

# **The problem of definitions: points of similarity and difference**

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This paper addresses how homeless people are defined in practice in different countries, especially in their different official reports. These definitions are based on principles that differ from one country to another<sup>1</sup>. The aim here is not to describe the actual phenomenon of homelessness - or rather its various national manifestations - as there is now a broad consensus that it is multidimensional both in its causes and consequences (involving employment, housing, health, social relations, *etc.*) and stems from macroeconomic factors (housing and job markets, immigration policies, *etc.*) no less than factors to do with the life courses of those concerned (children in care, institutionalization, estrangements, *etc.*).

The first difficulty involved in talking about the definition of *homeless* in different countries is that it assumes we are all talking about the same thing. But in fact, both the history of the emergence of homeless people (or rather, the simultaneous rise in their numbers and visibility) and the way in which that emergence has been shaped as a social problem, differ from one country to another, and are inseparable from social policies and from the activity of NGOs in each country. Translating the terms used in each language uniformly by the expression *homeless* evades the question of what this construct actually signifies. In this paper, therefore, I have chosen to keep the original expressions of which *homeless* is no more than an approximate translation. Also, not all countries really have an equivalent or even approximate concept to that of *hidden homelessness*, and the extended concept of homelessness is formed in those countries along different rationales that are tied to how the central concept itself is formed.

Different definitions exist alongside one another in the same country. These national definitions vary with the user (researchers, government or voluntary agencies, *etc.*), the users' purpose (research which may be directly used by other actors like government or voluntary agencies, data production by government or voluntary agencies for management or lobbying purposes, *etc.*), the methods they use (statistical surveys requiring a precisely defined coverage, qualitative investigation by sociologists or ethnologists, theoretical analyses of poverty or exclusion, prioritizing groups for rehousing, *etc.*), and the questions they ask.

The study here focuses essentially on three countries - Italy, the United Kingdom and France - all of which have definitions that are either statutory or used to compile official figures,

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<sup>1</sup> See for example Tosi, 1999, about the country specific combinations of housing and social dimensions.

supplied in reports like the National Action Plans for social inclusion<sup>2</sup> or, in the case of Italy, the Report of the Commission of Enquiry into Poverty. From a close examination of these three definitions, some salient characteristics can be elicited that distinguish the different national definitions in Europe: the United Kingdom has had legislation on homeless people since the late 1970s from which official or competing definitions have sprung; in Italy, the construction of the issue has resulted in the concept of the *senza dimora* as a specific situation of exclusion in which exclusion from housing cannot be divorced from psychosocial marginalization; finally, in France, informed by the work of the National Council for Statistical Information (Conseil National de l'Information Statistique - CNIS), a body that combines government departments, NGOs, and researchers, most statistics-based research has regarded the *sans-domicile* as people in a specific point-in-time situation within a continuum of housing situations.

A close consideration of these three cases will point up some wide divergences, like the existence or otherwise of a statutory definition, the linkage between the definition and social housing allocation, and whether aspects relating to the household and individual are included, or just the accommodation itself.

Consideration will also be given to the extended meanings prospectively given by users to these three definitions (*hidden homeless* or *at risk of homelessness*, *mal-logés* or *situations marginales de logement*, *disagio abitativo*). Finally, I shall discuss the difficulty of agreeing on a European definition, in the absence of a clearly-defined common social policy, referring to the definition worked out by the European Observatory on Homelessness, a research group established within FEANTSA, the European Federation of National Organizations Working with the Homeless, and the Eurostat recommendations.

## Three national examples

### 1. The United Kingdom: the impact of a statutory definition

The United Kingdom is taken here as exemplifying the case where there is national legislation on homeless people. Specifically, the United Kingdom comprises four countries (England, Northern Ireland, Scotland, Wales), each of which has different legislation and research, but in all of which the definition of *homeless* originates in the first enactment - The Housing (Homeless Persons) Act 1977, amended first by the Housing Act 1996 (for England and Wales), then by the Homelessness Act 2002.

The 1977 Act marked the shift from a welfare approach targeted on individuals who were disengaged from society to a more structural, housing market approach (Joan Smith, "Defining Homelessness", [www.cuhp.org](http://www.cuhp.org); Jacobs *et al.*, in Hutson and Clapham, 1999, 11-28). Responsibility for homeless people (within the meaning of the Act) was then transferred from *local authority social services* to *housing departments*<sup>3</sup>.

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<sup>2</sup> The National Action Plans for social inclusion, or NAPsincl, are reports that the Member States must submit to the European Commission. The first ones were submitted by the 15 members in 2001 for the period 2001-2003, the second in 2003 for the period 2003-2005. The ten accession countries submitted theirs in 2004 for the period 2004-2006.

<sup>3</sup> They are officers of the housing department *i.e.* local authority officers trained in housing work who apply the law and check on the case law. Now that much of the social housing stock has been transferred this role has also been taken in some areas by officers of the Housing Associations. They apply the law but are, essentially, described as: 'Housing Officers of the Local Authority or of Housing Associations/Housing Companies with

Where there is a legal framework that results in measures to help specific groups, that may be at the expense of other groups, at least in those areas where there is an insufficient supply of social housing. This framework then to a lesser or greater extent influences the voluntary agencies and researchers who frame their own definitions against the statutory benchmark definition (whether in line with or against, extending it or amending its underpinning principles). So, in her article, “The impact of legislation on the definition of homelessness and on research into homelessness in the UK”, Joan Smith describes how the 1977 Act created. “a national framework for defining homelessness”. A more detailed examination of the British legislation, briefly presented here, can be found in this article ([www.cuhp.org](http://www.cuhp.org)).

## The statutory definition

The Act defines those people whom local authorities must accommodate in social housing (owned by the local authority or by a housing association) or in temporary accommodation in the private sector, the others being helped by the voluntary sector. The extract below<sup>4</sup> is from the speech made at the London workshop by a local official, outlining the five hurdles to be cleared: being *eligible*; being *homeless*; being *in priority need*, which is to say being responsible for children, or being older than 60, or alternatively being in a category perceived as vulnerable; not being *intentionally homeless* (i.e., not having been made homeless by non-payment of rent or mortgage); and having local connections, (work, family, etc.)

DAVID GINSHALL, London Borough of Tower Hamlets

*“What does a council have to do when it takes an application?”*

*There are basically five hurdles:*

*The first is we must determine whether or not a person is **eligible for assistance**. It’s already been stated that, for example, asylum seekers are denied access to assistance from the council and there are other groups of people. I won’t go into them in detail but basically it’s people subject to immigration control, who are not in a class exempt by the Secretary of State, so it’s basically people from outside of the EU who don’t have a special allowance for being in this country and, as already stated, it also includes the new EU accession countries, they have no access to our service.*

*We then have to look at - Are they **homeless**?. Do they have a roof over their head or not? Or are they likely to lose that roof in the next twenty eight days? We are obliged to assist people who are threatened with homelessness.*

*The next step we have to look at is that of **priority need**, it’s already been mentioned people with dependent children, pregnant women, they will automatically qualify as priority need, as do sixteen and seventeen year olds. The most difficult area with regard to priority need is the term vulnerable which Simon alluded to.*

*Tests for vulnerability to qualify for priority need. So if we are talking about single people, childless couples, we have to ask is there any reason why they are vulnerable? And it is suggested a person could be vulnerable because they’ve got medical problems, because of their age and we are talking here about old age, it could be because they have a history of being looked after by social services, it could be because they are institutionalised by, as has already been alluded to, time spent in the armed forces or also time spent in prison. The test, which comes from case law on vulnerability, is a person less able to fend for themselves when homeless so that injury or detriment would result, that’s the test. So you have to look at the individual circumstances of that person. You cannot refer to your discretion and say ‘yes I’ll take that all of that group or none of that group’, every case must be looked at on its own merits. Things like whether*

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this responsibility’ (note by Joan Smith).

<sup>4</sup> Unless otherwise specified, all English contributions quoted below come from the London workshop.

or not someone's been in prison, was in care, is generally speaking a matter of fact, but we have to look at the result of that experience and decide if that has left them less able than others. If it has, then the second test is applied. The second test is whether their homelessness likely to result in them suffering injury or detriment. And it's not always an easy test but we need to seek information on an individual basis, so whichever agency our applicant is known to, you know whether it's health professionals, probation, social work, any voluntary agencies we need to make contact with that agency to get some background. If it's medical problems which are being claimed, we have our own health adviser, we will get all of the relevant information, we are looking at what medical problem they have, the extent of the medical problem, the effect the medical problem has on them, whether they are on any sort of medication, how regularly they see their doctor or their hospital, and we'll refer all of that information to our health adviser who will in turn make a recommendation to us this person is or is not vulnerable because of ill health. Depending on the circumstances our health adviser may seek further medical reports, they may directly interview the applicant, again it's each case on its own merits. The final decision however rests with the housing department and not the health adviser. So we'll get the recommendation back, we then have to make a decision, then as I said on vulnerability is probably the most difficult decision to make.

The next step after those three is **intentional homelessness**. There are hundreds of test laws on intentional homelessness<sup>5</sup>. In rough layman's terms it's if the person brought about their own homelessness, if they had the money to pay their mortgage or to pay their rent but chose not and then were repossessed or evicted there's a very good chance the local authority may say they are intentionally homeless. Equally if they had accommodation and they simply abandoned it they could be deemed to be intentionally homeless. And if they are intentionally homeless there is then no statutory duty on the part of the local council, apart from continue to provide temporary accommodation for a very short period of time.

