decision"*(De Windt and Temmerman, 2019). This reduces the chance of voluntary return and increases the chance of homelessness. Professor Arjen Leerkens notes a paradox: as the difficulty and risk of reaching Europe increase, the importance of staying increases with it, even with an undocumented status (Nl Times, 2022).

Thus, although it is often seen by policymakers as the only solution (Radio 1, 2022; VRT NWS, 2023), the federal influx and return policy is unable to obtain what it tries to: not having undocumented people on its territory. Consequently, part of these people end up in the homeless sector, who have a hard time finding sustainable solutions for themselves (as they don't decide on migration policy). This 'elephant in the room' concept is also often present during political debates at the EU level. For example, the EU Migration Pact may tighten border controls and return procedures and provide a dispersal mechanism, but it also remains silent on those already in Europe without a legal residence status.

Methodological Framework

In English, people without legal residence are often referred to as undocumented people, or people without legal residence. In the Belgian Official Journal, they are referred to as *"foreign nationals who are present on a territory, but who do not or no longer meet the conditions to enter or to stay"* (Belgian official journal, 1980, Title 1, chapter 1, article 1, 4°). To be precise, people in a procedure are not considered to be undocumented in this analysis. For this Research Note, the ETHOS Light typology was used to define people experiencing homelessness. ETHOS Light is usually maintained at an EU level for statistical purposes to classify different living situations amongst these people. It consists of six categories (Edgar et al., 2007, p. 199):

1. People living rough
2. People in emergency accommodation
3. People living in accommodation for the homeless
4. People living in institutions
5. People living in non-conventional dwellings due to a lack of housing
6. Homeless people living temporarily with family and friends (due to lack of housing)

A category of people threatened with eviction was added for counting the homeless in the Brussels-Capital Region in 2022. A detailed definition of each category can be found on pages 10-17 of the counting report (Paquot, 2023).

Approach

For this research note, the database of the questionnaire from the November 2022 census was analysed, and the findings were supplemented with a literature review, as well as consultations with experts. The combination of experts by experience, professionals working with the target group, scientific experts in homelessness, statistics, and/or people without legal residence ensured an almost complete coverage of all available knowledge.

The Homelessness Census of 2022

The data collection for the homeless census of the Brussels-Capital Region consisted of three parts:

- During the night count, the people spending the night in public spaces on November 8th to 9th, 2022, between 11 pm and midnight, were counted (Paquot, 2023).
- Data centralisation is a collection of data encoded by 95 accommodation and reception facilities, related sectors, and Public Centres for Social Welfare (PCSW) covering all the Ethos Light categories. It contains the data of people who were assisted between 11 pm and midnight on the night of the census, as well as people who are in hospitals or people facing eviction who are estimated to become homeless within the 30 days following November 8, 2022. The data collected includes the number of people helped, the gender of the adults, the age group of the children, and the capacity of the organisation (Paquot, 2023).
- One questionnaire per supported person was completed by 42 organisations, being almost all officially recognised shelter services, multiple day services, and three PCSW. This happened for the people accommodated during the night of the count or accompanied between late October and mid-November. (Paquot, 2023) 37.9% of the questionnaires came from the PCSW of Brussels City, 16.4% from the New Samusocial, and 12.8% from the PCSW of Saint-Gilles. 2097 questionnaires have been retained after the cleanup (Paquot, 2023).

The night count and the data centralisation together form the official homeless census. Although the census is still an underestimation of the reality, as well as just a point-in-time count of a continuously changing situation, it offers the most complete overview of the homelessness situation in Brussels. Unfortunately, this database does not provide detailed information about the population. Therefore, the questionnaires were added.

Introduction of the Research Sample

Size and Number of Questionnaires per Group of Organisations

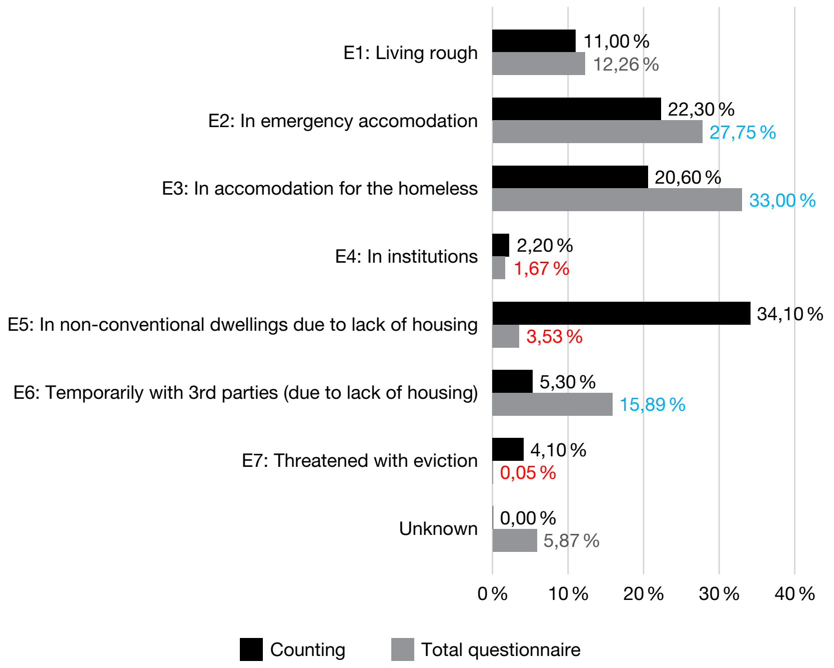
Five hundred and ninety-nine of the questionnaires collected were completed for undocumented people (28.5%).The 3 PCSW who participated in the questionnaires provided information about 309 undocumented homeless persons (51%). The 25 people for whom other centres approved by the government also completed a questionnaire, have been counted in the group of the PCSW. Two hundred and three people (34%) were identified across New Samusocial centres. An additional government-approved centre completed questionnaires for 25 of them, who are included in the New Samusocial count. Sixty-five people (11%) were assisted by 19 other centres approved by the government. Three-day services provided information about 22 people (4%).

