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

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Laure-lise Robben

LUCAS Centre for Care research and consultancy, KU Leuven, Belgium

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

➤ **Keywords\_** *Homelessness, postal address, social rights, administrative exclusion*

## Introduction

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

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

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

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

<sup>2</sup> More information: <https://www.feantsa.org/download/homeless-bill-of-rights-hand-book306835778875312583.pdf>.

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

## **Methodology**

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

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

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

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

<sup>3</sup> BAWO is the Austrian umbrella organisation for Austrian NGOs working in homelessness.

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

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

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

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

## The Issue: The Postal Paradox

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

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

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

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

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

Yet, classifications such as civil registries that are based on one's permanent residency are not naturally occurring systems – they are administrative databases created by governments to record and monitor events by their choice. The registry as such is not organically grown to be the basis for other institutions and public services, such as social housing or health care insurance. Policy choices shaped its importance and designed its eligibility criteria. For instance, in many European countries, there is an increased concern about mis-use of benefits and fraud preventions. Anti-fraud measures have become more popular, making a correct

and up-to-date register indispensable. However important, the access to social rights and services for PEH is at stake. “The unregistered remain outside the formal system”, the World Bank<sup>8</sup> states, because “without a legal identity, they cannot be formally employed, or taxed, and may be excluded from health, education, or social services”. A correct registration ensures their legal access to welfare provision, financial transactions, participation in society (e.g., voting), and so on. Another tangible benefit is that an address prevents the exacerbation of stigma or discrimination they are faced with. “They need an address to maintain connection with society, but also with their own families. Some of them have not been in contact with their families for many years because of the stigma of having to use an address of a homeless charity” (Respondent, July 2021). PEH (amongst others, such as exchange students or mobile population groups) show the blind spot of the register’s internal logic: being excluded because one does not fit the registry’s criteria means being excluded from public services (Peeters and Widlak, 2018), which makes it difficult for governments to locate and reach out to them, but also for researchers to include them in their sample design leading to underrepresentation and underestimation of the homelessness issue (Glasser et al., 2014; Nicaise and Schockaert, 2014).

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

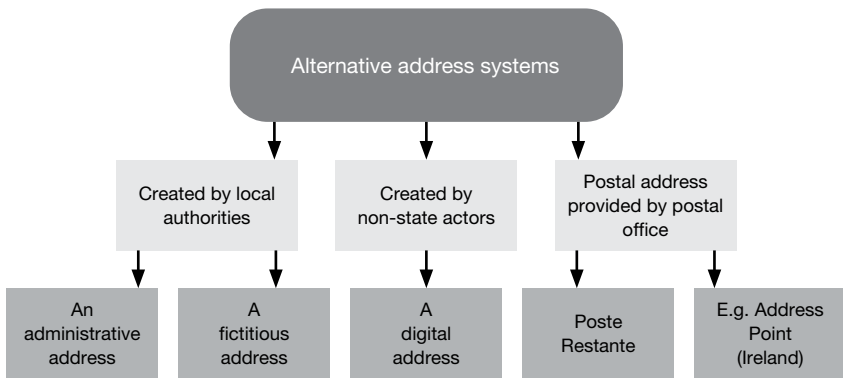
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<sup>8</sup> More information: <https://blogs.worldbank.org/en/opendata/civil-registrations-and-vital-statistics-its-not-just-important-its-matter-life-and-death>.

## Countries' Efforts to Overcome the Postal Paradox

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

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



### Type 1: Administrative Address – Created by Local Authorities

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

In Belgium, the so-called 'reference address' at a local welfare agency was specifically established for PEH to remain administratively 'anchored' in a municipality. PEH do not reside at this specific address, yet can use this when applying for a job, social housing, and so on. A similar system can be found in the Netherlands. Also provided by the municipalities – as well as by other organisations (who got the municipality's approval) – is their 'letter address'. Provided by every municipality, both practices require PEH to comply to formal requirements – and certain municipalities may impose additional eligibility criteria. By means of case-by-case judgements, claimants' specific circumstances are assessed. For instance, in Belgium, one needs to demonstrate they 'experience homelessness', for instance with a

signed declaration of a shelter. In both Belgium and the Netherlands, providing proof of a local connection to the municipality is required as well. PEH need to indicate a long-term residence in a particular location, or a kind of connectedness to a specific community or municipality. Recent evidence suggests these conditions hamper the access for PEH to such an administrative address (Robben et al., 2023a, 2023b), and more so when certain municipalities do not consider temporarily living with friends or family (the so-called ‘couch-surfers’ or living doubled-up) or in temporary shelters as having a ‘local connection’. Applicants are faced with a myriad of administrative burdens, ranging from such conditionalities to complex application forms. Robben et al. (2024) found that these burdens are specifically constructed by municipal policies to disincentivise the use of such administrative addresses, even though these are formal rights for persons without a residential address. Generally, the access to both administrative addresses are restricted due to administrative burdens (Robben et al., 2024) leading to a significant group that remains de-registered and therefore administratively invisible (Robben et al., 2023a). To illustrate, in 2018, almost 20 000 individuals claimed such an administrative address in Belgium (Rijksregister, 2023), and more than 50 000 did so in the Netherlands (CBS, 2019).

