

# Eu Social Cit

European Social Citizenship

## Assessing housing rights in the EU countries

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## Summary

The study aims to explore the state of the housing rights across the European Union (EU) countries and the instruments through which the EU supports housing as a social right. The sub-task, then, is to evaluate the state of the housing rights in selected EU countries, representing typical welfare state models and housing policy traditions: Denmark, the Netherlands, Belgium, Spain, Lithuania, and Poland.

The results provide more insight into the current state of housing rights in the European countries and inform how this state has changed in recent decades. The results show that, in general, housing policy decisions and outcomes have shifted towards greater convergence in the EU Member States over the past decades. However, the overall trajectory of changes is not very positive: government expenditure on housing-related policies is declining, and the sector's performance in ensuring housing availability, affordability and adequacy is not improving, and in some cases is even deteriorating. The analysis of the selected EU countries shows that the EU has a very few instruments to support housing rights. The right to housing is the responsibility of national states and is usually guaranteed at local/municipal level.

Although European countries are becoming increasingly similar in terms of various housing indicators, typical housing policy regimes remain. For example, countries with a larger rental sector (private and/or public) have better rates of availability, affordability, and adequacy. Thus, countries which belong to social democratic or conservative-corporatist welfare state and housing policy regimes are in a better position than the Central and Eastern European and Mediterranean countries.

Overall, our study shows that to increase housing rights and ensure better housing availability, affordability and adequacy, the public/social housing sector should be expanded. Tenant's involvement in the management of the social housing sector is crucial to protect the sector from the state (attempts to privatize and stigmatize) and the market (rising prices).

## Assessing housing rights in the EU countries

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<b>Work package</b>	<p>EuSocialCit is an interdisciplinary research project aiming to support the EU in strengthening social rights and European social citizenship. It evaluates the current state of social rights in Europe and their relationship to social inequalities, gender inequalities, poverty and precariousness, and diagnoses the shortcomings of current policies and institutions at the level of individual countries and the EU.</p> <p>The EuSocialCit project focusses on three domains in which social rights are important: the empowerment of citizens (e.g. education and activation), fair working conditions and social inclusion. Each of these domains are respectively studied as part of WP3, WP4 and WP5.</p> <p>This report is produced as part of WP5 which is entitled <i>Inclusion through social policy</i>. This WP analyses social rights in relation to the principles in the ‘social protection and inclusion’ cluster of the EPSR. Core diagnoses underlying this WP5 are the long-lasting trend of poverty in many EU welfare states and for particular groups, and the increased disparities between the member states and structural inadequacies of social protection for the most vulnerable. WP5’s central questions are: (1) what the role of the EU has been in delivering social rights for social protection and inclusion to all EU citizens, and (2) what improvements can and should be made.</p>
<b>Web address</b>	For more information about the EuSocialCit project, please visit <a href="http://www.eusocialcit.eu">www.eusocialcit.eu</a> . EuSocialCit’s output can also be found in its community on Zenodo: <a href="https://zenodo.org/communities/eusocialcit">https://zenodo.org/communities/eusocialcit</a> .

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# 1. Introduction

Affordable and adequate housing is important for wellbeing, health as well as financial and family stability. However, such housing has become increasingly unattainable for lower income households and even for the middle class, and homelessness is on the rise, also in economically advanced countries (Hoekstra and Boelhouwer, 2014; Galster and Ok Lee, 2021; Lund, 2011; Preece, Hickman and Pattison, 2020; Scanlon *et al.*, 2014; United Nations, 2021a). “Housing affordability has become a global crisis with strong negative impact on the wellbeing of people and on the exacerbation of urban inequality” (UN Habitat, 2015, p. 3). In most EU members, housing prices are growing faster than income, and it is found that income inequality and housing inequality are ‘mutually reinforcing’ (Pittini *et al.*, 2017). Thus, in many countries, people are spending increasingly more on housing, while other costs (e.g., food, health, education) have been stable or falling (OECD, 2019). According to Eurostat (2018, p. 70), “Housing costs often make up the largest component of expenditure for many households, thereby potentially leading to deferred or cancelled expenditure, possibly in relation to other basic needs”. The report “The state of housing in the EU 2019” delivered by the Housing Europe (2019: 6) states that “The housing question is at the heart of the growing social divide that we observe in most European societies over the last years”. Therefore, affordable housing has become an important question on the EU’s Urban Agenda, and the EU seeks to address housing in the European Pillar of Social Rights (Pittini *et al.*, 2017).

The aim of this report is to provide an analysis of the state of the housing rights in the selected EU countries, explore the instruments through which the EU supports housing as a social right, and to examine alternative policy scenarios for improvements. The sub-task is to study six countries, representing different geographical clusters and policy traditions: Denmark, Lithuania, Poland, Belgium, the Netherlands and Spain. The aim of the sub-task is to evaluate the state of housing rights in six selected countries according to Individualised power resources (the Normative, Instrumental, and Enforcement), which constitute a core of analytical approach of the EuSocialCit project, explained on page 18 of the report. This study seeks to answer the following questions: How does the welfare state typology reflect in housing policies? Is there a convergence or divergence in housing policy solutions and outcomes in Europe? What are innovative policy solutions to overcome housing problems? What is the rationale for the EU to be involved in providing housing rights? What kind of role should the EU take in housing policies?

Answers to these questions are sought by analysing multiple data sources: EUROSTAT statistics on housing, detailing tenure status, housing affordability, housing quality; OECD data on housing, detailing housing conditions, housing allowances, social housing; the European Quality of Life 2016 survey, detailing information on housing deprivation.

In the document issued by the United Nations (2009, p. 2), it is stated that „Adequate housing is universally viewed as one of the most basic human needs”. Without affordable and adequate housing, there won’t be “Social Europe”. Despite its relevance, housing sector has been rather neglected in the

welfare state studies (Kemeny, 2001; 2005). It is recognized that “Housing has increasingly been treated as an opportunity for investment, not as a social good and fundamental human right” (United Nations, 2021b). At present, we are witnessing the increasing commodification of housing through the financialization of mortgage, home ownership and real estate markets (Dewilde, 2022). Issues related to housing are becoming an increasing concern for people and governments in Europe and beyond, but public investment in (social) housing in most EU countries is declining (by more than a half since the early 2000s; Eurostat, 2021). Unsurprisingly, the supply of affordable housing does not meet its growing demand (OECD, 2019), and the burden of affordable housing cannot be shifted to the private sector. Affordable and adequate housing has been increasingly addressed as one of the most important elements in the resolutions, charters, declarations, and other documents of many international organizations (e.g., in New Urban Agenda (United Nations (2021c)). ‘Housing at the Centre’ aims to shift the focus from simply building houses to a holistic framework for housing development, orchestrated with urban planning practice, and placing people and human rights at the forefront of urban sustainable development (UN Habitat, 2015). To reach this milestone, instruments to support housing as a social right are needed. In this study, housing as a social right is understood as the state’s (national, regional, local) obligation to provide adequate housing to every citizen/resident irrespective of his/her income.

It is believed that making housing more available, affordable, adequate, and accessible could help reduce homelessness, poverty, inequality, and urban segregation. To overcome multifaceted issues related to housing innovative policy, solutions are needed.

The report is structured as follows. In Section 2, we provide a theoretical discussion on the definition of housing policy and the relationship between the housing policy and the welfare state. In Section 3, using quantitative techniques, we analyse the relationships between the explanatory variables – individualised power resources, outputs, and outcomes – that together define the state of the housing rights. In Section 4, we overview the state of the housing rights in the selected EU countries, representing typical welfare state models and housing policy traditions: Denmark, the Netherlands, Belgium, Spain, Lithuania, and Poland. Section 5 contains discussion and conclusions.

## 2. Theoretical overview: housing policy and welfare state

In this section, we focus on the relationship between housing policy and the welfare state. It is assumed that housing policy is a part of the country's welfare state and mirrors the dynamics of the particular country's welfare state model. We discuss the concept of housing policy and present different housing policy regimes, which originate from the welfare state regimes/models. The theoretical approach helps us to understand the dynamics of the housing rights and why they differ among EU countries. This section is partly based on the previous attempts (Aidukaite 2013, 2014; Aidukaite *et al.*, 2014) to review the interrelationship between the welfare state and housing policy by revisiting and revising it.

*Housing policy* is understood as the government's intervention in the housing field (through legislation or practice) in order to modify market forces by affecting the choices of households while achieving social objectives (Clapham, 2006; Doherty, 2004; Lund, 2011; Ruoppila, 2005, quoted by Aidukaite, 2013; Aidukaite 2014, p. 422; Aidukaite *et al.*, 2014). The aim of the housing policy is to provide the conditions for housing as a social right. Housing policy is considered to be a part of the welfare state, however, housing does not fit in perfectly with the other pillars of welfare state, such as education, health care and social security, due to its uncertain place between the state and the market (Kemeny, 2001, 2005; Kettunen and Ruonavaara, 2021). Over the last hundred years, the role of the state in realization of housing policy has been ambiguous. At present, in all developed industrialized countries the state intervenes in housing issues in one or another way and shapes housing markets (Doherty, 2004, quoted by Aidukaite, 2014: 423; Aidukaite *et al.*, 2014). In recent decades, there has been a gradual withdrawal of the state from direct involvement in housing sector, leaving more and more initiative to the market and to civil society agencies (Aidukaite, 2013, 2014; Aidukaite *et al.*, 2014; Arbaci, 2007; Doherty, 2004: 253; Clapham, 2006; Tsenkova and Polanska, 2014). However, studies (Aidukaite *et al.*, 2014; Dewilde, 2022; Doherty, 2004; Kettunen and Ruonavaara, 2021) show that housing policy still differs remarkably between EU countries, thus the evidence of the state's withdrawal is not conclusive. For instance, a recent study by Dewilde (2022) shows that redistributive housing allowance and rent regulations improve living and housing conditions for renters and low-income households. Kettunen and Ruonavaara (2021, p. 1461) studied rent regulations in 33 European countries, and concluded that European housing provision systems are far from completely neoliberalized, and the policy of rent regulation has not disappeared from the scene.

The changes in housing policy system can be explained by the changes of the political nature. Indeed, housing policy reflects the political ideology of the government in power. It is assumed that the 'right of centre' governments tend to favour less state intervention, promote home ownership and private rented housing, and they provide less support for state subsidized housing. On the contrary, governments to the 'left of centre' favour the state's intervention in the housing markets and seek to ensure affordable housing for all (Balchin, 1996). Similar political explanations have also been



employed to explain the differences in the welfare state systems across the developed western democracies (see e.g. Korpi and Palme, 1998). A more recent study (Hoekstra, 2013) shows that welfare systems and housing systems are more and more influenced by new trends, such as the global financial crisis and the regulations of the European Union and the rise of multi-level welfare state. The rise of multi-level welfare state suggests that the responsibility for some welfare policies is becoming more and more the responsibility of regional and local governments, while the responsibility for some rely on the EU level governments, and the other fields still remain under the strong influence of national states. Thus, nowadays we are witnessing a multi-level welfare state, which consists of national, the EU and regional/local initiatives. This is also applicable to the housing. Nevertheless, our study shows that the EU level is still negligible compared to the national and local levels.

As already noted, housing policy is a part of the welfare state. Therefore, to explain the differences in housing policy systems across countries, the authors attempted to reinterpret the Esping-Andersen's (1990) paradigmatic typology of the welfare state regime in the field of housing (Aidukaite, 2013, 2014; Aidukaite *et al.*, 2014). As noted by Stephens (2017), „regime theory has provided the most powerful non-structural theoretical framework for comparing (national) housing systems“ (p. 5). Probably the most influential attempt to adapt Esping-Andersen's regimes to the housing was made by Hoekstra (2003, 2013). Hoekstra proposed to modify Esping-Andersen typology to make it suitable for the study of the housing system; others (Allen, 2006; Arbacci, 2007; but also Barlow and Duncan, 1994 and Harloe, 1995 quoted by Allen, 2006) tried to explore housing provision in parallel with the income maintenance regimes. Table 1 summarizes the criteria used by the authors to theorize the differences in housing policy systems in various welfare state regimes. The criteria of de-commodification, stratification and the role of state, market and family mix in the housing provision are at the centre of the approach when seeking to understand the differences in housing policy and welfare state regimes among countries. Other criteria, summarized in Table 1, such as the degree of the state regulation, general housing policy objectives, price setting and price regulation, subsidization, rental system, housing allocation, organization of housing provision and the level of spatial segregation, are of the secondary nature and largely determined by actors undertaking the dominant position in the housing provision – be it the state, the family, or the market (Aidukaite *et al.*, 2014).

Table 1 includes the criteria proposed by Hoekstra, who aimed to understand the differences between the housing systems of the three welfare state regimes (social-democratic, conservative-corporatist and liberal), as well as extends Hoekstra's housing system typology by including attempts to systematize the housing systems of Southern European/Latin Rim (relying on Allen (2006) and Arbacci (2007)), and the post-communist welfare state regimes (relying on Aidukaite *et al.*, 2014; Soaita and Dewilde, 2019; Tsenkova, 2009).

Below we present ideal typical characteristics of the housing policy in different welfare state regimes by relying on previous studies (Aidukaite, 2013, 2014; Aidukaite *et al.* 2014), which have already described Hoekstra's (2003) typology, and how it fits with the Esping-Andersen's regimes.

*“Hoekstra (2003) has successfully applied the Esping-Andersen’s typology in studying the housing system of the Netherlands. According to Hoekstra, the meaning of “the housing system” does not only encompass the housing market or housing sector, but also the organization of housing provision, subsidization, rent regulation, general housing policy objectives and the level of state involvement in the housing policy. On the basis of the three criteria, borrowed from Esping-Andersen (de-commodification, stratification and the arrangements between the state, family and market), Hoekstra has identified three housing welfare regimes, which parallel Esping-Andersen’s welfare regimes (social-democratic, conservative-corporatist and liberal). While examining changes in the housing system in the Netherlands, Hoekstra has also shown that in the 1990s, the housing system in the Netherlands has developed into a distinct so-called modern corporatist regime, which occupies intermediate position between the social-democratic (state provision of welfare services) and the liberal welfare state regime (market provision of welfare services). Hoekstra’s approach helps to understand the housing systems in different welfare state regimes and is useful in many ways since it captures the main differences of the housing systems of various countries and explains how these differences operate and produce different outcomes, such as availability, accessibility, affordability and quality of the housing stock” (Aidukaite, 2014, p. 423).*

As it is shown in Table 1, in the social-democratic regime the level of de-commodification is high. *“Hoekstra defines the de-commodification in the housing field as the extent to which households can afford their own housing independently of the income gained from participation in the labour market. The government can influence de-commodification through the price regulation and through object and subject subsidies. The object subsidies refer to production subsidies affecting the price of housing. The subject subsidies refer to subsidies which affect the household income that can be general income support (pensions, unemployment benefits) and subsidies that are specific to the field of housing. Other authors (Allen, 2006; Arbaci, 2007; Doling, 1999) suggest that availability and the proportion of social housing within the housing stock can be also a measure of de-commodification. Thus, under the social-democratic regime, the state is the main provider of welfare and its influence on the housing policy is high. Under this regime, there is no preferential treatment for traditional families, and welfare is provided on the basis of individual needs and rights. The state takes the initiative for the production of newly built houses and provides large-scale production subsidies as well as subsidies for large target groups. The state’s influence on price setting and price regulation is strong and everyone must be guaranteed a universal high level of housing quality” (Aidukaite, 2014, p. 424).* As stated by Arbaci (2007: 404), the preservation of the “social rental sector and the proportional balance among tenures in the social-democratic welfare cluster reflects the concept of universalism and equal redistribution of high standards for all social groups and across all tenures”. Under the social-democratic regime, the unitary rental system prevails, under which the state integrates the social and private renting into a single market and consequently eliminates the price increase in the private sector by increasing competition between profit and non-profit renting. The unitary rental system is characterized by the housing tenure balance. The tenure balance/imbalance shows distributional relationship between the three tenures: owner occupation, private rental sector and social rental sector. In the dualist rental system, the state controls and residualizes the social rental sector to protect the unregulated private (profit) renting from facing the competition (Arbaci, 2007; Hoekstra, 2003; Kemeny, 2001).