And then the final hurdle is that of **local connection**, whether or not the person has a local connection with the authority that they came to, which can be either by normal residence, family association, employment. If they don't have a local connection with the council they came to then that council has to look at whether or not they have a connection elsewhere and if they do it may then refer them to that other authority. I think that was already alluded to earlier in relation to new changes under immigration legislation which would disallow us from accepting an application from a person who was an asylum seeker, but is now a refugee. For example a person who would be living in Manchester but decided they wanted to come to London; they turn up on our doorstep, we would say "You don't have a connection with us, you do have a connection with Manchester".

Those are the main hurdles that someone has to go through."

To consider some of these points:

## **1. Homeless or potentially homeless**

Being *homeless* is defined as, "without any right to access secure accommodation for that night *i.e.* not legal tenants of any property or not owning any property" (1996 Housing Act). Added to that are the *potentially homeless*, *i.e.*, threatened with homelessness by being likely to become homeless within 28 days.

This definition therefore bears not on the physical place where families take shelter<sup>6</sup> but on their occupancy status and (for the "potentially homeless") the security/insecurity of tenure of where they currently live.

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<sup>5</sup> UK legislation is based on case law. When David Ginshall refers to test laws he means case law that has been made through test cases brought by lawyers on behalf of clients who have been refused acceptance under the homelessness procedures. Every local authority has to abide by this test law in England and Wales but not in Scotland which has its own legal system.

<sup>6</sup> Except in some cases (homeless through floods/fires, or housing in extremely poor conditions and condemned under environmental health laws).

It bears pointing out, however, that since the 1996 Act, the list of *homeless* situations includes those in which women/children are subject to domestic violence, and since the 2002 Act, the risk of any kind of violence (racial violence being particularly targeted). It is therefore a definition that goes beyond the narrow framework of housing, since another household in the same housing conditions would not be regarded as *homeless*. It is this precise point, furthermore, that classifies the potential victim (and possibly his/her children) as *homeless*; the definition is therefore linked more to the individual (and his/her dependent children) than the household as a whole.

Variations remain between countries in the United Kingdom that can be used as a basis for demanding more across-the-board application of the most favourable measures:

*LINDA DELAHAY, Housing Policy Services Officer for Women's Aid Federation of England.*

*“And yet you see the legislation in Wales, and we are covered by the same laws England and Wales, the priority need order of Wales doesn't have any such exclusion, if you're fleeing domestic violence then you are in priority need regardless of whether you have dependent children or not. We want the same facility in England.”*

## **2. Priority need**

Households classed as *in priority need* in 1977 were those with children under the age of 16, those aged over 60, or with vulnerable members (people with a disability, etc). This list was expanded in the 1985 Act for England and Wales to include subsequently included in the 1996 and 2002 Acts. Finally, the 2002 Act added for England and Wales young people aged 16 and 17, and those leaving institutions such as prison and the armed forces. This list, based on the characteristics of households and individuals, is likely to be further expanded in response to progress in research into those most affected, and to the lobbying of pressure groups. It is essentially based on a concept of vulnerability<sup>7</sup>, whether explicit (list of situations of vulnerability) or implied (case of families with children).

As a result, individuals lacking the characteristics which at a point in time enable them to be classified as *in priority need* (families with dependent children, older persons or vulnerable people) cannot be classed as *statutory homeless*, *i.e.* accepted under the law. This would apply to single people and childless couples with none of the social difficulties or disabilities listed. Given the high proportion of one-person households within these nonstatutory homeless, it has become the practice to describe these people and the social problem they represent as *single homelessness*, albeit a proportion of the households concerned are childless couples or with older children. NGOs point out this limitation of the language (daunting for foreigners!):

*TONY DOBSON, GROUNDSWELL*

*“Just to say that we were talking a lot about single homelessness but we didn't define what we are actually talking about and what single homelessness is in the eyes of the housing law. From my own view or opinion or perspective, single homelessness means*

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<sup>7</sup> For a different era and country, see Valérie Laflamme's analysis of the elasticity of the definition of vulnerable young women housed by the YWCA in “Charitable solutions to the “lodger evil”: a case study of the Women's Christian Association of Quebec, 1875-1911”, contribution to the ENHR Symposium, Reykjavik, 2005.

*single homeless people and couples without children, I find that strange. Because predominantly it's single homeless that is talked about and the couples without children seem to get forgotten about.*

*TARIK HILAL, CRISIS*

*(...)I think I understand Tony [Dobson] and I have had this discussion on many occasions in the past and I think it is a misleading phrase, no doubt, it's not the best description of the people that we are talking about. But essentially it's a legal term, it's a legislative phrase and it does, I mean Crisis perspective for example, it does include couples. The key thing is the people who don't have dependents who they are you know people who they are ... who they are responsible for, many actually do even have children, some of them not necessarily responsible for them at the point at which they go to their local authority and it's that factor that means that they often don't get support."*

*SARAH CREDLAND, SHELTER*

*"I'm kind of not answering the question, I know I'm sort of expanding a discussion but it's for the benefit of people who aren't necessarily familiar with the realities on the ground in the UK. The problem with that grey area, couples form a grey area, and in terms of things like if it doesn't matter you can say single homeless, you are not being accurate but to be honest the point is that you are not defined as needy as having children who need schooling, who need healthcare and so on and other specific issues around that. And you don't fall into that priority group for that reason."*

## **NGOs and researchers**

British researchers often use definitions influenced by those that commission the research, who may be public agencies (the Department of the Environment, then the ODPM, Office of the Deputy Prime Minister) or voluntary agencies (Shelter, Crisis, Centrepoint, Crash..., who focus on discrete subpopulations). The definitions used by NGOs or researchers that work with them are framed reactively to the official definition, with a view to developing it, and so tend to be broader and more focused on single people and couples without dependent children. But the broad principles underpinning the legislation, in particular the concept of vulnerability, remain valid: the point is to extend the concept of vulnerability. Hence, voluntary community lobbying based on research financed or done by NGOs, led to the inclusion in the Act of different categories (young people aged 16-17) and situations of violence.

Other research work looks at a fairly broad list of housing situations, which takes into account both the physical aspect of the housing situation (sleeping rough, in hostels, caravans, *etc.*), tenure (temporary accommodation in overcrowded conditions, for example) and insecurity (threat of eviction). While not based on one-dimensional criteria, these lists are sometimes presented as scales of increasing degrees of acuity (or visibility). So, in Fitzpatrick *et al.*, 2000 (p. 8), we find *rooflessness, houselessness, people who have insecure or impermanent tenure, people who live in intolerable housing circumstances et households that are involuntarily sharing accommodation*. These are alternative definitions to the official definition, not by extension but by adoption of different principles. As Joan Smith put it in her paper in Milan ("Hidden Homelessness and definitions of Homelessness in the UK - some issues for European definitions of homelessness" ([www.cuhp.org](http://www.cuhp.org))) "Current discussions on the estimate of homelessness including "scales" of homelessness derive from the concerns of organizations working on behalf of the single homeless and young homeless,

many but not all of whom are excluded from official estimates, and from organisations like SHELTER that believe that many homeless households are not being accepted through the legislation.”

### **Segmented research areas**

However, as most research on homeless people is by reference to the statutory definition, the fields of research and official statistics tend to be segmented, such that *statutory homeless* and *non statutory homeless* are not studied together, just as they are addressed by separate measures, the former dealt with primarily by the local authorities, the latter by NGOs; the *single homeless* - a term that refers not to homeless one-person households but those without a dependent child (including couples), and who are not therefore in priority need - have been considered in a series of studies (see the bibliography in Fitzpatrick *et al.*, 2000). Likewise, a subpopulation of the *single homeless* group - *rough sleepers* - have been a specific policy<sup>8</sup> target for several years and have often been considered separately, as have the young homeless, who have been the target of an expanded supported housing provision.

Unlike the United States or France, therefore, where the *literal homeless* (United States) and the *sans domicile au sens restreint* (France) include those sleeping in temporary accommodation, including flats, or on the street (irrespective of family circumstances), people in either of these situations in the United Kingdom tend not to be studied together other than in a handful of studies of *single homeless people* like that of Anderson *et al.*, 1993, which concerns “homeless people living in hostels and on the street”, or the follow-on studies by Geoff Randall about the rough sleepers from the street to the hostel. This choice, which perhaps reflects the nature of British hostels (fewer large dormitories and more private rooms, and longer-term stays, therefore with less likelihood of a rapid transition from street to hostel and vice-versa), does not facilitate the collection of identical data and hence comparisons between people in these situations, or the study of transitions between situations (frequent in France, for example). There is therefore no real British equivalent to work on the *literal homeless* except a smattering of isolated studies.

Hence, the segmentation of research is influenced by the choice of definition. This is not specific to British research; even in France, where a comprehensive classification system that included all housing situations was purposely adopted, it is not easy to find really comparable data on the *sans domicile au sens restreint* and on other insecure housing situations.

