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Homelessness policy and provision in three European countries: Ireland, Scotland and Norway

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Abstract

This paper examines recent developments in homelessness policy and provision in a comparative context focusing on Ireland, Scotland and Norway. The introduction considers situates the analysis in the broader context of comparative approaches to theorizing European welfare states, and explains the basis of the comparative case studies.

The main body of the paper compares homelessness across the three countries in relation to:
(a) issues of the definition and measurement of homelessness;
(b) the profile of homeless people in the three countries and
(c) changing homelessness policy and housing options for homeless people

The concluding section provides a comparative discussion which relates developments in homelessness policy and provision to the approaches to welfare in Ireland, Scotland and Norway, and reflects on the potential for wider comparisons across Europe.

Introduction: homelessness in times of prosperity and austerity

The European Union and its neighbouring European countries retain diverse housing systems and varying approaches to defining, quantifying and resolving homelessness. The case for selecting countries for comparison could be made on a range of grounds, such as randomly or selecting similar or contrasting countries. Our approach here is to begin with three relatively close geographical neighbours which are similar in
One of our ‘countries’, Scotland, remains part of the United Kingdom but policy on housing and homelessness is largely devolved to the Scottish Parliament with legislation and practice increasingly divergent from the rest of the UK (Fitzpatrick, 2004; Anderson, 2007, 2009). A minority Scottish National Party (SNP) Government was elected in the 2007 Scottish Parliament elections and by the 2011 elections the party had achieved an overall working majority in the Scottish Parliament for the next five years. In September 2007, the Scottish Government published its overarching principles and priorities for its first programme in Government, with the ambitious twin objectives of achieving stronger economic growth but also delivering a fairer distribution of the nation’s wealth. The introduction to the SNP strategy stated:

*We believe that Scotland can match the success of similar countries – Ireland to our west, Iceland to our north and Norway to our east, nations that sit at the top of world wealth league tables and form an arc of prosperity around our shores. Scotland has important lessons to learn from each of these neighbours in terms of competitiveness, investment and economic growth and it is this government’s job to offer a vision for Scotland that enables us to match, and we hope, exceed their achievements* (Scottish Government, 2007, p9, authors’ emphasis).

This ambitious vision of course pre-dated the economic crisis which commenced with the 2008 credit crunch and continues to affect all four countries mentioned to varying degrees. While it has not been possible to integrate Iceland into this analysis, we are able to offer some initial comparisons of the extent to which homelessness persists in the other three relatively prosperous northern European Countries, assess the degree of commonality and convergence (or otherwise) in their approaches to tackling the issue, and reflect on the impact of the post-2008 economic climate.

Approaches to the comparative analysis of social policy, including housing and homelessness, have developed substantially since the ground breaking work of Gøsta Esping-Andersen (1990) which set out the thesis of three distinct, path dependent models of welfare capitalism (universalistic, corporatist and liberal). Almost from its inception, however, the model presented problems for analysis of the European Union as the southern European countries (Greece, Spain, Italy and Portugal) were not well served by the analysis and of course the project was completed prior to the collapse of communism in Europe and the much later accession of post-communist states into the European Union. Moreover, housing was not a component of welfare in the Esping-Andersen analysis, and the extent to which housing can be interpreted as a ‘welfare’ service or benefit is similarly highly variable across Europe. Indeed, prior to Esping-Andersen’s analysis, Norwegian social scientist Ulf Torgersen (1987) characterised housing as ‘the wobbly pillar under the welfare state’, arguing that the status of housing within welfare was weaker in comparison to education, health and social security/pensions, which constituted the core of the welfare state.

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1 Please note that this paper is a work in progress and the post-2008 analysis has not yet been completed.
Arts and Gelissen (2002) reviewed subsequent critiques of, and alternatives to, Esping-Andersen’s thesis, concluding that real welfare states are usually hybrid cases, but that the welfare regime approach remains a valuable tool given the lack of alternative theoretical development for comparative social policy research. For housing, the essential question remains the extent to which provision is a dimension of welfare, as compared to a commodity to be traded in the market place. Housing tenure is often taken as an indicator of the commodification of housing and Table 1 provides data on key population and tenure statistics for the three countries. It can be seen that while the three countries have broadly similar populations, their tenure patterns are very different. Ireland and Norway have relatively higher home ownership, Scotland has relatively higher social rented housing and Norway has a particularly small social rented sector. The Norwegian private rented sector is nearly double that of Ireland and Scotland.