*“Under the conservative-corporatist regime, the de-commodification is quite high, but not as high as under the social-democratic regime. The level of welfare services to which a person is entitled depends on the person’s occupation and/or social status. Under this regime, the degree of political corporatism is high. The provision of welfare services is often explicitly aimed at the preservation of a traditional family. Therefore, regulation tends to favor the breadwinner or give extra benefits for large families (Hoekstra, 2003). Under the conservative-corporatist welfare state regime, families are assumed to provide many welfare services themselves, therefore, the state’s position is important but subordinated to the traditional family’s needs and preferential treatment. The housing policy of the conservative-corporatist regime seeks to preserve social stratification and treat the traditional family as preferential. Under the conservative regime, depending on which groups have privileged access to certain parts of the housing stock, stratification is high and based on status. This is maintained by different construction firms, which specialize in producing housing for high-, middle- and low-income households at a small scale. A considerable influence of private non-profit organizations in the production of housing is also remarkable under this regime. However, the state intervenes in price regulation and offers tenure-neutral housing subsidies. Therefore, under the conservative-corporatist regime, home ownership is lower than the EU average and private rental housing takes over (see Balchin, 1996 about Germany; Hoekstra, 2013)” (quoted by Aidukaite, 2014, p. 425). Unitary rental system dominates in the corporatist welfare cluster, which suggests that housing tenure is balanced as a consequence of the price regulation and tenure neutral subsidies. However, as it has been noted, contrary to the social-democratic regime, predominance of private rental housing prevails over the social one (Arbaci, 2007).*

*“The liberal regime is characterized by market dominance, low de-commodification, and welfare services that are tailored to individual needs and incomes. Contrary to the two regimes described above, which have many corporatist structures and processes (Hoekstra, 2003), under the liberal regime, the degree of political corporatism is low. Housing policy is dominated by the market. The state intervention in the housing policy at both central and local levels is low” (Aidukaite, 2014, p.425). The governments are committed at targeting resources on the poorest and to protecting the incomes of the renters through housing benefits (Stephens, 2017). “Therefore, under this regime, stratification is high, and access to housing is mainly based on income. The state supports only marginal groups and provides social housing or means-tested subject subsidies and offers few production subsidies. Private actors (mainly big companies) take the initiative of the production of newly built houses. Under this regime, home ownership is high and results from the residualization and stigmatization of the social housing and predominance of the private rented housing over the social one. Under the liberal regime, the dualistic rental system dominates, which results in housing tenure imbalance in favour of owner-occupation (Arbaci, 2007; Balchin, 1996; Stephens, 2017). Thus, compared to the social-democratic and conservative-corporatist regimes, under this regime, the state’s intervention in the housing sector is lower” (Aidukaite, 2014, p, 425).*

Other authors (Allen, 2006; Arbaci, 2007) extended the understanding on how well welfare state regimes parallel housing systems of a given country by introducing into the discussion Southern European/ Latin-rim countries. Allen (2006) has explored whether housing provision systems in the Southern Europe (Italy, Spain, Portugal and Greece) are different from those in Northern Europe. As

Allen's study demonstrates, the Southern European welfare states are more or less corporatist in terms of program design (similar to the conservative-corporatist), but appear to leave a high proportion of workers with little protection in the labour market and dependent on their own resources for income maintenance. Therefore, in Southern Europe, extended families play an important role in housing provision (Hoekstra, 2013). Studies (Allen, 2006; Arbaci, 2007; Alberdi and Levenfeld, 1996) also show that in terms of tenure, Southern European countries are characterized by very high level of owner occupation and relatively low level of social housing. For instance, home ownership in Spain accounted for almost 83% in 2011, while social housing for only 8% (Eurostat data; also see Alberdi and Levenfeld, 1996; Hoekstra, Saizarbitoria and Etxarri, 2010). This situation is explained by historically low polarization of the Southern European societies (Allen, 2006). It is also "linked to ideological or historical residualism within the redistributive market-state mechanisms, which are based on minimum standards of well-being and weak provision of the state" (Arbaci, 2007: 414). Since home ownership has always been the dominant tenure in Southern Europe, policies have been steered towards improving access to the owner-occupation (Alberdi and Levenfeld, 1996). Under the Southern European regime, the state fosters home ownership and allows self-provided housing. State intervention in housing is very low and is limited to providing housing to stigmatized groups of population who are unable to participate properly in the housing markets. Non-profit or social sector is protected from the for-profit sector by being separated from the private market and organized as residual and stigmatized. Among other important distinctive features of the Southern European housing regime, is the development of the informal housing market (private rental sector and owner-occupied), as a result of patrimonial tradition in housing and land ownership. Thus, familiarism and clientelism are the major features of the Southern European housing policy. Clientelism means that "welfare becomes a unit of exchange between political and social groups, including trade unions – especially at the local level" (Martin, 1996 quoted by Allen, 2006: 267). In the field of housing this could mean that some groups can have better access to housing than others. As under the conservative-corporatist regime, the Latin-rim regime seeks to preserve the class status differential. Thus, the housing outcomes in the Mediterranean welfare state regime are similar to those in the liberal welfare state regime (Hoekstra, 2013). However, Hoekstra (2013) found that "the quality and appreciation of apartments compared to single-family dwellings is much higher in Mediterranean countries than in liberal countries" (p. 16).

Studies (see e.g. van Ham et al. 2021) show that spatial segregation in the cities differs remarkably among various welfare state regimes. Arbaci (2007) has examined the relationship between welfare and (ethnic) segregation across Western Europe (16 countries) until the mid-1990s including (for the first time) also Southern Europe. Arbaci's findings show that compared to the other welfare regimes, the socio-spatial segregation in the cities of Latin-rim and social-democratic countries fits in the intermediate cluster position. The cities of the liberal welfare regime have been producing the highest levels of socio-spatial segregation, while the conservative-corporatist regime produces the lowest levels of socio-spatial segregation. Such outcomes are determined by the form of rental system (unitary or dualistic) and the form of housing production (large or small scale). In the Latin-rim countries, the combination of the dualistic rental system and small-scale production produced higher segregation than in the conservative-corporatist welfare state. In the conservative-corporatist welfare state, small scale production is combined with the unitary rental system and thus, compared to other

regimes, ensures the lower levels of segregation. Under the social-democratic regime, the unitary rental system, but large-scale housing production leads to higher levels of segregation than under the conservative corporatist regime. Under the liberal regime, the dualistic rental system and large-scale production result in the higher levels socio-spatial segregation compared to the other housing regimes.

A number of studies (Aidukaite, 2009a; Cerami and Vanhuysse, 2009; Fenger, 2007; Golinowska *et al.* 2009; Kuitto, 2016) have already proven that the countries of Central and Eastern Europe (CEE) have developed into a distinct welfare type, which does not fit exactly the Esping-Andersen's paradigmatic regimes. It has become common to speak about the ideal typical post-communist welfare regime or hybrid model, which has features from all three welfare state regimes. Although the post-communist countries demonstrate diversity in addressing social policy issues, they have much in common. The post-communist welfare regime is characterized by the following features: a dominance of the insurance-based schemes, which play the major role in the social protection system (a return to the Bismarkian social insurance system); high take-up of social security; relatively low social security benefits; increasing signs of liberalization of social policy that did not exist during the communist period; the legacy of the Soviet/Communist type of welfare state, which leads to still deeply embedded signs of solidarity and universalism (Aidukaite, 2011).

Although, the CEE countries differed in the scale and speed of housing reforms, a common pattern can be observed for all countries. Studies (Aidukaite, 2014; Balchin, 1996; Hegedüs and Teller 2005; Soaita Dewilde, 2017; Tsenkova, 2009; Tsenkova and Polanska, 2014) indicate that housing systems in CEE countries have gradually moved towards the liberal welfare regime since the 1990s, which meant the withdrawal of the state, greater emphasis being put on the market and family in housing provision. Studies (Balchin, 1996; Tsenkova, 2009; Leonavičius and Žilys, 2009; Petkevicius, 2005) emphasised important common problems: no integrated rental market being developed; increasing rents; depleting public rental stock; deterioration of the old multi-apartment blocks which need a major repair has been a significant problem.

Nevertheless, at present housing quality differs within the post-socialist region. Soaita and Dewilde (2019) distinguished three housing models (HM) in the Eastern Europe (EE): 1) south-east Europe of the former classic Eastern European Housing Model (EEHM; Bulgaria, Romania); 2) CEE: Central-East Europe of the former reformist EEHM (Chechia, Croatia, Hungary, Poland, Slovenia, Slovakia), and 3) BS: the Baltic States of the former Soviet housing model (Estonia, Latvia, Lithuania). They found that housing quality is worst in Romania (see also Soaita and Dewilde, 2020); poor-to-intermediate in the mix group of Bulgaria, Hungary and Poland; intermediate-to-good in the Baltic States, and best in Croatia, the Czech Republic, Slovenia and Slovakia. This is explained by many factors, among which are path-dependency (the inherited constitution of housing systems), economic affluence, labour migration, ageing of the population, and welfare systems.

Studies also show that residential differentiation and segregation is on the rise in the post-communist cities (Hess and Tammaru, 2019). A comprehensive study of the effects of housing policies on residential differentiation in the city of Tallinn, carried out by Ruoppila (2005), shows that in Estonia,

housing policies at state and local levels do not even aim at reducing the housing inequality and increasing residential differentiation.

Stephens, Lux and Sunega (2015) attempted to interpret housing reforms in post-socialist Europe using a conceptual framework derived from welfare regime. They found that a major feature of post socialist housing is a debt-free home ownership society with weakly developed financialized housing markets. It is also characterised by the strong familialism in housing production and allocation, and self-build housing. These features are especially common for the south-east Europe.

All in all, the post-communist housing regime can be characterized by such qualities as low decommodification and high stratification based on income (see Table 1). The state's role in housing production and allocation is minimal. The state provides subject subsidies for low-income groups, mainly on means-tested basis, while the market agents decide on housing construction and price. No strict spatial planning exists in the post-communist model. Private actors (mainly big companies) take the initiative to build new houses (Aidukaite, 2014; Aidukaite *et al.*, 2014). However, residential segregation, although increasing, has not yet reached the levels of the Western countries (Aidukaite, 2009b; Ruoppila, 2005). This is due to the fifty years of centralized, party-ruled, planned Soviet/communist urban development and housing policy, which sought to eliminate class or income differences in housing allocation and quality, basically making everyone (except for corrupt government officials) equally poor under such regime. The decommodification is low for those who have to buy their housing at the market price. But it is quite high for those who obtained their housing through massive privatization (Aidukaite, 2014; Aidukaite *et al.*, 2014).

Overall, the theoretical overview of the ideal typical housing policy regimes shows that there are important differences in the way EU countries arrange their housing policies (Aidukaite, 2014; Aidukaite *et al.*, 2014). However, the housing policy regime does not always correspond to the welfare state regimes (Hoekstra, 2013; Kettunen and Ruonavaara, 2021). Nevertheless, the housing and welfare typologies are still a useful analytical tool when it comes to structuring and facilitating international comparative analyses (Hoekstra, 2013). The remainder of this report will assess the state of the housing rights through a comparative analysis of EU countries.



**Table 1. Housing policy in different welfare state regimes: criteria and major characteristics**

<i>Criteria</i>	<i>Social-democratic</i>	<i>Conservative-corporatist</i>	<i>Liberal</i>	<i>Latin Rim</i>	<i>Post-communist</i>
<b>De-commodification</b>	High	Quite high	Low	Quite high	High for those who obtained their housing through massive privatization; low for those who obtain their housing at the market price
<b>Stratification</b>	Relatively low	High, mainly based on social status	High, mainly based on income	High, based on social status	High, mainly based on income
<b>The role of State, market and family</b>	Dominant position of the State	Important position of the family; Considerable influence of private non-profit organisations	Dominant position of market parties	Dominant position of the family	Dominant position of market parties; Family plays also important role
<b>State regulation</b>	Strong central government influence	Functional decentralisation, incremental, problem-solving policies	Relatively little State regulation (at both central and local levels)	Relatively little State regulation (at both central and local levels)	Relatively little State regulation (at both central and local levels)
<b>General housing policy objectives</b>	Guaranteed universal high level of housing quality	Preservation of the social stratification in society - Preferential treatment of the traditional family - Stimulation of households and other private actors to take initiatives on the housing market	Dominant position for the market - State only supports marginal groups	State fosters home ownership and allows housing self-construction	Dominant position for the market - State only supports marginal groups
<b>Price setting and price regulation</b>	Strong State influence on price setting and price regulation	Moderate State influence - State regulation of prices to correct negative effects of the market	Market determination of house prices	Moderate State influence	Market determination of house prices

<b>Subsidisation</b>	Large-scale production subsidies - Subject subsidies for large target groups	Segmented subsidies; specific arrangements for specific groups	Means-tested subject subsidies - Few production subsidies	Stigmatized provision for a residual population unable to adequately participate in markets	Means-tested subject subsidies - Few production subsidies
<b>Rental system</b>	Unitary: housing tenure balance, predominance of social rental sector	Unitary: housing tenure balance, predominance of private rental housing	Dualist: housing tenure polarisation (imbalance), predominance of owner occupation	Dualist: housing tenure polarisation (imbalance), predominance of owner occupation	Dualist: housing tenure polarisation (imbalance), predominance of owner occupation
<b>Housing allocation</b>	Allocation on the basis of need	State intervention to correct the market - Certain groups may be favoured in the allocation process	Market determination of housing allocation in a large part of the housing stock - Regulated allocation in a small part of the housing stock (reserved for low-income groups)	Clientelist elements in housing allocation: social networks, family determines access to new housing	Market determination of housing allocation in a large part of the housing stock - Regulated allocation in a small part of the housing stock (reserved for low-income groups)
<b>Organisation of housing provision</b>	Strict spatial planning - State initiates the construction of new residential buildings	Moderately strict spatial planning - Private actors (households, small companies) initiate the construction of new residential buildings	No strict spatial planning - Private actors (mainly big companies) initiate the construction of new residential buildings	No strict spatial planning Private actors (households, small companies) initiate the construction of new residential buildings	No strict spatial planning - Private actors (mainly big companies) initiate the construction of new residential buildings
<b>Segregation</b>	Low	Moderate	High	Moderate	Low

Source: Aidukaite *et al.*, 2014, Table 1, p. 17; Allen, 2006; Arbaci, 2007, Table 1, p. 412; Hoekstra, 2003, Table 1, p. 62; Hoekstra, 2013; Balchin, 1996; Hegedüs and Teller 2005; Kettunen and Ruonavaara, 2021; Ruoppila, 2005; Soaita and Dewilde, 2019; Stephens, Lux and Sunega, 2015; Tchenkova, 2009



### 3. Assessing housing rights at the EU level

In this section, we provide an overview of the housing sector through the lens of the housing rights in the Member States of the European Union. Using quantitative techniques, we analyse the relationships between the explanatory variables – individualised power resources, outputs, and outcomes – that together define the state of the housing rights. The results of this analysis give us more insight into the current state of housing rights in EU countries and inform how this state has changed in recent decades. The results also provide a better understanding of whether housing policy decisions and outcomes in these countries have shifted towards greater convergence or differentiation over the past decades.

The sector of housing as well as the issues related to it are complex and multi-dimensional. There is no single indicator allowing for objective assessment as well as transnational comparison of the state of the housing rights. Instead, dozens of indicators must be considered. Therefore, in order to bring more clarity and structure to our study, we assigned each (available) housing indicator to one of the following groups that together help to assess the state of the housing rights:

- **AVAILABILITY.** Shows whether there is enough or a lack of (certain) housing. In the context of housing studies, it is often associated with the shortage of affordable housing.
- **AFFORDABILITY.** Shows whether housing is affordable for lower-income groups (typically those whose income is below the median household income). (Un)affordable housing becomes an issue when a majority of the population cannot afford housing at the market price and has no other alternatives (e.g., social housing).
- **ADEQUACY.** Indicates the right to housing of acceptable quality. In general, housing must ensure security, peace, and dignity. Adequate housing associates with adequate privacy, space, lighting, temperature and ventilation, basic infrastructure, and access to facilities (such as health, food, etc.) – all at reasonable cost (United Nations, 2009).
- **ACCESSIBILITY.** Refers to the disabled, elderly, refugees, homeless, children and other vulnerable groups. Iwarsson (2013) defines housing accessibility as the relationship between the individual's functional capacity and the demands of the physical environment. The purpose of accessible housing is to enable or facilitate the independent living of above-mentioned groups. (We do not analyse accessibility in more detail in this report).

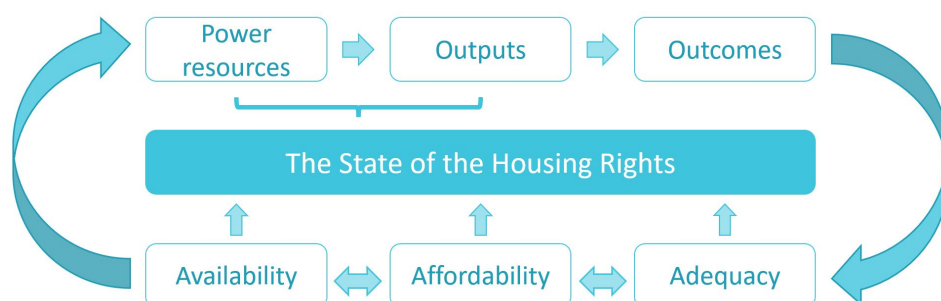
All of the housing elements listed above are interrelated and must be implemented to ensure housing rights. Otherwise, for example, the housing may be available, but unaffordable or affordable, but inadequate. Such scenarios would not be in line with the proper enforcement of the housing rights.