## **2. Italy: a singular case of the concept of exclusion**

Notwithstanding an express reference to homeless people in the Welfare Act 2000, Italy has no statutory definition of homeless people. The issue of homelessness as generally addressed by the various actors is more to do with the concept of social exclusion, and the multidimensional approach that implies. Housing is only one of the dimensions taken into account. The expression adopted in Italian, *senza dimora*, by the *Commissione di indagine sulla povertà* (a committee established in 1984 operating under the aegis of the Ministry of Labour and Welfare - *ministero del Lavoro e delle politiche sociali*, also known as *ministero del Welfare*) is seen as encompassing both housing-related factors and factors related to

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<sup>8</sup> The *Rough Sleepers Initiative* (RSI) launched by the conservative government in 1990, followed by the setting-up of the *Rough Sleepers Unit* (RSU) in 1998 by Tony Blair’s New Labour government under the *Rough Sleeping Strategy*, which aimed to cut the number of rough sleepers by two thirds by 2002.

social and inter-personal problems (a reasonably close French term might be *sans foyer*). It differs from *senza casa* (houseless), which is closer to the definition looked at below, that adopted by French statisticians, based on housing situation. The term *senza dimora* has been popularized by NGOs (e.g., the *Federazione Italiana Organismi Persone Senza Dimora* or FIOpsd, the counterpart to FNARS in France).

So, the survey done by the Padua-based Zancan foundation in March-April 2000<sup>9</sup> commissioned by the *Commissione di indagine sulla povertà* gives a specific definition of *senza dimora*:

*“persona priva di dimora stabile, in precarie condizioni materiali di esistenza, priva di una adeguata rete formale/informale di sostegno. La definizione (...) ha reso possibile escludere dall’analisi le persone che pur non disponendo di una dimora stabile non rientravano nei criteri definitivi utilizzati dalla ricerca” (Fondazione Zancan, 2000, p4)*

*(individuals without permanent housing, living in conditions of extreme economic insecurity, with no sufficient formal or informal support network. The definition (...) made it possible to exclude from the analyses individuals who, though without permanent housing, did not fall within the definition criteria used by the research) (Fondazione Zancan, 2000, p4)*

Unlike Britain, where the issue of *homeless* and *statutory homeless* is tied to social housing allocation and housing policy, notwithstanding that factors other than the physical housing situation are involved, *senza dimora* in Italy is more about the existence of social ties. So it is at the nexus of two interpretations and two policies: housing policies and social policies (whether at national level, through the Housing Ministry (*Ministero dei Lavori Pubblici*) and Welfare Ministry (*Ministero del Welfare*), or at regional and local level). But these two public policy spheres are not completely joined up, in that the Housing Ministry’s agenda is more focused on the much wider category of people experiencing *disagio abitativo* (housing hardship).

According to Antonio Tosi, one specific characteristic of the Italian situation is that the issue of *senza dimora* is equated with that of extreme poverty, such that it is not always clear from official documents like the NAPs whether groups classed as *senza dimora* and *povertà estrema* are identical or overlapping.

The scope of this definition also effectively excludes various groups like immigrants living in shacks, who are not perceived as experiencing social marginalization in the definition’s terms but rather status-, employment- and housing-related difficulties.

### **A category with shifting boundaries**

However, the existence of these situations on the boundaries of the category of *senza dimora* may act to call into question both the category itself and the social policies that address it. A survey done by FIOpsd showed an increase in the number of immigrants using homeless services, calling into question the separation of services for these two categories of people (in France, likewise, some voluntary and official social service providers are starting to question how their practices need to change to address the different demands of homeless immigrants).

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<sup>9</sup> A first survey had been done in 1992.

For one thing, a protracted spell of homelessness may be the first step for immigrants towards social marginalization. Also, some homeless nonimmigrants seem to display no other problems than those related to housing and employment. This issue of homeless immigrants is therefore having a shaping influence on the redefinition of *senza dimora*.

*“Possiamo affermare, in linea generale, che vi una grossa differenza tra le modalità ed i tempi dell’essere senza dimora italiano e quelli dell’immigrato; la persona italiana che ricorre ai servizi per senza dimora generalmente in condizioni di disagio per il fallimento del proprio progetto di vita che si manifesta con la perdita del lavoro, del contesto relazionale di riferimento, della abitazione; l’immigrato, in alcuni casi, assume consapevolmente la condizione di “senza dimora” come un rischio, un costo, una fase transitoria del proprio progetto migratorio; per lo straniero la condizione di “senza dimora” quindi una fase della propria vita legata alla difficoltà di soddisfare bisogni primari; per il cittadino italiano spesso l’esito di un percorso di progressiva emarginazione e di isolamento con implicazioni psicologiche e relazionali molto diverse.*

*Anche all’interno dell’utenza straniera dei servizi per senza dimora rileviamo alcune persone immigrate in situazione di emarginazione ed isolamento molto simile a quelle degli italiani; sono quelle situazioni dove, per età, per malattia, per rotture relazionali la persona immigrata vive il fallimento del proprio progetto migratorio e il contestuale allontanamento dal proprio gruppo etnico o dalla propria famiglia.” (FIOpsd, Immigrazione e persone senza dimora, 2002, [www.fiopsd.org](http://www.fiopsd.org))*

*(broadly speaking, there can be said to be a big difference between the patterns and stages of the situation of Italian and immigrant senza dimora; Italian nonimmigrants that use senza dimora services tend to be experiencing poverty as a result of a life crisis reflected in job loss, breakdown of emotional ties, and homelessness; whereas immigrants in some cases consciously assume the condition of senza dimora as a risk, a cost, a transitional stage in their planned migration; for the incomer, therefore, the condition of senza dimora is a life stage related to the difficulty of meeting their basic needs; while for the Italian citizen it is often the outcome of a gradual descent into marginalization and isolation with a range of psychological and relational implications.*

*Some immigrant users of senza dimora services are also to be found experiencing marginalization and isolation very similar to those of Italians; these are situations where problems related to age, illness or relational breakdown have led to failure of the migration plans and the simultaneous disaffiliation of the immigrant from their ethnic group or family) (FIOpsd, Immigrazione e persone senza dimora, 2002, [www.fiopsd.org](http://www.fiopsd.org))*

The chapter on the *senza dimora* in the *Rapporto sulle politiche contro la povertà e l’esclusione sociale* (report on anti-poverty and social exclusion policies) (Saraceno, 2002) summarises the previous survey’s findings and also qualifies the foregoing definition, specifying that:

*“Ma, accanto a queste figure che forse corrispondono maggiormente all’immagine consolidata [tra gli operatori], ve ne sono altre in cui è la povertà economica, unita talvolta anche a forme di discriminazione, la ragione principale della condizione di senza dimora”*

*(but, along with these cases, which may more reflect managers’ perceptions, there are*

*others for whom economic poverty, which may be compounded by forms of discrimination, is the main reason for their being senza dimora).*

### **Theoretical definition and operational definition**

In the Zancan Foundation's statistical survey, the "housing" component of the definition was particularly narrowly defined as the study covered only people sleeping in public spaces or in "low threshold" hostels. While narrowly construed from this angle, it nevertheless went further than *senza dimora* from the social ties angle, as presumably on feasibility grounds, the statistical survey coverage proper was confined to the housing situation: people who had maintained some kind of relational network, as found in the part examining social relations, were not excluded from the findings.

More generally, in Italy, as in other countries, there seems to be a two-way flow between a theoretical definition, based on the multidimensional concept of exclusion, which accommodates both houselessness and the lack of social ties, and an operational definition (for the establishment and analysis of statistical data) based on the housing situation only.

### **3. France: an operational definition for statistics based on housing situation**

In France, two broad groups of work on homeless people can be identified from the 1990s onwards<sup>10</sup>.

One is the qualitative sociological or ethnographical research largely financed by the Urban Plan and its successor the *Plan Urbanisme, Construction et Architecture* (PUCA - Urban Development, Construction and Architecture Plan attached to the ministry for housing but also for regional planning and development and urban issues) (Joseph 1992; Ballet 2003): this corpus of work often refers to a definition of homeless people which, while not sufficiently precise for statistical surveys, is quite narrow and generally based on visibility in public spaces, notwithstanding the PUCA's express request to consider the scope of the definition. So, the second invitation to tender comprises a section on "concepts and categories, semantic and legal aspects" asking researchers to consider "the rationale of the terms used and their use in the different environments - the street, the media, institutions; the underlying perceptions behind categories, internalized by the people themselves, and expressed by different players with varying degrees of involvement" (invitation to tender - *Les "SDF", représentations, trajectoires et politiques publiques*, p. 7).

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<sup>10</sup> After the path-breaking works by Vexliard in the 50s (see for example *The tramp, Le clochard*, 1957), during the 1980s some isolated works focused on the homeless, most of a qualitative nature. The only statistical data were those published by the Ministry of Social Affairs on shelters funded by the State. The beginning of the 1990s can appear as the years of emergence of homelessness as a subject for research (PhDs, books by researchers and journalists). As to the larger NGOs, they have funded research institutes to produce statistical surveys and studies, or published their own figures. The definitions were either not precised or linked to a clientele.

In 1991 the Plan Urbain (the research section of the Ministry of Equipment, Urban Planning, Construction, and Architecture, created in 1984) gave a decisive impulse to this research issue thanks to the program "Public Spaces: the social construction of urbanity, the management of public space". These works were of sociological or ethnological type. A second research program was launched in 1999.

The INED research, of a statistical but also of a qualitative nature, has been carried out since 1993, at the instigation of the National Council of Statistical Information (CNIS). The same survey method was also used in the national survey conducted by INSEE in 2001.

The other corpus is quantitative research, much of it originating in the work done in the early 1990s by the National Council for Statistical Information (CNIS), a body that brings public statistics producers face to face with their users (government departments, NGOs, trade unions, researchers, etc.). The definition of *sans domicile au sens restreint* developed out of that work, considered in more detail here, is that of people who, at a specific point in time, find themselves in a particular housing situation in a continuum of housing situations. This is the one currently used in the statistics published by the National Institute of Demographic Studies (INED) and the National Institute of Statistics and Economic Research (INSEE) (especially for the figures used in the NAPincl).