Table 1: Indicative population and tenure statistics in Ireland, Norway and Scotland

<table>
<thead>
<tr>
<th></th>
<th>Ireland</th>
<th>Norway</th>
<th>Scotland</th>
</tr>
</thead>
<tbody>
<tr>
<td>Population</td>
<td>4,314,634</td>
<td>4,681,134</td>
<td>5,117,000</td>
</tr>
<tr>
<td>% Home ownership</td>
<td>80</td>
<td>80</td>
<td>65</td>
</tr>
<tr>
<td>% Private renting</td>
<td>10</td>
<td>18.5</td>
<td>10</td>
</tr>
<tr>
<td>% Social renting</td>
<td>10</td>
<td>1.5</td>
<td>25</td>
</tr>
</tbody>
</table>

Sources: Eurostat 2007 and Irish, Norwegian and Scottish national statistics

While post-1980 neo-liberalism has broadly resulted in the increasing marketisation of housing across most European countries, with respect to homelessness the ongoing welfare role remains substantial. Doherty (2004) reflected on post-1990s comparative housing research, noting a common theme of the role of state in the strategic development of housing policy, albeit reflecting the ‘roll back’ of the state and the continuing ‘roll out’ of neoliberalism (Peck and Tickell, 2002). The resilience of state involvement in housing led to the conclusion that housing regimes of Europe, as embedded in national welfare states, demonstrated much continuity and the state remained a key player (Doherty, 2004).

Within the original Esping-Andersen typology, Norway was one of the universalistic, social democratic welfare states characteristic of Scandinavia, while the UK (including Scotland) and Ireland were both classed as liberal, market driven welfare states. However, Anderson (2004) argued that the UK had more universalistic tendencies during the period of welfare expansion from 1945 to the mid-1970s, a position supported by Nixon et al (2010 p319-320) who considered that the post-devolution separation of policy-making was combined with a stronger retention of universalist welfare state assumptions in Scotland which helped explain policy differences from England. O’Sullivan (2004) contended that Ireland is actually very difficult to classify within the Esping-Andersen scheme. Indeed, reflecting on the literature on the comparative analysis of welfare, O’Sullivan commented that ‘the only ‘welfare regime’ or ‘family of nations’ that Ireland has not occupied in this comparative research is the social-democratic one’ (p326).
Dyb (2007a) noted that state intervention in Norwegian housing policy has indeed been universalistic in nature, in line with the Scandinavian social democratic welfare model. The high proportion of home ownership was achieved with the support of general subsidies, notably interest rate subsidies post World War II which allowed the payment of mortgage interest to be withdrawn from taxation, and low interest rate loans submitted by the State Housing Bank. The Housing bank was established in 1946 and emerged as the most significant post WWII housing policy tool. In essence, in the post-1945 period, the Norwegian social democratic government selected state supported home ownership in preference to state supported renting (Annaniassen, 2006). This was important in general housing supply, suggesting that the Norwegian housing model indeed matched Esping-Andersen’s social democratic/universalistic welfare state regime. From the 1980s, the objectives of Norwegian housing policy changed from an overall universalistic approach to a targeted policy aimed at groups with specific needs and from the middle of the 1990s the remaining universalistic approach was effectively repealed (Annaniassen 2006). Dyb (2007a) concluded that in the early 21st century, Norway could be characterised as displaying ‘roll-back’ of state intervention in housing policy combined with stronger engagement in homelessness policy, in line with arguments of Anderson (2004) for the United Kingdom and Sahlin (2004) for Sweden.

Defining homelessness in the three countries

The profile of the homeless population in any country will first and foremost reflect its definition of homelessness, combined with the accuracy and frequency of quantifying homelessness. Outside of Scotland and the rest of the UK, definitions of homelessness tend to focus on rooflessness (Stephens and Fitzpatrick, 2006) although FEANTSA has always argued for a wider definition (Edgar and Meert, 2005).

Ireland

In Ireland, under Section 2 of the Housing Act 1988, a person is officially regarded as homeless if the housing department of their local authority judges that they have no accommodation that they can ‘reasonably occupy’, or are living in some form of emergency accommodation, and are judged to have insufficient resources to secure reasonable accommodation. This is an elastic definition which in principle might be interpreted to encompass a wide range of housing need. In practice, a narrow interpretation focuses on rough sleepers, those in emergency accommodation and transitional accommodation, and more recently has included other groups at acute risk of homelessness such as soon-to-be released prisoners without an address. Some commentators have, however, suggested that certain categories should be excluded from the definition, principally those in long-term supported accommodation (e.g. Bergin 2005). The official view (DoEHLG 2008: 54) is that the 1988 definition should be retained, whilst the operational categories to be included will be reviewed after consultation with the National Homeless Consultative Committee (whose establishment was one of the recommendations of the 2006 independent Fitzpatrick Review).