Figure 1 illustrates the conceptual framework for the analysis of the state of the housing rights, which is the extension of the general framework of the EuSocialCit project. In the context of housing, power resources guarantee subjective powers to obtain a state housing support. There are three types of

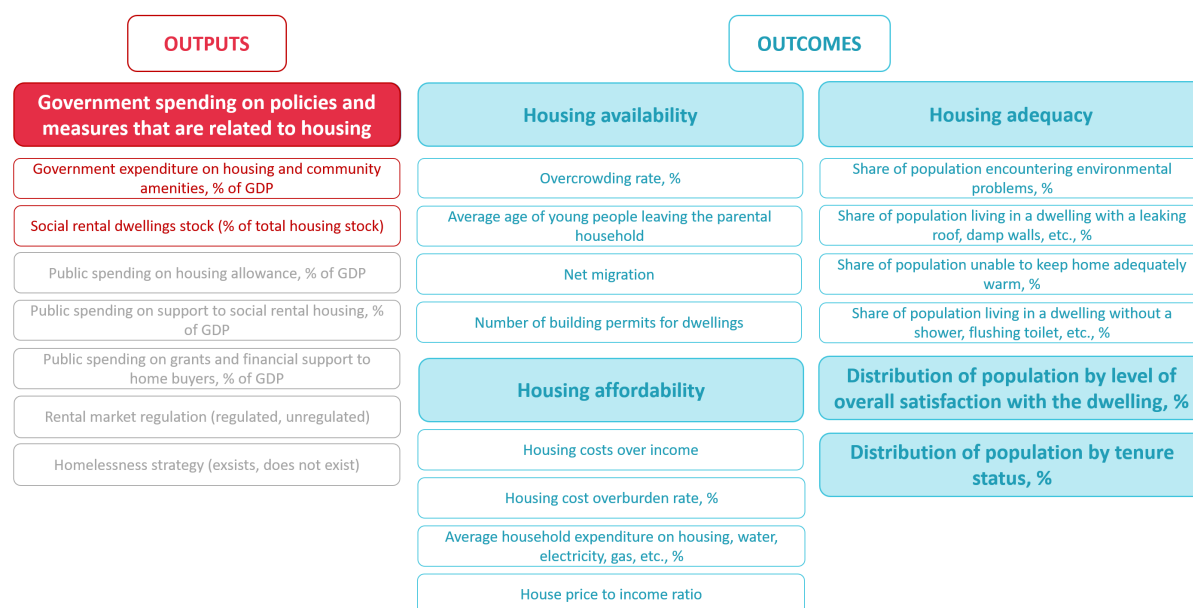
power resources: normative, instrumental and enforcement; they will be studied in the following sections in more detail. The outputs are tangible goods assembled into benefits and services ready to be delivered to individuals. While outcomes are the results produced by the power resources and outputs (Vandenbroucke *et al.*, 2021).

In this study, when accessing housing rights, based on the framework of this project, the link between the indicators representing outputs and outcomes is analysed. As a key output indicator, we consider the Government spending on policies and measures that are related to housing; it consists of general government expenditure on housing, support for home buyers, housing allowances, social rental housing; support for the homeless, etc. Accordingly, we consider the following groups of indicators as the outcomes: 1) indicators of housing availability (overcrowding rate, homelessness, etc.); 2) indicators of housing affordability (housing costs over income, average household expenditure on housing maintenance, etc.); 3) indicators of housing adequacy (housing deprivation); 4) housing satisfaction rate; 5) distribution of population by tenure status. In this study, we will focus on the most important indicators and the relationships between them.

Based on the conceptual framework of the EuSocialCit project, the power resources constitute the social rights, outputs are associated with those rights, and outcomes are associated with the outputs, and thus with the related social rights, in case of this study – housing rights (Fig. 1). The state of housing rights can also be characterized through the interplay between availability, affordability, and adequacy. Together, these elements (top and bottom part of Fig. 1) form a circle. To gain more knowledge on how this circle works in EU Member States, we analyse various indicators (variables) associated with housing availability, affordability, and adequacy (abbreviated to AAA) in EU countries. AAA are represented by a set of indicators listed in Figure 2, which also shows a breakdown into output and outcome indicators (note that the list of indicators is not exhaustive, but is shows the complexity of the studies phenomenon). The outputs are directly related to the policies and measures pursued by the governments (mainly through investments and regulations (see Section 2 on Theoretical overview). The outcomes are associated with these outputs, and the quality of the outputs is an explanatory variable for the quality of the outcomes. Therefore, all these variables might be influenced by a country’s housing policy to a greater or lesser extent.



**Figure 1. Conceptual framework for the state of the housing rights** (authors’ elaboration)



**Figure 2. Indicators included into the analysis (authors' elaboration)**

Note: the indicators marked in grey are not included in the final calculations as they did not have a significant effect on the results.

### **Data and methods**

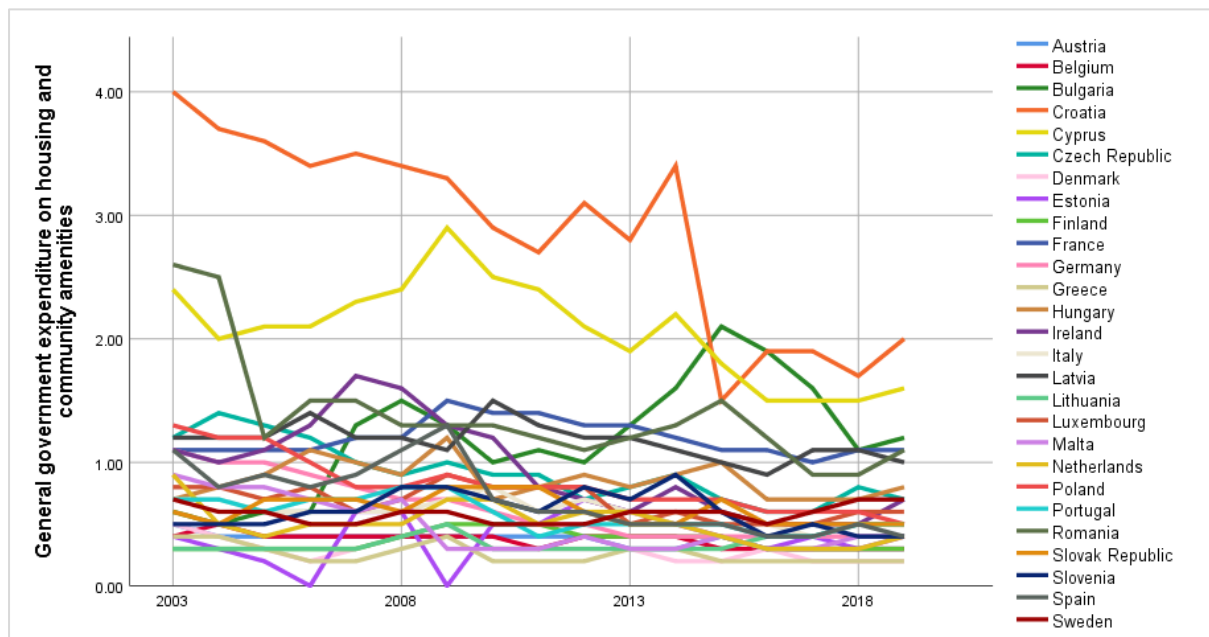
To gain more insight into the state of the housing rights in the Member States of the European Union, we employ quantitative techniques and use Eurostat and OECD housing statistics over the period of 2003–2019. We want to discover to what extent the government spending on policies and measures related to housing helps in ensuring housing rights (housing availability, affordability, and adequacy). Therefore, we analyse the relationships between and within the output and outcome indicators. Cluster analysis is used to identify structures within these data and identify more homogenous groups of countries. In addition, cartographic techniques are used to visualise the results.

There are some important challenges we face in this study that could call into question the reliability of the research results. First, it is difficult to compare EU countries using (only) quantitative data, because of great variety of housing policies and forms of housing support as well as different concepts (e.g., social housing, homelessness), and data availability. Therefore, in Section 3, we provide a general overview of the housing rights in the European countries, but we do not aim to conduct a systemic data analysis, which would require a consistent review of housing policy documents in each of the country. Second, the challenges also lie in the use of national-level data: there are significant differences between regions, and especially between urban and rural areas in terms of housing availability, affordability, and adequacy. A common phenomenon is the spatial mismatch between housing supply and demand, with a shortage of housing in cities, and a high vacancy rate in rural areas. Of course, such areas are subject to different housing policies and housing support measures. Unfortunately, in this study, the distinction between urban and rural areas (or any other spatial dimension) was not possible due to lack of availability; data at national level are used. And third, we are aware that there may be a time lag between the output and outcome indicators, e.g., when the government's spending does not have an immediate effect, so we can only speculate on their expected results.

### 3.1 Outputs' analysis

In the context of housing, 'output' is a benefit or a service provided by the state and dedicated to improve the housing conditions of those in need. The initial phase of our study involved an overview and systematization of existing output indicators. This initial analysis showed that the lack of data is an issue regarding further analysis of some existing indicators, such as public spending on grants and financial support to home buyers, public spending on housing allowance, public spending on supporting social rental housing, along with indicators on rental market regulation and homelessness strategies. Given the limitations of the data and the scope of this study, it was decided to focus on two indicators further in this study: *Government expenditure on housing and community amenities* and *Social rental dwelling stock*.

**General government expenditure on housing and community amenities<sup>1</sup>** (hereinafter referred to as government expenditure). Figure 3 illustrates that although the expenditure varies greatly from year to year in many countries, the convergence among EU countries is observed – on average governments' expenditure on housing has been declining. This is confirmed by the data at the aggregate level: in 2003 the EU-27 total expenditure amounted to 1% of GDP and in 2019 – 0.65% of GDP (Eurostat, 2021).

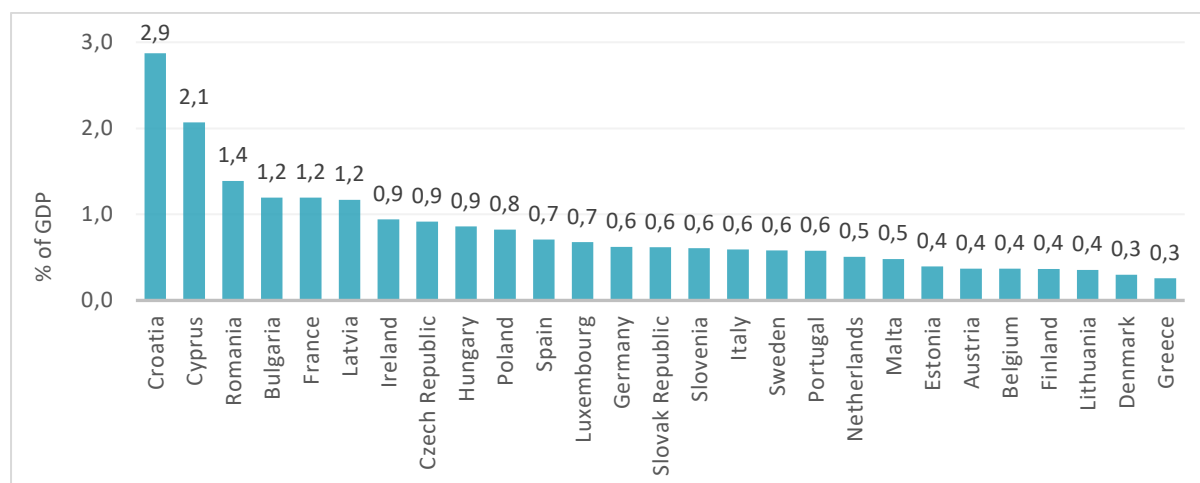


**Figure 3. General government expenditure on housing and community amenities in EU, 2003–2019, % of GDP**

Data: Eurostat

<sup>1</sup> These are expenditures on housing development (20% from total), community development (40% from total), water supply, street lighting, R&D related to housing and community amenities, housing and community amenities (Eurostat, 2021)

Figure 4 shows that during the period of 2003–2019 Greece and Denmark had the lowest expenditures (less than 0.3% of their GDPs), and Croatia and Cyprus had the highest expenditures (more than 2% of their GDPs). These data are in line with our literature review (see Section 2), in which we noted that the state is gradually withdrawing from the housing sector in all EU countries, but that the process is uneven in scale and speed.

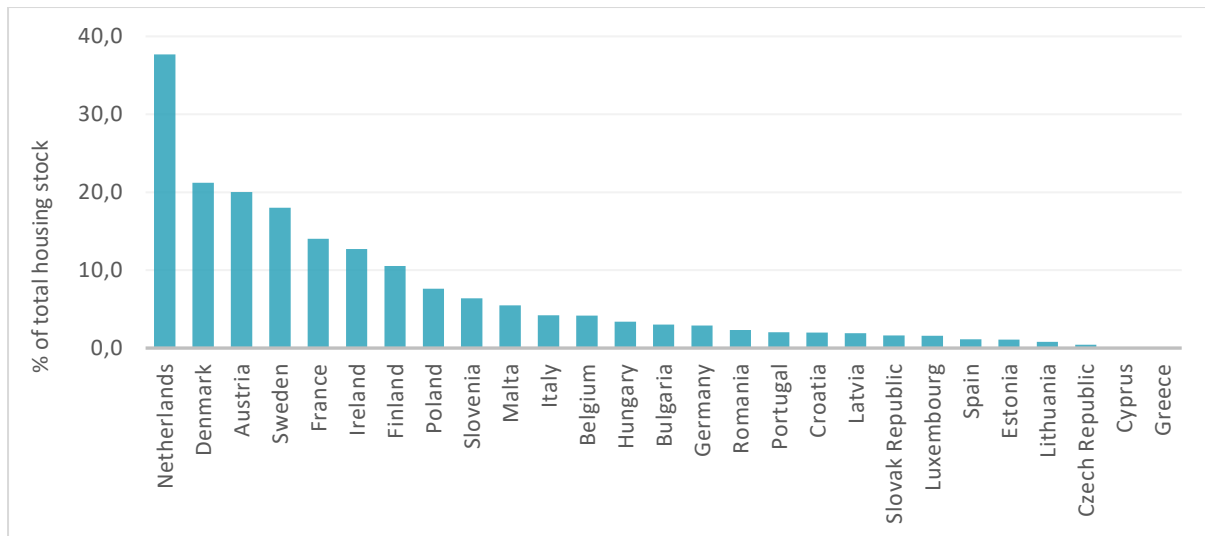


**Figure 4. General government expenditure on housing and community amenities in EU, average between 2003–2019, % of GDP**

Data: Eurostat

**Social rental housing stock.** Social housing is very important element of the housing policies aiming to ensure housing availability, affordability, and adequacy and, therefore, housing rights. The definition and perception of social housing varies greatly from country to country, thus statistics need to be critically assessed. For example, in some countries social housing is targeted only to the most vulnerable groups, while in others it is open to all (Hansson and Lundgren, 2019). Based on the official statistics, social housing accounts for the largest share in the Netherlands,<sup>2</sup> Denmark, and Austria; its' share is very small in Lithuania, Estonia, and Spain. There are also countries that do not have social housing at all or do not provide data on it (Figure 5) (OECD, 2021a).

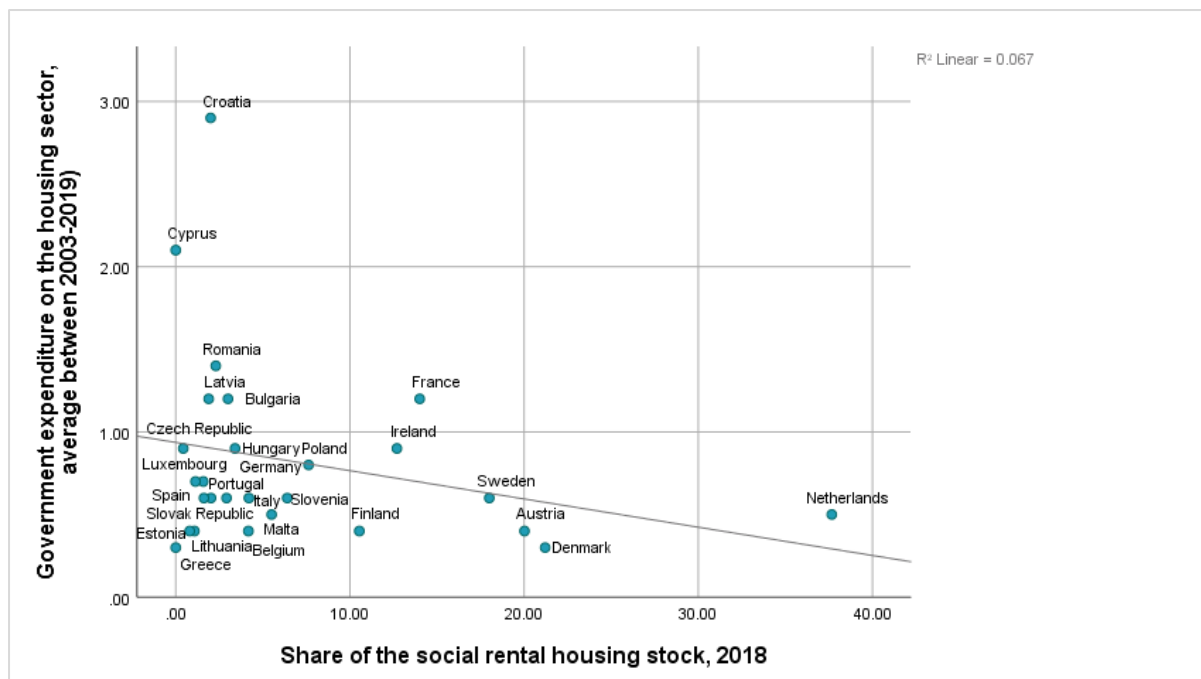
<sup>2</sup> The Netherlands is exceptional in terms of the share of social housing in the total housing stock. The reasons for this lie in history and housing policy (see Sections 2 and 4).