## **A classification of all housing situations**

Between 1993 and 1996, a specific group of the National Council for Statistical Information looked at statistical methods for surveys of homeless people and people experiencing housing exclusion<sup>11</sup>. INED's initial studies of homeless people in Paris were a component of these investigations, along with the development of a classification of all housing situations, including that of *sans domicile au sens restreint* (see <http://www.cuhp.org/parisworkshop.cfm>, <http://www.cuhp.org/admin/EditDocStore/ACF6C42.pdf>, and the CNIS report, 1996).

The housing situation is described in terms of four aspects: housing type, occupancy status, housing quality and amenities (including access to a water point for the unsheltered or unsheltered), security/insecurity over time.

The group saw a need to take multiple dimensions into account simultaneously, as a situation may be favourable on one dimension (e.g., among the types of tenure, being an owner-occupier) but unfavourable on others (e.g., for housing quality, being in a house with no running water). It is not, therefore, a scalar classification.

However, while a situation can be classified in terms of the first two dimensions using existing simple classification systems, they can be less easily so for the housing quality aspects, which may involve many things; and the final dimension (security/insecurity over time) is difficult to accommodate in surveys, because the respondents themselves do not always reliably know how secure their situation is.

It was also thought important to classify all housing situations, not just those that can be described as *sans-domicile*. As François Clanché writes,

*“for the same reasons that the group refused to treat the homeless population as a separate population, so it did not want to establish a list or classification of situations of exclusion that was distinct from that for “ordinary” situations. Although effective observation of these situations clearly requires specific procedures, it was decided to develop a set of classifications that described the full range of housing situations, from the most conventional and most stable, to the least secure and least habitable”* (p. 2 of the text on the CUHP site).

As well as avoiding stigmatization and the creation of a “statistical ghetto”, this choice has several things in its favour, not least that of enabling observation and analysis of movements

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<sup>11</sup> The CUHP network has only occasionally delved into the historical aspect of the adoption of definitions. This would be an interesting line of future research.

between being “housed” and “unhoused”, and the housing supply accessible to the poor. It is a way of balancing the focus on “situations” and the processes that result in becoming homeless, in residential terms at least.

The situation of *sans domicile au sens restreint* as used in the INED<sup>12</sup> and INSEE surveys is defined as the fact of sleeping in a place not meant for human habitation or in temporary accommodation provision, i.e., situations defined by reference to the first two dimensions of the CNIS classification (housing type, occupancy status). A working definition of homeless people themselves also meant including a time-related aspect: that chosen was the housing situation on the night before the survey (which is also somewhat restrictive). The methodology guidance notes for the INSEE survey (INSEE, forthcoming) give it as:

*“Une personne est donc dite sans-domicile si elle dort dans un lieu non prévu pour l’habitation ou si elle est prise en charge par un organisme fournissant un hébergement gratuit ou à faible participation. Ces organismes peuvent fournir des places dans des structures collectives, des chambres d’hôtel ou des appartements ordinaires. Ces hébergements peuvent être proposés pour des durées différentes: d’une nuit à quelques jours, voire plusieurs semaine ou plusieurs mois.*

*Les lieux non prévus pour l’habitation sont les suivants:*

- *cave, parking fermé, grenier, cabane;*
- *voiture, wagon, bateau;*
- *usine, bureau, entrepôt, bâtiment technique;*
- *parties communes d’un immeuble d’habitation;*
- *ruines, chantiers, grotte, tente;*
- *métro, gare, couloirs d’un centre commercial;*
- *rue, pont, parking extérieur, jardin public, terrain vague, voie ferrée.*

*(...) Une personne sera dite sans-domicile un jour donné, si la nuit précédente elle a été dans l’une ou l’autre des deux situations suivantes: soit elle a eu recours à un service d’hébergement, soit elle a dormi dans un lieu non prévu pour l’habitation (rue, abri de fortune).”*

*“A person is therefore deemed to be homeless if sleeping in a place not meant for human habitation or taken in charge by an organization providing accommodation free or for a small co-payment. Such organisations may provide places in communal facilities, rooming hotels, or ordinary flats. The accommodation may be provided for different periods of time, from overnight to several days, weeks or even months.*

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<sup>12</sup> Ined’s working definition of homeless also included the small proportion of people using the homeless services surveyed and who were and living in squats, staying with family or friends, or in paying hotel accommodation.

*Places not meant for human habitation are:*

- *cellar, closed car park, attic, sheds;*
- *car, railway wagon, boat;*
- *factory, office, warehouse, equipment room;*
- *common parts of a residential building;*
- *derelict buildings, building sites, cave, tent;*
- *underground station, mainline railway station, shopping centre gangways;*
- *street, bridge, open-air car park, park, waste ground, railway.*

*(...) A person will be deemed homeless on a given day if they spent the previous night in either of the following two situations: either using temporary accommodation provision, or sleeping in a place not meant for human habitation (street, makeshift shelter)."*

## **Historical context**

This deliberate narrowing-down to the "housing" dimension reflects an analysis of homelessness issues in housing market terms, and a refusal to label the unhoused along lines redolent of divisions into "deserving" and "undeserving". It is also related to the terms in which the problem was couched. The setting-up of the CNIS (temporary) "*sans-abri*" (shelterless) group addressed a demand made in the CNIS standing body on demographic and social statistics by Michel Mouillart, specialised in housing economics, and Françoise Euvrard, representing the Fondation Abbé Pierre's Commission Connaître et Evaluer. The Fondation is an NGO that has published an annual report on *mal-logement* (housing hardship) every year since 1995. Abbé Pierre engaged with the plight of the *mal-logés* in the 1950s, and remains a powerful symbol of the defence of those experiencing housing deprivation.

According to Michel Mouillart (interviewed on 7 June 2005), in a context where public policy action on housing was severely lacking (sharp decline in assistance for first-time home ownership and rented social housing construction), and housing needs underestimated, the idea was to press for these needs to be taken into account again. Calling for a survey into homeless was one way of doing that.

Also, the CNIS is tasked with further informing knowledge in various fields through public statistics. But the very fact of their being unhoused prevents homeless people from being reached by household surveys, the sample frame of which is generally based (in France) on a housing list (rather than on population registers as in other European countries, like Belgium).

In these circumstances, it was arguably self-evident to couch the question in terms of housing, therefore.

## Drawing on the US research

The INED researchers tasked with developing a sampling procedure for homeless people took as their starting point the only methods existing at the time which focused both on hostel users and street people, *i.e.*, the US methods (as mentioned earlier, British statisticians broke these populations down into several sub-groups surveyed by different methods). The US definitions fulfilled statistical feasibility criteria and were very close to the administrative category defined by the McKinney Act (Stewart B. McKinney Homeless Assistance Act, July 22, 1987). This definition has come under criticism on the grounds that by identifying homelessness as a housing problem, the federal State came up with solutions that were essentially accommodation-related. The US Act definition is:

*“For the purposes of this chapter, the term “homeless” or “homeless individual” or “homeless person” includes:*

- (1) an individual who lacks a fixed, regular, and adequate nighttime residence; and*
- (2) an individual who has a primary nighttime residence that is*
  - (A) a supervised publicly or privately operated shelter designed to provide temporary living accommodations (including welfare hotels, congregate shelters, and transitional housing for the mentally ill);*
  - (B) an institution that provides a temporary residence for individuals intended to be institutionalized; or*
  - (C) a public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings”.*

French practitioners adapted these definitions and the use made of them, repositioning them within the complex of housing situations. This made it possible to design a system of interlinked surveys in order to be more widely informed of the other situations, especially those that could also reasonably have been classed as homelessness (such as the situation of *personnes hébergées* (people staying with family or friends) included in the 1996 and 2002 INSEE Housing surveys following the CNIS recommendations). Categories that are formally close can therefore be used differently.

Also, while the definition's housing dimension focus refers back to the structural causes of these situations (the same CNIS group also produced research on the housing market through a study of vacant housing), the characteristics of those most affected, their daily lives and life courses are also taken into account through highly detailed questionnaires, which partly enable comparison with the housed population and the analysis of the various dimensions of the phenomenon. Some housing situations having been appointed as defining the situation of homelessness, other characteristics of the individuals and their life histories can be studied for information about the range of life experiences that lead to this situation, and the factors (resources or “capital”) that may be an asset or an added liability. The use of a category is therefore not limited to its shaping dimension.

## **The big divisions in the development of the definitions**

The three cases studied above - the United Kingdom, Italy and France - have “official” definitions that are most commonly used in statistics-based studies. It should be borne in mind, however, that the different definitions - both those studied, and competing definitions within the same country - were not created by the same actors nor in the same circumstances, and may reflect different uses. A study of them nevertheless brings into sharp focus some principles that reflect essential differences in these definitions: the existence or lack of legislation on homelessness, the linkage between the definition and allocation of social housing, whether a multidimensional definition or not ....

### **Legislation on homelessness**

This is found in both the United Kingdom (studied above) and the United States, and in our network, in Hungary (Social Law 1993). Where there is legislation that expressly targets homeless people as a specific category (rather than a system in which they benefit from the same services as those on equivalent incomes, for example), there is a statutory definition of homeless people. It may be quite narrow (as in the United States or Hungary) or broader, like that of the United Kingdom which includes those who are “physically” housed but are not safe where they live - e.g., the victims of violence - or who may be made homeless within a very short time. It generally reflects a policy towards the designated groups either to enable them to access housing (United Kingdom), or to organise temporary accommodation provision or other measures (United States).

