

Abstract: *This paper reviews the research evidence on homelessness and destitution amongst migrants, regarding its causes, affected groups and the interventions used by cities and their partner agencies to address it. The review finds that homelessness most often results from adverse life events, such as eviction and relationship breakdown coupled with structural conditions that put individuals and families in financially vulnerable situations. For settled populations, interventions can draw on the broader support of the welfare state and the potential of labour markets, however for migrants excluded from such services or rights, a limited number of policy tools are at the disposal of cities and their partner agencies. As such, interventions tend to focus on the provision of advice and a number of specialised services have been developed across Europe to meet the needs of this sub-group of the homeless population.*

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1. Introduction

This background paper aims to set out the evidence relating to homelessness and destitution amongst migrants in Europe, focusing in particular on the solutions cities and their partner agencies have used to address the problems that arise when migrants are excluded from services and from labour markets because of their immigration status. Academic and grey literature on this subject was compiled by searching online academic databases using keywords: migrant/migration, Europe, homelessness and destitution. Broader literature on homelessness was also compiled due to the relatively limited body of literature specifically addressing migrant homelessness and destitution. Literature from 2000 onwards was prioritised with a geographic remit covering all of Europe, although literature focusing on Eastern and Southern Europe is more limited on this topic. Additional examples of promising practice were sought by undertaking a systematic search of the internet, using the above key words in addition to 'good practice' as well as targeted searches of good practice databases on websites such as FEANTSA (European Federation of National Organisations Working with the Homeless) and Cities of Migration.

Whilst drawing on the breadth of academic research on homelessness, the particular area of homelessness and destitution amongst excluded migrants is covered to a greater extent in the grey literature, such as NGO reports, policy papers and conference papers. The focus of the paper is on migrants who are excluded from services and labour markets and less attention is given to the literature on housing and migration more broadly e.g. discrimination in the allocation of social housing.

The paper begins with a discussion of key terms. It then proceeds by discussing the causes of homelessness and destitution amongst excluded migrants, the groups who are affected and the challenges for cities in addressing these problems. The paper closes with an exploration of interventions in the area of homelessness and destitution amongst migrants and some examples of promising practice.

2. Defining homelessness and destitution

Having an operational and conceptual definition of homelessness is important for getting the problem on the political agenda, identifying the nature and extent of the problems that require solving and for monitoring progress with these solutions (Amore *et al*, 2011; Busch-Geertsema *et al*, 2010). There are many challenges in establishing a definition of homelessness that is meaningful in different national contexts due to localised sets of policy circumstances. FEANTSA (The European Federation of National Organisations working with the Homeless), a pan-European NGO working to combat homelessness, and the European Observatory on Homelessness, developed a European Typology of Homelessness and Social Exclusion (ETHOS) that has currency in policy circles and is cited widely across Europe (Busch-Geertsema, 2010). It is a broad definition with four categories that span more to less acute homelessness experiences. They are: rooflessness, houselessness, insecure housing and inadequate housing. The definition has been successful in drawing attention to the breadth of homeless experiences. In particular, it demonstrates that homelessness is broader and more complex than the phenomenon of rough sleeping alone (Amore *et al*,

2011) and that solutions to homelessness need to respond to a range of presenting issues. Homelessness is increasingly understood as a process that is dynamic, having routes in and routes out, and comprising different stages through which individuals and families may move between (Busch-Geertsema *et al*, 2010). It is comprised of three domains which are required in order to have a home: the social (space to maintain privacy and interpersonal relationships), the legal (possession, legal title and security) and the physical (a dwelling that meets a person's needs). This results in a range of homeless and housing situations being incorporated within the definition, such as people living rough or in night shelters, those due to be released from institutions, people under threat of eviction or violence and those in unfit or overcrowded conditions.

Multiple exclusion homelessness (MEH) is another useful term to describe incidence of homelessness for people experiencing 'deep social exclusion' with distinct routes into homelessness and requiring special considerations regarding solutions to their problems. Deep social exclusion may arise as a result of having experienced institutional care (prison, local authority care, mental health wards) substance misuse and street culture activities (begging, street drinking, sex work, shoplifting) (Fitzpatrick *et al*, 2012). The literature has highlighted distinctions in the likely routes into homelessness amongst migrant groups vis-à-vis settled populations, with migrants less likely to experience multiple exclusion homelessness because a higher proportion will be homeless due to service exclusions that do not apply to the settled community rather than because of entrenched social problems (*ibid.*).

Destitution is a term used widely in the literature on migrants living in poverty and with limited access to services. It is defined in many reports, encompassing a homelessness element and incorporating a financial or material domain; in other words, those without the means to obtain basic material goods. Some go further to argue that the term describes those who are in a position of social exclusion; have limited financial, social and human capital; are subjects of processes that sustain disadvantage; and do not have control over their own lives (Regioplan Policy Research, 2014; Kennedy and Fitzpatrick, 200; JRS, 2010).

A study recently commissioned to define destitution and estimate its prevalence in the UK provides a more specific picture. The study's method included interviews with key informants and testing out of their definition with focus groups, and resulted in the following:

"People are destitute if they, or their children, have lacked two or more of these six essentials over the past month, because they cannot afford them:

- *Shelter (have slept rough for one or more nights)*
- *Food (have had fewer than two meals a day for two or more days)*
- *Heating their home (have been unable to do this for five or more days)*
- *Lighting their home (have been unable to do those for five or more days)*
- *Clothing and footwear (appropriate for weather)*
- *Basic toiletries (soap, shampoo, toothpaste, toothbrush)*

...People are also destitute, even if they have not as yet gone without these six essentials, if their income is so low that they are unable to purchase these essentials for themselves.” (Fitzpatrick et al, 2015 pg. 6)

It is a specific, measurable definition focusing on lack of material goods and low income, over and above the dimensions of powerlessness or individual agency. A lack of shelter, or rough sleeping, is included within this definition of destitution, as are elements that could contribute to other forms of homelessness, as included under the ETHOS typology, such as poor heating or lighting leading to unfit housing conditions.