Norway
The definition of homelessness in Norway, by contrast, is not defined in legislation but set by a survey conducted in 1996 (Ulfrstad 1997) and repeated in 2003 and 2005 (Hansen et al 2004, Hansen et al 2006). Those counted as homeless in this survey are those in casual or temporary accommodation, people without an organised place of residence for the coming night, and those who are living temporarily with family, friends or acquaintances. Also included are people who are in prison or in an institution, and who are to be released or discharged within two months without an address. This rather narrow definition of homelessness effectively results in a homeless population very similar to ‘vagrants’, the majority of whom also have a serious addiction problem (Dyb 2007b). Those in precarious housing situations (e.g. moving between short term arrangements) are not defined as homeless (Dyb, 2007a).

**Scotland**

The current definition of homelessness for Scotland which is contained in Section 24 of the Housing (Scotland) Act 1987, as amended, defines homelessness for the purposes of the act as follows:

* A person is homeless if he/she has no accommodation in the UK or elsewhere.
* A person is also homeless if he/she has accommodation but cannot reasonably occupy it, for example because of a threat of violence. A person is potentially homeless (threatened with homelessness) if it is likely that he/she will become homeless within two months. A person is intentionally homeless if he/she deliberately did or failed to do anything which led to the loss of accommodation which it was reasonable for him/her to continue to occupy (Scottish Government, 2008, p18).

In practice, this definition is applied in such a way as to include a much wider range of housing need than in Norway or Ireland.

**Measuring homelessness**

As noted earlier, measured homelessness in different countries will reflect both varying definitions of homelessness and approaches to measurement.

**Ireland**

Every three years Irish local authorities conduct a national assessment of the extent of homelessness (stock rather than flow), as provided for in section 9 of the Housing Act 1988. The most recent data, from the 2008 count, show a continuing reduction in the numbers of homeless households (from 2,468 in 2002 to 2,399 in 2005, to 1394 in 2008) (DoEHLG, 2008: 103). Most homeless NGOs continue to cite the long-standing figure of 5,000 persons homeless, although accepting that only a small percentage of these are roofless. Nonetheless, commentators do agree that roofless persons are predominantly (around 80%) male and single, and showing high levels of addiction and mental health issues (Amnesty International, 2003; Lawless and Corr, 2005; O’Carroll and O’Reilly, 2008). Homelessness in Ireland is highly concentrated in the main cities, with Dublin accounting for over half of the recorded homeless

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1 To be updated for any subsequent repeat surveys.
population. The current extent of rough sleeping, according to official statistics, is quite low at around 70 persons in Dublin in 2010 (Homeless Agency 2010).

A separate count of those in social housing need, which includes categories such as those living in unaffordable accommodation and those involuntarily sharing who have applied to and been found eligible by the local housing authority for social housing, shows a much larger population, a figure which is more comparable to the Scottish homelessness statistics. Currently, a Data Subgroup of the National Homeless Consultative Committee is due to report on the use of the ETHOS classification (Edgar and Meert, 2005) in Dublin and its potential for application nationally (DoEHLG 2008: 17-18). A significant factor impacting on demand for Irish homeless services in recent years has been the growth in homeless persons of Eastern European origin (Bergin & Lalor, 2006; Sheehan, 2007). This growth is the result of three linked factors: sharply rising unemployment, particularly in the construction sector; the eastern enlargement of the EU, and the application of a Habitual Residency Condition which bars anyone not resident in Ireland for the previous two years from claiming social welfare assistance.

Scotland

Official homelessness statistics for Scotland count the total flow of applicants who apply to local authorities for assistance under the legislative framework and thus enumerate a much higher level of households recorded as homeless across the year, than is the case for Ireland or Norway. A more accurate figure for international comparisons is therefore the stock of homeless households in temporary accommodation at the end of the accounting year (typically 31 March). Nevertheless, Scotland still emerges with a relatively higher level of homelessness, broadly reflecting its wider legal safety net. For example total applications to Scottish local authorities reached 60,500 in 2005-6, reflecting the widening of the safety net prior to full implementation of post-2000 changes described in detail below (Scottish Government, 2008). By 2009-10, total annual applications had reduced somewhat to 56,947, of which 37,044 were assessed as priority homeless by local authorities in Scotland (Scottish Government, 2011).

Changing patterns mainly reflect increases in applications from single person households who have been the main beneficiaries of the post-2000 legislative changes. Similarly, households in temporary accommodation increased as new duties were implemented and again this may be levelling off. Overall, 60% of applicants were single persons, mainly men (Scottish Government, 2008, 2011). As at 31 December 2010, there were 10,952 households in temporary accommodation, an increase of 674 households (7%) compared to one year earlier (Scottish Government, 2011).