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

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



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

## Type 2: A Fictitious Address

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A different type of address for PEH can be found in Italy. More than 19000 people live on the Via Modesta Valenti<sup>10</sup> in Rome, yet, local residents would find it challenging to pinpoint the address. Certain Italian municipalities offer *via fittizie* or fictitious addresses – addresses which cannot be found on the map, but do hold a legal value. Like those with a residential address, this fictitious address makes them eligible for social assistance, social security benefits, an identity card, and gives PEH the opportunity to go voting. Originally, these addresses were established by the Italian Government to enumerate circus performers and traveling professionals. Individuals experiencing homelessness can apply for one at the municipality in which the person has a ‘*dimora abituale*’ – again, a long-term residence. In 2022, over 230 such fictitious addresses were registered, yet it is not a standard practice across Italy (Choi, 2022; Ioannoni & Paluzzi, 2023), and the application procedures or eligibility criteria vary depending on the municipality you reside in (Avvocato di Strada, n.d), as stated below.

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

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

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

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

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

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

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<sup>11</sup> More information can also be found on their website: <https://www.proxyaddress.org/>.

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

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

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

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

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

<sup>15</sup> More information: <https://www.addressingtheunaddressed.org/>.

## Type 4: Postal Address

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

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

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

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

However, it is not available across Ireland – post offices in smaller rural areas may not offer such a service. It differs from an administrative address because it addresses the need for collecting correspondence, not the need for being registered. 'It's

simply a mailing address', a correspondent (July 2021) states, "People ask if it can be used as proof of identity. So that it can be used for banking or other services. It certainly is used by people in applying for a job. But this [Address Point] was not designed to be proof of identity. We just want to provide a secure, dignified address they can use, that's what it is designed for". Moreover, compared to administrative addresses, postal services do not suffer immediate financial consequences if more people make use of this system. They do not work with municipal offices either, and so they are not restricted (e.g., in budget or staff) if the demand for said addresses may suddenly increase. It can be compared to a PO Box, albeit the latter is not free. Local organisations are aware of Address Point for PEH, and will redirect them if necessary. In 2020, more than 2800 individuals made use of such a postal address in Ireland (O'Connor, 2020) – making up for only a fraction of the whole population.<sup>16</sup>

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

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

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

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<sup>16</sup> The Irish Government publishes their statistics of PEH residing in emergency accommodation each month (see Irish Department of Housing Local Government and Heritage, 2024). For instance, in December 2020, 5873 adults were sleeping in emergency accommodations.

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

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

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

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

Such proof of identity, however, is necessary to access social and political rights and services. Administrative addresses do so, whilst simultaneously connecting applicants with local social services or municipalities that can offer additional support. Yet, in case of administrative addresses, such as those in Belgium and the Netherlands, a myriad of barriers restrict their accessibility – including conditions

that PEH need to meet, complex applications forms, and administrative burdens (e.g., Robben et al., 2024; Robben et al., 2023b; Nationale Ombudsman., 2016). Moreover, its purpose needs to be clearly formulated for each actor involved. In Belgium, for instance, different actors regard this address as a stepping stone toward social assistance, legitimising them to impose additional (albeit unlawful) conditions, such as a weekly follow-up, applying for a job, or even addiction treatment. What social workers may then see as helpful nudges, can overall be a push too far – causing them to disengage from social assistance or avoiding care in general (Robben et al., 2023b). Moreover, not complying with the locally imposed conditions means a refusal or discontinuation of the administrative address, and leads to being un-registered, falling of the radar, and an exacerbation of their already precarious situation (Robben et al., 2023a).

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

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

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

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

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

Of course, also that the address had to look like a regular, normal address.

There was really little point in providing an address that was very obviously for homeless people. We would be reinforcing the stigma. (Respondent, July 2021)

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

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

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

## Discussion

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The postal paradox means that losing one's address can exacerbate PEH's living situation, hampering the access to rights and services, and can lead to (both administrative and social) exclusion. Drawing from the insights of experts and literature on alternative address systems, several elements emerge as crucial for designing a so-called 'effective' address for PEH. The homeless population,



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

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

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

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