Accompanied Minors

For ethical reasons, a questionnaire has been completed for each adult and for each unaccompanied child. Accompanied children have been included in the questionnaire of one of their parents. Altogether, 106 children under 18 years old were indicated for 67 single or two-parent families. 40 of them accompanied one child, 21 accompanied two children, 2 had 3 children with them, 2 had 4, and 2 had 5 children. Only the family composition, the number of children, and their ages were asked. Since we don't have other information, unless indicated otherwise, this group has been left out for this first analysis. Caution is needed when considering this group, as their residence status was not asked.

Representativeness of the Questionnaires compared with the general Count Database

Figure 2 - Representativeness questionnaires compared to general counting database



Despite being still incomplete (certainly for categories 1, 4, 5, and 6), the counting database is the most comprehensive there is. So, when we compare the representativeness of the questionnaires, we see that people in categories 2, 3, and 6 are far more represented in the questionnaire, and that people from categories 5 (and 7) are underrepresented. Certainly, for the squats, this could cause a bias in the results, which should be considered as a limitation of this pilot study.

Limitations

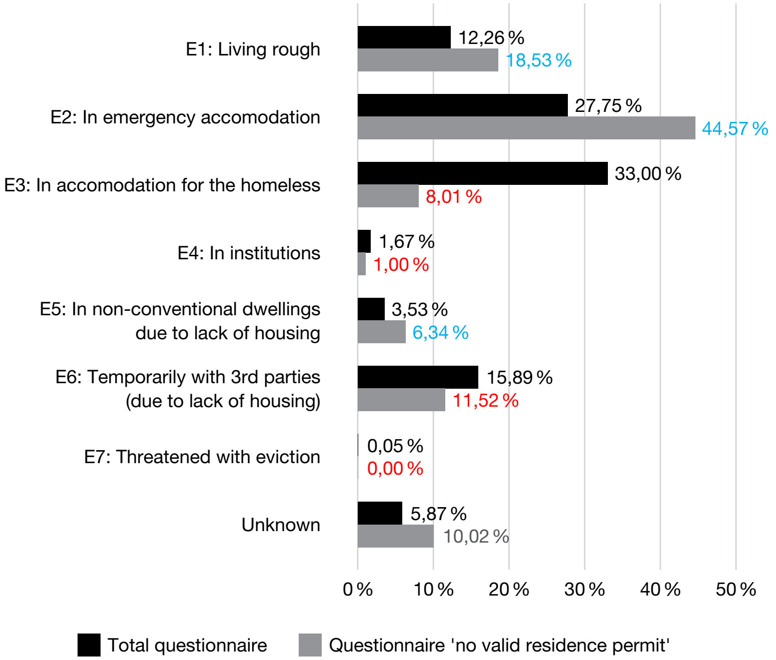
The author of the homeless census report, however, notes that the questionnaire is a pilot project needing improvement and broader institutional participation for more representative results(Paquot, 2023). Despite possible future improvements, we must bear in mind that it is often in the interest of the undocumented person to stay hidden and withhold certain information. Finally, the author warns that information about subjects such as health is not always precise because the questionnaires have mostly been completed by the social worker on his or her own (94.49%), and only 5.51% together with the person. One shall bear in mind that it's a point-in-time count of people in a situation that is constantly changing. Also note that only PCSW and municipalities can verify the residence status in the Population Register. Finally, as will be recommended in the next chapter, some questions must be redrafted.

Profile Analysis: main results

Living Situation

ETHOS Light Category

Figure 3 - Representation of undocumented people for each Ethos Light category (housing situation)



Looking at the situation of undocumented people in terms of distribution by housing in the survey, we expectedly find a significantly larger representation in Ethos Light categories 1, 2, and 5 compared with the survey as a whole. What is interesting is the lower representation in category 6. The expert committee noted that most undocumented people lack Urgent Medical Aid and thus are not known to the PCSWs who give access to this right, and who provided 51% of the questionnaires. This complements the scientific committee's observation that this result may introduce bias, as undocumented individuals have strong incentives to remain hidden.

Profile

Sex/Gender

Of the 19 people aged 18 or younger for whom an individual questionnaire was completed, 17 were men. The gender distribution amongst undocumented homeless individuals is very similar to the distribution of the entire population of the questionnaires: 33% to 35% are women, 65% to 64% are men, and 2% to 1% of people did not identify themselves with their assigned gender at birth ('X').

Age

Of these 599 people, 19 unaccompanied foreign minors were aged 18 or younger, with 15 of them aged between 16 and 18 years, and 4 younger than 16 years. It is recommended that for the next census, the age group should end at 17 years of age to capture the number of UFM.