There is a clear overlap between these concepts of destitution and homelessness. In looking at the situation of excluded migrants, both are useful terms, providing a tool for understanding a range of homelessness and housing circumstances in addition to the financial and material consequences of being excluded from welfare services and labour markets.

3. What causes homelessness and destitution amongst migrants?

The causes of homelessness and destitution incorporate a combination of structural and individual factors, including factors in both categories that are specific to migrants. Whilst there is therefore some overlap in the causes of homelessness and destitution amongst both migrant and settled communities, certain additional considerations are required to understand the causes of homelessness and destitution amongst migrants. Broader structural factors that emerge from the literature are considered here first, followed by those that are specific to the experiences of excluded migrants, then we consider broader individual causes and those relating to excluded migrants, respectively.

Early research on homelessness conducted in the US, and to a lesser extent in the UK, in the 1970s/80s focused on individualistic explanations for homelessness, based on ideas that individuals' characteristics were to blame for their misfortune. With the rapid growth in homelessness in North America and Europe in the 1980s and 1990s alongside welfare state retrenchment, such arguments were difficult to sustain and these were gradually replaced by structural explanations. As the body of research expanded with the rise of visible homelessness, a more robust evidence base led to a 'new orthodoxy' (Pleace, 2000) in which homelessness was understood as a consequence of traumatic or adverse individual events for those who were vulnerable as a result of broader social and economic structures (Busch-Geertsema *et al*, 2010; Fitzpatrick, 2005).

Structural factors that cause homelessness are deeply embedded in broad social and economic structures, including firstly, a shortage of housing and poor housing affordability; secondly, weak labour market conditions and unemployment; thirdly, poor welfare and social services provision; and fourthly, problems accessing housing and discriminatory practices of statutory authorities or private landlords (affecting certain groups who are thought to be risky tenants, for instance) (Busch-Geertsema *et al*, 2010; Edgar *et al*, 2004).

For migrants, a number of additional structural factors are identified in the literature that cause homelessness and destitution. They include formal exclusions to welfare and housing services, and to labour markets, which are codified in immigration, housing, welfare and/or employment legislation. As a tool of immigration control, welfare exclusions increased during the 1990s (Bommes and Geddes, 2000). Welfare magnet theory (Peterson and Rom, 1990), which assumes an incentivising effect for migrants of the welfare state provisions, has created considerable currency underpinning restrictionist policies. Nonetheless, the assumptions underlying that theory have been empirically challenged. In the context of EU expansion, for instance, variable welfare provisions have been shown to not significantly affect migration flows (Skupnik, 2013).

Legal and policy frameworks governing migrants' access to welfare and housing-related services are typically comprised of tiered access to social rights with certain migrants enjoying greater rights than others, based on status, length of residence and other relevant factors. These can be enacted at national or regional levels of government. Irregular migrants and mobile EU citizens have been found to be the groups most poorly protected by mainstream welfare systems in some EU countries such as Germany and Spain (Price and Spencer, 2014). Asylum seekers and in some cases, refused asylum seekers, may be entitled to support services that are administered by central governments, however delays in the provision of support or strict eligibility criteria has caused gaps in services that can lead to homelessness (Allsopp *et al*, 2014).

In the UK, as part of a raft of measures to create a 'hostile environment' for migrants in order to deter them from migrating or encourage them to leave, a pilot has recently been completed to extend housing restrictions to migrants with irregular status from renting in the private rented sector (PRS). An independent evaluation of the pilot found that the implementation of the legislation had led to discrimination against black and minority ethnic tenants and migrants with lawful status and could lead to increased homeless presentation to the statutory authorities amongst these groups (JCWI, 2015). An additional deterrent affecting access to welfare services for migrants with irregular status is a requirement on welfare services in some EU countries, including Germany, to inform immigration authorities when they seek services (Regioplan Policy Research, 2014).

National or regional legislation can be highly complex and in the process of being interpreted at local level by 'street level bureaucrats' can create institutional barriers to accessing rights as a result of complex administrative processes, service providers' lack of knowledge, or discrimination and unfair practices. Additionally, migrants may face discrimination when seeking to access labour markets or employers' refusal to consider qualifications gained abroad (*ibid.*). Recent studies have noted in particular the tightening of access to social benefits for mobile EU citizens, particularly in Austria, Germany and the UK. In the UK, specific policy measures have been introduced, testing the limits of the common European framework for the provision of social benefits ('The Citizens Directive') including the removal of Housing Benefit for all EU jobseekers. In all three countries, it has been argued that the evidential requirements on mobile EU citizens have become increasingly exacting, including the establishment of assessments to ascertain individuals' chances of obtaining employment. Migrants are increasingly required to maintain a paper trail of their employment history to prove eligibility to the authorities, a form of evidential burden that

some migrants may not simply keep records of (Blauberger and Schmidt, 2014). Language can also be used by service providers as a mechanism of withholding services. Research in Berlin found that statutory service providers there used overly formal language in their interaction with migrants (Price and Spencer, 2014).