In this case, researchers often apply the statutory definition of homeless people (or one akin to it), especially where they are financed by public bodies (national or local), e.g., to provide data for statutorily-prescribed reports; it is also used by NGOs in lobbying. The latter may also be apt to broaden the definition in order to reach people still outside the legislation. Generally, the existence of a statutory definition conferring different rights on people according to whether they fall within the definition of homeless or not often results in the other definitions used by the different actors being developed by reference (including in opposition) to the statutory definition.

Where the United Kingdom is concerned, the legislation aims not - as in the United States - to find a solution (which some critics argue is primarily a sticking plaster solution) for people whose visible presence in public spaces makes them hard to ignore, but to regulate the allocation of social housing which is often in short supply. The point then is to identify criteria for establishing priorities among the *homeless*, based on the underlying idea of the risk to which one or other category of the population might be exposed if it were not rehoused, *i.e.*, to classify applicants by characteristics generally related to the notion of disadvantage due to either old age or the presence of children, or what the law designates as *vulnerability*.

*SIMON CRIBBENS, GREATER LONDON AUTHORITY*

*“Homelessness as we have already learnt this morning is defined in several ways, and counted in several ways. We have those who are declared as homeless under the legislative framework, this was set out in the Housing Act of 1996 which has been amended in 2002 and homeless people in law in England and Wales if there is not accommodation they have the right to occupy or accommodation that it is not reasonable*

*that they should occupy, so that would include those who are fleeing domestic violence or harassment, it is unreasonable to return to their properties. To be classified as statutory homeless an applicant needs to apply to one of their local authorities in London and it's up to that authority to interpret the law in making this decision, so it's quite subjective. And even if somebody is homeless as you've heard this morning being homeless is not enough to benefit from the services that local authorities can offer, an authority only has a duty to rehouse you if you are seen to be a priority need and in general that is for applicants who have dependent children or who are pregnant and single people who may be considered vulnerable. Vulnerability often relates to an illness – physical or mental illness – and in some categories age and has been broadened recently to incorporate some other categories.”*

Given the many possible pathways into homelessness, and the shifting outcomes of policy changes (immigration, employment, taking young people into care, provision for mental illness, etc.) the definition cannot remain fixed in time, producing an increase in “at risk” categories (violence, prisoners homeless on release, young people aged 16 and 17, etc.). This group-based rationale leads to some being prioritized, which means others being rejected (see e.g., Crane, *Our forgotten elders*, 2001, <http://www.mungos.org/facts/reports.shtml>); looking into the difficulties faced by these can lead researchers and NGOs to look at other categories of people and press for their inclusion. Such pigeonholing risks lacking points of comparability between the different segments of the population; having little information about transitions between categories; and giving scant information on the categories rejected. By contrast, it will give copious, regular data on the categories selected.

## **How the definition influences social housing allocation**

Another question that arises is the linkage between social housing allocation policy and the definition of homeless people. There is a direct linkage in the case of the United Kingdom. In France, the definition adopted for statistical work and in the context of the housing crisis described above is decoupled from social housing allocation, the procedure for which is: first, certain eligibility criteria are checked, relating to nationality, legality of stay in France, and household resources which must be below a maximum. A *Conseil d'Etat* order stipulates that “in examining applications, allocation committees (...) shall in particular take into account the composition, level of resources and current housing conditions of the household. They shall also take account of the distance from the place of work, and of amenities that address the applicants' needs. They shall ensure the social diversity of towns and neighbourhoods, giving priority in the allocation of available housing to those who are homeless, or whose applications must be treated as urgent because they are living in insecure or unhealthy accommodation, and those with both economic and social difficulties (...) Priority in other applications for social housing shall go to the categories of people defined by departmental regulation”. Each department has its own “departmental allocation rules” which defines priority families.

In terms of priority households, the allocation rules are ultimately not that different from the British ones, as priority goes to those who are homeless or living in unhealthy or dangerous accommodation, those being evicted under town planning arrangements, people with disabilities or with a disabled dependent, large families, pregnant women, heads of large families, young first homeseekers, people experiencing a sudden loss of income, etc. Young people forced to leave home at age 18 can be housed via a voluntary social action agency. Domestic violence is a priority. Normally, where a married couple is concerned, the applicant

would have to show proof of divorce proceedings, but low-rent housing providers often rehouse where such costly proceedings have not been filed (even though subject to a fine) (interview with Patrick Kamoun, Union sociale de l'habitat, 28/06/2005; see also, Kamoun, 2000).

France also has a range of stepping stone providers (CHRS [accommodation and resettlement centres], and various forms of supported housing such as *logements d'insertion*, *résidences sociales* and *maisons relais*), part of whose job is to lay the ground for inclusion and intake into the social rented stock. Those leaving integration provision are now classed as priorities for access to social housing (Borloo Social Cohesion Act).

But, the housing market situation remains important in all countries; where the market is tight, not even all priority cases can necessarily be housed. So, in the United Kingdom:

*LINDA DELAHAY, Housing Policy Services Officer for Women's Aid Federation of England.*

*(...) I think it very much depends upon availability of accommodation as to how you are treated. With regard to the intentionally homeless, some women who come into refuges are sometimes classed as intentionally homeless, unfortunately, due to rent arrears being the highest among them. Yet these women have not been able to in any meaningful way have any control over their household finances and yet because they are a joint tenant, jointly and severally liable and are blamed for the problems of the partner who has control of the household purse. The Homelessness Act 2002 does extend its remit to include intentionally homeless people, local authorities do have policies to meet the needs of the intentionally homeless but what you know in actuality this is promised much but in reality delivers very little.*

## **A multidimensional or housing-focused definition**

Italy is a defining case where multiple dimensions are taken into account simultaneously to define homeless people: being unhoused and socially marginalized.

French statisticians and quantitative researchers, by contrast, follow the CNIS' work by using a definition focused on the housing situation, and only at the point of analysis do they look at the linkages with other dimensions (employment, basic training, etc.). But the list of situations taken into account to define the *sans-domicile* has something of a social dimension if the specialised centres (for immigrants, for women victims of violence, drug abusers, etc.) are broken down between those included in and excluded from the definition.

Indeed, the term "housing" may have a meaning that differs between definitions<sup>13</sup>: in the French definition - shaped by the circumstances in which it was constructed - housing is defined by its material aspects and occupancy status in terms of the housing market; in the British definition, where the housing condition includes situations of potential violence and

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<sup>13</sup> British researchers who have studied the definitions given by homeless people themselves have produced results that differ according to the respondent's residential trajectory. Fitzpatrick *et al.* (p. 9) report that studies of young people (who have generally never had their own home) appear to show that housing insecurity and impermanence are most important in defining what it is to be homeless, whereas for (childless) women it is material conditions. But the two population groups were studied by different authors, which somewhat restricts comparison.

imminent eviction, it is more the social function of housing (*home* rather than *housing*), as a place which one can inhabit with a sense of security. This meaning related to the social and psychological roles of housing is found in the Italian term *dimora*.

But, the fact of seeing the lack of social ties or the presence of various difficulties as a factor in or consequence of becoming homeless (in a given housing market context) may coincide with a housing-focused definition, as in this remark of a British NGO:

*EMMA STRONG, CENTREPOINT*

*(...) Homelessness is not about accommodation, it's about needs that people have to get over difficulties in their lives.*

Or in Fitzpatrick *et al.* (2000) describing the trend of research in the United Kingdom: “ The review revealed a shift in research literature away from explaining homelessness as a “housing problem” to more complex analyses which weave together consideration of social and economic factors on the one hand, and “individual” factors on the other.” (<http://www.crashindex.org.uk/overview.html>).

Likewise, French researchers have not confined themselves to an analysis in housing market terms, albeit acknowledging its importance. So, the constituents of the definition must be distinguished from those involved in an analysis of the causes and consequences of the situation of homelessness. The view expressed here differs from that of Antonio Tosi, for whom the choice of a definition by housing type can be interpreted as an affirmation that the problem is primarily a housing problem that can be resolved by housing policy.

Addressing the London workshop, Antonio Tosi pointed out that the two dimensions (housing and social marginality) are taken differently into account in different countries, and connects each to the provision made for homeless people by the relevant government department:

*ANTONIO TOSI, ITALY (London workshop day 2)*

*“A question about the starting point of the second intervention [James Francis, Thames Reach Bondway]. If I understand well, the problem for those who were working with street homeless persons was in some way to try to “add” to the accommodation dimension of the problem the problems of social relations and social isolation. For many other European countries the problem was in some way the reverse, street homeless was - and it is still - defined as a problem of extreme poverty or social marginalization. So the problem was to convince social workers and policy makers that accommodation, the housing part of the problem, was important.*

*I don't think that the two stories are converging. I think it is important to underline the research and policy implications of the two images, homelessness as housing issue, homelessness as social issue. I think they are both correct in some way, but research and policy implication are very different. For instance, in the case of South Europe countries, where the prevailing images consider homelessness as a “social” problem, even today housing research is not open to consider homelessness as a problem of its competence and housing departments or housing policies are not open to view homelessness as something of their competence. It is passed completely to social welfare attributions.”*

Compare this with the position of Spanish researchers as outlined at the Paris workshop: according to Carmelo Vazquez and Manuel Munoz, both dimensions are important and the focus can be put on either as required, e.g., whether dealing with the Housing<sup>14</sup> or Social Affairs Ministry. Incorporating both housing-related and psychosocial factors into the definition would then enable several categories to be clearly delimited among the houseless and frame appropriate social policies for them. But Spain has no statutory definition of homeless people and the working definition used by the Spanish team for its statistical surveys is that of *sans domicile au sens restreint*, which is akin to that of literal homeless used in the United States (the team being familiar with the American research, having worked with Paul Koegel of the Rand Corporation, for example).