Age	Figure 4 - Number of accompanied minors
0	11
1	11
2	16
3	9
4	9
5	11
6	3
7	11
8	1
9	1
10	5
11	3
12	3
13	3
14	2
15	2
16	1
17	3
Unknown	1
Total	106

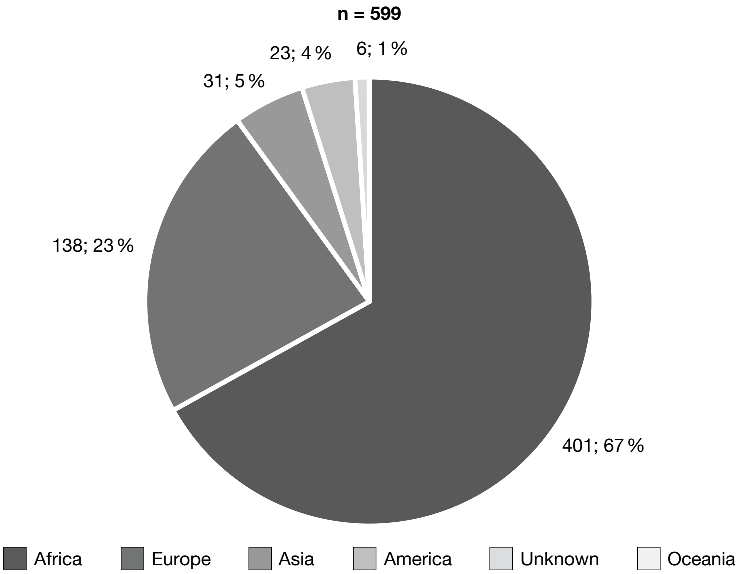
Age	Figure 5 - N° of adults and unaccompanied minors
Less than 16 years	4
Between 16 and 18 years	15
Between 19 and 24 years	36
Between 25 and 29 years	55
Between 30 and 39 years	138
Between 40 and 49 years	153
Between 50 and 59 years	104
Between 60 and 69 years	67
Between 70 and 79 years	17
80 years or older	6
Unknown	4
Total	599

The median age of the 67 accompanied children is notably low (four). For adults and UFM, the median age ranges from 40 to 49. 15.69% of this latter group are at least 60 years old.

Nationality

Eighty percent of the undocumented people in our database (481 persons) hold nationalities from outside the EU. 19% (112 persons) are EU-citizens, and for 1% (6 persons) the nationality was unknown. To verify the reliability of our database, we compared the ratio of irregular third-country nationals to irregular Schengen citizens with the study by Surkeyn et al. This team estimated that on an average day between 2012-2016, there were approximately 83.87% irregular third-country nationals and 16.13% irregular Schengen citizens in the Brussels-Capital Region. The researchers believe their estimation of irregular third-country nationals is likely quite accurate. However, they consider the estimation for irregular Schengen residents to be potentially an underestimation due to the criteria of free movement within the Schengen area (Verhaeghe, 2023). In our database, the ratio of non-Schengen citizens to Schengen citizens is 86.85% to 13.15%. No new countries joined the Schengen zone between 2012 and 2022. If we subdivide into regions according to the 'Standard country or area codes for statistical use' of the United Nations(United Nations, n.d.), we see that the majority of the population comes from Africa (67%) and Europe (23%).

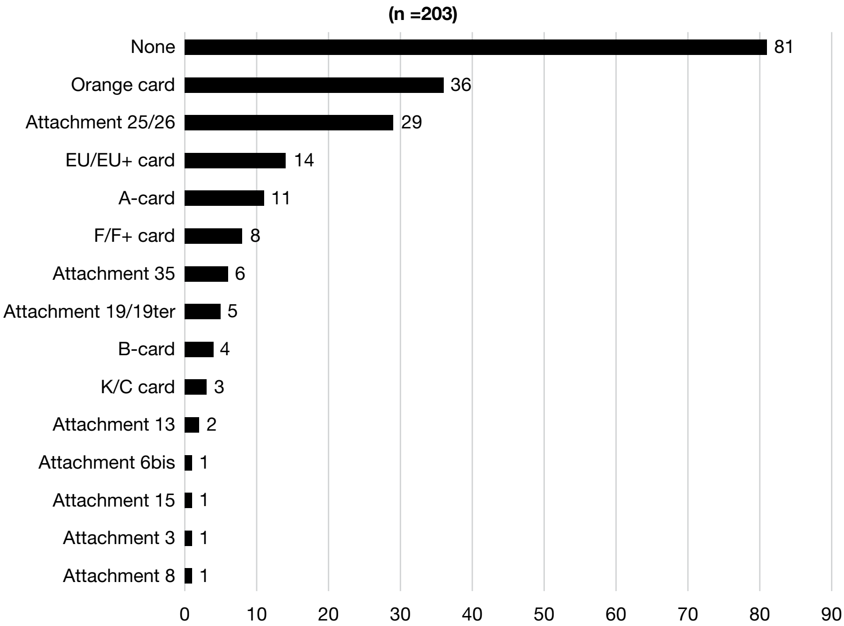
Figure 6 - Regions



If we go into more detail about the countries, we see that 49% of the people (296) come from only 4 countries being Morocco, Congo, Algeria, and Poland.

