

## **Approaches to Homelessness Policy in Europe, the United States, and Australia**

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*Workable and effective policies addressing homelessness need to be based on a clear definition of homelessness. This overview of recent policies in the European Union, the U.S., and Australia shows that, even at the very basic level of being able to define and enumerate the homeless, policy approaches are extremely variable. Research indicates the growing significance of the “new homeless,” consisting of families, women, and children. Homelessness also needs to be seen as something dynamic that may involve movement into and out of housing and other supports over time. Older policies that address only limited kinds of homelessness and which do not recognize the dynamics involved are likely to be less effective. “Good practice” policy incorporates these changing understandings of homelessness by addressing the housing, psychological and social needs of the homeless, as well as integrating across programs and increasing independence through capacity building.*

To create workable and effective policies addressing homelessness it is critical that policy-makers have a clear definition of homelessness and an understanding

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of its prevalence. This is one of the ways in which a clear connection can be made between research and policy. It is also helpful for policy-makers to have a satisfactory concept of what constitutes “good practice” in homelessness policies. An understanding of the policies in place in other relevant countries and of how they are implemented supports both these goals.

This article reports on a project that reviewed approaches to homelessness policy, and updates and extends an earlier baseline study completed in 1998 (Mani-caros & Lanyon, 1999). The project compared approaches taken in Australia with those in the U.S., the U.K., and the European Union (E.U.) member states as a way of advising the Australian Government, and particularly its Supported Accommodation Assistance Program (the principal program through which national-level funding to address homelessness is made available) on the current state of homelessness policies. The investigation explored definitions and concepts of homelessness and whether they had changed since 1998, the changes to legislation and policy over that period, and analyzed what could be considered good practice in alleviating homelessness.

The research was completed in early 2003 (see Greenhalgh, Miller, Mead, Jerome, & Minnery, 2004), but for the current article some of the more recent policy literature has been included or previous references updated. The scope of the review is limited to literature about policies and applied social policy documents in the English language, but includes publications from government agencies and nongovernment organizations as well as the available academic and research literature.

The aim of this article is to provide an overview of the main issues to emerge from the review and to compare recent advances in the homelessness debate and in policy responses with the expectations emerging from ideas about “good practice.” Although such a comparative overview can be helpful in identifying problems and potential solutions in any arena of substantive policy concern, the interpretation of specific policy approaches to homelessness needs to be seen within a wider social policy framework. The major differences between the Australian and U.S. policy environments and how these might impact on policies concerning AIDS risk behavior among homeless youth, for example, is clearly identified by Milburn and her colleagues (2007). The complexities of the overarching policy environments of the different countries referred to in this article are not canvassed, but nonetheless the overview does identify some important policy approaches and points to some policy-related research gaps.

### **Homelessness: Recent Conceptualizations**

As identified in other contributions in this issue, ideas about homelessness—what it is, what leads people to homelessness, who constitute the homeless, and what kinds of policy response are most effective—have been the focus of considerable and ongoing debate. Although a number of different views of homelessness

were identified and discussed in the earlier review project (Manicaros & Lanyon, 1999), since the mid-1990s a number of new concepts have emerged.

Homelessness itself is not new. What is more recent is an understanding of the extent of the phenomenon and its visibility (Forrest, 1999). As Toro (2007) argues, it has recently emerged as a major social issue in most developed countries. The causes of homelessness are important to both the research community (in terms of trying to better understand it) and the policy community (in terms of trying to find ways to address it). In the past, debates on causes have polarized around sociostructural causes concerned with changing labor markets, poverty, the housing system, and the nature of the welfare state, on the one hand, and individualist and psychological factors reflecting individual agency, including alcohol dependence, substance use, social and behavioral problems and the like, on the other hand (Glasser, 1994; Neale, 1997). Neither approach, by itself, properly identifies the full complexity of homelessness. It is now clear that there is a continuum of causes that crosses both structural and individual issues (Avramov, 1999; Forrest, 1999; Tomas & Dittmar, 1995) and there is a growing consensus around the interaction of the two sets of causes (Anderson, 2007). A more nuanced understanding has, as Chamberlain and MacKenzie (2004) note, evolved using both approaches.

Forrest (1999) stresses that this idea of a continuum of potentially precipitating factors recognizes that homelessness can have different causes and that while, for some, the experience of homelessness may be a temporary episode, for others it is a manifestation of a continuing poverty of personal and social resources.