**Figure 5. Social rental housing stock (% of total housing stock), 2018**

Data: OECD

While social housing is crucial in securing housing rights, it is not the only tool to help vulnerable groups to gain access to housing. Often, countries with a lower share of social housing have other measures in place to help the less well-off. This observation can be supported by the results of the correlation between the government expenditure on the housing sector and the share of the social rental housing stock (Figure 6). The correlation is not significant ( $r = -.259$ ,  $p = .192$ ,  $N=27$ ). For example, in the Netherlands social housing accounts for as much as 37.7% of total housing stock, but the government expenditure on housing and community amenities accounts for only 0.5% of GDP, whereas in Croatia social housing accounts for 2%, but the expenditure accounts for 2.9%. Several reasons may explain the absence of the correlation between the mentioned variables. First and foremost, government expenditure also includes grants and financial support to homebuyers (such as subsidized mortgages, guarantees to home buyers, mortgage relief) as well as housing allowances, subject subsidies for renters, etc. Thus, we may assume that countries that have a higher share of social housing tend to spend less on support for homebuyers or housing allowances, while those with the lower share of social housing require bigger expenditures (or actual investments) to increase the share of the social housing, or to ensure the right to housing by other costly means. Secondly, there are different types of social rental housing providers, roughly: non-profit, limited-profit, and for-profit providers. Therefore, not all (although most) of the costs of social housing are covered by the state.



**Figure 6. Relationship between government expenditure on the housing sector and the share of the social rental housing stock**

Note: If we consider the Netherlands outlier, and remove from the calculation, the result remains the same.

Data: OECD and Eurostat

The correlations in Table 2 suggest that government expenditures are directed at promoting home ownership – the correlation between the government expenditure and the share of homeowners in the housing tenure composition is positive and significant ( $r = .334$ ,  $p = .089$ ,  $N=27$ ). Thus, public spending on the housing sector is relatively higher in countries with higher levels of home ownership; such spending is likely to take the form of mortgage subsidies. Meanwhile, the correlation between the share of the social housing and the share of the homeowners is negative and significant ( $r = -.499$ ,  $p = .008$ ,  $N=27$ ). The following interpretation is also possible: the higher the share of social housing in the country, the lower the need for home ownership.

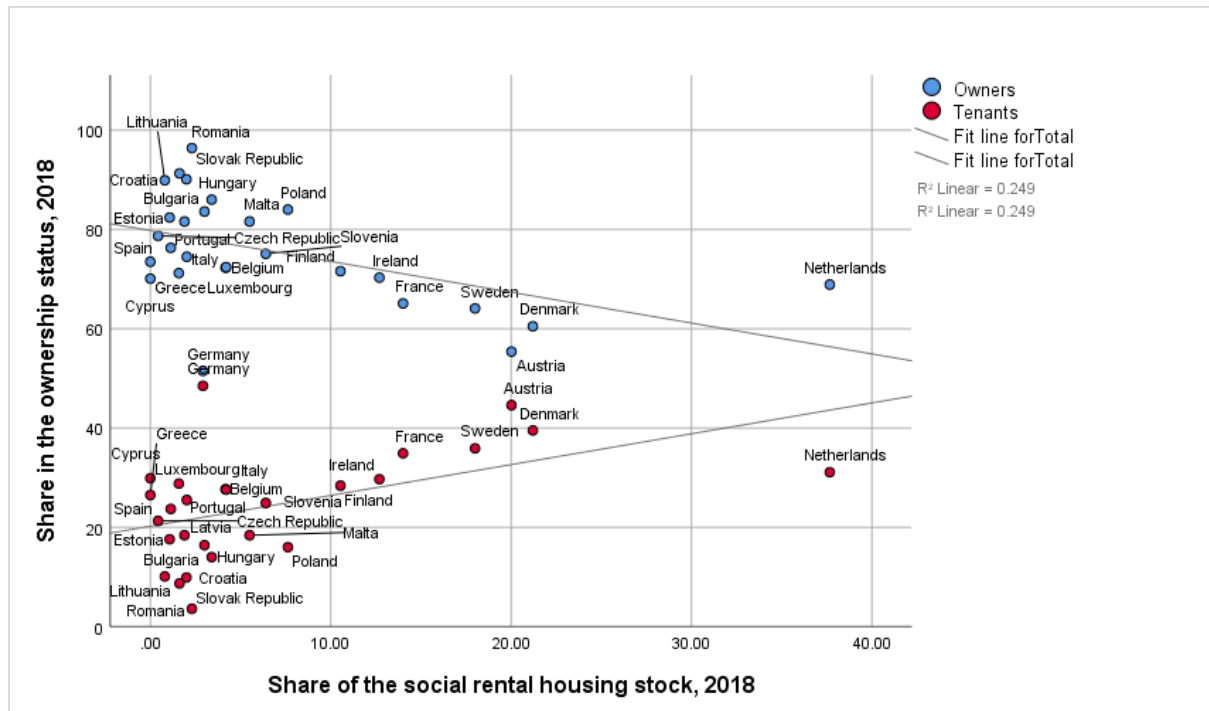
**Table 2. Pearson correlations between the government expenditure, social rental housing stock, and the tenure composition (N=27)**

	HOUSING EXPENDITURE (AVG. 2003-2019)	SOCIAL RENTAL HOUSING STOCK, 2018, %	OWNERS	TENANTS
Housing expenditure (avg. 2003-2019)	1	-.259	<b>.334</b>	<b>-.334</b>
<i>Sig. (2-tailed)</i>		.192	.089	.089
Social rental housing stock (2018), %	-.259	1	<b>-.499</b>	<b>.499</b>
<i>Sig. (2-tailed)</i>	.192		.008	.008

Data: OECD and Eurostat



Figure 7 illustrates how countries are distributed according to the share of social housing and the form of home ownership. Although owners dominate in all countries, the differences between countries are obvious. The Netherlands is exceptional with high share of social housing and relatively small share of homeowners. Home ownership is absolutely dominant in Eastern and Central European countries, which have very little social housing. In countries belonging to socialdemocratic and conservative-corporatist welfare state regimes, social rental housing averages to 10–20% of total housing stock.



**Figure 7. Relationship between ownership status and social rental housing stock**

Data: OECD and Eurostat

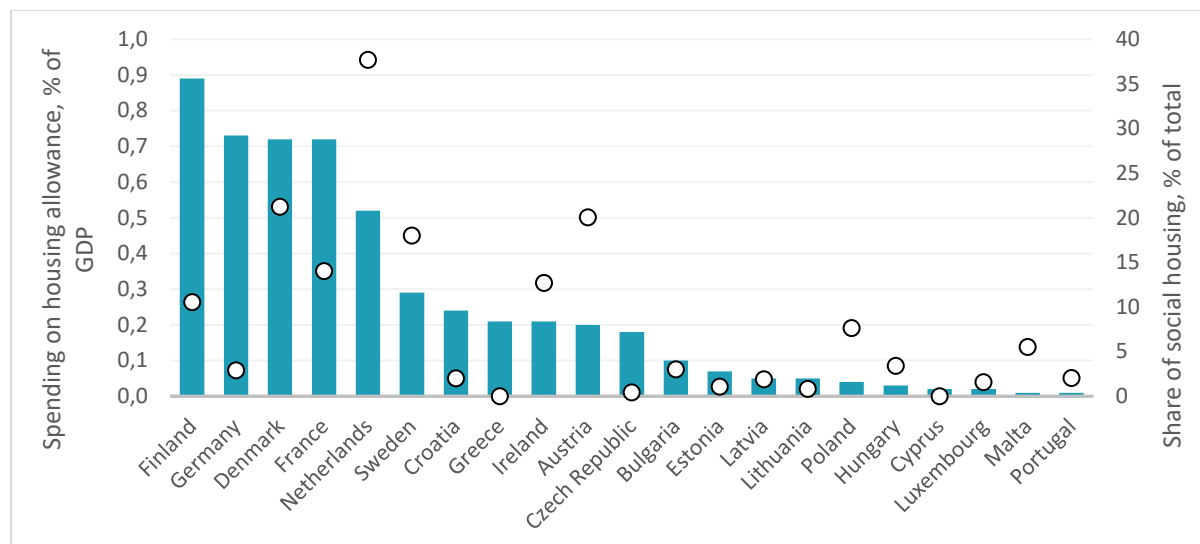
Additionally, we also examined two distinct but complementary indicators that are part of the public policies towards affordable housing. Figure 8 shows data on public spending on housing allowance, % of GDP (2016-2018)<sup>3</sup>, and Figure 9 shows data on public spending on support to social rental housing, % of GDP (2015-2018)<sup>4</sup> (only countries where such data were available are shown). Western and Northern countries appear to be spending more on both types of allowances. These statistics correspond to the discussion provided in the theoretical overview (Section 2), stating that the socialdemocratic and conservative-corporatist housing policy regimes provide higher subject and

<sup>3</sup> According to OECD, “Housing allowances are a form of demand-side support generally provided to low-income households who meet the relevant eligibility criteria to help meet rental and other housing costs, temporarily or on a long-term basis. Although such schemes are commonly called housing allowances, they are also known as “housing benefits” (in the United Kingdom), “rent assistance” (Australia), “rent supplement” (Ireland, New Zealand), or “housing vouchers” (United States)” ( OECD Affordable Housing Database, 2021: 1a).

<sup>4</sup> According to OECD, public spending on support to social rental housing “typically includes expenditure aimed at direct provision of social rental housing and subsidies to non-government social rental housing providers. They do not include personal housing benefits granted to social housing tenants, which are treated as part of housing allowances” (OECD Affordable Housing Database, 2021:1b).



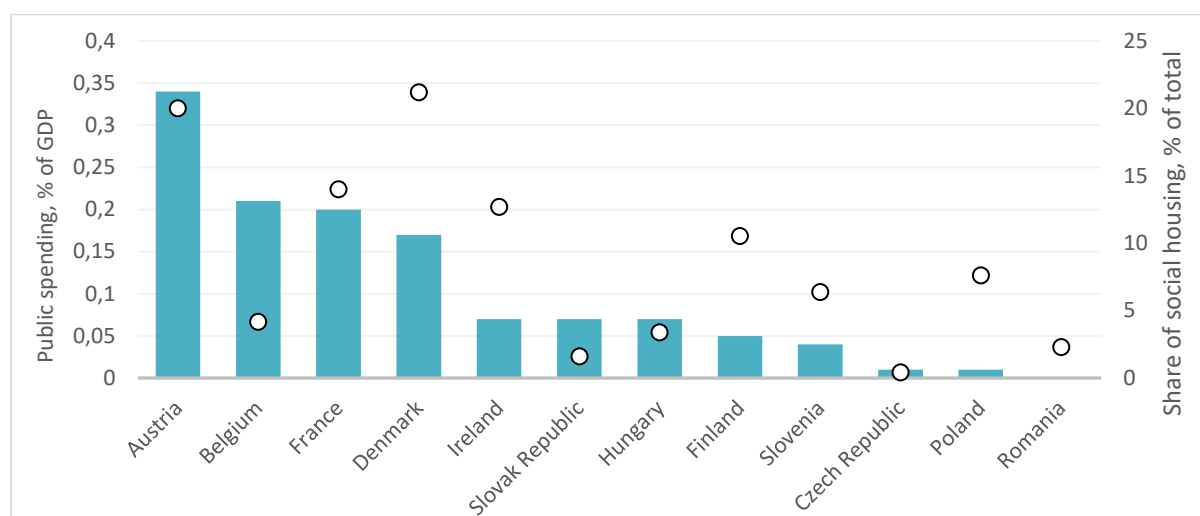
object subsidies to housing, compared to other housing policy regimes. Figure 9 shows that public spending on housing allowances is the highest in Finland, Germany, France, Denmark, and the Netherlands. These countries also tend to have more social housing. On the other side of the graph are the countries with the lowest spending on housing allowance as well as one of the lowest shares of social housing: Portugal, Malta, Luxemburg, Cyprus, Hungary, Poland, Lithuania, Latvia.



**Figure 8. Public spending on housing allowance (2016-2018) and share of social housing (2018)**

Data: OECD

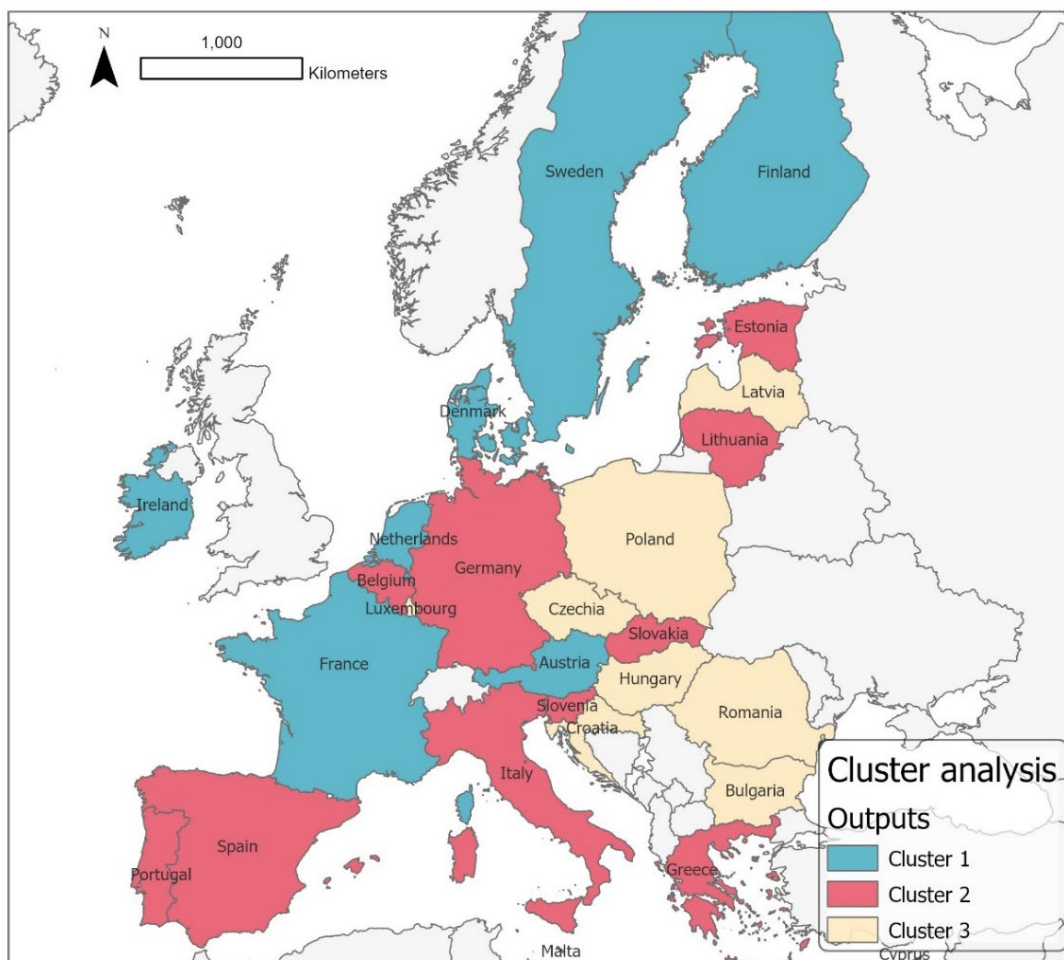
Countries with a relatively higher share of social housing also tend to spend more on support to social rental housing. Figure 9 shows that Austria, Belgium, France, and Denmark are the most generous in this area, while Romania, Poland, Czech Republic, and Slovenia devote much less of their GDP in this area. In particular, Austria and France have a strong social housing system and relatively high maintenance costs. In general, in Central and Eastern European countries, social housing plays a very insignificant role in the housing system, so the support associated with it is also insignificant.