Former Residence Status

Figure 7 - Last residence permit



The last residence permits of 396 out of 599 people were unknown, so they were excluded from this analysis. This may introduce a bias. Of the 203 individuals, 39.9% (81) never had a residence permit before becoming undocumented. Some still may have applied for regularisation—such as family reunification or humanitarian grounds—but during these procedures, one does not receive a temporary permit (Fedasil, 2024b). The same applies to those seeking recognition as 'non-removable' (AgII, 2024a; AgII, 2024c), meaning they were refused at first, but cannot return to their country of origin due to risks like persecution (Danckaerts, 2022) or because their country of origin refuses to give them a document that gives permission to pass (Devillé, 2008) (e.g., in the absence of a readmission agreement).

Consider that in Belgium, lacking a residential address limits access to regularisation procedures like humanitarian or medical regulation (9bis, 9ter) (AgII, 2024b; AgII, 2024d). We also noted that certain presumed residence documents do not allow a legal stay. This highlights the policy volatility and complexity of residence statuses, making accurate data collection challenging. Nearly 17.73 percent (36 out of 203) held an Orange card, indicating a pending regularisation procedure, which gives them a temporary residence permit. The submitted request could be: international protection, family reunification, studies, medical regularisation, a victim of human trafficking and smuggling, and non-accompanied minors (AgII, 2023a). Given these challenges, future surveys could ask about the reason/type of request and the residence permit duration rather than the permit type.

Family Composition

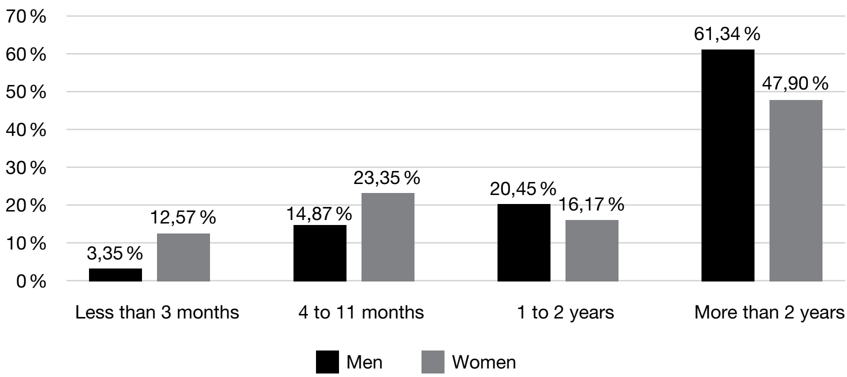
As to the family composition, unsurprisingly, as for the sample as a whole, the vast majority (or 87%, or 508 people out of 582 for whom the family composition was known) were single without children. 55 people (10%) were single with (a) child(ren), 12 (2%) were couples with a child(ren), and 7 (1%) were couples without children. Children refer to the person's own children. Some additional information was provided for 8 single individuals without children. Five of them lived together or were in the company of a sibling, 2 singles lived together with a third party, and 1 single adult was accompanied by his parents. This example shows that being single without children does not automatically mean that these people do not have close relationships with other people in Belgium. Only 1 person (single, without children) in our sample had a domestic animal (a dog). Comparing men and women, 97% (367 men) of all men were single without children. Similarly, 68% (131 women) of the women were single without children, but 29% (55 women) were also single with a child (ren).

Situation of Homelessness

Duration of Homelessness

Most of the 599 undocumented people in our sample were homeless for more than 2 years (56 %).

Figure 8: Period without stable housing (M vs. W). n = 436



Excluding the unknown, and considering both genders as 100%, we see that women are slightly less represented in groups that stay 1-2 years or more than 2 years homeless, although this still applies to 64.07% of them. Comparing individuals with and without health problems (leaving out the 138 persons for whom the health situation is unknown again, as well as the 98 persons for whom the duration is unknown), analysis shows that 67,78% (183 people) of the 270 individuals with health problems experience a duration of over two years of homelessness, whereas this is the case for 31,18% (29 out of 93 people) without health problems.

Health and Help

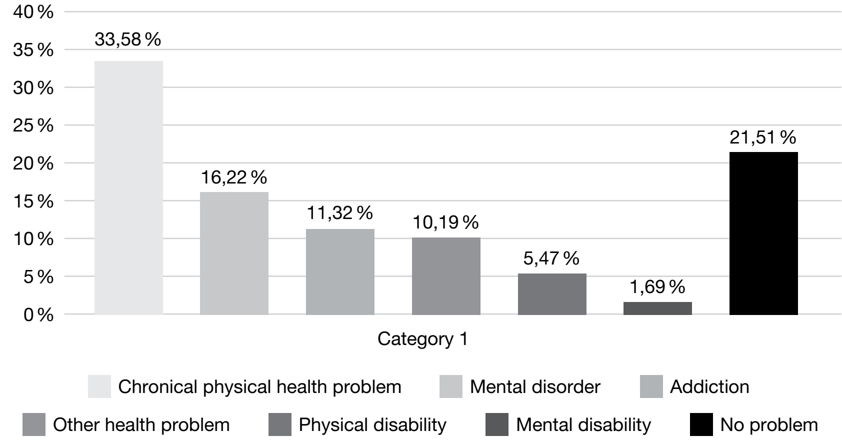
Health Insurance

The PCSW is the institution allocating the Urgent Medical Aid (UMA). This is often the only official aid available to undocumented individuals in Belgium (families with minor children may also be eligible for housing at a reception centre). This aid covers a range of situations, from serious accidents or diseases to a simple visit to the GP (FOD MI, 2016). Most undocumented homeless individuals known by the PCSW have UMA (98%). This is significantly lower for other institutions (56%). Hence, these statistics are probably more accurate. However, considering that these institutions also often try to facilitate UMA access for all, this figure is still likely to be an overestimation when compared with the entire undocumented homeless population. This is probably because individuals not identified by any institution are likely to be the most marginalised in terms of access to their rights.