Looking at the narrower definition of ‘people sleeping rough’, Scottish Executive (2007) statistics indicated that in 2005-6, 7% of applicants reported sleeping rough the night before applying for assistance, which was down from 10% in 2002/3. The average number of people sleeping rough per month also fell from 440 in 2002-3 to 330 on 2005-6 As was the case in Ireland, those sleeping rough were predominantly single men aged 25-54. The Scottish Executive also funded counts of the number of
people sleeping rough in specific reference weeks in Spring and Autumn during 2001-2003. For example, one count identified 328 people sleeping rough in one week in October 2003, compared to 130 formal applicants who said they had slept rough the night before during the same period. This finding suggests that current published statistics may still be underestimating extent of rough sleeping in Scotland (Scottish Executive, 2007). 

Norway

According to the last census there were 5500 homeless persons in Norway. The census was carried out during one specific week (week 48). 76% were men, mostly under 40 years of age and 70% were single. Three out of four were born in Norway. 8%, 440 persons, were either literally sleeping rough or stayed in overnight shelters with no place to stay at daytime. The largest group, 42%, were staying temporarily with friends or relatives, whereas 41% were in various types of treatment institutions, in prison or in homelessness shelters (Hansen et al 2006).

The surveys do not capture all groups that are literally homeless and some groups are excluded for different reasons. The study "Roof for everybody" carried out in winter 2006 in Oslo strongly suggests that the national survey underreported on rough sleeping. Excluded groups also included those characterised as being “homeless by political choice”. Other groups excluded from the last survey are refugees without a residence permit, who had left the refugee reception centre. It has been documented that this group is largely homeless by the definition applied in the surveys (Brekke & Søholt 2005). Another excluded group is trafficked women. The main argument against including these groups is that they have no legal rights to housing and services in Norway, and it is not useful for the policy making to include them. This implies that the survey largely is a mapping of the number of people who are homeless and entitled to assistance from the authorities.

Homelessness policy and housing options

Ireland

As noted above, the Housing Act, 1988 set out a definition of homelessness for the first time in Irish legislation, and established a periodic count of the numbers of homeless persons under this definition. It also gave power to local authorities to intervene directly via cash payments (e.g. for emergency B&Bs) or direct provision (social housing, comprising the local authority and voluntary housing providers), or indirectly via cash assistance to voluntary bodies for providing emergency shelters, to assist homeless persons find accommodation. (The final housing option is via a rent supplement scheme, a demand-led housing benefit, with the Community Welfare Officer to whom the homeless person applies simply applying a means test to adjudicate on eligibility.)

3 Scottish Government (2011) statistics do not include data for rooflessness in this bulletin. Most recent official estimates in Scotland and any other evidence, e.g. from homelessness NGOs to be checked/added.

4 Minister of municipalities and regions in the former government.
However, the 1988 Act left unclarified the relations of local authorities with the other statutory provider, the Health Boards (now the Health Services Executive), and indeed with voluntary providers, and had given great discretion to local authorities in terms of who was to be counted as homeless and what services were to be provided to them. Under the Health Act 1953, the new Health Service Executive continues to have a broadly defined remit to cater to the needs of homeless persons.

Taken as the main response to homelessness, the 1988 Act did little to address issues of prevention and of meeting non-accommodation support needs. Additionally, the Act made little difference to the social housing allocations policy of many local authorities, despite the later issuing to local authorities of guidelines on allocations - though the lack of data makes monitoring difficult (Nexus, 1991; Harvey, 1995; Bergin et al. 2005, Finnerty & O’Connell 2006). A more ambitious policy response to adult homelessness was proposed in the policy documents *Homelessness – An Integrated Strategy HAIS* (2000) and the *Homeless Preventative Strategy* (2002). The HAIS involved an emphasis on partnership working between local authorities, Health Boards and voluntary agencies, via local action plans and local homeless fora. Substantially increased funding was committed under HAIS, with local authorities responsible for funding ‘bed nights’ in shelters and capital expenditures, and Health Boards for in-house care and health needs. The HAIS also signalled a shift in focus towards moving people out of shelters, with an increased stress on transitional accommodation, with increased attention to the health, training and life-skills issues that homeless people may face, and to the variety of supports that may be required in moving on from emergency accommodation.

Both strategies were the subject of an official independent review (Fitzpatrick Associates 2006) whose findings the government broadly committed to endorse. It found that HAIS in particular had been successful in terms of generating increased funding for the sector, in promoting joint working between the statutory and voluntary sectors, and in reducing rough sleeping. One of the more detailed recommendations was that resources previously focused on the provision of emergency accommodation should be redeployed to the provision of long-term accommodation. It is also recommended that the focus should be on the provision of long-term accommodation rather than on transitional accommodation (usually provided by voluntary bodies, with capital costs funded by the DoEHLG). This recommendation embodies the ‘housing first’ emphasis now widely espoused in relevant policy documents (DoEHLG: 2007, 2008; DoECLG: 2011c). In a significant departure from HAIS, the use of the private rented sector proposed by Fitzpatrick Associates parallels the current policy emphasis on the new Rental Accommodation Scheme as a long-term housing option for homeless persons. Also feeding into the revised national strategy were a series of plans and evaluations (including service evaluations and value for

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5 In the Dublin area, the Homeless Agency co-ordinates the planning and implementation of homelessness policy.