Structural explanations provide a useful account of the social and economic conditions that can make people vulnerable to homelessness and destitution, but they fail to explain why, as a result, some people become homeless and others do not. As such, factors relating to individual circumstances are also key to understanding the causes of homelessness and destitution. There is evidence to suggest that the majority of homelessness is triggered by two 'adverse life events': relationship breakdown and eviction. Those recently released from prison and those who have recently lost their jobs are also particularly vulnerable to homelessness (Busch-Geertsema *et al*, 2010). Whilst these adverse life events may only cause homelessness on a temporary basis and may require simple interventions, the literature identifies a sub-group within the population of homeless people who are more likely to experience entrenched or episodic homelessness. Such experiences are strongly linked with certain forms of 'deep social exclusion' such as substance abuse, experience of institutional care (prisons, local authority care, mental health wards) or 'street culture activities' (begging, sex work) (Fitzpatrick *et al*, 2012).

Some migrants may also have experienced deep social exclusion, however additional individual factors may also help to explain homelessness, including those that create barriers to accessing services: poor language skills, inability to negotiate unfamiliar systems, and low levels of skills or employability (Regioplan Policy Research, 2014; Mostowska, 2014). It has been noted that many migrants do not make use of their entitlements, partly due to fear of stigma and humiliation, and discrimination from service providers or fear of disclosure to immigration authorities (Hartmann-Hirsch, 2011; FEANTSA, 2014). Arguably however, such individual factors may arise as a result of broader structural factors at play, for instance, scant provision of language courses for migrants or poor provision of translation services, complex welfare systems and discrimination in the provision of services.

A study comparing the experiences of multiply-excluded homeless migrants and those from the settled population in the UK found that the causes of homelessness amongst migrants were much less likely to be associated with deep social exclusion, such as experiences of childhood trauma or other complex support needs and much more likely to be associated with structural issues, including exclusions from welfare benefits and housing-related services (Fitzpatrick *et al*, 2012).

A body of evidence developed since the 1990s explains the causes of homelessness as resulting from certain structural conditions, weak welfare systems and labour markets in particular, triggered by adverse life events and maintained by deep social exclusion. The situation for migrants is distinct, particularly on a structural level, as there are additional factors precluding access to welfare services and labour markets, making them more vulnerable to homelessness and destitution, should they experience adverse life events.

4. Affected groups and their needs

The research evidence helps us to understand who comprise the people who are homeless and destitute in Europe, although much of the literature focuses on rough sleepers and less is known about the hidden homeless or inadequately housed. Homelessness is argued to be a differentiated process comprised of distinct sub-populations with specific routes in and out of homelessness (Busch-Geertsema *et al*, 2010). They are most commonly grouped into sub-populations according to their welfare needs, their particular experience of deep social exclusion, the temporal nature of their homelessness and/or a fundamental characteristic such as their age or gender. The broader homelessness literature often refers to migrants as a homogenous group within the homeless population, however the literature on migrant homelessness reveals a heterogeneous group that form their own sub-populations according to immigration status, whilst also sharing particular welfare needs, experiences of social exclusion or fundamental characteristics with the wider homeless population (such as gender and age). Understanding migrant homelessness therefore requires a consideration of different dimensions of need.

Data on the bigger picture of homelessness across Europe shows that up to 2010, many countries were reporting reduced levels of homelessness, including Germany, England, Wales, Scotland, Ireland, Austria, Netherlands and Finland. It is also noted however that data collection on homelessness across Europe is done in different ways and is, on the whole, weakly developed (Busch-Geertsema *et al*, 2010). Since the economic crisis in Europe however, notable increases in homelessness have taken place in many European countries: 16% in Denmark between 2009-2013; 21% in Germany between 2009-2013; 17% in the Netherlands between 2010-2012; 29% in Sweden between 2010-2012, although this coincided with a broadening of their definition of homelessness; and 37% of rough sleepers in the UK between 2009/10 and 2012/3 (Busch-Geertsema *et al*, 2014). The increasing proportion of migrants as a sub-group of Europe's homeless populations is reported in several NGO and academic reports (FEANTSA, 2013; Eurodiaconia, 2014; Busch-Geertsema *et al*, 2010).

Changes in the profile of homeless populations in Europe are noted in a review of the findings of an EU survey on homelessness, which found that whilst single, middle-aged men were the largest users of homelessness services, there were increasing numbers of women, young people, families with dependent children, and, as stated above, migrants (Frazer *et al*, 2010). Explanations offered for this trend include welfare state retrenchment, decreased ability to rely on families for support immigration and EU mobility (Busch-Geertsema *et al*, 2010).

Research in the US has divided the homeless population into those experiencing chronic, episodic or transitional homelessness (Culhane and Metraux, 2008; O'Sullivan, 2008), which provides a useful way to understand the temporal nature of homelessness as well as the routes out of homelessness that may be effective for particular sub-groups of homeless people. These broadly correspond with particular welfare needs, such that those experiencing problems of 'deep social exclusion' are more likely to be chronically or episodically homeless, whilst those experiencing adverse life events such as eviction or relationship breakdown are more likely to be transitionally homeless. The evidence suggests

that the majority of homelessness is transitional. Whilst all homeless people need access to affordable, decent housing what differentiates them is their support needs, transitionally homeless people requiring labour market or financial solutions and chronically/episodically homeless people requiring more specialised social/health support (Busch-Geertsema et al, 2010).

Women are a small, albeit growing, proportion of the homeless population and have distinct routes into homelessness. For instance, they are more likely than men to be homeless as a result of domestic violence. Women are more likely to use informal arrangements with friends and family to avoid rough sleeping or access homelessness services, and are more likely to be responsible for dependent children and as such, may access social assistance (Busch-Geertsema *et al*, 2014). One empirical example of this is the support provided to migrant children and their families who are excluded from mainstream welfare benefits in the UK but are owed statutory duties under children's social care legislation to avoid children becoming destitute. In one recent study, 84% of supported parents were found to be female (Price and Spencer, 2015).