Health Situation

When interpreting the health situation, some limitations need to be considered: The questionnaires have been completed by the social worker, not by medical professionals. Also, not all medical information is known and frequently based on assumptions (Paquot, 2023). The 138 people for whom this information is not known were removed from the sample. Further, since the PCSW allocates the UMA, the prevalence of health problems has also been investigated separately for these centres. This allows us to observe that the prevalence of people without medical problems is higher for institutions that are not PCSW (32.52% to 15.74%), which is probably a more accurate percentage.

Figure 9: Prevalence of the health problem (n=599)



Chronic physical health problems are most prevalent amongst undocumented homeless individuals with known health status in our database (33.58% or 178 times), followed by mental disorders (16.22% or 86 times). Attention: Some people have multiple types of health problems. The figure above shows how common a particular type of health problem is in relation to the others. Chronic physical health problems include conditions like cancer, diabetes, chronic hepatitis, HIV, arthritis, etc. Mental disorders encompass depression, trauma, schizophrenia, eating disorders, etc. We have no insight into the prevalence of the specific diseases.

Legal Assistance and Future Orientation Support

The questionnaire only asks about legal aid from a PCSW, which undocumented people don’t receive. However, various regional and non-profit initiatives do offer socio-legal aid. Fedasil itself also has an information point and, since 2020, a mobile team. Though awareness about this among the target group is uncertain. Furthermore, helping people without stable housing is also challenging. Federal voluntary return programmes have existed since 1984 (Fedasil, 2009). Additionally, since 2021, there are so-called ‘ICAM coaches’ to whom people are invited by letter or can make an appointment themselves. If a legal stay seems possible, the person themselves must apply. Otherwise, a return is arranged. If the person refuses, the risks of illegal stay are explained (the risk of forced return and a possible entry ban), and the trajectory ends (Fedasil, 2024a; Dienst vreemdelingenzaken, 2024).

As mentioned earlier, once the decision is made, voluntary return is more effective than forced return. Yet, we also saw that there were only 778 departures in 2023. A 2015 KU Leuven study for Fedasil found that discussing voluntary return is difficult: social workers report defensive reactions (Bossens et al., 2015). A holistic approach called 'future orientation' was recommended. This was developed by some organisations in Brussels after the last big regularisation campaign in 2009. Hereby, all the options are discussed: from return to legalisation, to staying in Belgium undocumented. In 2024, the PCSW of Brussels City successfully started inviting undocumented people with relatively stable housing to reflect on their future. Inspired by a Utrecht model (the Netherlands), similar projects started in Ghent (2022) and other cities (all providing housing), in collaboration with Fedasil and others.

As announced in their Masterplan to end homelessness by 2030, Brussels social stakeholders recommend expanding the Brussels City project to other PCSWs and offering people accommodation during their trajectory. Doing so, homeless people could also qualify. Entering this trajectory is voluntary, and for those who don't join, the Masterplan explores expanding temporary housing options. A review of past and current initiatives is underway to shape and adapt the trajectory over time. Success will depend on reaching and convincing the target group, providing stabilising accommodation, psychological counselling, sufficient and skilled staff, strong partnerships, and so on. Smooth processing of applications is also key.

External factors also matter. For instance, except in 2023, humanitarian regularisations have declined since 2011 (Myria, 2024; Algemene Directie Dienst Vreemdelingenzaken, 2024). Some realism will also be necessary. Probably not everyone will find a solution, but documenting these cases could inspire future policy decisions.

Conclusions

Collecting data is crucial to counter stereotypes about undocumented PEH, such as the majority being former applicants for international protection or that most homeless people are undocumented. Therefore, this study responds to the European and academic call for data. The 2024 EU homeless count teaches us that undocumented people are still not always included in local censuses (Hermans et al., 2025). The EU capital, with its long experience in data collection on PEH, including undocumented people, offers a valuable case study to inspire other European cities. Subsequently, we recommend using these data to discuss undocumented people at all political levels, especially national and European levels. This study provides objective insights into the scale, urgency, and diversity of the population concerned, encouraging tailor-made solutions.

In Belgium, a lever for debate could be the upcoming interregional cooperation agreement (Accord de coopération concernant le sans-abrisme et l'absence de chez-soi, forthcoming), in which all signatories will commit to ending homelessness by 2030 by aligning policies and cooperation. At the European level, a renewed version of the Lisbon Declaration should mention that eradicating homelessness requires addressing the issue of undocumented people. In this respect, the elephant in the room needs to be made visible.

The scientific committee of this study and the Brussels homeless sector stress that the situation of undocumented PEH and the pressure on the EU capital and its homeless sector must be acknowledged, as migration and homelessness are interconnected. This can be extrapolated to other places in Europe. It must also be noted that leaving this target group in the streets, squats, or emergency accommodation is not a solution. In this respect, the jury of the European Consensus Conference on Homelessness in 2010 stated that legal barriers may trap them in staying long-term in emergency accommodation, harming well-being and contradicting the goal of the homeless sector to provide long-term solutions (Vandenbroucke et al., 2010).