### **The “New Homeless”**

As Toro (2007) notes, a fundamental problem in addressing homelessness is the difficult task of actually defining it. The fact that there are various kinds of homelessness is now widely accepted. The problems and potentials of different definitions, and the case for one that is widely applicable, are clearly identified by Edgar, Doherty, and Meert (2002). FEANTSA (2007) provides a four-part categorization ranging from rooflessness (sleeping rough), through houselessness and insecure housing, to inadequate housing. Chamberlain and MacKenzie (1992) cover a similar range in three categories: primary, secondary, and tertiary homelessness.

But whatever the overall definition used, a critical factor is that homeless people are no longer seen as being almost exclusively male, alcohol-dependent transients (Crinall, 2001). Recent studies identify the emergence of the “new homeless,” defined as families, women, children, youth, the elderly, and marginalized ethnic or migrant groups (Forrest, 1999; Wearing, 1996).

The fact of this new homelessness calls for new responses in the types and levels of service provision. Many of the new homeless may have, in the past, been excluded from assistance (Jerome, Heffernan, Adkins, Greenhalgh, & Minnery, 2003). Manicaros and Lanyon (1999) provided some evidence of the emergence of

the new homeless in the late 1990s and recognized that new and different groups were even then being identified as homeless. But now the need to acknowledge and deal with the new homeless has become much more urgent as the full extent of this particular population and their assistance needs is becoming fully apparent. In some locations subject to rapid and illegal migration, such as in the southern Mediterranean countries of Europe, the presence of these illegal migrants poses special problems for homelessness policies as well as for wider social service provision. Illegal immigrants cannot be registered for social services and so are not identified in homelessness surveys based on access to these services. Some studies have identified the special problems that face homeless people, especially youth, in particular locations such as rural areas (Beer, Delfabbro, Natalier, Oakley & Verity, 2003) or just youth in general (Chamberlain & MacKenzie, 2004).

### Homeless Careers, Pathways, and Trajectories

Homelessness is not a static experience. While many standard definitions of homelessness such as those by Chamberlain and Mackenzie (1992) and others identified by Toro (2007) differentiate between specific but static subcategories, there is now a shift toward viewing homelessness as a dynamic and possibly long-term process. This is referred to as a homeless career, pathway, or trajectory. The benefit of viewing homelessness in this light is that it enables a much greater reflection on “severely problematic life events and associated care and support needs” (Anderson, 2001, p. 2).

Anderson’s (2001) work identified a number of pathways into homelessness. These differed according to the age of the person involved, but could include influences such as a relationship breakdown, bereavement, or loss of an adult caregiver. In Australia, MacKenzie and Chamberlain (2003, p. 1), use the term *homeless career* to draw attention to “the process of becoming homeless as people pass through various phases before they develop a self-identity as a homeless person.” MacKenzie and Chamberlain (2003) identify three principal career pathways into homelessness: one as the result of a housing crisis; one as the result of a family or relationship breakdown (particularly if this also involved domestic violence); and the third as a transition from youth to adult homelessness. Thus, a homeless career represents chronic homelessness, where homelessness is clearly a long-term predicament. Viewing homelessness in this dynamic way has implications for policy, particularly for prevention, early intervention, crisis intervention, and long-term support.

Robinson (2003) has also considered homelessness as a trajectory, but uses the term *iterative homelessness* to illustrate the potentially ongoing and repeated nature of homelessness episodes. The term encourages policy makers and researchers to conceptualize homelessness as repeated uprootings throughout an ongoing process. In Robinson’s usage, “[i]terative . . . describes the repeated move through

accommodation experienced in homelessness, rather than the time frame of homelessness or the kinds of accommodation being moved through” (2003, p. 3). Such an approach to homelessness clearly takes into account movement into and out of more and less tenuous housing situations.

### Social Exclusion

Rather than being linked to poverty or deviance, homelessness is increasingly being viewed as a component or expression of social exclusion (Edgar & Doherty, 2001; Edgar, Doherty, & Mina-Coull, 2000), something that is seen as a process by which individuals and groups become isolated from major societal mechanisms providing social resources (Room, 1992). A conceptualization of homelessness as one expression of the wider process of social exclusion requires solutions to be much more comprehensive than if homelessness is seen solely as an issue to be tackled on its own. Policy solutions for homelessness in this context need to consider accommodation but also the social circumstances and welfare of homeless people. As components of social integration policies, they need to provide for successful reintegration and consider issues of social participation, personal security, control, and empowerment (Edgar et al., 2000).