Young people leaving local authority care are another group at risk of homelessness as they are required to transition to independence at a younger age than children who have the support of their families (Busch-Geertsema *et al*, 2010). For migrant children, they may not receive continued leaving care support on turning 18 if their immigration status precludes it. These young people are highly vulnerable to homelessness and exploitation should their support stop (COE and UNHCR, 2014).

Research comparing experiences of homelessness between settled populations and migrants in the UK found that pathways into homelessness were more likely to have structural causes for migrants and they were less likely to have experienced 'deep social exclusion' as a result of institutional care, troubled childhoods, substance misuse or street culture activities than UK nationals. Migrants were more likely to have slept rough and to have experienced destitution and serious material deprivation. Where migrants experienced multiple exclusion homelessness, their personal and social needs tended to develop after they had been in the UK for some time as they were not pre-existing problems (Fitzpatrick *et al*, 2012).

Evidence relating to homeless and destitute migrants suggests that there are distinct routes in and out of homelessness for migrants with different immigration statuses, forming distinct sub-groups within the population of homeless migrants. These include asylum seekers, for whom it has been argued that poor housing conditions and a lack of sufficient financial allowances to cover basic needs are provided in a number of EU states under restrictively interpreted reception standards; although strategic litigation in Germany and the UK has been successful in raising minimum levels of support to asylum seekers (ECRE, 2005; Bales, 2015; Price and Spencer, 2014). Destitution amongst refused asylum seekers has received some attention, mainly in small, city-level NGO reports, highlighting the removal of statutory support for those whose asylum claims are unsuccessful and their refusal to accept voluntary return, as well as difficulties collecting data on this hidden group (Prior, 2006; Restore of Birmingham Churches Together and the Church Urban Fund 2005; Woodcock, 2006; Refugee Action, 2006). Homelessness and destitution amongst migrants

with irregular status has received less attention in the literature, although studies have found that those with irregular status receive little or no mainstream welfare support and may be subject to removal should they seek to access it (Price and Spencer, 2014). Those newly granted refugee status, although rarely excluded from welfare services or labour markets, often experience difficulties transitioning from centrally provided to locally provided housing support (Allsopp *et al*, 2015).

A more recent group identified within homeless and destitute populations in Europe is mobile EU citizens. It has been argued that in northern European countries, destitution amongst mobile EU citizens has arisen as a result of sophisticated policy tools to restrict access to social rights enshrined under the EU's Citizens Directive (Blauberger and Schmidt, 2014).

Homeless people can be grouped by welfare need, helping us to understand routes in and out of homelessness. Some have deeper social needs that are likely to cause entrenched homelessness, whereas others will experience adverse life events that cause homelessness in the short term but can be relatively easily resolved. Migrants are a distinct sub-group within the population of homeless people because of their limited or lack of access to services and right to work, making their situation unique. However, they are not a homogenous group. Rights to welfare services and to work are dependent on immigration status and this creates a number of sub-groups within the homeless migrant population with distinct routes in and out of homelessness.

5. Challenges for cities

*“Traditional solutions to homelessness don’t work [for migrants], as these are typically structured and funded around the needs of the population that are entitled to claim benefits and housing support.” (Homeless Link, 2010 quoted in Fitzpatrick *et al*, 2012, pg 6)*

The first challenge facing cities and their partner agencies working to address homelessness and destitution amongst migrants is the lack of clear routes out of homelessness for those excluded from welfare services and from access to the labour market. As encapsulated by the above quote, homelessness services have traditionally been designed for people with a minimum level of support provided through mainstream welfare and employment agencies (*ibid.*). A limited range of evidenced successful interventions with homeless migrants requires cities to think innovatively about meeting needs whilst their hands are partially tied by restrictions relating to the immigration status of their service users. Current thinking in this field appears to be moving towards an approach

The current funding environment for cities across Europe is a major challenge. Although budgetary pressures on local services is a recurring theme in the literature (Tunstall, 1997; Fargion, 2007), austerity measures affecting public sector bodies and their contractors in recent years have been unprecedented in their scale in some parts of Europe (ETUI, 2014). At the same time, demand for services from cities has increased both in terms of general social protection systems (housing services, unemployment and other benefits) and specialised social services (mental health, disabilities, homelessness etc.) whilst populations

age and diversify (European Social Network, 2014). A survey of directors of social services carried out by the European Social Network found that, in order to make the required savings demanded by central government, they would seek to require users to pay more for their care, close essential services, alter eligibility criteria and reduce staff training allowances and negotiate their pay (*ibid.*). In relation to housing and homelessness specifically, a lack of affordable housing compounds difficulties in tackling homelessness in many European countries, including Ireland, Slovenia and Sweden (DEHLG, 2008).

In a context of fiscal conservatism, cities and their 'street-level bureaucrats' (public servants fulfilling statutory powers and duties) face ethical dilemmas in delivering care and support, including where restrictive immigration legislation reduces their power to help migrants presenting in need. Some service providers, it has been empirically demonstrated, deliberately overlook formal restrictions in order to meet presenting needs, however this depends on their being given a certain degree of professional freedom (Van der Leun, 2006; Mostowska, 2014). Some research argues that in some European countries, such as Ireland and the UK, cities and their 'street-level bureaucrats' have less freedom due to centrally-imposed, prescriptive policies and legislation (Wilson, 2003; Mostowska, 2014).