References

AgII (2023a) Attest van Immatriculatie [Certificate of Immatriculation]. (AgII, Brussels). Available at: https://www.vreemdelingenrecht.be/verblijfsdocumenten/papieren-verblijfsdocumenten-en#block-ai-of-oranje-kaart

AgII (2024a) Papieren Verblijfsdocumenten en Proceduredocumenten [Paper Residence Documents and Procedural Documents]. (AgII, Brussels). Available at: https://www.vreemdelingenrecht.be/verblijfsdocumenten/papieren-verblijfsdocumenten-en#block-bijlage-25-en-25quinquies

AgII (2024b) Procedure Humanitaire Regularisatie (9bis) [Humanitarian Regularisation Procedure (9b)]. (AgII, Brussels). Available at: https://www.vreemdelingenrecht.be/verblijfsrecht/uitzonderlijk-verblijf/humanitaire-regularisatie-9bis/procedure-humanitaire-regularisatie-9bis

AgII (2024c) Staatloosheid [Statelessness]. (AgII, Brussels). Available at: https://www.vreemdelingenrecht.be/belgische-nationaliteit/staatloosheid

AgII (2024d) Procedure Gezinshereniging in het Buitenland (Art 10 Vw) [Procedure Family Reunification Abroad (Art 10 Residence Law)]. (AgII, Brussels). Available at: https://www.vreemdelingenrecht.be/verblijfsrecht/reguliere-migratie/gezinshereniging/gezinshereniging-met-derdelander/procedure-gezinshereniging-het-buitenland-art-10

AgII (2024e) Voorwaarden Medische Regularisatie (9ter) [Conditions for Medical Regularisation (9b)]. (AgII, Brussels). Available at: https://www.fedasilinfo.be/nl/humanitaire-regularisatie-9ter/voorwaarden-medische-regularisatie-9ter

Algemene Directie Dienst Vreemdelingenzaken (2023) Verwijderingen. Maandelijkse Statistieken, December 2023 [Removals. Monthly Statistics, December 2023]. (Federal Public Service for Domestic Affairs, Brussels). Available at: https://dofi.ibz.be/sites/default/files/2024-02/Verwijderingen_Eloignements_2023_diffusion_site%20NL_12_2023.pdf

Algemene Directie Dienst Vreemdelingenzaken (2024) Terugkeerbesluiten. Maandelijkse Statistieken, December 2023 [Return Decisions. Monthly Statistics, December 2023]. (Federal Public Service for Domestic Affairs, Brussels). Available at: https://dofi.ibz.be/sites/default/files/2024-01/STAT_OQT-BGV_NL_2023_12.pdf

Algemene Directie Dienst Vreemdelingenzaken (2024) Aanvragen om Machtiging tot Verblijf om Humanitaire of Medische Redenen 2014–2023 [Applications for Authorisation to Stay for Humanitarian or Medical Reasons 2014–2023]. (Federal Public Service for Domestic Affairs, Brussels). Available at: https://dofi.ibz.be/sites/default/files/2024-03/STAT_HUM-MED_NL_2014-2023.pdf

Amnesty International (2024) Lebanon: Joint Statement – Respect International Law in EU–Lebanon Migration Deal. (Amnesty International, Brussels). Available at: https://www.amnesty.eu/news/lebanon-joint-statement-respect-international-law-in-eu-lebanon-migration-deal/

B, J. (2023) Bewoners Ontruimd Tentenkamp naar Opvanglocaties Gebracht [Residents Evacuated Tent Camp Taken to Shelters]. (Bruzz, Brussels). Available at: https://www.bruzz.be/actua/ontruiming-tentenkamp-molenbeek-gestart-2023-03-07

Baeyens, P., Beys, M., Bourguignon, M., Büchler, A., De Smet, F., Dewulf, K., Dutilleux, A., Gaspart, G., Lejeune, J., Swankaert, J., Vandenberghe, I., Vanhoren, T., Vanparys, N., Vause, S. and Weinberg, D. (2015) *2015 Migration en Droits et en Chiffres. 2015 Migratie in Cijfers en in Rechten* [2015 Migration in Numbers and Rights]. (Myria, Brussels). Available at: https://www.myria.be/files/Migratie-verslag_2015-LR.pdf

Belga (2022) Europees Hof Roept België op Onderdak te Voorzien voor 148 Asielzoekers [European Court Calls on Belgium to Provide Accommodation for 148 Asylum Seekers]. (VRT, Brussels). Available at: https://www.vrt.be/vrtnws/nl/2022/11/16/europees-hof-roept-belgie-op-onderdak-te-voorzien-voor-148-asiel/

Belgian Official Journal of 31.12.1980, ref 1980121550. Available at: https://www.ejustice.just.fgov.be/eli/wet/1980/12/15/1980121550/justel

Belgian Official Journal of 12.01.2007, ref 2007002066. Available at: https://www.ejustice.just.fgov.be/cgi_loi/change_lg.pl?language=nl&la=N&cn=2007011252&table_name=wet

Bircan, T., Surkyn, J. and Yar, A.W.A. (2023) *Migration and Mortality: What Do We Know?* (Knomad: Washington, DC).

Bossens, N., Platteau, E., Frees, W. and Pattyn, V. (2015) *Onderzoeksrapport: De Bekendheid en het Imago van Vrijwillige Terugkeer bij Irreguliere Migranten en hun Vertegenwoordigers in België* [Research Report: The Awareness and Image of Voluntary Return Among Irregular Migrants and Their Representatives in Belgium]. (Catholic University of Leuven, Leuven). Available at: https://www.fedasil.be/sites/default/files/imago_vrijwillige_terugkeer_-_studie_kul_7.pdf

Bruss'help (2021) *Actieplan 2021–2024* [Action Plan 2021–2024]. (Bruss'help, Brussels).