Specific groups of the new homeless are more vulnerable to social exclusion than others. For example, women who are not able to participate in employment cannot achieve economic independence, nor can women who are not able to access education. Migrants and asylum seekers may be excluded from accessing health care, education, and/or employment resulting in poverty and homelessness (Room, 1992).

### Good Practice in Policy Responses

The terms *best practice* and *good practice* tend to be used interchangeably in the literature; however, *good practice* is preferred as it better recognizes the developing nature of the particular area of concern. Identifying good practice is intended to help find places or agencies that have put in place approaches that are worth emulating. Good practice in policies and programs aimed at preventing homelessness need to be innovative and flexible. One of the outcomes of the increasingly nuanced conceptualization of homelessness is that responses to homelessness must incorporate the diversities of a relevant target group. The programs and policies considered as being good practice are those that appropriately and adequately respond to a homeless population that we now know is not homogeneous.

Good practice policies and programs involve combinations of prevention, early intervention, crisis intervention, and long-term support strategies aimed at facilitating independence. They should provide services that focus on clients acquiring a set of skills that will lead to social competence, securing a “home,” maintaining financial stability, and exiting social exclusion.

Good practice policies should also be based on an adequate understanding of both the underlying causes and the immediate events that may trigger homelessness that lie along the continuum of structural and individual issues (Avramov, 1999). Edgar et al. (2000) show how each of the causes and triggers can be linked to a relevant support focus or policy approach.

Homelessness policies thus need to address prevention through dealing with wider social and welfare issues, to address specific accommodation needs, to offer care and support, and to support social reintegration of excluded groups and individuals. They need to be innovative and address both the social and the housing needs of clients while explicitly incorporating integration across relevant programs, and they should aim to increase independence through capacity building (Jerome et al., 2003).

### **Responses to Homelessness in Europe, the U.S., and Australia**

A review of relevant policy literature since 1998 shows there has been only a relatively modest international advance in homelessness policies and programs. In those instances where definitions of *homelessness* exist, the majority are inadequate and narrow. These can best be illustrated through the definitions on which policies are based. Many definitions still do not recognize the sets of issues preceding and accompanying homelessness or that homelessness is a dynamic process that may include sleeping rough, insecure tenure, and chronic homelessness or, at times, being housed.

#### **European Union**

A major source of information on homelessness in the E.U. is the European Federation of National Organizations Working with the Homeless (FEANTSA). The overall definition of homelessness used by FEANTSA has not altered since Manicaros and Lanyon's (1999) report, although there have been considerable changes in its details. FEANTSA's definition includes rooflessness, houselessness, living in insecure housing, and living in inadequate accommodation. This four-part classification of homelessness and social exclusion was, after its use within the organization for national reporting over a long period, launched in 2005 as a definition that would be applicable to the various E.U. countries (FEANTSA, 2007).

For most European countries, homelessness does not extend beyond the highly visible but simplistic concept of rough sleeping. The review found that there is a growing awareness of the diverse nature of homelessness; however, the inability to robustly define homelessness impacts on the quality and quantity of statistics on homeless people and thus on policy approaches. Avramov (1999) estimated that annually in the combined E.U. countries, which includes the U.K., there were

2.7 million homeless people who rotate between friends and relatives, furnished rooms rented on a short-term basis, and services for homeless people, and 1.8 million people dependent on public and voluntary services for homeless people.

While this provides a broad overview of the people who are homeless and at risk of homelessness in the EU, in many European countries it has proved impossible to derive figures for the whole country. In other European countries, Doherty, Edgar, and Meert (2002) claim there are simply no official statistics on homelessness, at least in part because of the widely recognized difficulties in measurement.

The way in which homeless people are enumerated still varies from country to country. Many of the statistics are based on those who are accepted as being homeless by a service provider. Many counts of homeless people are only a snapshot, and are limited in coverage. However, other contributions in this issue do demonstrate that serious efforts at enumeration are now being made (Toro et al., 2007).

Another barrier to developing good practice responses relates to the lack of statutory responsibility for homelessness. For example, some governments in the E.U. have a statutory responsibility for housing, but not for homelessness. Housing is but one of the responses to alleviating homelessness. Homelessness is located at the peripheries of both housing and social policy; thus responses may not be targeted or appropriate.