**Figure 9. Public spending on support to social rental housing (2015-2018) and share of social housing (2018)**

Data: OECD

Figure 10 summarises the section on outputs by providing the results of the cluster analysis, which groups the countries according to the values of the output indicators. For this analysis we used only two key indicators: *General government expenditure on housing and community amenities* and *Social rental housing stock, % of total housing stock*, as there were too many missing values for other indicators. The results in Figure 10 show the distribution of EU countries into three clusters. The first cluster (blue colour) includes countries with the medium government expenditure and high rental housing stock. These are countries with the social-democratic housing policy regime and/or corporatist housing policy regimes, as discussed in the theoretical section. We can also clearly see a cluster of the CEE housing policy regime (yellowish colour). These are countries with a higher government spending and small social housing stock. The cluster in between (red colour) consists of countries with the low government spending and a small social housing stock. In this cluster, we find some CEE countries representing post-communist housing policy regime and Latin Rim countries, which belong to the Mediterranean housing policy regime. Germany also falls into this cluster because of the small public/social housing sector. In Germany, rental housing is large, but provided by the private sector and other non-profit organizations. The results of this analysis show that the differences between EU countries, which traditionally have ideal typical welfare state and housing policy models, are still quite well observed.



**Figure 10. Cluster analysis for the outputs, 2018** (authors' elaboration)

Note: Cluster 1 – Medium government expenditure and large rental housing stock; Cluster 2 – Higher government expenditure and small social housing stock; Cluster 3 – Low government expenditure and small social housing stock  
Data: OECD and Eurostat

**Table 3** (supplementing Figure 10). **The results of the cluster analysis** (authors' calculations)

	GOVERNMENT EXPENDITURE, % OF GDP (MEAN 2003-2019)	SOCIAL RENTAL HOUSING STOCK, % OF TOTAL HOUSING STOCK (2018 OR LATEST YEAR AVAILABLE)	CLUSTER
<b>Finland</b>	0.4	10.5	1
<b>Ireland</b>	0.9	12.7	1
<b>France</b>	1.2	14.0	1
<b>Sweden</b>	0.6	18.0	1
<b>Austria</b>	0.4	20.0	1
<b>Denmark</b>	0.3	21.2	1
<b>Netherlands</b>	0.5	37.7	1
<b>Greece</b>	0.3	0.0	2
<b>Lithuania</b>	0.4	0.8	2
<b>Estonia</b>	0.4	1.1	2
<b>Spain</b>	0.7	1.1	2
<b>Slovak Republic</b>	0.6	1.6	2
<b>Portugal</b>	0.6	2.0	2
<b>Germany</b>	0.6	2.9	2
<b>Belgium</b>	0.4	4.2	2
<b>Italy</b>	0.6	4.2	2
<b>Slovenia</b>	0.6	6.4	2
<b>Poland</b>	0.8	7.6	2
<b>Czech Republic</b>	0.9	0.4	3
<b>Luxembourg</b>	0.7	1.6	3
<b>Hungary</b>	0.9	3.4	3
<b>Malta</b>	0.5	5.5	3
<b>Cyprus</b>	2.1	0.0	3
<b>Latvia</b>	1.2	1.9	3
<b>Croatia</b>	2.9	2.0	3
<b>Romania</b>	1.4	2.3	3
<b>Bulgaria</b>	1.2	3.0	3

Data: OECD and Eurostat

### 3.2 Outcomes' analysis

If, in the context of housing, we defined 'output' as a benefit or a service provided by the state and dedicated to improve the housing conditions of those in need, then 'outcome' is a result produced by the output. Both, outputs and outcomes may be influenced by a country's housing policy to a greater or lesser extent. Governments through their housing policies seek to ensure housing rights, mainly by increasing housing availability, affordability, and adequacy. This is done by various means of financial support (subsidies for rents or for mortgages, housing allowances, etc.), development of the social

housing, helping homelessness, other financial support (subject subsidies, and other social security benefits), regulations (e.g., rental price regulation), etc. In addition to direct government intervention, there are many other external and internal factors shaping housing markets (e.g., cultural context, climate conditions and climate change, global migration flows, global financial crises, etc.). The multifaceted interaction between these factors and the government intervention determines the conditions of the housing sector, which we analyse in terms of housing availability, affordability, and adequacy (see Figure 1 and Figure 2).

### 3.2.1 Availability

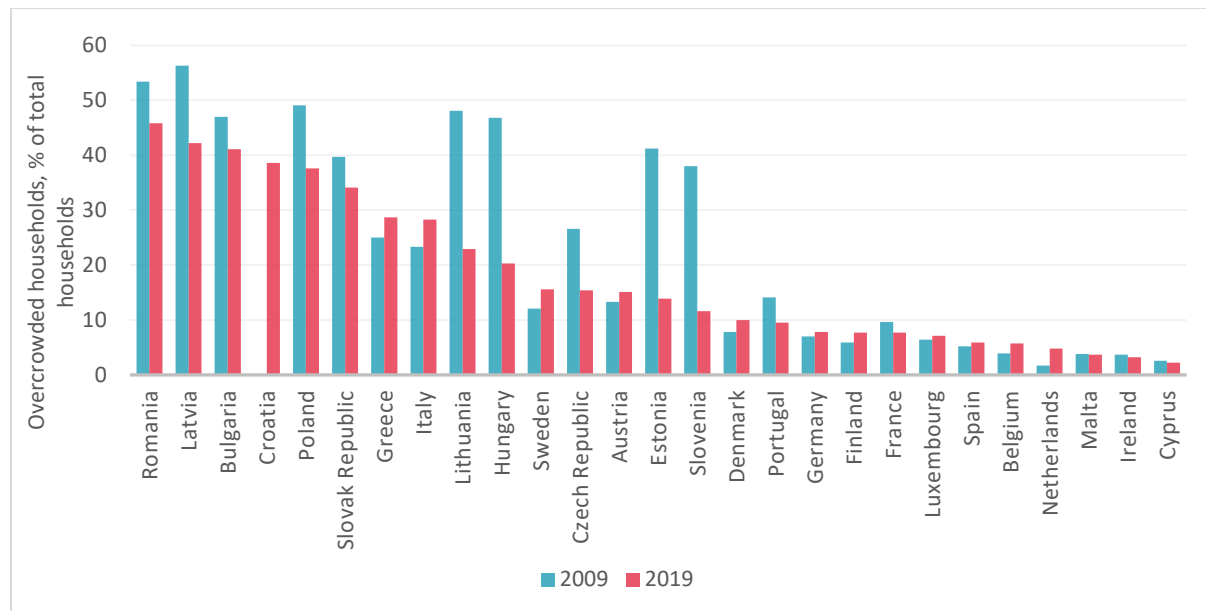
Availability indicates whether there is enough or a lack of (certain) housing, and it is often associated with the shortage of affordable housing. The initial data analysis showed that the following indicators best reflect the situation of the housing availability in the EU Member States: *overcrowding rate, the average age of young people leaving the parental household, net migration, number of issued building permits to dwellings (in other words, new residential construction)*.

**Overcrowding rate** is the percentage of the population living in an overcrowded household.<sup>5</sup> The comparison of the countries in Figure 11 shows a very clear pattern: in CEE countries, the overcrowding rate is very high, but it has decreased significantly over the last decade, while in Western Europe, the rate is low, but it has increased slightly over the same period. From the historical point of view, overcrowding in Western Europe has been lower due to intense urbanization and industrialization and mass housing construction after World War II. Accordingly, these processes were smaller in scale and less efficient in the CEE countries, leading to a shortage of housing, especially in the countries of the former Soviet Union. The apartments there were also smaller. All this has led to a major overcrowding in the CEE, which is still evident, although the situation is improving. The decline in the overcrowding rate in CEE countries is mainly due to their declining population, both due to natural change and the negative net migration. The growing economy and quality of life in CEE countries in recent decades, as well as the large-scale new residential construction in their metropolitan regions, are also contributing to declining overcrowding rates. Meanwhile, the already densely populated cities of Western Europe are experiencing a steady population growth (especially due to international immigration), making housing shortages a growing problem in many cities and countries. In Figure 11, it can be seen that overcrowding rate declined significantly in many CEE countries from 2009 to 2019, especially in Lithuania, Hungary, Estonia, and Slovenia. However, the overcrowding rate noticeably increased in Greece, Italy, Sweden, Denmark, Belgium and the Netherlands. The population of these countries was growing relatively fast due to international migration, which was not sufficiently covered by the new residential construction. The availability of

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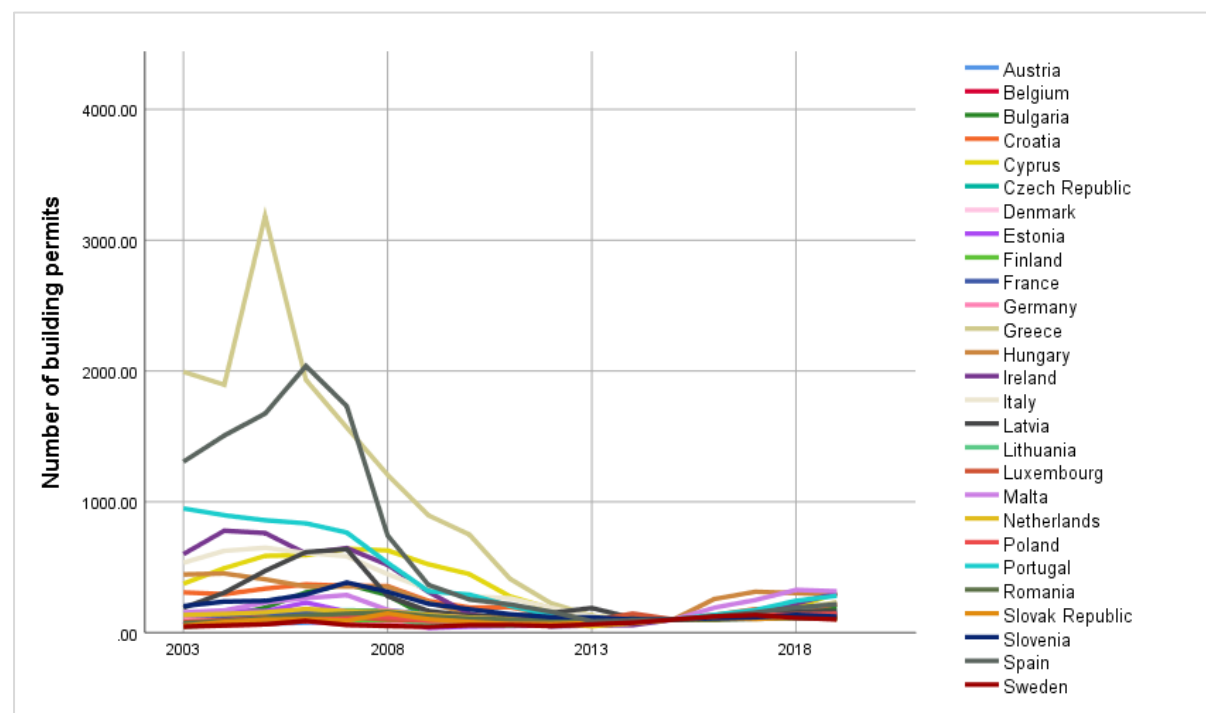
<sup>5</sup> According to EU-SILC survey, “A person is considered as living in an overcrowded household if the household does not have at its disposal a minimum of rooms equal to: - one room for the household; - one room by couple in the household; - one room for each single person aged 18 and more; - one room by pair of single people of the same sex between 12 and 17 years of age; - one room for each single person between 12 and 17 years of age and not included in the previous category; - one room by pair of children under 12 years of age” (Eurostat dataset details, 2021a).

housing in Western Europe was further hampered by the Financial crisis of 2008, when the economic recession also led to stagnation in the construction sector (see Figure 12). Interestingly, when analysing the data, we did not find a clearer relationship between the volume of **new construction** and net **migration**, suggesting that the underlying factors of housing shortage are more complex; a more detailed analysis of this phenomenon is beyond the scope of this study.



**Figure 11. Overcrowding rate (%) in 2009 and 2019**

Data: EU-SILC survey

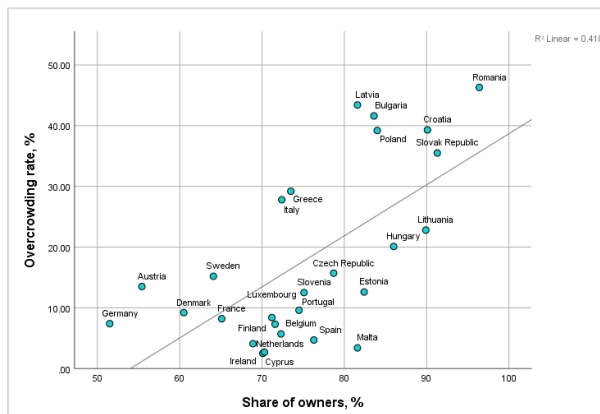


**Figure 12. Number of building permits to dwellings, 2015 = 100%**

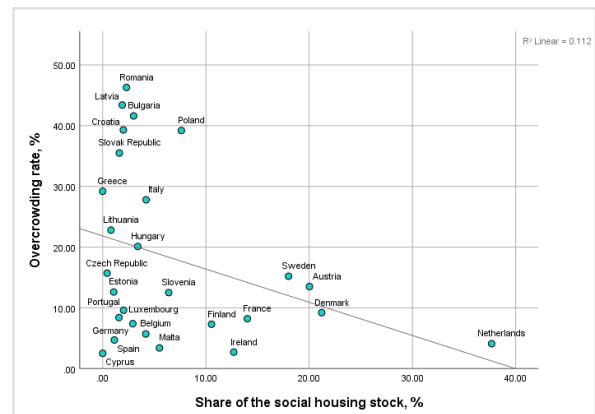
Data: Eurostat

To better understand the phenomenon of overcrowding and its possible causes, we looked at the relationship between this variable and several other variables. First, we looked at the relationships between the overcrowding rate and the distribution of the population by the tenure status. First, we found that a higher share of home ownership is associated with a higher overcrowding rate ( $r = .640$ ,  $p = .000$ ,  $N=27$ ) (Figure 13, a). The CEE countries have a very high share of homeowners due to massive privatization carried out during the 1990s, especially Romania. Home ownership traditionally is also high in the Mediterranean countries. Thus, these two groups of countries also have a higher rate of overcrowding. In contrast, the Nordic countries and Continental Europe have a relatively higher share of rental housing and lower overcrowding. This interdependency suggests that a higher rental (public or private) sector provides better conditions for less overcrowding, while home ownership, although generally seen as advantage, acts as a kind of a barrier to spacious living. Indeed, this was confirmed by the following correlations. The relationship between the overcrowding rate and the share of social housing (Figure 13, b), although is not strong ( $r = -.335$ ,  $p = .088$ ,  $N=27$ ), shows that the higher the share of social housing, the lower the overcrowding rate. We also looked at two other categories: tenants renting at the market price and tenants renting at the reduced price (Figure 13 c and d). All results, albeit at varying strength, suggest that any rental housing, whether private or social, contributes to a lower rate of overcrowding.