6 The Homeless Preventative Strategy focused on discharge policies for those leaving state care.

7 The RAS represents a development of the rent supplement scheme described earlier. Effectively, the local authority would let the accommodation from participating private landlords and sub-let to qualifying households.

The main recommendation of Fitzpatrick Associates (2006) that the Integrated and Preventative Homeless Strategies should be ‘amalgamated and revised’, with a global target of eliminating rooflessness and houselessness within a specified timescale, was accepted by the government in the form of the new national strategy, The Way Home, and the Implementation Plan (DoEHLG: 2008 and 2009). The government endorsement of this recommendation may well have been based on the sanguine view by Fitzpatrick Associates (2006) that this would effectively be a cost-neutral strategy, involving the switching of existing expenditure from emergency and transitional to long-term accommodation responses” (Anderson et al), what is officially referred to as the ‘reconfiguration of homeless services’ (DoEHLG, 2008: 6, 53). However, the failure to achieve these national targets (set for 2010), and the specific target of supplying 1,200 housing units in 2010 for persons who have been homeless long-term, have led to sharply contrasting assessments (Higgins 2011; Morgan, 2011). A key issue here involves the proposed housing destinations of formerly homeless persons: a reliance on sub-leasing from private landlords by local housing authorities (this ‘Rental Accommodation Scheme’ is a modification of the existing rent supplement scheme), and on long-term leasing from private property developers (Finnerty, 2009). Take-up of both schemes, particularly the latter, have met with decidedly patchy results, with low levels of participation from developers, and concerns expressed by homeless NGOs about the funding for floating supports in this ‘housing first’ approach.

Scotland
The legal and policy framework for homelessness which existed prior to devolution had been in place across England and Scotland since 1977. The framework placed a legal duty on local housing authorities to take action where individuals or households presented themselves as homeless or threatened with homelessness. The legislation did not, however, treat all homeless households equally. From its inception, local housing authorities were required to apply four ‘tests’ to those in housing crisis:

1. Is the household ‘homeless’ as defined in the legislation?
2. Is at least one member of the household in ‘priority need’ of accommodation, defined as:
   a. Household with children of school age or an expectant mother?
   b. Households ‘vulnerable’ due to old age, health, disability or other ‘special reason’?
   c. Household homeless because of an emergency such as a fire or flood?
3. Has the household become homeless ‘intentionally’ (by deliberate act or omission which led to homelessness)?
4. Does the household have a ‘connection’ with the local authority to which they have presented (for example through residence or employment)? If the household does not have such a connection with the local authority to which it applies, it may be referred to another area for long term housing, although temporary accommodation would normally provided pending such a decision.

By and large, over a twenty year period, households who applied for assistance and met these tests were rehoused in secure council or housing association tenancies. The
legislation worked much less well for single people and couples without children, who were largely excluded from the benefits of the legislation. This led to the introduction of special initiatives to tackle rough sleeping during the 1990s. Scotland had a policy target that by the end of 2003 ‘no one should need to sleep rough’ and, to an extent, real reductions in rough sleeping were achieved (Anderson, 2007a).

During the period 1999-2007, a Labour/Liberal Democrat coalition government in the newly created Scottish Parliament undertook a major review of this homelessness legislation. The review was conducted by a specially constituted Homelessness Task Force which published an interim report in 2000 and its final report and action plan in 2002 (Homelessness Task Force, 2000, 2002). As well as representing a strategic framework for a new approach to homelessness in Scotland, the Task Force reports made recommendations for legislative change which were subsequently enacted in the Housing (Scotland) Act 2001 and the Homelessness, etc. (Scotland) Act 2003.

The Housing (Scotland) Act 2001 required local authorities to produce comprehensive strategies to assess the level of homelessness in their areas and to provide temporary accommodation for all homeless households (typically for 28 days) until a full decision is reached on their application (Scottish Executive, 2005, p55). Perhaps the most significant recommendation for legislative change was the phasing out of the longstanding differential treatment of households according to ‘priority’ or ‘non-priority’ need status by the target date of 2012. The HTF also recommended dispensing with the other two tests (‘local connection’ and ‘intentionality’). On full implementation, the four tests of the 1977 legislation would be reduced to one – is the household homeless? The Homelessness etc (Scotland) Act 2003 ((Office of Public Sector Information, 2003) further extended the existing definition of priority need and set out the framework for achieving the ultimate aim of ensuring that by 2012, everyone assessed as being unintentionally homeless in Scotland would be entitled to permanent accommodation.