In March 2000, the European Council decided to develop and implement a common strategy to eradicate poverty and social exclusion by 2010. Within the framework of the common strategy, each member state is to develop and implement a National Action Plan (NAP). Reducing homelessness is one of the objectives of the NAPs. The overarching common objectives of all the NAPs are “providing access for all to decent and sanitary housing, preventing homelessness; helping the most vulnerable; and mobilizing all relevant actors” (FEANTSA, 2001, p. 2).

### **Good Practice in the E.U.**

A policy declaration by FEANTSA (2003b) proposed that good practice in the fight against homelessness should have the following characteristics: it should rest on a solid regulatory basis; it should particularly target the homeless to be able to respond adequately; it should consider homelessness in all its multidimensional aspects and so provide solutions for the different problems in the lives of the homeless (housing, health, work, mental illness, and education); and it should introduce measures to prevent homelessness, improve the facilities for helping the homeless, and create reintegration programs adapted to the homeless.

However, FEANTSA found the first round of NAPs (2001–2003) deficient in producing solutions for homelessness. FEANTSA identified at that time seven countries (Sweden, Luxembourg, Ireland, Greece, Denmark, Finland, and Italy) that were unable to offer examples of good practice that tackled the various

dimensions of homelessness. For the remaining countries (Spain, Portugal, The Netherlands, Germany, Belgium, Austria, France, Finland and the United Kingdom), a number of emerging programs have been acknowledged as possible examples of good practice; however, it was then too early to judge their effectiveness (FEANTSA, 2002). FEANTSA also commented that countries might not include all programs responding to homelessness in their NAPs.

In May 2003, FEANTSA held a European Seminar on Best Practices in the fight against homelessness (FEANTSA, 2003b). FEANTSA believes that the promotion of best practices by example is both useful and effective, as member states learn from each other and can promote effective and/or innovative approaches. FEANTSA called on all member states to include best practices concerning homelessness in their next *Action Plan for Social Inclusion*. The success of this intention will be gauged when the second round of NAPs (2003–2005) is reviewed. The most recently published review of European homelessness policies (Edgar, 2005) considers homelessness policies up until then in the light of changes of governance, access to housing, prevention of social exclusion, and policies targeting the most vulnerable. It also includes a separate section on the policies of the recent additional members of the E.U. The overall outcomes of policies have been extremely variable, especially where decentralization of responsibilities for the homeless has occurred and for federated government systems.

### United Kingdom

The U.K. is worthy of special attention. It is the only European state with a statutory responsibility toward the homeless, and the only country to have set up a task force for homelessness (FEANTSA, 2002). The Housing (Homeless Persons) Act, 1977, placed specific responsibilities on local authorities to rehouse families and other defined groups of people who are not intentionally homeless (FEANTSA, 2003a).

In the U.K., a person is generally defined as being homeless if there is nowhere they (and anyone who is normally with them) can be reasonably expected to live (for details, see Anderson, 2007). Statistics in the U.K. are based on persons or households being accepted as homeless, which means they are defined as eligible, are not intentionally homeless, and have been assessed as having a priority need. The U.K. approach thus excludes those who choose not to present to a service and those not seen to be eligible for services. In 2000–2001, the numbers accepted as being homeless were 114,350, an 11% rise from 1997–1998 (Office of the Deputy Prime Minister (ODPM), 2002a).

The major change to occur since the 1998 review is that the U.K. is no longer a unitary state. Following the constitutional reforms of 1999, many of the key areas of policy responsibility, including housing, rest with the devolved administrations in Wales, Scotland, and Northern Ireland. According to Aldridge, although these

reforms are quite recent, there have already been significant changes in housing policy. The devolved structures have different powers, with the Scottish Parliament having the greatest powers to legislate directly but with limited fiscal autonomy (Aldridge, 2001). Anderson's (2007) discussion identifies the substantive impacts of this differentiation through the differences in the Rough Sleepers Initiative implemented in London and Scotland.

### **Good Practice in the U.K.**

Overall, the U.K. would appear to be moving toward good practice in a number of ways. It has extended the definition of priority need to include more groups of vulnerable persons, thus recognizing an increasing number of the new homeless. It has recognized the potential pathways to homelessness for the new homeless by extending priority need to cover those leaving other forms of care or institutions, and has recognized iterative homelessness (e.g., in Northern Ireland's 1999 Policy on Accommodation for Travelers [or gypsies]). In addition, it has developed policies and programs that espouse many of the principles of good practice, such as those developed by the Office of the Deputy Prime Minister (ODPM, 2002b).