Bruss'help (2024) *Masterplan de Fin du Sans-Chez-Soirisme: La Stratégie Opérationnelle Bruxelloise pour Sortir d'Ici 2030 de la Fatalité via la Prévention, l'Accompagnement et le Logement* [Masterplan to End Homelessness: The Brussels Operational Strategy to 2030 Through Prevention, Counselling and Housing]. (Bruss'help, Brussels).

Danckaerts, T. (2022) Het Politiek Taboe van de Onverwijderbaren [The Political Taboo of the Unremovable]. (MO*, Brussels). Available at: https://www.mo.be/analyse/het-politiek-taboe-van-de-onverwijderbaren

De Moor, N. (2023) Nicole De Moor: Eerste Pakket Hervormingen voor Gecontroleerd en Rechtvaardig Migratiemodel [First Package of Reforms for Controlled and Equitable Migration Model]. (cd&v, Brussels). Available at: https://afdeling.cdenv.be/nicole_de_moor_eerste_pakket_hervormingen_voor_gecontroleerd_en_rechtvaardig_migratiemodel

De Windt, H. and Temmerman, M. (2019) Waarom Lukt het Niet om Alle Afgewezen Asielzoekers Terug te Sturen? [Why Does It Fail to Return All Rejected Asylum Seekers?]. (VRT, Brussels). Available at: https://www.vrt.be/vrtnws/nl/2019/12/16/terugkeer/

Debruyne, P. and Geldof, D. (2021) De Deur naar Regularisatie Dichthouden Ontneemt Mensen een Toekomst [Keeping the Door to Regularisation Closed Deprives People of a Future]. (MO*, Brussels). Available at: https://www.mo.be/opinie/de-deur-naar-regularisatie-dichthouden-ontneemt-mensen-een-toekomst

Devillé, A. (2008) *Schuilen in de Schaduw: Mensen Zonder Wettig Verblijf in de Belgische Samenleving: Een Kwalitatieve Multi-Method Benadering* [Hiding in the Shadows: Undocumented Migrants in Belgian Society: A Qualitative Multi-Method Approach]. (Wolters Kluwer Belgium NV, Mechelen).

Dienst Vreemdelingenzaken (2024) Alternatieven voor Detentie [Alternatives to Detention]. (Federal Public Service for Domestic Affairs, Brussels). Available at: https://dofi.ibz.be/nl/themes/irregular-stay/alternatieven-voor-detentie

Edgar, B., Harrison, M., Watson, P. and Busch-Geertsema, V. (2007) *Measurement of Homelessness at European Union Level.* (European Communities, Brussels). Available at: https://ec.europa.eu/employment_social/social_inclusion/docs/2007/study_homelessness_en.pdf

European Union (2021) *Lisbon Declaration on the European Platform on Combatting Homelessness.* (European Union, Lisbon). Available at: https://ec.europa.eu/social/BlobServlet?docId=24120&langId=en

Fedasil (2009) 25 Jaar Vrijwillige Terugkeer in België [25 Years of Voluntary Return in Belgium]. (Fedasil, Brussels). Available at: https://www.fedasil.be/nl/nieuws/25-jaar-vrijwillige-terugkeer-belgie

Fedasil (2024a) Begeleiding en Informatie [Counselling and Information]. (Fedasil, Brussels). Available at: https://www.fedasil.be/nl/vrijwillige-terugkeer/begeleiding-en-informatie

Fedasil (2024b) Contacten voor Vrijwillige Terugkeer [Contacts for Voluntary Return]. (Fedasil, Brussels). Available at: https://www.voluntaryreturn.be/sites/default/files/public/content/contacts_nl.pdf

Fedasil (2024c) Humanitaire Regularisatie [Humanitarian Regularisation]. (Fedasil, Brussels). Available at: https://www.fedasilinfo.be/nl/humanitaire-regularisatie

Fedasil (2024d) Projecten [Projects]. (Fedasil, Brussels). Available at: https://www.fedasil.be/nl/vrijwillige-terugkeer/projecten

Fedasil (2024e) Reach Out – Informatie Geven aan Moeilijk Bereikbare Migranten [Reach Out – Providing Information to Hard-to-Reach Migrants]. (Fedasil, Brussels). Available at: https://www.fedasil.be/nl/reach-out-informatie-geven-aan-moeilijk-bereikbare-migranten

FOD MI (2016) (Dringende) Medische Hulp [(Urgent) Medical Help]. (Federal Public Service for Social Integration, Brussels). Available at: https://www.mi-is.be/nl/dringende-medische-hulp

Graas, C. and Lelubre, M. (2023) *MENA en Errance autour de la Gare du Midi, une Recherche-Action Collaborative*[Unaccompanied Foreign Minors Wandering Around the South Station, Collaborative Action Research]. (Crebis, Brussels).

Haj Ahmad, M.-T. and Busch-Geertsema, V. (2024) Homeless Migrants and EU Mobile Citizens in Europe, *European Journal of Homelessness* 18(1) pp.59–81.

Hermans, K., Dyb, E., Knutagård, M., Novak-Zezula, S. and Trummer, U. (2020) Migration and Homelessness: Measuring the Intersections, *European Journal of Homelessness* 14(3) pp.19–42.