Cities are required to negotiate complex legal and policy frameworks that are subject to significant changes in primary legislation, their interpretation and reinterpretation in case law, and in the development of national and local policies. This can lead to confusion, inconsistency and a lack of understanding between and within cities. Cities face legal challenge and courts are able to expand their duties without the accompanying resources to account for such expansion (Price and Spencer, 2014; 2015).

Meeting needs within communities in a context of fiscal constraints is increasingly challenging for cities, as demand grows due to ageing populations with diverse needs. Further constraints are imposed on cities' ability to respond to emerging needs amongst migrant communities by immigration restrictions, requiring new solutions and with a more limited set of policy tools at their disposal.

6. Interventions

The broader homelessness literature analyses trends in the policy solutions implemented over the years in various European countries in order to address homelessness and destitution. The various approaches have been evaluated and critiqued, providing an evidence base for what is thought to be effective. Less is known about interventions seeking to address homelessness and destitution amongst migrants specifically, although the broader approaches provide useful lessons, especially for migrants and mobile EU citizens that may have some rights (to work but not to welfare, for instance). Where migrants are excluded from welfare services and labour markets, fewer policy tools are available to cities and their partner agencies, however some targeted interventions and promising practices from selected European countries are provided below. We begin by looking at the broader structural context in which cities operate, before looking at different models of intervention.

The interventions of cities take place within broader structural context, including crucially, the 'welfare regime' of the country in which they operate. European welfare states differ considerably in the way they were constructed and in the way they are arranged, helping to explain the variable levels of protection afforded to individuals and families and their relative vulnerability to social exclusion and homelessness on the whole. They were characterised and arranged into a typology of 'welfare regimes' in the seminal work of Esping-Anderson (1990). His typology consisted of three groups of welfare states: conservative-corporatist, social democratic and liberal.

Conservative-corporatist regimes are characterised by strong rights for workers and a subsidiary level of support for those on the margins of the labour market to complement support provided by the family. Germany, France and Belgium are often cited as the key examples. Social democratic welfare regimes are characterised by largely state-funded, abundant services allocated on a universal basis, existing principally in Scandinavia. 'Liberal' welfare regimes, such as those in the UK, Ireland and US, are comprised of means-tested, basic support with strict rules of eligibility. Esping-Anderson's typology was based on the key concept of 'decommodification', that is, the extent to which individuals are protected from the vagaries of the market in which their labour is a commodity, with those in liberal welfare states being least protected and those in social democratic having the most protection (*Ibid.*).

A fourth welfare regime was subsequently added to this typology to include the Mediterranean countries of southern Europe: the 'Mediterranean model', comprising a conservative-corporatist social insurance approach, and a weak safety net in the form of under-funded social services assistance and a strong reliance on informal family support, churches and charities (Fererra, 1996). We might therefore expect to see weaker statutory support in general in Mediterranean and liberal welfare states with a greater level of protection in conservative-corporatist and social democratic welfare states. The evidence suggests that there is a link between welfare regimes, homeless populations and interventions: in less comprehensive regimes, the homeless population is more likely to be made up of people with access and affordability problems, requiring broader and more basic interventions, and in more generous regimes, the homeless population is more likely to be made up of people with acute needs such as drug dependency and mental health problems, requiring tailored, social interventions (Busch-Geertsema, 2010). Important differences within welfare regimes however are identified in relation to housing and homelessness (as in Scandinavia, for example) (Bengtsson *et al*, 2006) and in relation to migration policy, some countries within particular welfare regimes having exclusionary welfare policies and others having more inclusive policies (Sainsbury, 2012).

In most European countries, cities have the key competencies for the delivery of housing and homelessness services, however many do so by commissioning NGOs to undertake this work e.g. in Finland, Germany, the Netherlands and Poland. As welfare states retreated, there was a shift in the role of cities more as commissioning bodies – planning strategically and coordinating, whilst the delivery of services was outsourced (Edgar *et al*, 1999). NGOs have long tradition of providing these services, particularly faith-based organisations such as the Salvation Army, Diaconia and Caritas. France and the Netherlands use NGOs for almost all services and in Spain and the Czech Republic, cities having no major role. Nonetheless, in

some countries, cities are also direct providers of services alongside NGOs, for example in Sweden, England and Hungary (Fitzpatrick and Stephens 2007). The role NGOs are able to play considerably affected hugely by the level of funding they receive from the state: in the Mediterranean welfare regimes of southern Europe, this is often negligible, making them vulnerable; in Germany and the social-democratic welfare regimes of Scandinavia, more than 90% of NGO costs are met by city or regional authorities (Busch-Geertsema, 2010).

Broadly speaking, interventions have been grouped into the following categories of services (Busch-Geertsema *et al*, 2010):

- Preventative services to avert emergency situations
- Emergency shelter for rough sleepers
- Temporary accommodation in hostels, refuges or supported housing
- On-going interventions to support those who have been homeless and to prevent re-entry into homelessness
- Mainstream services such as health, welfare and advice services
- Outreach services and floating support
- Specialist services – immigration advice, drug counselling, mental health services

The particular configuration of services employed to address homelessness and destitution varies between and within countries, however a number of broad approaches are discussed in the literature, including rights-based, housing-first and staircase approaches.

Rights-based approaches in Europe, existing only in France and the UK, guarantee an individually enforceable right to housing (although restrictions relating to migrants may apply). Several NGOs including FEANTSA have argued for right-based approaches to be established across Europe, however there is some disagreement in the literature on whether this is the only approach that might work, as many countries that have seen reductions in homelessness do not have rights-based approaches (Busch-Geertsema *et al*, 2010). It has been argued that the approach can guard against the potential for social landlords to exclude certain households on grounds of social mix (Fitzpatrick *et al*, 2012). On the other hand, it has been acknowledged that rights-based approaches can create the ‘moral hazard’ of incentives for households to define themselves as homeless in order to be prioritised for social housing (Fitzpatrick and Pleace, 2012). Conversely, restriction-based approaches (which includes restrictive policies relating to migrants or local connection/habitual residence requirements) are likely to lead to greater exclusion of homeless people on the whole.