It is clear from the papers given by Antonio Tosi and the Spanish researchers that a linkage exists between the Ministry with responsibility for homelessness and the definition. This has already been remarked on by Brousse, 2004, p. 17, in her report for Eurostat on the statistical treatment of homelessness in the European Union.

Also, the sharp division between definitions that refer only to the “housing” aspect and those that include other factors does not necessarily (although it often does) reflect a division between individual approaches (with the potential for a “blame game”) and structural approaches (with the risk of denying the victim any form of agency, or any ability to withstand events). So, in his Milan workshop paper, Antonio Tosi points out that social vulnerability must also be seen in terms of where it stands in relation to social changes embodied in the restructuring of the labour market, the family and social protection systems. He argues that the weakening of social ties is not just an individual issue (in an analysis close to that of Robert Castel, 1995). Indeed, this division between individual and structural factors can be surmounted (see the application of Pierre Bourdieu’s concepts to homelessness, e.g., Marpsat & Firdion 2000, and Jean-Marie Firdion’s paper on social capital, [www.cuhp.org](http://www.cuhp.org)).

### **Classifying housing, household or individual situations?**

The different definitions of *sans-domicile*, *homeless*, *statutory homeless*, *mal-logé*, *senza dimora*, etc., may relate to:

- housing situations only; any other household in the same situation would then be classified in the same way;
- characteristics of the household or its members (e.g., a victim of violence in the United Kingdom: the same person, in the same violent household, would be classified as *homeless* regardless of their housing situation); or
- a combination of elements of the housing situation and the characteristics of the household or the individual: in the case of the United Kingdom, a “vulnerable” person, by reference to an uncertain list of characteristics of the household, experiencing certain housing situations, will be classified as *statutory homeless*; in France, a household will be classed as *mal-logé* (the definition of which is not completely settled) if it is in an inappropriate housing situation, e.g., unaffordable, too small, inaccessible to a person with a disability, etc. In this case, a different household living in the same housing would not necessarily be regarded as *mal-*

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<sup>14</sup> If there is one, which is not the case in all countries.

*logé*, nor would the same household if living in more appropriate housing.

The same kind of division is also found over whether to focus on the housing dimension only, or include other aspects.

The French definition of *sans-domicile*, and more generally the classification of housing situations developed out of the CNIS' work and produced at the outcome of discussions between government departments, researchers and NGOs, focus only on the "housing" aspect. There is no reported instance where two households in the same housing situation would be classified differently - one as *sans-domicile*, the other not - by reference to the presence of children, domestic violence, etc. By contrast, the French departmental allocation rules, which list the priority need situations for the allocation of social housing, or the British definition of *statutory homeless*, likewise referable to the management of the social housing stock, do take these factors into account. The Italian case differs somewhat, since it also factors in individual characteristics, but not with a view to immediate policy action.

As an incidental point, the distinction between people and households is important from the policy action viewpoint, partly because not all people in the household are necessarily similarly positioned as regards insecurity of tenure (only one may be the named leaseholder) and partly because different kinds of solution may be sought according to whether it is people or households that are counted and characterised (housing for the whole family or temporary accommodation in separate centres, for example).

## **Continuum and scale?**

These two terms - continuum and scale - were the focus of different discussions in the CUHP network.

As to the **continuum** (of housing situations), part of the discussions stemmed from different interpretations. For the French team, the term means that there is no clearly-defined dividing line between the worst situations of *mal logement* (housing hardship) and those classified as *sans-domicile*. For other teams, it implies that a person experiencing housing hardship will necessarily end up houseless, and that a homeless person was necessarily experiencing housing hardship before; but while some kinds of housing hardship (like staying with family or friends) may hold a higher probability of becoming houseless, it is not possible to generalise. Finally, some teams who use a multidimensional definition see a sharp divide between homeless people and others, either in terms of social ties, or in terms of mental illness.

Some definitions were seen to involve an idea of the **scale** of situations (e.g., that referred to earlier and presented in Fitzpatrick *et al.*, or the research done by CRISIS and the New Policy Institute (Kenway, Palmer 2003). This scale can be construed as pointing to varying degrees of acuity of situations, but also, for critics, as a visibility scale or even a *nuisance scale*. In terms of priority access to housing, the priority ranking given by visibility scales has been criticised by a member of the English team:

*"One of the problems of producing a scale of homelessness that places "rooflessness" or rough-sleeping at the top of the scale is that it invokes the response that the most visibly homeless are the most vulnerable and the most at risk. However, there are different types of vulnerability and different types of risk. There are risks associated with the street and*

*the risks of living in someone else's home, up to and including murder for women facing domestic violence. (...) It is a problem if abstract scales of homelessness/housing exclusion avoid the question of the type of household that is being discussed."* (Joan Smith, Milan paper on "Hidden Homelessness and definitions of Homelessness in the UK - some issues for European definitions of homelessness", [www.cuhp.org](http://www.cuhp.org)).

## **Extending the definition of homeless people**

One issue raised at the Milan workshop was that of extending the category of homeless people. It was found that different countries reasoned this differently. In the French case, where the definition is referable exclusively to the housing situation, so is the extended definition: this produces situations that are different but similar - like living in someone else's home or an overcrowded house - which are not seen as resulting in a higher probability of becoming homeless, although homeless people have often experienced such situations. In the United Kingdom or Italy, where the basic definition includes factors relating to the household or the individuals that comprise it, the same goes for extending the category, with a higher probability, a greater "risk", of becoming homeless, when other, non-housing dimensions are taken into account.

These methods of extending the categories, which hark back to their formative principles, may also reflect two different uses: one focussed on the development of statistical data and research based on a quantitative approach (in the French case, the housing situation is what determines the survey coverage, and the socio-demographic characteristics of homeless people as defined by their housing situation are studied only subsequently; extending the category therefore entails studying "similar" housing situations); the other is focused on public policy or voluntary action (in the British case, extending the category means defining which people should be on priority lists but are not because they are classed as non-priority or because they are not known about; in the Italian case, it involves exploring prevention policies). Obviously, the same category can be used differently by different actors, or by the same actors in different circumstances.

### **In the United Kingdom**

The definition is extended either by a concurrent definition (see above, on "scales"), or by keeping to the approach of helping people already defined as vulnerable. Where a concurrent definition is concerned, this generally takes the form of trying to extend the benefit of the Act to categories (single men, childless couples) previously classed as non-priority. In the second case, identifying the *hidden homeless* means identifying those who should benefit from social housing under the terms of the Act, but are not counted for one reason or another. In her paper to the Milan workshop, Joan Smith distinguishes three intermeshing categories, from broadest to narrowest - *concealed households*, which are households living with another household; *potential households*, which are those of the former wanting to move; and the *hidden homeless*, who are those among the potential households who meet the eligibility criteria defined above (insecurity, asked to leave by the host household).

### **In Italy**

On extending the category, Antonio Tosi recommends broadening the issue to a conceptual framework that is wider than the polar situations, while remaining at the nexus of the two spheres of housing and social inclusion:

“(…) the question must be examined in relation to both the types of problem that cross paths in the concept of homelessness - poverty and social exclusion as against housing exclusion (understood in the wider meaning of the term rather than just the literal sense of “lack of a home”). (…) this duplicity means that research must run along two lines: the problems of housing (exclusion) and those of poverty/social exclusion. It is impossible to exclude one of the two dimensions” (Tosi, The construction of homelessness in Italy, [www.cuhp.org](http://www.cuhp.org))

Also, like France, Italy has no commonly used equivalent to the concept of *hidden homelessness*. The category traditionally used is that of *disagio abitativo* (housing hardship), which approximates to *mal logement* in French.

### **In France**

The definition of *sans domicile au sens restreint* adopted by French statisticians has attracted criticism from two quarters: one from groups engaged with people sleeping rough or in emergency shelters, which found it too wide and focused on the “well-off homeless”; but also from groups who found it too narrow, in particular because it did not include people living in someone else’s home, and accused the statisticians, working in the government sphere, of following a political agenda and playing the problem down. It is true that people living in someone else’s home cannot be reached by “service user” type surveys, but questions on them, also based on the work of the CNIS, are included in the Housing survey.

There is no concept of *hidden homelessness* in France, where it is more common to refer to *mal logement* (as in the Fondation Abbé Pierre’s annual report) or *situations marginales de logement* (e.g., in the INED’s work). Any extension of the concept of *sans domicile* therefore takes place within the narrow confines of the housing issue. The detailed classification of housing situations drawn up for the CNIS’ work (Clanché, 1998/2000) enables different kinds of difficulties to be identified in this sphere.

Each of these classification systems (housing type, occupancy status, housing quality, security/insecurity over time) corresponds to one aspect of what may be called poor housing conditions, or housing needs. Examples include hostel and street living, for the housing type classification system; living with parents or friends, or in a squat, etc, for the occupancy status classification system; living somewhere (which may be on the street or anywhere not meant for human habitation) without access to running water, etc., for the quality of housing classification system; being at risk of eviction, or living in voluntary-run temporary provision approaching the maximum stay, for the security/insecurity over time classification.