Anderson (2007b) has provided some assessment of the first five years of progress with this new framework, although the scope for analysis was limited by the lack of transparent and rigorous monitoring of progress at the national level. From available evidence however, Anderson expressed concern that implementation was not yet matching the high expectations of what was widely recognised as a very progressive review and a significantly changed legislative framework. For example while local authorities were given flexibility in meeting their expanded duty to abolish the priority/non-priority distinction, this meant at least a temporary lack of clarity and arguably fairness in terms of who should be brought within the safety net sooner rather than later.

The newly elected SNP Government publicly confirmed in 2007 its commitment to the 2012 homelessness target, with a switch of emphasis to service delivery (Scottish Government, 2007; Chartered Institute of Housing, 2007). The new Government launched a major consultation on housing policy in 2007/8 with the publications of its Firm Foundations discussion paper (Scottish Government 2007b). While this document heralded some key policy developments, notably an overall increase in housing construction and support for a return to new council house building, it had little new to say on homelessness, given the extent of the previous review and sustained consensus on the approach. However, the Firm Foundations paper did raise
the question of whether greater use could be made of the privately rented sector in meeting the 2012 target, marking an important departure from the long standing practice of valuing the security of social rented housing as the main solution to homelessness.

After the 2007 Scottish Parliament elections, the SNP Government confirmed its commitment to the 2012 homelessness target, with the emphasis very much on service delivery. It set up the 2012 Steering Group with high-level membership focusing on four objectives in the run up to 2012:

- Promoting and improving joint working
- Preventing homelessness where possible
- Working together to maximise access to housing association and private rented sector housing
- Investing in the appropriate areas

The early Homelessness Task Force reports and recommendations had envisaged that the prevention of homelessness would be addressed within local homelessness strategies. However, research found that homelessness prevention strategies typically focused on tenants facing eviction and individuals facing discharge from institutions using mechanisms such as early warning procedures/protocols, family mediation and tenancy sustainment schemes (Pawson et al., 2007). This was quite different to the approach in England where prevention (rather than widening the safety net) was a core strategy in reducing homelessness. However, the English approach raised concerns around possibly undermining the core legislation by attempting to use preventive measures to ‘manage’ or ‘control’ the level of homelessness applications and acceptances.

A Homelessness Prevention Advisory Group was set up in June 2008 and in 2009, *Prevention of Homelessness Guidance* was published by the Scottish Government and COSLA. The guidance adopted the following definition of homelessness prevention:

> Scottish Government and Convention of Scottish Local Authorities (2009 p4, emphasis in original):
>
> *For the purposes of this guidance and central to our definition of homelessness prevention, we consider that; following a competent and person-centred assessment of the risks of homelessness, the approaches and activities undertaken to secure the most effective, appropriate and sustainable housing outcome for the person concerned should be deemed as acceptable prevention activity”.*

The key messages from the 2009 guidance on preventing homelessness can be summarised as follows:

- The prevention of homelessness does not happen solely through an exclusive focus on homelessness; a holistic or systemic approach to all relevant issues is needed.
- While alleviating homelessness may be expensive, principles of “spending to save” apply in relation to prevention.
- Homelessness prevention must be embraced across all local authority services as well as partner agencies such as housing associations and health services.
Effective and sustainable homelessness prevention activity will only take place when partners work in tandem to tackle the causes.

- Prevention is not an alternative to increasing housing supply. However, even with expanded housing supply there will be a need for an integrated prevention approach to avoid the damaging effects that homelessness can have on children and adults.
- Pro-active and early intervention, based on a well understood knowledge of the local triggers of homelessness, will have more impact than traditional re-active responses to homelessness.
- Homelessness prevention activity should focus on providing sustainable housing outcomes based on person-centred assessment and planning measures. New techniques such as Housing Options interviews and Personal Housing Plans are likely to provide earlier opportunities to avert later housing crisis.

Both local authorities and housing associations were expected to play a full part in the prevention and alleviation of homelessness but of course the sector face wider challenges. An analysis by the University of Glasgow and Neary Consultants (2010) identified these key challenges as:

- The impact of the economic and credit crisis at the end of the decade 2000-2010
- Medium to long term cuts in public expenditure
- Factors affecting the demand for housing association tenancies including demographic change, affordability, individual pressures and social change.
- and
- Government policies to achieve greater efficiency and effectiveness in the sector.

Despite these challenges, the SNP Government in Scotland retained the ambitious 2012 target, though it did introduce flexibility in delivering that target through the option of increased use of the private rented sector as ‘settled accommodation’.