The policy focus of the ODPM has been on specific portions of the homelessness population through the creation of two units: the Rough Sleepers Unit and the Bed and Breakfast Unit. The common themes in these responses are consistent with those considered to be good practice (Jerome et al., 2003). Both these programs have met their initial targets. The Rough Sleepers Unit claims to have reduced numbers of rough sleepers by at least two thirds in 2002 (ODPM, 2002a) and the Bed and Breakfast Unit has reduced the numbers of families living in bed-and-breakfast accommodation. Against these trends, however, the numbers of older people sleeping rough has increased and the number of homeless persons using bed-and-breakfasts has also increased, which demonstrates the complexity of attempting to target responses to specific groups. Anderson's (2007) analysis of the Rough Sleepers Initiative explores further complexities in the program and particularly its focus on London.

What is of concern, however, is the overall policy environment in the U.K. in which these policies and programs continue to operate. People need first to be accepted as being homeless, then to be accepted as being unintentionally homeless, so that they can then receive assistance according to their priority needs, but these needs are determined by an assessment of the individual's vulnerability in comparison with other individuals.

Another issue is whether the use of intentionality and priority need is promoting discrimination. Those who are deemed to be unintentionally homeless are seen to be in priority need. Clients require a level of sophistication to fully understand the meaning of "unintentional" and whether they will be able to receive assistance. There is evidence that homeless single people are not presenting to

agencies because they fear that they will not be identified as having a priority need. This has led to a culture of homeless people being judged or tested and then found to be either deserving or undeserving of assistance. The result of this is an assessment process where people do not feel they can be frank with assessors about their housing careers (Jerome et al., 2003). The resultant dilemma facing people working with homeless people, especially young people, is well captured by the question in the title of McGrath and Pistrang's (2007) contribution: "Policeman or Friend?"

### **Lessons from the European Experience**

In Europe there are very few strategic approaches to homelessness. In fact, homelessness is often not considered as worthy of a policy response in its own right and may be relegated to the periphery of both housing and social policy arenas.

The review revealed a shift toward punitive responses to homelessness. Examples include categorizing homeless people as deserving of homelessness because their experience is seen as a choice or tradition (for example, asylum seekers or gypsies). In some countries it is illegal for services to assist anyone who does not have appropriate identification or residency status. Housing may be denied as a punishment for antisocial behavior. This approach does not take into account people with high and complex needs (such as those with mental illness or drug dependency) who are likely to need additional support and services, at least in the interim, to demonstrate behavior that is appropriate and self-reliant. These responses are in direct contradiction to the notion of social inclusion that is claimed to underpin approaches to addressing homelessness in the E.U.

The limited identification of examples of reported good practice does not mean that it does not exist. The project this article reports focused on the national policies and programs of 21 countries. Examples of good practice are in reality more likely to be found at the regional or local level. As Edgar (2005) noted, decentralization of homelessness and social exclusion policies is occurring across the E.U., so implementation of policies is increasingly likely to be found at this more localized level.

### **The United States**

Federal legislation demonstrates that there is some movement toward a "continuum of care" approach to homelessness and its causes. The McKinney-Vento Homeless Education Assistance Improvements Act of 2001 is aimed at ensuring educational rights and protection of homeless children and youth. Every State is to have an educational coordinator and every school district to have a liaison officer for homeless students (National Coalition for the Homeless (NCH), 2001).

The work of the Interagency Council on the Homeless tries to identify barriers to homeless persons' access to services such as Medicaid, Substance Abuse Block Grants, and the like (Department of Housing and Urban Development, 2003). There has also been an attempt to enumerate people without conventional housing in the U.S. through a service-based enumeration (which identified approximately 170,700 people in 2000; Smith & Smith, 2001), but this is recognized as an inadequate measure of total homelessness. The various measures of prevalence that have been produced over the last 20 years, using a variety of definitions, are discussed in Toro et al. (2007).

On the other hand, the National Law Center on Homelessness and Poverty, reporting on a survey of 50 largest cities of the U.S., notes that 86% of these cities have enacted antipanhandling laws and 73% have enacted laws against sleeping in public places. Over half of the surveyed cities remove homeless people from the public eye. This practice is widespread in cities with shortages of emergency shelters and affordable housing (Jerome et al., 2003). In addition, the Bringing America Home Bill [H.R. 2897 (108)], aimed at ending homelessness in the U.S., supported by an extensive campaign and with 57 sponsors, never became law (Govtrack.us, 2005). The NCH also reports that federal agencies such as HUD interpret "homelessness" very narrowly (NCH, 2002).