But other factors like the unsuitability of the housing for the household (cost, overcrowding, etc.) can be included, and this would break with the approach of looking only at the housing situation independently of the household that lives in it; or living environment, etc. For a more comprehensive discussion, see for example the French paper to the Milan workshop, “Beyond literal homelessness” ([www.cuhp.org](http://www.cuhp.org)).

### **The implications of choosing a broad or narrow definition**

The social policy implications of a broad or narrow definition were pointed out by the network partners. Joan Smith argued that adopting too **narrow** a definition leads to an

“aggressive” policy, because the public does not perceive the problem as affecting everyone; she referred to Fitzpatrick *et al.*, reporting researchers and NGOs’ concern at the recent focus on measures targeted at rough sleepers: “there is concern that the recent emphasis on rough sleeping has narrowed the debate around homelessness to a minimalist definition of the problem”. For Antonio Tosi, looking at the social policy implications, “**extending the definitions** plays the role of giving visibility to categories with the aim of including them in the problem that public policies will have to address” (Milan workshop paper), whereas Carmelo Vasquez argued that too broad a definition contributed to making the poor invisible.

But it can also be argued that too narrow a definition, as well as creating an artificial divide between homeless people and the population at large, may result in the structural causes, especially the housing market, going ignored.

### **Towards a European classification system**

Creating a common definition of homeless people where there is no common policy for them, with reference to different national legislative provisions using data collected by a wide range of methods that are themselves dependent on specific social policies and a specific framing of the problem, is fraught with difficulties<sup>15</sup>.

One is that the features of a country’s homeless populations are shaped by prevailing national social policies. A woman victim of violence, for example, could be deemed homeless (and therefore counted as such in the United Kingdom, say) or be the subject of protective measures in a different capacity, which could result in her living in a refuge (but not being regarded as homeless, in Finland, say). Also, availability of places in such provision will dictate the numbers of women who can leave home to take shelter there. The social policy pursued will therefore dictate the number of women counted as homeless. A supranational definition cannot therefore square with all national practises, albeit trying to reconcile the maximum number of aspects. And joining-up the different countries’ social policies does not seem to be on the cards any time soon.

To construct a classification system, you must establish equivalence between the objects (people, situations) classified within the same rubric of that system. But where homeless people are concerned, national classification systems already exist that are based on different principles and refer to different legislation and social policies. These policies create equivalences for each country which either draw together or distinguish between some of the elements classified. In the United Kingdom, for example, a family with dependent children about to be evicted will be classified as *statutory homeless* on a par with a disabled person who has just lost her home; on the other hand, a single male rough sleeper presenting none of the features of “vulnerability” will not be classified as in priority need. In France’s definition of the *sans domicile au sens restreint* used for the statistics given, for example, in the National Action plan for social inclusion (NAPincl, <http://www.social.gouv.fr/htm/dossiers/pnai/>), the housing situation is what determines classification, in which the approach to housing is shaped by substantive and legal factors, but not psychosocial aspects.

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<sup>15</sup> Also found in other cases, like insecure forms of employment. See the works of the seminar “Statistique et évaluation des politiques publiques” (2004-2005).

## Feantsa's classification system: seeking common ground between different approaches?

The European Federation of National Organizations Working with the Homeless (FEANTSA) was founded in 1989 and receives funding from the European Commission. It publishes an annual report on homelessness in the European Union based on national reports written by experts in each country linked together within *The European Observatory on Homelessness*.

The Observatory has tried to develop a common definition of homelessness within the broader framework of housing exclusion. In this, it engages with the concerns of the *Social Protection Committee*, whose recommendation No. 29 is that “as a matter of urgency the Commission should examine different approaches to the definition and measurement of homelessness and precarious housing in a comparable way across Member States and see whether a Level 1 indicator can be developed for use in the EU monitoring process”<sup>16</sup> (Edgar *et al.*, 2004, p. 3).

As Meert *et al.* point out (see <http://www.enhr2004.org/delegates.asp>), “one of the main difficulties in measuring homelessness within an international perspective is the lack of a widely accepted definition of what constitutes homelessness”. FEANTSA has therefore endeavoured to come up with one through consultations between the team and Observatory researchers.

Some properties of the definitions looked at earlier are found in it, which raises the problem of how to find common ground between approaches originally working to different agendas.

Like the CNIS classification in France, FEANTSA's definition is based on several (three) dimensions that characterise all housing-related situations. The first two are “the physical domain” and “the legal domain”, which are very akin to the first two dimensions of the CNIS classification - “housing type” and “occupancy status”; but the “legal domain” also includes elements of permanency over time addressed in the CNIS classification by the fourth dimension (“security/insecurity over time”). The third dimension relates to the “social domain” - “the possibility to maintain privacy and enjoy relations” (Meert *et al.*, 2004). It is this dimension that embraces the network of relationships found in the Italian definitions, for example, but also the psychosocial dimension of housing (like the concept of security found in the English definition).

FEANTSA's proposed definition of homelessness situations therefore combines these three dimensions. Situations are presented according to a kind of scale of acuity, according to whether households are ill-placed in all three or just two aspects. The authors extend the concept to that of *housing exclusion*, which corresponds to hardship in just one of these three

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<sup>16</sup> The purpose of the 18 Laeken indicators (December 2001) drawn up by the EU's 15 Heads of State and Government after consulting NGOs as part of the EU Strategy to Combat Poverty and Promote Social Inclusion is to give a measure of the progress made in tackling poverty and social exclusion decided on by the Lisbon and Nice European Councils in 2000. They cover the spheres of (monetary) poverty, employment, health and education. There are 2 levels of indicator, level 1 being considered most important. They give an assessment of how Member States are performing and are an incentive to improvement, using the Open Method of Coordination (OMC). At the time of writing (June 2005), the number of indicators has risen from 18 to 21, the first 12 of which are regarded as “level 1” (or primary) indicators.

fields and not the others<sup>17</sup>. For a brief discussion of these dimensions and the associated definition of homelessness, see the French paper to the Milan workshop<sup>18</sup> (“Beyond literal homelessness”, www.cuhp.org).

Table 1: Seven theoretical domains of homelessness

		CONCEPTUAL CATEGORY	Physical Domain	Legal Domain	Social Domain
<i>homelessness</i>	1	<b>Rooflessness</b>	No dwelling (roof)	No legal title to a space for exclusive possession	No private and safe personal space for social relations
	2	<b>Houselessness</b>	Has a place to live, fit for habitation	No legal title to a space for exclusive possession	No private and safe personal space for social relations
	3	<b>Insecure and Inadequate housing</b>	Has a place to live (not secure and unfit for habitation)	No security of tenure	Has space for social relations
	4	<b>Inadequate housing and social isolation within a legally occupied dwelling</b>	Inadequate dwelling (unfit for habitation)	Has legal title and/or security of tenure	No private and safe personal space for social relations
<i>Housing exclusion</i>	5	Inadequate housing (secure tenure)	Inadequate dwelling (dwelling unfit for habitation)	Has legal title and/or security of tenure	Has space for social relations
	6	Insecure housing (adequate housing)	Has a place to live	No security of tenure	Has space for social relations
	7	Social isolation within a secure and adequate context	Has a place to live	Has legal title and/or security of tenure	No private and safe personal space for social relations

Source: Meert *et al.* (<http://www.enhr2004.org/delegates.asp>)

The black and grayed boxes represent the characteristics that lead to classification in the proposed category of “homelessness and housing exclusion”.

Also, the concern with housing security which in the United Kingdom is an integral

<sup>17</sup> A somewhat different classification is to be found in Bill *et al.*, 2004.

<sup>18</sup> Briefly, on top of some risk of double counting and the difficulty of defining some kinds of housing or accommodation due to differences in countries’ social policies, the main remark relates to the third dimension, which arguably does not lend itself easily to a statistical survey, because whatever the value of the approach, the question arises as to whether it relates to households or the individuals who compose them (like the question of violence experienced). The degree of personal privacy possessed in the dwelling may vary with those who live there. Framing questions to explore this dimension, and interpreting the answers, is also less than straightforward, since what is concerned is not the characteristics of the dwelling, but a social perception, which may differ, even within a country, by age, sex, social status category, culture, etc., and is difficult to summarise in a quantitative indicator.