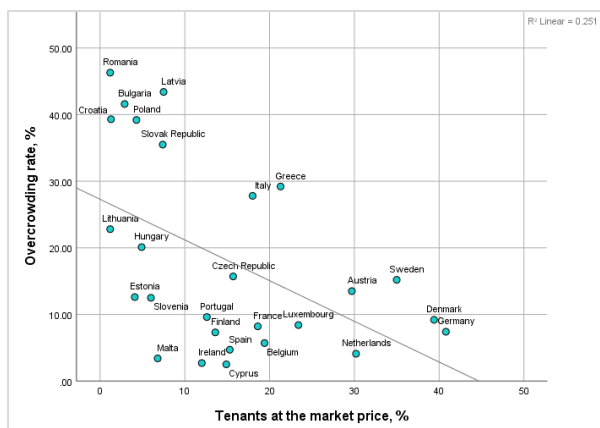
a)



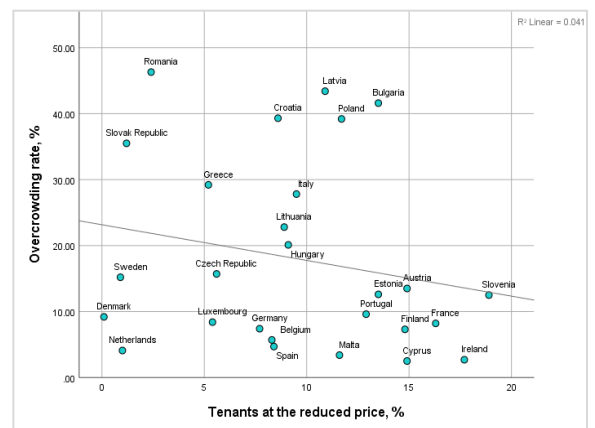
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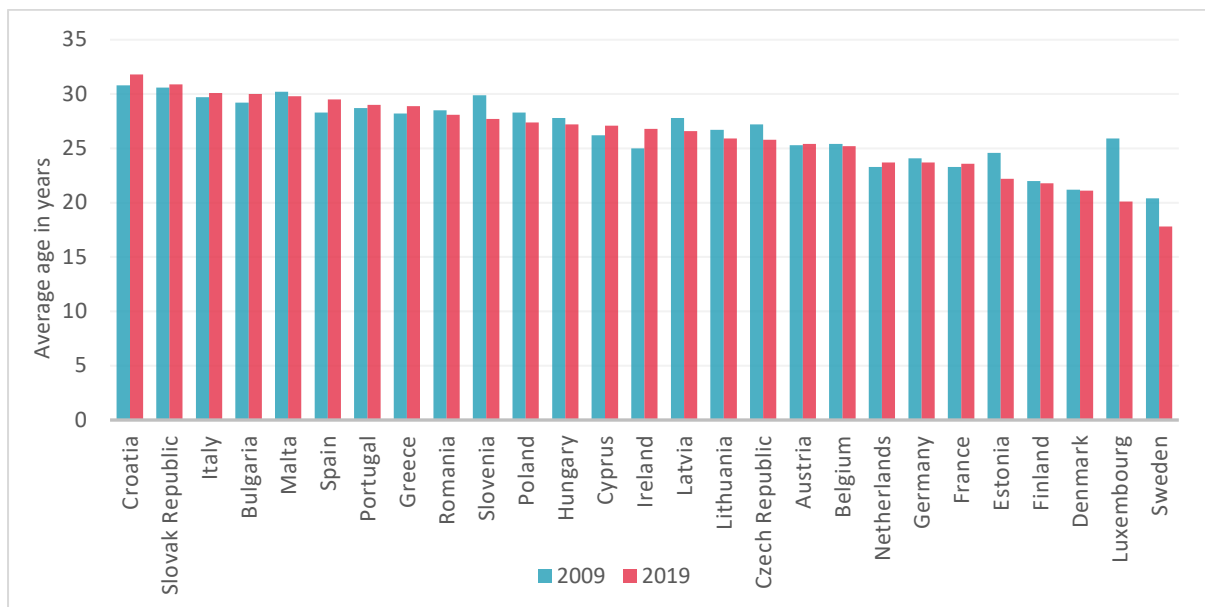
d)



**Figure 13. Relationship between the overcrowding rate and the distribution of the population by the tenure status in 2018**

Data: EU-SILC survey

We assume that part of the overcrowding phenomenon may be directly related to the **average age at which young people leave their parents' household**. Figure 14 shows that Europe is divided into two parts: north with west and south with east; this division is similar to the one we saw in the case of overcrowding rate. In Northern and Western Europe, young people leave their parents' homes earlier, while in the rest of Europe children tend to live longer with their parents. The average age at which children leave their parents' homes remained almost unchanged over the period analysed (except for a sharp decrease in Luxembourg). In 2019, the average age in Europe was 26.2; the children lived with their parents the longest in Croatia (31.8) and the shortest in Sweden (17.8). While these figures are likely to reveal general trends, they may be inaccurate. For example, in many countries, students do not always declare their place of residence, and actually "stay" living with their parents.



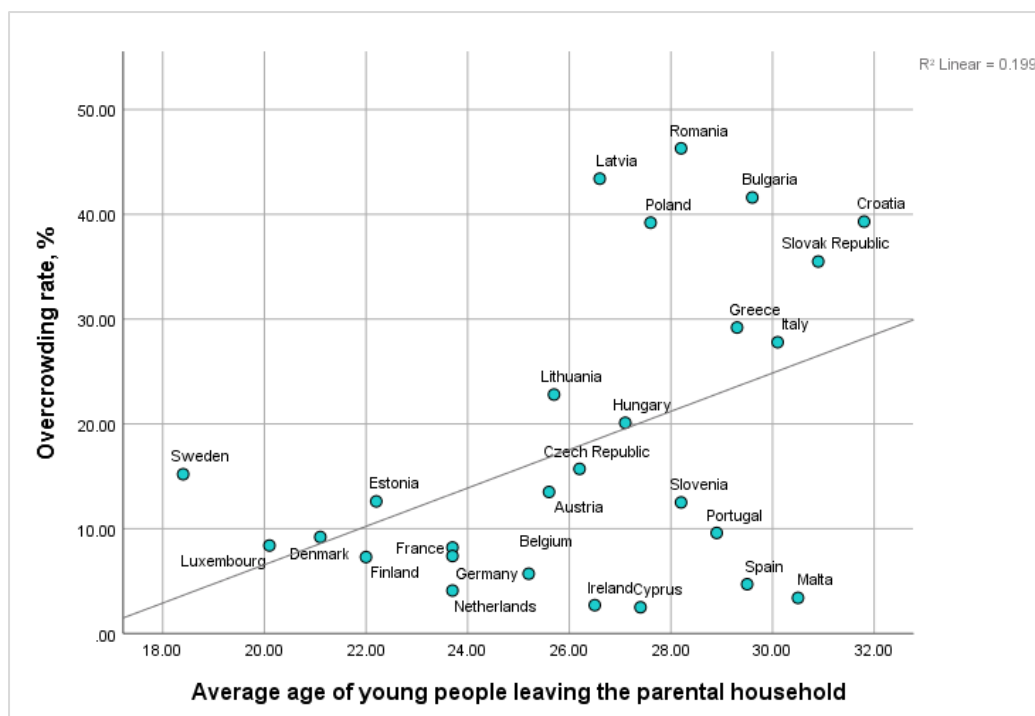
**Figure 14. The average age of young people leaving the parental household in 2009 and 2019**

Note: Denmark 2010 data

Data: Eurostat

There is a moderate relationship ( $r = .446$ ,  $p = .020$ ,  $N=27$ ; Figure 15) between the average age of young people leaving the parental household and the overcrowding rate – the older the age, the higher the overcrowding rate. Our results suggest that housing availability and affordability poses challenges for young people when they start their independent housing careers. This is particularly the case in the CEE and Mediterranean countries, where the rental sector is small, so buying your own home is almost the only option in the long run, and it requires (at least initially) more resources and time compared to renting. Although, in the context of this study, overcrowding and late departure from parents' home signal problems in the housing system, cultural differences between countries and different family traditions should also be taken into account, as they contribute significantly to differences between the European countries, but they are not necessarily related to housing deprivation.





**Figure 15. Relationship between the average age of young people leaving the parental household and the overcrowding rate in 2018**

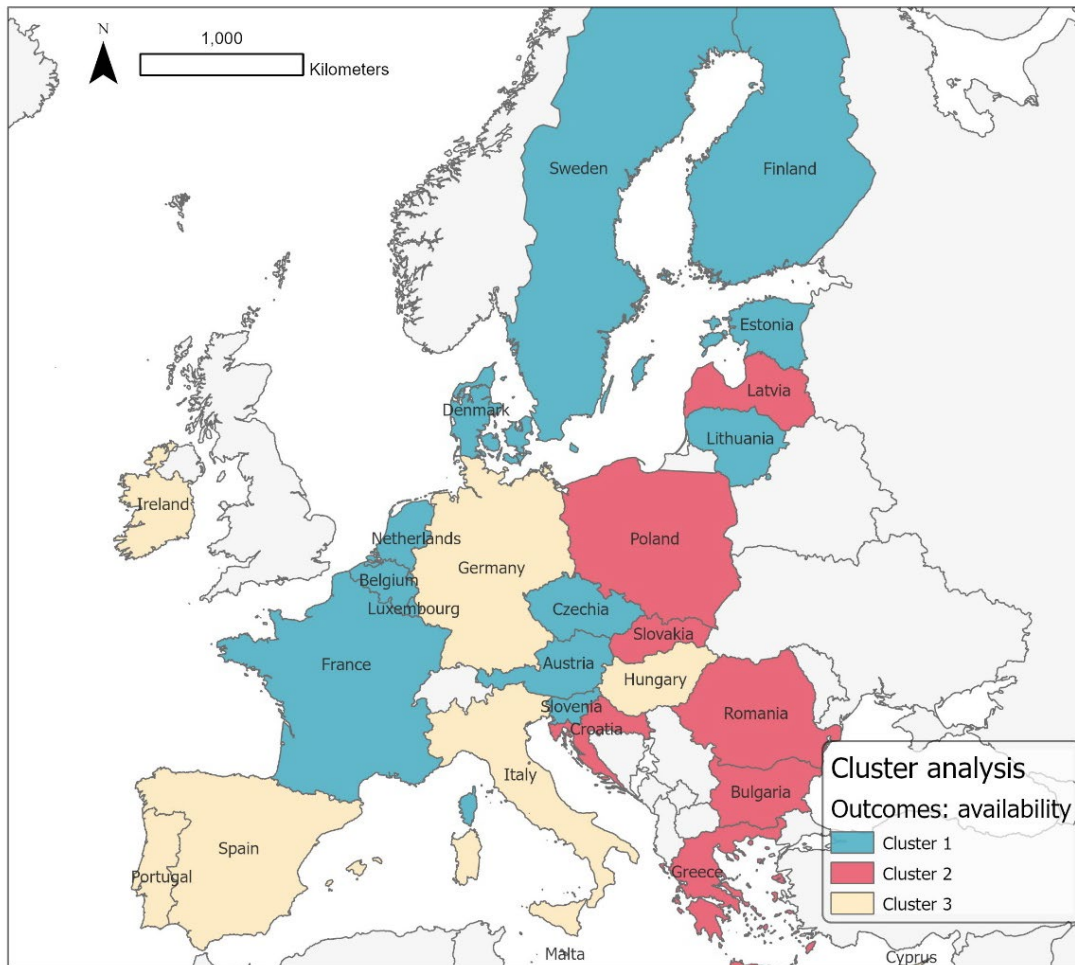
Data: EU-SILC survey, Eurostat

To sum up, the analysis of the indicators discussed in this section gives us more insight into the housing availability and its differences across the European countries. There is no single and specific indicator that reveals the availability of housing, so we analysed four indicators, the choice of which was also determined by data availability. These are *overcrowding rate*, *average age of young people leaving the parental household*, *net migration* and *the number of building permits issued for dwellings*. In general, we argue that if the overcrowding rate is higher and children leave their parents' homes at an older age, it means that housing availability is more difficult. Higher immigration flows and lower volumes of new construction also indicate a housing shortage. There is, unfortunately, no statistics on housing shortage – which would be fairly universal indicator for assessing housing availability. It should also be noted that the share of social housing partly reflects housing availability too, but we have included this indicator with the output indicators (see output analysis).

The map in Figure 16 summarises the section on housing availability by providing the results of the cluster analysis, which groups the EU countries into three groups according to the values of the analysed indicators. The cluster analysis takes into account the four indicators mentioned above. In the map it can be seen that there is cluster (yellowish colour) accommodating Mediterranean countries, Germany, Ireland and Hungary. On average, this group of countries distinguishes by higher housing availability (significantly lower rates of overcrowding, a lot of new construction, albeit a large immigration). Then we find a cluster (red colour) with post-communist housing policy regime countries, which can be characterised by the lowest housing availability (very high overcrowding, high average age when children leave their parents' homes, but negative net migration). The third cluster (blue colour) contains those countries, which belong to social-democratic and corporatist housing policy regime, Sweden, and some Central and Eastern European countries (Estonia, Lithuania, Czechia, Austria



and Slovenia) end up in this cluster. These countries occupy an intermediate position in terms of housing availability in Europe.



**Figure 16. Cluster analysis for the housing availability, 2018** (authors' elaboration)

Note: Cluster 1 – Lower housing availability; Cluster 2 – Moderate housing availability; Cluster 3 – Higher housing availability  
 Data: Eurostat and EU-SILC survey

**Table 4** (supplementing Figure 16). **The results of the cluster analysis** (authors' calculations)

COUNTRY	OVERCROWDING RATE, % (2018)	AVG. AGE OF YOUNG PEOPLE LEAVING THE PARENTAL HOUSEHOLD (2018)	NEW RESIDENTIAL CONSTRUCTIONS (2018, 2015=100)	NET MIGRATION (MEAN 2003-2019)	CLUSTER
Cyprus	2.5	27.4	194	6560	1
Malta	3.4	30.5	326.5	7027	1
Italy	27.8	30.1	127.4	268580	1
Hungary	20.1	27.1	302.4	19575	1
Germany	7.4	23.7	115.4	285975	1
Portugal	9.6	28.9	243.5	2124	1
Spain	4.7	29.5	191.8	232113	1
Ireland	2.7	26.5	223.1	20818	1
Bulgaria	41.6	29.6	205.8	-3597	2
Romania	46.3	28.2	109.2	-58807	2
Croatia	39.3	31.8	168.9	-4498	2
Latvia	43.4	26.6	163.8	-14170	2
Poland	39.2	27.6	138.2	-28661	2
Slovak Rep.	35.5	30.9	116.6	3643	2
Greece	29.2	29.3	175.9	-540	2
Finland	7.3	22	135	13468	3
Slovenia	12.5	28.2	136.2	5794	3
Belgium	5.7	25.2	136.1	43484	3
Luxembourg	8.4	20.1	137.3	8502	3
Estonia	12.6	22.2	125.1	-198	3
Lithuania	22.8	25.7	120.2	-25813	3
Czech Rep.	15.7	26.2	127.2	20189	3
Netherlands	4.1	23.7	129.3	41706	3
Denmark	9.2	21.1	170.7	13078	3
Austria	13.5	25.6	114.1	42395	3
Sweden	15.2	18.4	112.3	61216	3
France	8.2	23.7	114.4	69598	3

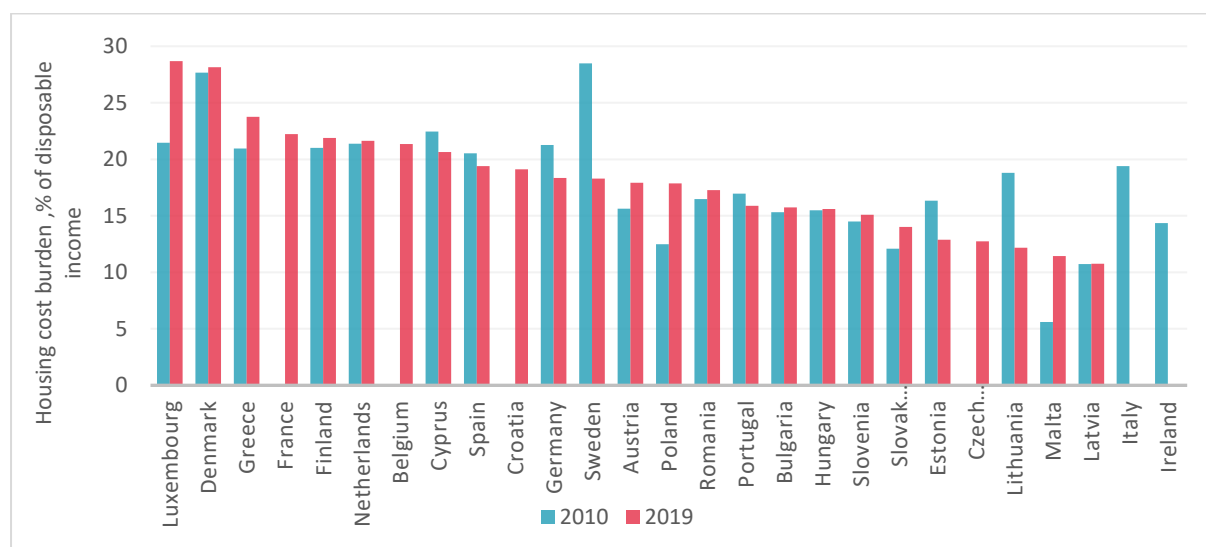
Data: Eurostat and EU-SILC survey

### 3.2.2 Affordability

Housing affordability is another important feature that is needed to secure housing rights. Affordable housing should address the housing needs of the lower- or middle-income households, while (un)affordable housing becomes an issue when the majority of the population cannot afford housing at the market price and has no other alternatives, such as social housing. Given the choice of existing indicators and data coverage, our analysis showed that the housing affordability in EU countries is best reflected by the following indicators: *households' housing cost burden, housing cost overburden rate, average household expenditure on housing, water, etc., and house price to income ratio.*

Figure 17 shows the distribution of countries according to the **households' housing cost burden** (mortgage and rent cost), calculated as a share of disposable income. The higher this number, the more difficult it is for the household financially. In most cases the households of the Western and Northern European countries need to allocate a larger share of their disposable income to housing related expenses, while in the CEE countries and some Mediterranean countries (Malta and Portugal) housing costs are relatively lower. It can easily be explained by the differences in the tenure composition, specifically – high ownership rate in the CEE and Mediterranean countries (Table 5, Figure 18). Not surprisingly, in countries where home ownership is widespread, the burden of housing cost on the households is lower, especially if a large proportion of home ownership is without outstanding mortgages. Thus, many households in the countries such as Lithuania, Latvia, Estonia, Malta and Czechia can enjoy relatively small housing cost burden. However, in countries where a large share of home ownership is tied to loans, the housing cost burden is high – the Netherlands, Belgium, Finland, Luxemburg, Denmark. The greatest burden falls on households in countries where a significant part of housing is rented at market price; Denmark and the Netherlands also belong to this group. Finally, the relationship between the share of housing rented at the reduced price and the burden of housing cost is not statistically significant, but the burden in such housing tends to be lower.