Hermans, K., Demaerschalk, E., Mertens, N. and Teller, N. with Fritz, L. (2025) *EU – Homelessness Counts.* (KU Leuven, Leuven). Available at: https://www.kuleuven.be/lucas/en/eu_homelessness_counts

Horvat, N. and Striano, M. (2020) *Dénombrement des Personnes Sans-Abri et Mal Logées en Région de Bruxelles-Capitale* [Counting of the Number of Homeless and Inadequately Housed People in the Brussels-Capital Region]. (Bruss'help, Brussels).

Human Rights Watch (2023) *Letter to the EU on Human Rights Conditions for Strategic Partnership and Enhanced Cooperation with Egypt.* (Human Rights Watch, New York). Available at: https://www.hrw.org/news/2023/12/06/letter-eu-human-rights-conditions-strategic-partnership-and-enhanced-cooperation

La Strada (2008) *Une Première Tentative de Dénombrement des Personnes Sans-Abri dans la Région de Bruxelles-Capitale* [A First Attempt to Count the Number of Homeless People in the Brussels-Capital Region]. (La Strada, Brussels). Available at: https://www.lastradapils.brussels/census/files/fr/editions/2008/rapports/2008-Rapport-Denombrement-FR.pdf

Myria (2023) *Migratie in Cijfers en Rechten 2023: Het Jaarverslag van Myria: Katern Humanitaire en Medische Regularisatie* [Migration in Figures and Rights 2023: Myria's Annual Report: Humanitarian and Medical Regularisation Section]. (Myria, Brussels).

NL Times (2022) Agreements with Countries to Take Back Asylum Seekers Have Little Effect. (NL Times, Amsterdam). Available at: https://nltimes.nl/2022/10/25/agreements-countries-take-back-asylum-seekers-little-effect

Paquot, L. (2023) *Dénombrement des Personnes Sans-Chez-Soi en Région de Bruxelles-Capitale — Septième Édition, 8 Novembre 2022* [Counting of the Number of Homeless People in the Brussels-Capital Region — Seventh Edition, 8 November 2022]. (Bruss'help, Brussels).

Radio 1 (2022) Theo Francken (N-VA): Er Wordt te Weinig Ingezet op Ontrading en Terugkeer van Illegale Migranten [Too Little Is Being Done to Discourage and Return Illegal Migrants]. (VRT, Brussels). Available at: https://radio1.be/luister/select/de-ochtend/theo-francken-n-va-er-wordt-te-weinig-ingezet-op-ontrading-en-terugkeer-van-illegale-migranten

Roberfroid, D., Dauvrin, M., Keygnaert, I., Desomer, A., Kerstens, B., Camberlin, C., Gysen, J., Lorant, V. and Derluyn, I. (2015) *Welke Gezondheidszorg voor Personen Zonder Wettig Verblijf? – Synthese* [What Healthcare for Persons Without Legal Residence? – Synthesis]. (KCE – Belgian Health Care Knowledge Centre, Brussels).

Statbel (2019) België Telde op 1 Januari 2018 11.376.070 Inwoners [Belgium Had a Population of 11 376 070 on 1 January 2018]. (Statbel, Brussels). Available at: https://statbel.fgov.be/nl/nieuws/een-derde-van-de-belgische-huishoudens-bestaat-uit-alleenstaanden

Triandafyllidou, A. (2009) *Clandestino Project. Final Report.* (European Commission, Brussels).

Turner, B.S. (2016) We Are All Denizens Now: On the Erosion of Citizenship, *Citizenship Studies* 20(6–7) pp.679–692.

United Nations (n.d.) *Methodology.* (United Nations, New York). Available at: https://unstats.un.org/unsd/methodology/m49/

van Meeteren, M., van San, M. and Engbersen, G. (2007) *Irreguliere Immigranten in België. Inbedding, Uitsluiting en Criminaliteit* [Irregular Immigrants in Belgium. Inclusion, Exclusion and Crime]. (Risbo Contractresearch BV, Rotterdam).

Vandenbroucke, F., Gil-Robles, Á., Becker, R., Daly, M., Szabó, M., Mikkola, M. and Wolf-Wicha, B. (2010) *European Consensus Conference on Homelessness: Policy Recommendations of the Jury.* (European Union, Brussels).

Verhaeghe, P.-P. (2023) *Speaking from the Grave.* (Prof. Pieter-Paul Verhaeghe, Brussels). Available at: https://pieterpaulver.wordpress.com/2023/04/12/speaking-from-the-grave/

Vluchtelingenwerk Vlaanderen (2023a) EU Sluit Migratiedeal met Tunesië: Mensenrechten, een Illusie? [EU Concludes Migration Deal with Tunisia: Human Rights, an Illusion?]. (Vluchtelingenwerk Vlaanderen, Brussels). Available at: https://vluchtelingenwerk.be/nieuws/eu-migratiedeal-tunesie

Vluchtelingenwerk Vlaanderen (2023b) *Access to the Territory and Push Backs.* (Asylum Information Database | European Council on Refugees and Exiles, Brussels). Available at: https://asylumineurope.org/reports/country/belgium/asylum-procedure/access-procedure-and-registration/access-territory-and-push-backs/

VRT NWS (2023) Moet er een Muur Rond Europa Komen? [Should There Be a Wall Around Europe?]. (VRT, Brussels). Available at: https://www.youtube.com/watch?v=Omg7NE7uJj4