In addition, other domains - like access to amenities, excessive costs, etc. - may be factored in.

dimension of the definition of *homeless*, is found in category 7 of the above table, as one case of housing exclusion beyond homelessness. Likewise, the fact of imminently being made homeless is partly found in category 6. The authors also give descriptions of the specific categories in the table below:

*Table 3: an operational definition of homelessness and housing exclusion*

	CONCEPTUAL CATEGORY		OPERATIONAL CATEGORY	
<i>Homelessness</i>	1	Rooflessness	1	Living in a public space (no abode)
			2	Stay in a night shelter (spending a part of the day in public space)
	2	Houselessness	3	Stay in service centre or refuge: <ul style="list-style-type: none"> <li>• Hostels for the homeless</li> <li>• Women's shelters</li> </ul>
			4	Live in temporary accommodation: <ul style="list-style-type: none"> <li>• Temporary accommodation (paid by public funding)</li> <li>• Interim accommodation (awaiting assessment)</li> <li>• Transitional living unit (short term lease)</li> <li>• Live in low budget hotels (Bed &amp; Breakfast)</li> </ul>
			5	Live in temporary accommodation reserved for immigrants (asylum seekers, repatriates etc)
			6	Living in institutions: Prison, care centre, hospital who have to leave within (3) months and for whom no accommodation is available
			7	Living in designated supported accommodation (without a legal tenancy contract or where tenancy is dependent upon support to be accepted and available)
	3	Insecure and Inadequate housing	8	Living in mobile home / caravan (which is not a holiday accommodation or on legal site)
			9	Living in dwelling which is declared unfit for habitation under (national) legislation
	4	Inadequate housing and social isolation within a legally occupied dwelling	10	Living in a dwelling which is severely overcrowded (according to national statutory definition)
<i>Housing exclusion</i>	5	Inadequate housing (secure tenure)	11	Living in temporary structure or shanty dwelling
	6	Insecure housing (adequate housing)	12	Have legal notice to quit / evict related to landlord action or mortgage provider (rent arrears)
			13	Living temporarily with family or friends (not through choice)
			14	Living in dwelling without a normal legal tenancy
7	Social isolation within a secure and adequate housing context	15	Living in designated supported accommodation	
		16	Living under threat of violence (from partner or family)	

However, the mere fact that elements of a country's classifications are found does not thereby make the result satisfactory to those using that country's classification. There may be serious misgivings about the proposed use of a new classification. For example, a classification of situations devised by CRISIS in the *How many, how much* report (2003: see [www.crisis.org](http://www.crisis.org)) "is the one most similar to that of Meert *et al.* But it should be noted that this estimate has taken place in the context of UK homelessness legislation and is part of CRISIS's campaign to extend more protection to the single homeless". (Joan Smith, Milan workshop paper). Joan Smith's concern in connection with a definition that would designate priority need populations for rehousing is that the FEANTSA classification system excludes from the *homeless* category (and generally relocates them in the *housing exclusion* category) households that would be regarded as *statutory homeless* in the United Kingdom.

## **The work of Eurostat and the preparation of a Laeken indicator**

To turn more generally to the problems created by framing a definition at a European level and incorporating it into the Laeken indicators.

When the FEANTSA definition looks at people in temporary accommodation provision, it comes up against differences between social policies, whereby similar situations may be classified very differently, or provision be very diverse, etc. The Observatory is at present looking into a "generic classification of homeless accommodation" by which to "classify" the different forms of national provision by establishing equivalences between them on the basis of principles to be defined. The definition of a hostel (compared to specialised provision) depends on the country and its social policies.

Likewise, occupancy status takes different forms in different countries, which means that equivalences must be established according to principles that are acceptable to all.

The list of Laeken indicators does not include an indicator of homelessness, but a recommendation to move towards that made by the Social Protection Committee in its 2001 report. Following that recommendation, Eurostat set up a Task Force of representatives from national statistical institutes and NGOs in 2001. The Eurostat report (Brousse, 2004) includes the analysis of a questionnaire put to statisticians, students, researchers, civil service managers, and NGOs to elicit the definitions of *homeless* for these different categories. More specifically, the respondents had to select from a list the situations which they classed as *homelessness*, and give their opinion on an initial definition suggested by Eurostat.

The comments clearly point up some of the elements described above: the desire to take other dimensions than housing into account, different understandings of what housing means, an Irish charity's suggestion of defining situations rather than people, the essential time consideration, whether the definition is too narrow or too broad. The report cited analyses the position taken on this issue of what the definition encompasses according to the respondent's occupation and the more national or more European aspect of their work.

Commentators also experience some difficulty in finding their way through the categories of temporary accommodation provision proposed by Eurostat which, due to the nationality of the task force leader, were clearly inspired by the British case (Brousse, 2004, p. 32): cases in point are *Bed and Breakfast hotels*, used by British voluntary agencies to house homeless people, and *registered squats*, which have no equivalent in other countries.

The definition finally proposed by the report is based on a classification system of housing-related situations referable to that of the CNIS, with which the report's author is familiar, being also a member of INSEE, the French National institute of statistics, which was involved in the CNIS work. Situations of homelessness would therefore be those corresponding to certain combinations of the two dimensions - housing type and occupancy status - with the two other dimensions - quality/amenities and security/insecurity over time - used only to define situations of housing hardship.

A few remarks on this proposal:

- housing is taken in the same meaning as in the French definition, *i.e.*, more in its physical and legal than its social and symbolic dimensions; this is arguably acceptable for most countries, but not necessarily all (cf, the British case);
- the broad scope attributed to "homelessness" situations can be accepted by those who wanted a broader definition only if indicators of housing hardship are included;
- some dimensions of housing hardship (e.g., overcrowding) are not accommodated in this classification system, and may have to be added back in to achieve broader indicators; but it is clear that housing hardship situations are defined by reference to a more or less explicit "norm" and that this norm depends on both spatial and temporal factors;
- then, too, housing situations need to be equivalized between countries: for example, by classing together types of housing that do not exist together in a country by reference to principles to be worked out, but on which there must be a measure of consensus and which must be operationalizable. But the extreme diversity of the forms such housing takes (*transitional housing, supported housing, logement passerelle, baux glissants, centri di accoglienza, alloggi protetti, comunità-alloggio*, etc.) complicates such equivalization and the explanation of its principles;
- likewise, differences between legislation requires classes of equivalence to be devised for occupancy status.

In the absence of European legislation on access to housing, what use can be made of a European definition of homeless people? Developing indicators is not about gaining an improved knowledge of these hardship situations, the trajectories that lead to them or the shaping factors conducive to them, with a view to addressing the problem. If an indicator on the number of homeless is included in the Laeken indicators without any associated analysis of what it actually means, governments might be tempted, via the Open Method of Coordination (OMC) to work first on reducing that indicator. That could prompt them to target their measures first on the most easily rehousable populations, and to neglect those requiring greater resources, or to change priority needs categories in countries like the United Kingdom. If indicators have to be produced for the OMC, the question arises of having several that dovetail in various ways, accompanied by an analysis that takes the structural aspects of the phenomenon into account.

## References

- Ballet Danièle (ed), 2003, Représentations, trajectoires et politiques publiques, les SDF, PUCA.
- Brousse Cécile, 2004, *The production of data on homelessness and housing deprivation in the European Union: survey and proposals*, Eurostat/European Commission, Working papers and studies.
- Brousse Cécile, Guiot de la Rochère Bernadette and Massé Emmanuel, *L'enquête auprès des sans-domicile usagers des services d'hébergement et des distributions de repas chauds: méthodologie* [The survey of homeless users of shelter and hot meals: methodology], INSEE-Méthodes (forthcoming).
- Castel Robert, 1995, Les métamorphoses de la question sociale, une chronique du salariat, Paris: Fayard.
- Clanché François, 1998, « Le classement des situations de logement: les sans-domicile dans des nomenclatures générales », *Sociétés Contemporaines*, n°30, avril 1998. Revised version in Marpsat, Firdion, 2000. English version on the CUHP website, <http://www.cuhp.org/parisworkshop.cfm>, <http://www.cuhp.org/admin/EditDocStore/ACF6C42.pdf>
- Comité de la protection sociale, 2001, *Rapport sur les indicateurs dans le domaine de la pauvreté et de l'exclusion sociale*, Union Européenne, octobre.
- CNIS, 1996, *Pour une meilleure connaissance des sans-abri et de l'exclusion du logement, rapport final du groupe de travail sur les sans-abri*, rapport du CNIS n°29, mars.
- Kamoun Patrick, 2000, « Pour qui sont ces logements ? », *Diagonal*, novembre-décembre, 26-30.
- Kenway Peter and Palmer Guy, 2003, *How many, how much ? Single homelessness and the question of numbers and cost*, CRISIS/ New Policy Institute.
- Fondazione E. Zancan, 2000, *Indagine sulle persone senza fissa dimora*, rapport final.
- Edgar Bill, Meert Henk and Doherty Joe, 2004, *Third review of Statistics on Homelessness in Europe. Developing an Operational Definition of Homelessness*, FEANTSA.
- Fitzpatrick Suzanne, Kemp Peter and Klinker Suzanne, 2000, *Single homelessness: an overview of research in Britain*, Bristol: Policy Press.
- Hutson Susan and Clapham David, 1999, *Homelessness. Public policies and private troubles*, London: Cassell.
- Jacobs Keith, Kemeny Jim and Manzi Toni, 1999, « The struggle to define homelessness: a constructivist approach », in Susan Hutson and David Clapham, ed, *Homelessness, Public Policies and Private Troubles*, London:Cassell, 11-28.
- Joseph Isaac, ed, 1992, *Sans domicile fixe dans l'espace public - Contextes et catégories de l'expérience*, Actes du séminaire Accessibilité et situations d'urgence. Paris: Plan Urbain/DRAST/RATP.
- Marpsat Maryse and Firdion Jean-Marie (eds), 2000, *La rue et le foyer. Une recherche sur les sans-domicile et les mal-logés dans les années 90*, PUF/INED.
- Saraceno Chiara (ed), 2002, *Rapporto sulle politiche contro la povertà e l'esclusione sociale*, Commissione d'indagine sull'esclusione sociale, Roma, Carocci editore.
- Tosi Antonio, 1999, « Homelessness and the Housing Factor : Learning from the Debate on Homelessness and Poverty », in Avramov D., *Coping with Homelessness*, Ashgate, Aldershot, 103-126.