Figure 17 also shows the changes in the housing cost burden in EU countries. Between 2010 and 2019, this burden has decreased significantly in Sweden and Lithuania (by about 10 percentage points each); it has also decreased in Estonia and Germany (by about 4 p.p.), followed by Portugal, Spain and Cyprus (by about 1-2 p.p.). Meanwhile, in the rest of the countries, the housing cost burden has increased, and this increase was the most pronounced in Luxemburg (by 7 p.p.) and Poland (by 6 points). Interestingly, in Luxemburg (to a lesser extent also in Poland), during the same period there was a sharp decrease in the average age at which children leave their parents' homes (see Figure 14). Thus, the increase in housing cost burden may be related with the youth policies encouraging independent living. Overall, the changes in housing cost burden in European countries may have been driven by a variety of developments in their economies: increasing wages, rising housing prices, after-crisis changes and related economic restructuring.



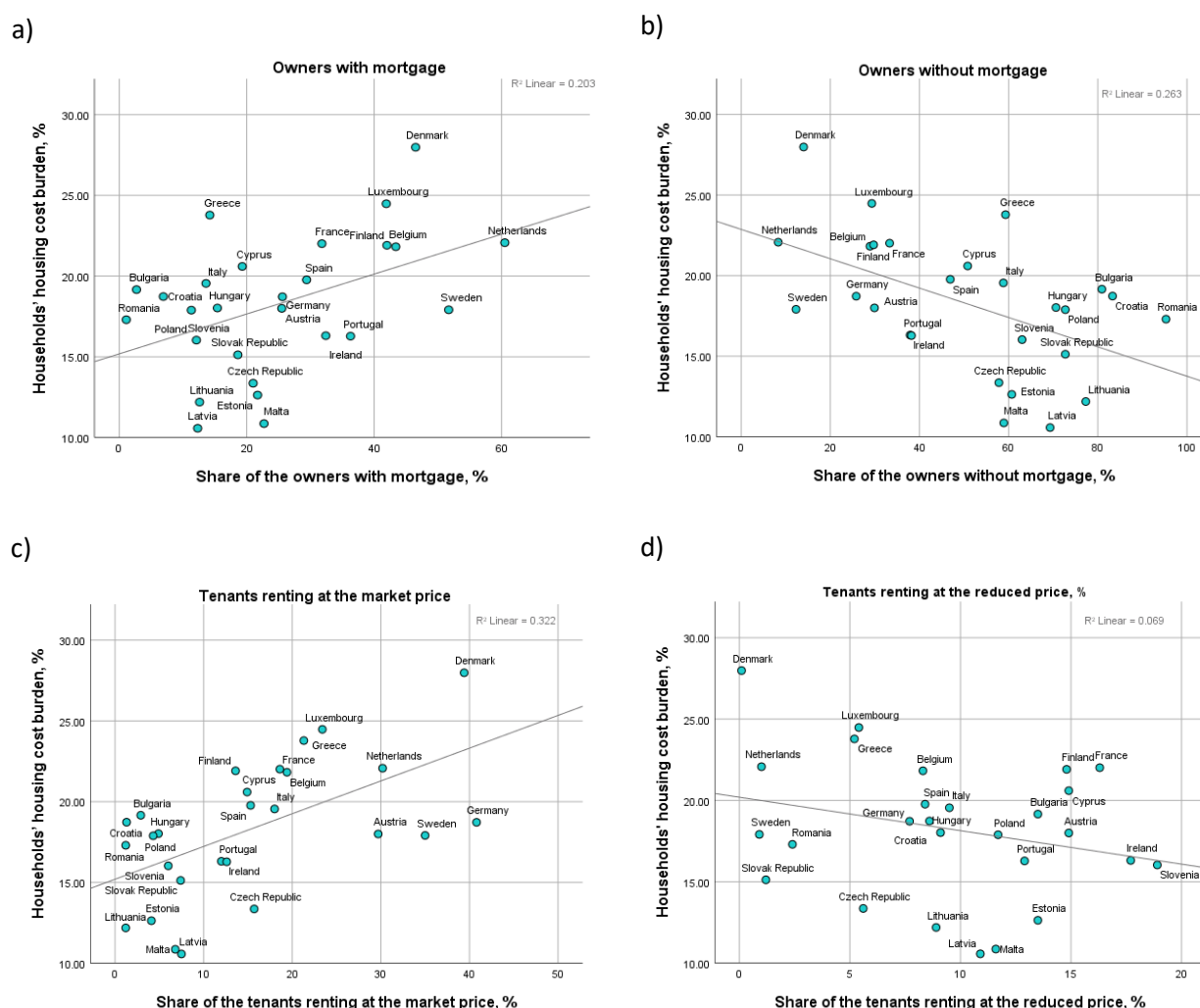
**Figure 17. Households' housing cost burden (mortgage and rent cost) as a share of disposable income in 2010 and 2019**

Data: OECD data

**Table 5. Person correlations between households' housing cost burden and tenure type, in 2018 (N=27)**

	OWNER	OWNER WITH MORTGAGE	OWNER NO MORTGAGE	TENANT	TENANT MARKET	TENANT REDUCED
<b>Households' housing cost burden</b>	-.481	.450	-.513*	.481	.567	-.263
<b>Sig. (2-tailed)</b>	.011	.018	.006	.011	.002	.184

(OECD and Eurostat data)



**Figure 18. The relationships between households' housing cost burden and tenure type, in 2018**

Data: OECD and Eurostat

Figure 19 compares housing affordability between mortgage holders and renters (as well as total) in EU countries. In general, the biggest burden of housing cost falls on the households in Denmark, Luxemburg and Greece. The differences based on tenure statuses are very small in Luxemburg, France, Ireland, Slovenia and Czechia. The discrepancy between renters and those with mortgages is very high in the Netherlands, Finland, Belgium, Sweden, and the affordability is very problematic for

the renters. Interestingly, the opposite is in Cyprus, Croatia, Slovakia, Latvia, and Malta where those with mortgages struggle more than those renting. However, an overall picture suggests that housing cost burden is typically higher for the renters compared to mortgage holders in most EU countries. Such data support the fact that the policies to promote home ownership are already in place in many countries (see Section 2). It is worth noting that tenants are more likely to be lower-income residents, and those who own houses with or without mortgages are more likely to be middle- or high-income earners. It is therefore not surprising that the burden of housing costs is higher for the low-income population and, unfortunately, this creates a kind of a vicious circle from which it is difficult for the low-income population to escape. This is in line with the previous studies (Pittini *et al.*, 2019; Whitehead and Scanlon 2007).



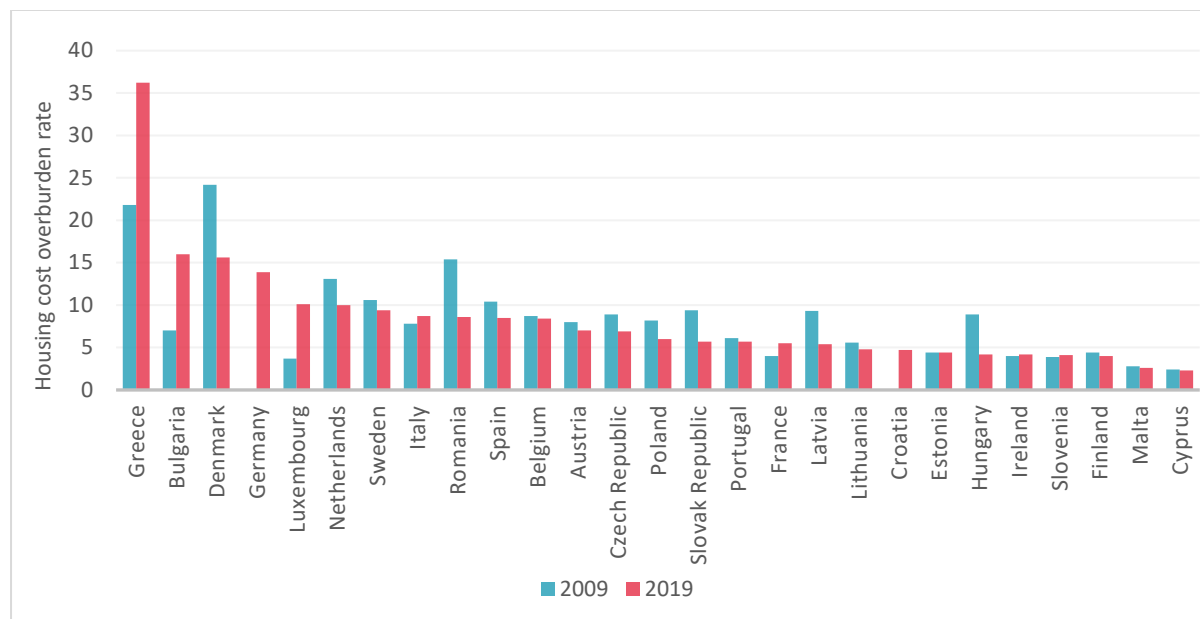
**Figure 19. Households’ housing cost burden; comparison between mortgage holders, renters and the total, in 2018**

Data: Eurostat

Our analysis also includes the indicator **Housing cost overburden rate**,<sup>6</sup> which is derived from the indicator just presented. These two indicators are complementary, but are not strongly correlated ( $r = -.449$ ,  $p = .019$ ,  $N=27$ ). If households’ housing cost burden is calculated as a share of disposable income, housing cost overburden rate indicates the percentage of households that spend more than 40% of their income on housing costs. Thus, the higher the value of the indicator, the lower the affordability of housing in the country. In terms of overburden rate, huge differences are observed between the countries, where in Greece this rate is exceptionally high (in 2019 one third of the households spent at least 40% of their disposable income on housing costs). The rate was also relatively high in Bulgaria and Denmark. Interestingly, while in most of the EU countries the overburden rate has dropped, it has increased significantly in Greece, Bulgaria and Luxemburg over

<sup>6</sup> According to Eurostat, “This indicator is defined as the percentage of the population living in a household where the total housing costs (net of housing allowances) represent more than 40% of the total disposable household income (net of housing allowances) presented by age groups” (Eurostat dataset details, 2021b).

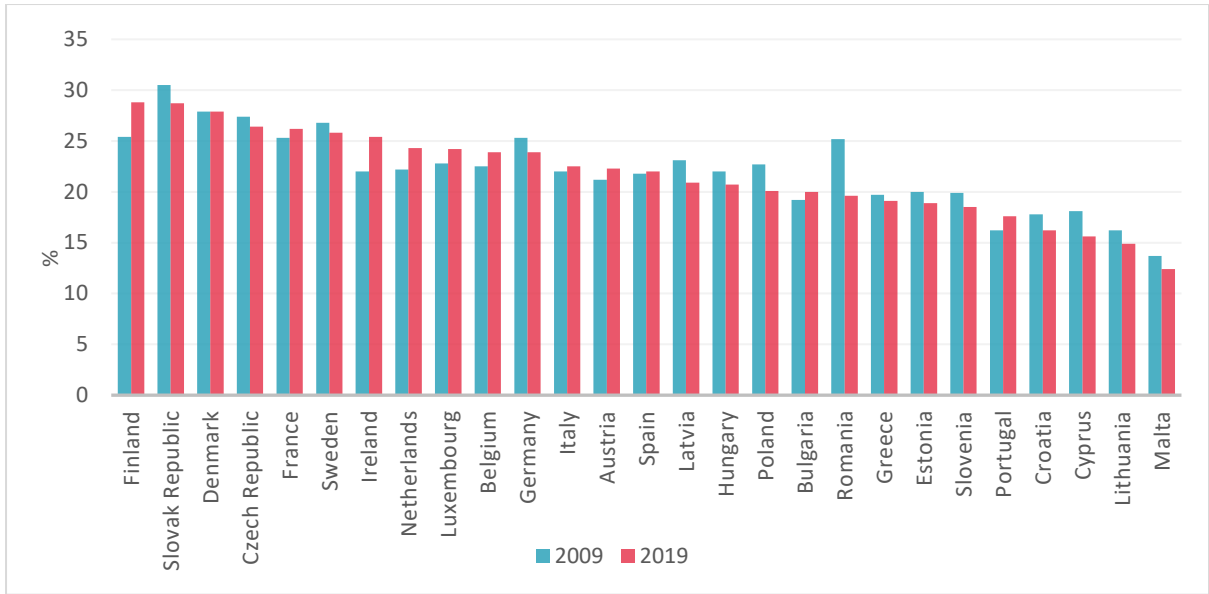
the decade. This warns of negative trends in the housing market in these countries and implies that it is becoming increasingly difficult to secure housing rights there.



**Figure 20. Housing cost overburden rate in 2009 and 2019**

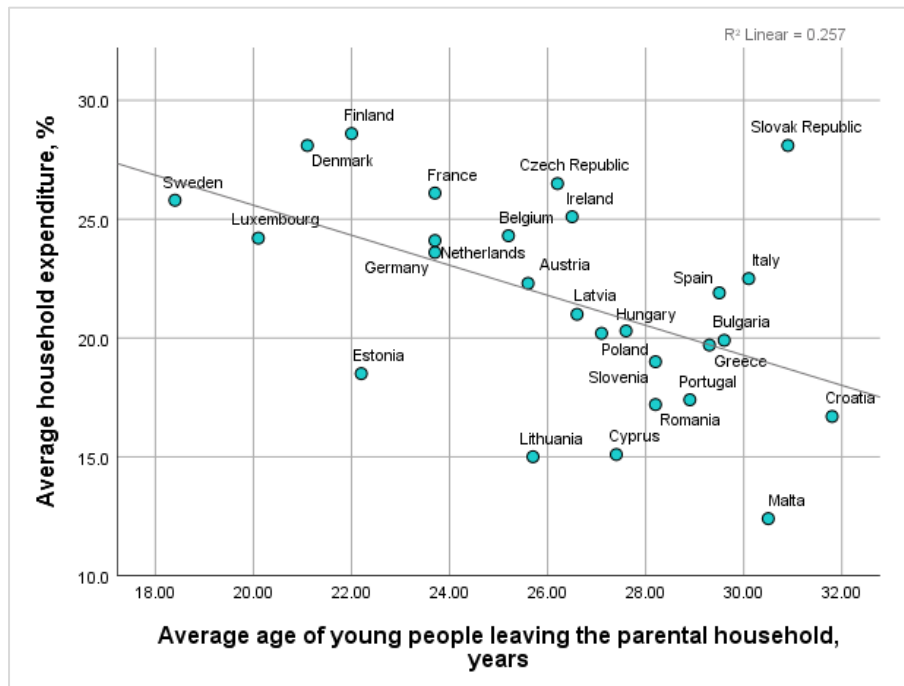
Data: Eurostat data

On average, in the EU almost a quarter of household income is allocated for housing, and the differences between countries are not exceptionally large; over the decade, the level of these expenditures has changed very little in most of the countries (Figure 21). Interesting relationships can be found between this variable and some other variables already discussed. For example, Figure 22 illustrates that the average household expenditure on housing-related costs is significantly lower when children live longer in the parental households ( $r = -.507$ ,  $p = .007$ ,  $N=27$ ). This can probably be explained by the fact that adult children living with their parents contribute to expenditures associated with housing, so in a sense they live more efficiently but also overcrowded. Unexpectedly, Figure 23 shows that higher household expenditure is associated with higher share of social rental housing ( $r = .417$ ,  $p = .031$ ,  $N=27$ ; without the Netherlands  $r = .476$ ,  $p = .014$ ,  $N=26$ ). Most likely this is because typically the social housing is occupied by those with lower incomes, and although they pay less for rent, the cost of maintaining housing still requires a large portion of their modest income. Therefore, in the absence of social housing in Western European countries, the affordability of housing is likely to be a real challenge for the low-income population.