The ‘staircase approach’ involves stabilising homeless people in temporary accommodation with the help of targeted interventions, then moving them on to more independent housing when they are felt to be ready (Johnsen and Teixeira, 2010). This has been the principle approach in many European countries until recently (Busch-Geertsema *et al*, 2010). The effectiveness of the approach has been questioned in the literature because it puts unrealistic expectations on service users, such as abstaining from drugs and alcohol, for its lack of flexibility, and because many homeless people have negative experiences in hostels, such as bullying, theft or violence (Sahlin, 2005; Busch-Geertsema and Sahlin 2007; Fitzpatrick and Jones, 2005). Housing first approaches are based on the idea that people

stay in temporary accommodation for as short a time as possible, and they may be more effective at achieving sustainable exits from homelessness. From the outset they are placed in more permanent housing and receive floating support. The idea comes from the US and is increasingly being adopted in Europe e.g. in Denmark, Finland and France. Housing first approaches require services to be flexible and based on individuals' needs, they need to be in an appropriate location and they need to bring together a range of specialised services to meet various needs. The need for a stock of more permanent housing can be difficult in areas with problems of housing affordability and supply (Busch-Geertsema *et al*, 2010).

Alongside a move towards housing-first approaches has been a shift in the broader welfare systems towards enforcement and conditionality as a policy tool in the form of sanctions, threats or rewards (Dwyer and Scullion, 2014). Such policy responses focus on personal rather than structural change, requiring homeless people to behave in certain ways rather than the development of demand-side labour market policies or the expansion of broader welfare services (Kennedy and Fitzpatrick, 2001). Sanctions are administered by service providers working according to strict criteria with limited room for manoeuvre. Whilst in the UK, enforcement approaches have been argued to have reduced rough sleeping, research has also questioned whether such approaches promote the long-term welfare of homeless people (Fitzpatrick and Jones, 2005).

One UK study examined the effectiveness of enforcement and conditionality-based support on the one hand, and flexible approaches on the other. 'The Home Study' considered the views of multiply-excluded homeless people of successful interventions by homelessness agencies, finding that the most effective help was given when agencies were given the professional freedom to problem solve and to be compassionate and kind to service users; ineffective interventions were associated with agencies that were constrained in their practice by external agendas, such as migration management (Dwyer *et al*, 2011). Similar findings emerge from a comparative study of homelessness agency interventions for excluded migrants in Copenhagen and Dublin, where in spite of similarly restrictive policy environments, professionals in Copenhagen had comparatively greater levels of freedom to make humanitarian interventions (Mostowska, 2014). The Home Study also identified that where homelessness agencies were not constrained in their professionalism by external agendas, such as exclusions to services facing migrants, they were able to offer the most effective help (Dwyer *et al*, 2011).

The relationship of migration with race in the context of homelessness service provision in the UK has been considered, with evidence of discrimination and racialisation leading to higher use of sanctions as a form of welfare conditionality for people from ethnic minority backgrounds (Hudson *et al*, 2006; Craig, 2007) and amongst refugees (Scottish Refugee Council, 2013). Migrants therefore may face the barriers of legal exclusion and race discrimination simultaneously. Further barriers have been identified in work intervention services, where migrants are deprioritised vis-à-vis indigenous service users. 'Welfare to work' providers, in the effort to meet targets set in funding schedules, are more inclined to work with the 'job-ready' unemployed than migrants who may require more complex interventions, interpreting services or who may be less likely to have the necessary skills to enter labour markets (Shutes, 2011).

The diverse needs of homeless people has led to the increasing specialisation and segmentation of services linked to particular sub-groups of the homeless population, including tailored support for migrants. It has been argued that resolving homelessness amongst migrants requires bespoke solutions, which can't necessarily be left to traditional homelessness organisations. Their needs are more likely to be around practical support, help into the labour market and help finding interim support in a context of welfare exclusions, rather than traditional models of support designed for those with problems of deep social exclusion but with the safety net provided by welfare benefits and housing/homelessness support (Fitzpatrick *et al*, 2012).

The question of return or 'reconnection' as a solution to homelessness, or as a condition of limited support services provided by agencies (such as tickets and temporary accommodation) has received relatively little attention in the academic literature on homelessness and destitution. Research has found that successful reconnection depends on certain basic conditions being met on return, such as the availability of accommodation, access to employment and the existence of social networks, and that changes within countries of origin such that it no longer feels like home for returnees can jeopardise successful reconnection (Lietaert *et al*, 2013). Return assistance programmes have been found to be a crucial factor determining the success of reconnections, in order to facilitate the integration of migrants back into housing and employment (Ruben *et al*, 2009).

Immigration advice is a key intervention for migrants whose status precludes them from accessing services, but for whom resolution of their immigration situation could bring them within scope of welfare provisions. The declining provision of immigration advice as a result of legal aid cuts in the UK is the subject of a recent study, which found that migrant children turned to poor quality and exploitative legal advisers (Pinter, 2015). Welfare rights advice has also been found to be crucial for migrants seeking to secure services to which they are entitled, however the provision of such advice can be patchy and variable in quality (Price and Spencer, 2015).