In addition to the number of federal and state government agencies aimed at tackling homelessness, there is also a National Alliance to End Homelessness (NAEH), a nonprofit organization that targets public and private sectors for a united effort to end homelessness. The NAEH recommends four proactive steps to be taken simultaneously to end homelessness: planning for outcomes (by identifying real needs); "closing the front door" (by shifting the flow of incentives toward prevention); "opening the back door" (by helping people exit homelessness quickly); and building the infrastructure (by changing homeless assistance to improve the supply of affordable housing and providing adequate income and services for the disadvantaged; National Alliance to End Homelessness, 2001).

In a policy environment as complex as the U.S., there are clearly a wide range of public and private initiatives aimed at reducing or alleviating homelessness, including the National Center on Family Homelessness, National Law Center on Homelessness and Poverty, National Health Care for the Homeless Council, HomeAid America, Home Base and Homes for the Homeless. One of these, Homes for the Homeless, is an example of an initiative that shows many of the elements of good practice, in that it tries to address the many interrelated issues that support a family in maintaining a house (including needs assessment, counseling, and access to healthcare and housing search assistance, as well as skills for independent living). In addition to organizations and agencies, there are also a growing number of Internet sites that have been developed for the homeless.

## Australia

Australian approaches to homelessness seem to be closer to good practice than those in many of the other countries discussed here. There are two reasons for this. First, current definitions are evidence-based, robust, and take into account homeless pathways as well as the age and cultural background of homeless people. While it is not yet possible to fully enumerate homeless populations, both the Supported Accommodation Assistance Program National Data Collection (NDC) and the five-yearly national census provide useful and relatively comprehensive statistics on homeless people who are both service and nonservice users. The NDC is reported nationally and annually, which is significantly more advanced than the majority of the other countries in this review. The provision of relatively comprehensive statistics in Australia enables both government and nongovernment agencies to respond strategically to homelessness.

Second, a most significant development in Australia is the introduction of strategic approaches to policy and programs, such as a National Homelessness Strategy (Australian Department of Family and Community Services, 2000, 2004; Commonwealth Advisory Committee on Homelessness, 2001, 2003) and various state homelessness strategies. However, there is some concern that the NHS is not a strategy as such (i.e., a long-term plan) but a number of initiatives and programs. It is also a point of concern that the state responses do not appear to be linked to the national strategy. There is an opportunity to have a much more united response to homelessness in Australia. One of the benefits of a more strategic response is the inclusion of evaluation as a requirement of program provision. This will enable federal and state governments to determine the success of the strategies and demonstration projects. This then provides a clear set of benchmarks from which to assess program effectiveness and to develop further strategies and responses.

## Conclusions

There is continuing international development and change in policies to alleviate or reduce homelessness. There seems to be gradually growing acceptance that homelessness is a complex and dynamic phenomenon. The important concept of homelessness pathways or careers implies that homelessness cannot be addressed through single-focus initiatives.

A fundamental starting point in addressing homelessness is clarity on what it means. This is not mere pedantry. Narrow definitions lead to many people being excluded from the reach of programs that would otherwise support them. Narrow definitions lead to underestimation of the scope of the homeless population. And narrow definitions exclude the growing number of the new homeless, including families, women, and children. Definitions are also the connecting link between the problem of homelessness and agency responsibility. Definitions can have a

substantial impact on policy (Chamberlain, 1996). The fact that a number of countries have national agencies with responsibility for housing but none responsible for homelessness leads to homelessness being treated merely as an absence of suitable housing and remaining on the fringe of both housing and social policy consideration.

Responses through legislation, policies, and programs vary enormously across the countries considered here. The approaches that seem to be the most effective are those that conceptualize homelessness as complex and dynamic and involving far more than mere houselessness. The better programs link the provision of shelter with social support and capacity building, in the process dealing with both sociostructural and individual causes of homelessness.

This is also a policy arena where there is a strong role for nongovernment and not-for-profit organizations. Some of these gain support from government or nongovernment funding to coordinate data collection and program implementation. The role of FEANTSA in the E.U. illustrates the potential international reach of the nongovernment sector.

In addition to helping to alleviate the plight of the homeless through material and financial support, government can also play an important role in supporting community consultation in policy development, in supporting evidence-based research to underpin the programs and in supporting the evaluation of programs and initiatives to determine their effectiveness. This support then provides a clear reference from which to develop further strategies and responses.

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