**Norway**

In common with Ireland and Scotland, Dyb (2007a) noted that homelessness has been particularly high on the Norwegian policy agenda in the post-2000 period. The first systematic national initiative to curb homelessness, Project Homeless, was launched in White Paper No. 50 (1998-99). Project Homeless was primarily a trial scheme to develop models and methods to curb homelessness and to build competence about homeless people’s needs. The prime target group was homeless persons with drug addiction and double diagnoses addiction/mental health problems. The evaluation of the project drew some important lessons, which became important in developing a homeless policy (Dyb 2005):

- The project created acceptance for right to homeless people with substance misuse or double diagnoses abuse/mental health problems, often seen as the “undeserving” people, to have access to housing and services.
- Project Homeless became a housing project. The “housing first” approach, which is the current homelessness policy, developed throughout the project.
- Building competence was important and necessary.
- The results from the project seemed to be implemented and grounded in management and professional departments in the municipalities.
There had been too little room in the project overall for other groups than the primary one (persons with substance abuse and double diagnoses).

Building on this evaluation of Project Homeless, the Norwegian Government developed an ongoing strategy against homelessness for the 2005-2007 period, “The pathway to a permanent home”. The new strategy built on Project Homeless, and on a broad vision of good, safe, housing for all, with the specific goals and targets set out in Table 2.

<table>
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<tr>
<th>General Goals</th>
<th>Targets</th>
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<tr>
<td>Help prevent people from becoming homeless</td>
<td>Number of eviction petitions to be reduced by 50% and evictions by 30%</td>
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<td></td>
<td>No one shall have to seek temporary housing upon release from prison</td>
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<tr>
<td></td>
<td>No one shall have to seek temporary housing after release from a treatment institution</td>
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<tr>
<td>Contribute to good quality overnight shelters</td>
<td>No one shall be offered overnight shelter that does not meet agreed quality standards</td>
</tr>
<tr>
<td>Help ensure homeless people rapid offers of housing</td>
<td>No one shall stay more than three months in temporary housing.</td>
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Source: Sveri, 2004, p73.

Edgar (2006) noted the overall programme aimed at including the prevention of homelessness for people threatened with eviction and for people leaving prison or institutions; also improvement in the quality of shelters; and a reduction in reliance on temporary accommodation and time spent in temporary accommodation. Edgar noted that the national housing policy was being delivered by 431 municipalities in Norway (a much higher number than in Scotland or Ireland). Drawing on monitoring information provided by the Norwegian State Housing Bank and a survey of homelessness, Edgar concluded that there had been significant positive achievements in the early phase of the strategy. Unfortunately, the detailed data are not reproduced in Edgar’s 2006 paper. Nonetheless, he commends the role of the Housing Bank in policy implementation (the Scottish equivalent, Communities Scotland, was abolished by the SNP government in 2008, and there is no equivalent body in Ireland). The use of forums to improve practice do have comparable equivalents in Scotland and Ireland, though this is less clearly the case with regard to a firm policy on quality standards in hostels and the implementation of quality agreements.

In another review, Dyb (2007) notes that responsibility for homelessness at government level in Norway is divided between housing and social security authorities. Again, as with Ireland and Scotland, Dyb notes that the strategy was developed by national government with responsibility for implementation directed to local authorities, and that the Norwegian approach included funding for a variety of homelessness projects to support local implementation of state policy. However, Dyb argues that social housing in Norway remains inadequate to meet either need or demand. Some local authorities have responded by renting from the private market and sub-leasing to their clients.
The tools with which the Norwegian government is steering the national homelessness policy include by funding specific projects which are coherent with the overall targets and objectives of the homelessness policy. Local actors, in particular local authorities, but also NGOs, other organisations and private enterprises are encouraged to apply for funding for individual projects. A very important part of the national homelessness strategy is networking and formation of formal collaboration agreement both vertically and horizontally, between private and public actors and among public actors. Such approaches are also evident in the implementation of local homelessness strategies in Scotland. A substantial part of Norwegian government funding is directed towards the formation of networks and collaboration agreements.

[Final section on Norway 2008-2011 still to be inserted].

Conclusions: towards a comparative understanding of homelessness

Despite differing historical welfare paths, and differing contemporary tenure structures, some key aspects of convergence on homelessness policy can be identified across Ireland, Norway and Scotland. A key feature of approaches to homelessness in all three countries is not just the sustained involvement of the central state, but also the crucial role of the local state in the implementation of nationally set policy and strategy. All three countries have introduced national strategies with broad goals of integrated service provision, supported by partnership working. All at least recognised the need for support services as well as housing provision and all made use of incentive funding to encourage local delivery of the national strategy. Broadly, all now have a goal of providing at least temporary/emergency accommodation for all citizens or ending the most extreme experience of street homelessness.