Interventions by cities and their partner agencies addressing homelessness and destitution are affected by the welfare regime in which they operate, some providing more generous provisions than others, and as such requiring a greater proportion of specialised services (such as drug rehabilitation and mental health support) over and above more basic solutions, such as rent deposit schemes and temporary housing. A range of interventions are used by cities, who frequently outsource the delivery of services to NGOs, from prevention, to the provision of temporary housing, to outreach and specialised support for particular sub-groups of the homeless population. Their interventions have been grouped into rights-based, staircase and housing-first approaches. As the effectiveness of staircase has been increasingly critiqued in the literature, European countries have begun to adopt housing-first models of more permanent housing provision from the outset with floating support. NGOs also argue that rights-based approaches provide protection to homeless people through individually enforceable rights to housing. The development of specialised, segmented services addressing the particular needs of sub-groups of the homeless population includes the emergence of targeted interventions for homeless and destitute migrants, for whom fewer policy tools are available (through the provision of mainstream

welfare provisions or employment, for instance), and for whom solutions centre principally around practical support in the form of immigration, welfare or reconnections advice.

7. Promising practice

Given the limited policy tools and resources which cities and their partner agencies have at their disposal to resolve homelessness and destitution amongst migrants, interventions tend to centre around practical support in the form of immigration, welfare and reconnections advice, and temporary accommodation. There is a noticeable trend however towards problem-solving approaches that seek to resolve the underlying causes of migrant homelessness and destitution by providing a range of targeted interventions. The relatively recent emergence of such interventions means that their evaluation is not as thorough as for broader homeless interventions. A selection of promising practice from across Europe is highlighted below.

Temporary accommodation with floating support coordinated centrally by regional and local governments

Regional and local governments in Madrid fund a range of NGOs to provide temporary accommodation to destitute migrants, who are restricted from accessing mainstream welfare benefits or social services support. Services are provided to individuals and families with diverse housing-related needs, from those rough sleeping to those who are falling behind on their mortgage repayments and face losing their homes. One project is comprised of self-contained apartments in the centre of Madrid, another is made up of temporary structures on the outskirts of the city. All projects involve a strong element of professional intervention, seeking to reintegrate individuals and families back into labour markets or into more secure and permanent housing. The NGOs coordinate with one another and with the municipality social services department to ensure service users facing safeguarding risks through destitution are referred to relevant projects depending on the level and nature of their needs.

One such project is run by ACCEM, a national NGO with offices across Spain. ACCEM runs an accommodation centre on the outskirts of Madrid, funded by and in partnership with the Municipality of Madrid, the largest municipality in the region of Madrid. The accommodation consists of individual units, communal kitchens, bathrooms, a nursery and educational spaces. It is situated on the northern section of Madrid's motorway ring road. The units house a variety of families with dependent children under the age of 18, from Romanian and Bulgarian Roma families with a right to work but without residence permits, sub-Saharan African families with irregular migration status and Latin American families with more settled status but struggling to find work due to Spain's economic crisis.

ACCEM provides intensive support to service users, principally around routes into employment, but also language support, immigration advice, and emotional and psychological support. With demand for spaces exceeding supply, spaces are allocated on a system of priority e.g. pregnant women and those with small children. Families stay with the project until they are ready to move on, whether into independent living or into another supported accommodation project. It is worth mentioning one potential critique of the

project, which is that the accommodation is far from the city centre in an undesirable location and could be interpreted as hiding the problems of families from mainstream view (Price and Spencer, 2014).

Strategic litigation for minimum standards of support

A network of NGOs, with the assistance of certain Dutch municipalities, strategically litigated using the collective complaints mechanism of the European Social Charter, on the subject of minimum standards to emergency food, clothing and shelter for migrants with irregular status. Successful complaints to the Committee of Social Rights have significant impact on law and policy reform, and in this instance, it influenced the Dutch Government's subsequent decision to reimburse Dutch municipalities for the provision of emergency shelter to migrants with irregular status.

In the case of *Conference of European Churches (CEC) v The Netherlands*, it was argued that the latter was in breach of Article 13§4 (right to social and medical emergency assistance) and Article 31§2 (right to housing) of the European Social Charter by failing to provide emergency shelter to migrants with irregular status. The Committee on Social Rights found that the Dutch government was in violation of the Charter, whose remit is broader than ECHR or EU law, both of which protect only those with regular status.

Refuge support for victims of domestic violence

The provision of refuge support to people fleeing domestic violence is often dependent on charities funding bed spaces through public funds, which are administered by municipalities. The exclusion of migrants from such provisions was the focus of a campaign by an initiative of Sweden's No One is Illegal Network, entitled 'Ain't I a Woman'. The demands of the initiative were tabled at the City of Gothenburg and the motion to reimburse refuges for the costs of supporting migrants fleeing domestic violence was passed by its members. Since the passing of this motion, provision of accommodation services to those fleeing domestic violence is reported to have improved considerably (PICUM, 2014).

This initiative mirrors a similar campaign in the UK, the 'Abolish the No Recourse' campaign, by a coalition of women's organisations and local authorities, which sought to abolish the exclusion from Housing Benefit which made it difficult for refuges to fund bed spaces for migrants on spouse visas fleeing domestic violence. Policy change was achieved at a national level in 2011, ensuring that those in the UK on spouse visas would be able to access refuge space if they were fleeing domestic violence. Both initiatives show that considerable change can be achieved where domestic violence is the cause of homelessness and destitution.

Influencing central government

Local authorities across the UK (Bradford, Bristol, Glasgow, Kirklees, Leeds, Leicester, Liverpool, Oxford, Manchester, Sheffield and Swansea) are working with a coalition of NGOs (Still Human Still Here) to pass motions within their local authority that support policy positions relating to destitute asylum seekers, including urging government to provide them with sufficient support whilst they remain in the UK, improving initial decision-making and granting free healthcare. The initiative aims to mobilise local politicians in order to influence central government policymaking.