Scotland is characterised by a greater willingness to resort to legislation while Ireland and Norway have relied more on financial incentives to encourage local delivery (which were also adopted in Scotland). Because of its detailed legal framework, Scotland could be characterised as the country with the most comprehensive approach. However, that conclusion should perhaps be interpreted in the light of Scotland having the highest overall level of homelessness among the three countries compared. Stephens and Fitzpatrick (2006) concluded that the UK (including Scotland) was still unusual in having a legislative basis for legally enforceable rights for homeless households. The legislative basis also applied in Germany, but only for temporary accommodation (not settled/secure accommodation as in the UK). In Sweden, Poland, and Hungary, limited rights for emergency accommodation for some homeless groups were identifiable and social welfare legislation assisted homeless people in other countries. France introduced a legally enforceable right to housing in 2007 (Loison, 2007).

In terms of housing outcomes for formerly homeless people, commentators have characterised the social rented sectors in all three countries as residualised, notwithstanding the very different scale of the sector across the three. Stephens et al (2003) also demonstrated the diversity in the conception of ‘social rented housing’ across six EU countries, particularly in terms of the client groups who live in the tenure. Ireland and Scotland are exploring greater use of the privately rented sector to
assist in resolving homelessness. Cost is obviously a key factor and, importantly for Scotland, Housing Benefit and the new Local Housing Allowance for private tenancies are reserved matters to London/the UK parliament, over which the Scottish Government has no control.

Ireland is to be commended for having commissioned and published independent reviews of the progress of its strategies and the Norwegian strategy has also been evaluated\(^8\). It is to be hoped that Scotland will do the same, as was the case for the earlier Rough Sleeping Initiatives (Anderson, 2007a). That said, only Scotland (along with the rest of the UK) routinely collects and publishes a comprehensive set of homelessness statistics over the long-term, which certainly contribute to monitoring the impact of change.

The three country analysis of Ireland, Scotland and Norway demonstrated considerable convergence in approaches to tackling homelessness despite continuing divergence in wider housing market structures, notably in the balance of tenure. All three welfare states have exhibited rollout of neoliberalism to some degree – if from different starting points and at different paces. All three housing systems give precedence to the market but certainly not to the extent of withdrawing or failing to provide a basic safety net for those facing a homelessness crisis. Some characteristics of ‘path dependency’ can also be identified with Norway emerging as the still the ‘best housed’ nation; Ireland’s housing and welfare policy still reflecting its agrarian past and later economic development; and Scotland’s overall economy and housing/homelessness landscape reflecting it’s long term relatively poorer status than it’s much larger immediate neighbour, England.

Up to the onset of the international credit crisis in 2008, all three countries had developed a sound basis for progressive policies to end the most extreme manifestations of homelessness and integrate wider strategies to move towards the provision of reasonable housing for the whole population. This was achieved during a decade of economic growth and relative prosperity. The ensuing economic crisis affected the three countries to differing degrees, resulting in a much more uncertain economic climate at national and international levels.

In the case of Scotland, the full impact of the ensuing ‘austerity period’ is only being recognised in the public sector post the 2011 election of a Conservative/Liberal Democrat UK Government at Westminster. This UK Government has subsequently embarked upon a radical, neoliberal programme of welfare reform (Anderson and Sim, 2011), the objectives of which go substantially beyond the simple reduction of a government deficit, and which will substantially amend the Housing Benefit and Social Security systems in Scotland, as well as imposing cuts to overall public spending in the Scottish block grant. In the meantime the people of Scotland returned a majority SNP Government in the 2011 elections with the share of the vote to all three major UK parties (Conservative, Labour and Liberal Democrat) reducing significantly. Ireland has been particularly severely affected by the post-2008 crisis and while positive homelessness policies have remained in place, targets have not been achieved.\(^9\) Norway’s economy has perhaps been best placed to survive the

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\(^8\) Update on findings evaluation of Norwegian still strategy to be inserted.

\(^9\) Conclusions on Ireland and Norway still to be refined.
economic downturn, though the question has been raised as to what extent different measures have encouraged Norwegian municipalities to prioritize homelessness prevention. Several evaluation reports have identified a greater emphasis on and understanding of the needs of homeless people and various financial support measures and other initiatives have had a positive influence on how the local levels prioritise housing and help to homeless people (Ytrehus, 2008). Nevertheless, the question arises as to whether the awareness and prioritising will continue without additional support from the central government and levels of both awareness and help provided still vary widely among Norwegian municipalities. In conclusion then, Ireland, Scotland and Norway may be entering a period where divergence of outcomes (if not policy) in relation to homelessness may emerge as the dominant trend in a decade where vulnerability to international economic trends may become a more forceful determinant of housing and homelessness outcomes for nation states, local communities and individuals at risk of homelessness.

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