Mediation between tenants and landlords

Provivienda in Madrid and Abraço in Brussels are both NGOs mediating between undocumented tenants and landlords to protect them from discrimination.

Provivienda is funded by the regional government of Madrid. They check properties before service users take up tenancies to ensure they are in an adequate condition. The identity of service users is not revealed to the landlord until the tenancy is signed and they are not required to provide official paperwork as part of this process, removing some of the administrative barriers to securing accommodation.

Abraço provides safeguards to prevent rent deposits being lost by Portuguese-speaking migrants with irregular status due to lack of protection in law enjoyed by settled residents in Belgium. They provide proof of rental and deposit payment to avoid situations where migrants make verbal agreements with landlord, enabling them to receive their deposit back at the end of their tenancy (PICUM, 2014).

Cross-subsidising housing model

London-based NGO and housing association Praxis and Commonweal have developed a project in partnership with several London local authorities to cross-subsidise accommodation for homeless migrants. Local authorities in the UK have statutory duties to provide accommodation to homeless migrant children and their families, the provision of which they contract out to Praxis in accommodation provided by Commonweal at peppercorn rents. This enables them to subsidise temporary accommodation to those without access to statutory support (e.g. single adult refused asylum seekers). Both groups receive 'wraparound support' whilst in the accommodation, including immigration advice, welfare advice. A support plan is agreed with service users and reviewed by a case worker on a monthly basis. Commonweal secured social investment funding from a range of social investors to buy properties in order to test the model. The project involves a strong evaluation component, which will take place throughout its duration in order to determine whether the model can be scaled up (Petch *et al*, 2015).

Advice centres

Crossroads is an advice centre based in Stockholm, run jointly by the City of Stockholm, Stockholms Stadmission, the Salvation Army, and the Public Employment Agency of Sweden and with the collaboration of the Red Cross, Medecine du Monde and several other local NGOs. It is funded by the European Social Fund (ESF). Crossroads works with mobile EU citizens and third country nationals with residence permits who are homeless, living in poverty and/or unemployed. A range of support needs are addressed by the project, from basic needs such as food, a laundry service and washing facilities, to mediation with public authorities and linking service users into local businesses for employment (Jesuit Refugee Service, 2011).

Reconnections

Support for the reconnection of mobile EU citizens to their home country is provided by a range of NGOs, including Thamesreach, a London-based organisation. Thamesreach works with local authorities across London, whose homeless outreach teams refer service users who may wish to return to their home country to them. The service is aimed to people with

health or drug or alcohol dependency problems. Escorts are provided and people are linked into services at home including housing and detox services (Homeless Link, 2013).

Linking homeless outreach services with immigration advisers

Westminster City Council in London has included a requirement for the NGOs commissioned to deliver its homelessness services to provide immigration advice. The Connection at St Martins in the Field is one such service, which now employs a 'street legal worker'. The service links homeless hubs and outreach workers with immigration advisers, to provide expert advice to new and long-term rough sleepers and those who are hidden homeless. The approach involves joint casework management and practical support to find temporary accommodation. This now being developed into a London-wide resource (Petch *et al*, 2015)

8. Conclusions

This background paper reviewed the evidence relating to homelessness and destitution amongst migrants in Europe, focusing in particular on its causes, affected groups and the interventions used by cities and their partner agencies to address it. A body of evidence developed since the 1990s explains the causes of homelessness as resulting from certain structural conditions, weak welfare systems and labour markets in particular, triggered by adverse life events such as eviction or relationship breakdown. Chronic or episodic homelessness is more likely to be caused by deep social exclusion, including drug/alcohol or health problems. Whilst some migrants share such individual problems, the situation for migrants is distinct on a structural level, as there are additional factors precluding access to welfare services and labour markets, making them more vulnerable to homelessness and destitution, should they experience adverse life events.

Homeless people can be grouped by welfare need, helping us to understand routes in and out of homelessness. Some have deeper social needs that are likely to cause entrenched homelessness, whereas others will experience adverse life events that cause homelessness in the short term but can be relatively easily resolved. Migrants are a distinct sub-group within the population of homeless people. However, they are not a homogenous group, having various routes in and out of homelessness.

The biggest challenge for cities at present is meeting needs within communities in a context of fiscal constraints and as demand grows due to ageing populations with diverse needs. Further constraints are imposed on cities' ability to respond to emerging needs amongst migrant communities by centrally- or regionally-imposed immigration restrictions, requiring new solutions and with a more limited set of policy tools at their disposal.

Interventions by cities and their partner agencies addressing homelessness and destitution are affected by the welfare regime in which they operate, some providing more generous provisions than others, and as such requiring a greater proportion of specialised services (such as drug rehabilitation and mental health support) over and above more basic solutions, such as rent deposit schemes and temporary housing. A range of interventions are used by cities from prevention to the provision of temporary housing, to outreach and specialised support for particular sub-groups of the homeless population. Their

interventions have been grouped into rights-based, staircase and housing-first approaches (although these are not necessarily mutually exclusive). As the effectiveness of staircase has been increasingly critiqued in the literature, European countries have begun to adopt housing-first models of more permanent housing provision from the outset with floating support. NGOs also argue that rights-based approaches provide protection to homeless people through individually enforceable rights to housing. The development of specialised, segmented services addressing the particular needs of sub-groups of the homeless population includes the emergence of targeted interventions for homeless and destitute migrants, for whom fewer policy tools are available (through the provision of mainstream welfare provisions or employment, for instance), and for whom solutions centre principally around practical support in the form of immigration, welfare or reconnections advice.

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