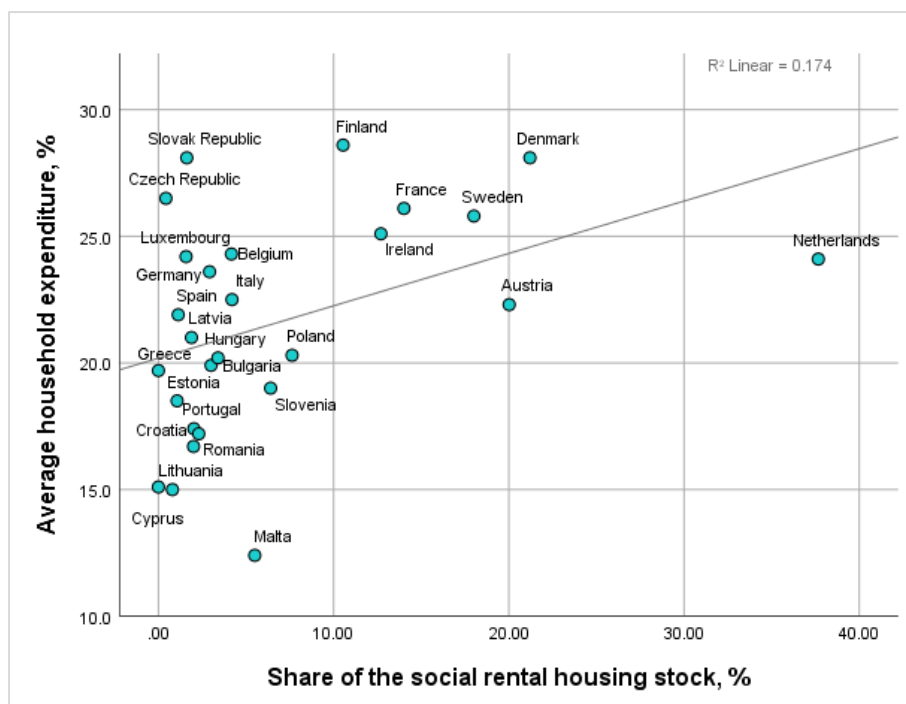
**Figure 21. Average household expenditure on housing, water, electricity, gas and other fuels, % of total household consumption expenditure in 2009 and 2019**

Data: Eurostat



**Figure 22. The relationship between the average household expenditure and the average age of young people leaving the parental household in 2018**

Data: Eurostat



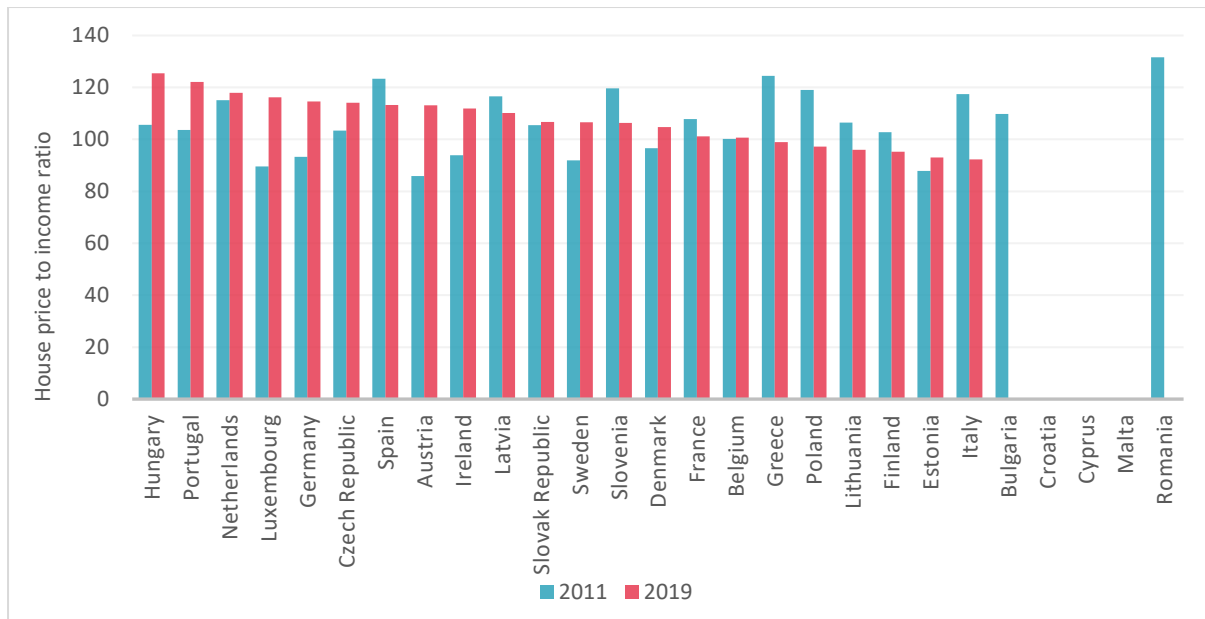
**Figure 23. The relationship between the average household expenditure and the share of the social rental housing stock in 2018**

Data: Eurostat and OECD

Figure 24 shows data on the *house price to income ratio*<sup>7</sup> and its change between 2011 and 2019 in the EU Member States. A higher ratio implies that it is more difficult to buy a house. It may be noted that the differences between countries diminish over time – the contrast between the highest and lowest values was higher in 2011 compared to 2019. In 2019, the house price to income ratio was the highest in Hungary, Portugal and the Netherlands. Interestingly, Figure 25 shows that price to income ratio negatively correlates with overcrowding ( $r = -.577, p = .004, N=27$ ), which suggests that the harder it is to afford housing in the country, the less it is overcrowded and vice versa. However, if this ratio is controlled by the housing tenure, the correlation becomes statistically insignificant.

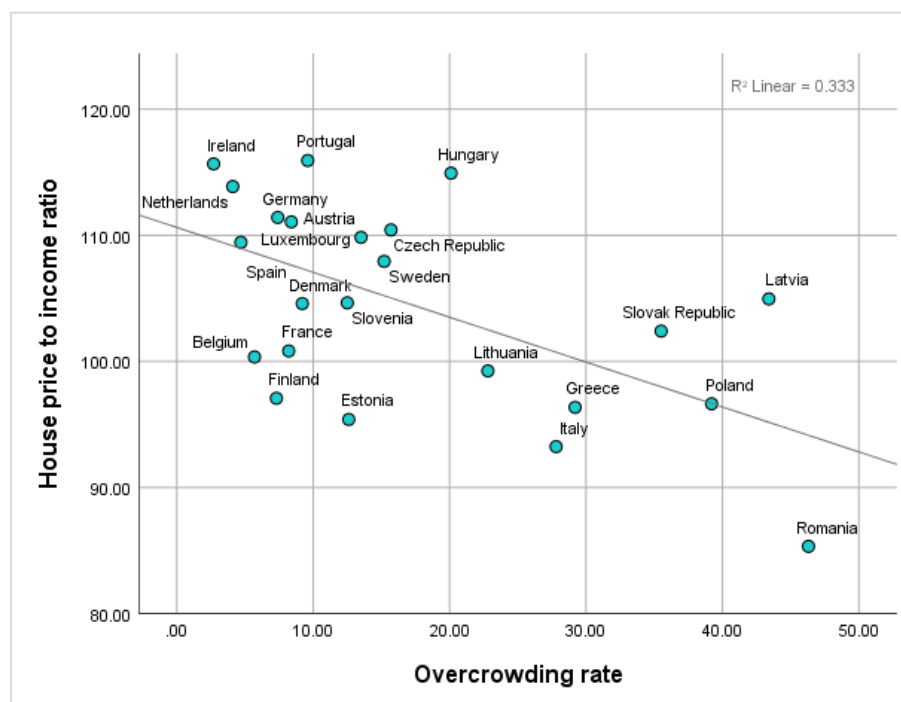
<sup>7</sup> According to OECD (2021), “The price to income ratio is the nominal house price index divided by the nominal disposable income per head and can be considered as a measure of affordability”.





**Figure 24. The house price to income ratio; 2015=100, annual rate of change**

Data: OECD data

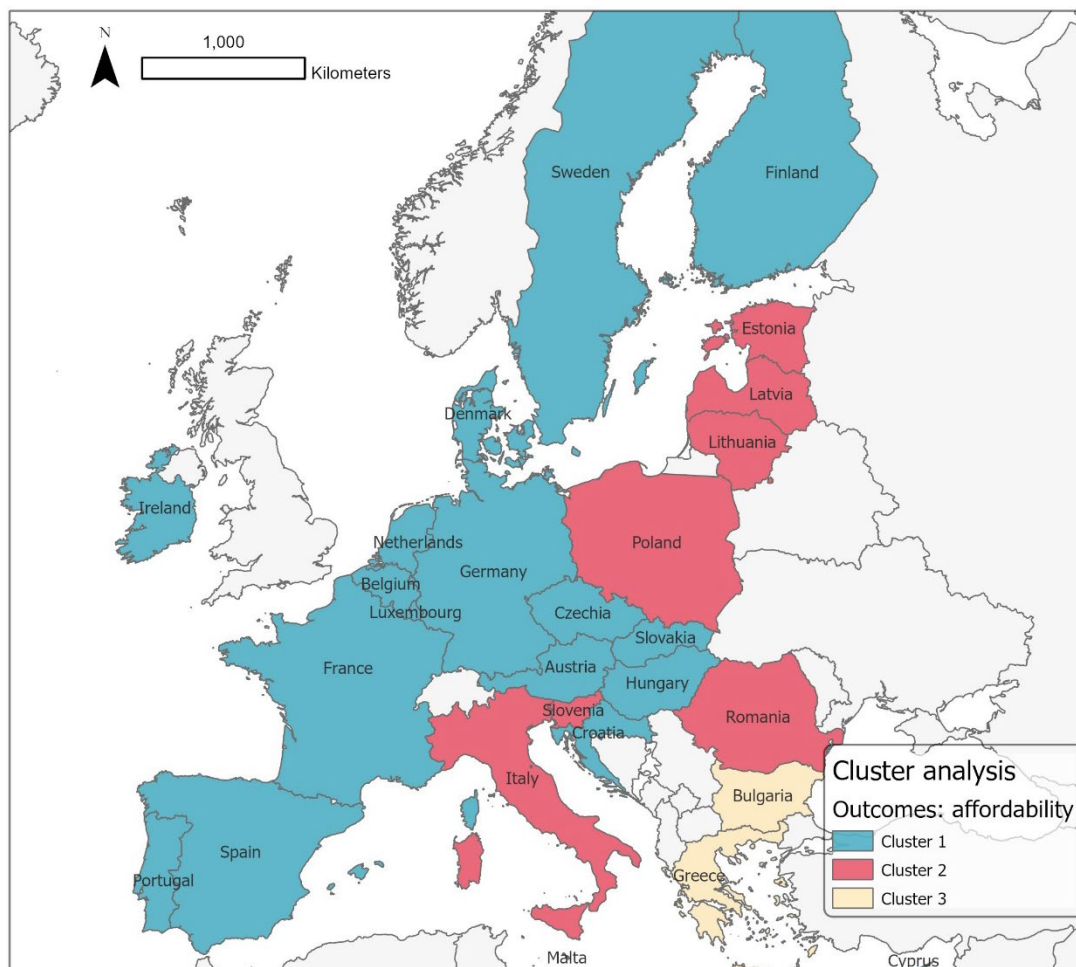


**Figure 25. The relationship between the house price to income ratio and overcrowding rate, 2018**

Data: OECD and Eurostat

The map in Figure 26 summarises the section on housing affordability by providing the results of the cluster analysis, where we can see EU countries being distributed into three clusters. The formation of these clusters is based on four indicators: *households' housing cost burden, housing cost overburden rate, average household expenditure on housing, water, etc., and house price to income ratio*. The results show that the lower affordability is in the Northern and Continental Europe, including continental CEE countries and some Southern European countries (blue cluster). Despite the relative disadvantage of these countries in terms of the indicators analysed, they are characterised by higher

wages, better policies at keeping the cost of housing lower, more state intervention in the housing policy. Housing is relatively more affordable in many CEE countries (Estonia, Latvia, Lithuania, Poland, Romania, Slovenia) and Italy (red colour). These countries are characterised by relatively lower wages, less state intervention in the housing market, and housing policy liberalization and marketization. According to results of the cluster analysis, Greece and Bulgaria forms a separate cluster (yellowish color). In case of Bulgaria, it happened because of some missing values; and in case of Greece - because of some extreme values – high housing cost overburden, but low household expenditure and low house price to income ratio.



**Figure 26. Cluster analysis for the housing affordability, 2018 (authors' elaboration)**

Note: Cluster 1 – Lower housing affordability; Cluster 2 – Higher housing affordability; Cluster 3 – No clear trend

Data: OECD and Eurostat

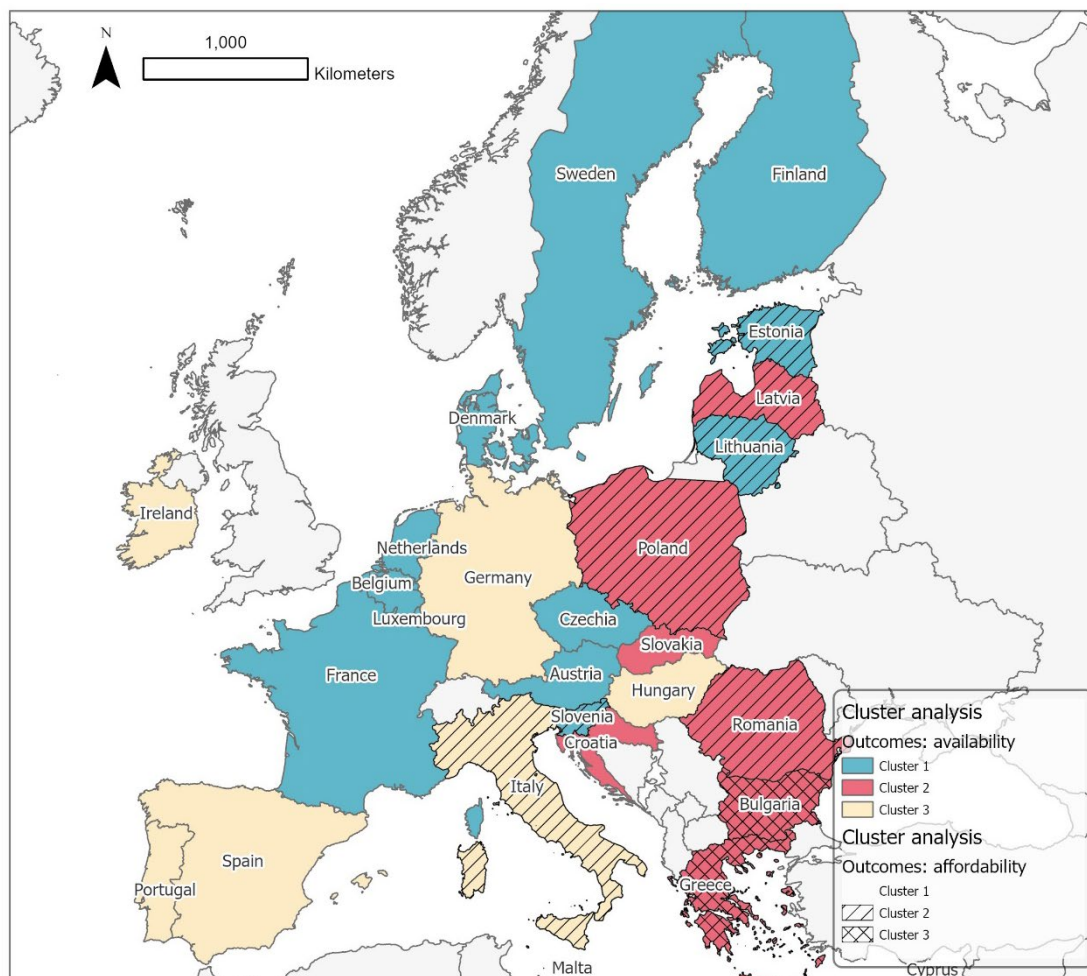
**Table 6** (supplementing Figure 26). **The results of the cluster analysis** (authors' calculations)

	EXPENDITURE ON HOUSING, WATER, ETC.	OVERBURDEN RATE	HOUSING COST BURDEN	HOUSE PRICE TO INCOME RATIO	CLUSTER
<b>Austria</b>	22.3	6.8	18.0	109.8	1
<b>Belgium</b>	24.3	8.9	21.8	100.4	1
<b>Croatia</b>	16.7	5.1	18.7	.	1
<b>Cyprus</b>	15.1	2.0	20.6	.	1
<b>Czech Rep.</b>	26.5	7.8	13.4	110.4	1
<b>Denmark</b>	28.1	14.7	28.0	104.6	1
<b>Finland</b>	28.6	4.3	21.9	97.1	1
<b>France</b>	26.1	4.7	22.0	100.8	1
<b>Germany</b>	23.6	14.2	18.7	111.4	1
<b>Hungary</b>	20.2	9.6	18.0	114.9	1
<b>Ireland</b>	25.1	3.4	16.3	115.7	1
<b>Luxembourg</b>	24.2	9.6	24.5	111.1	1
<b>Netherlands</b>	24.1	9.4	22.1	113.9	1
<b>Portugal</b>	17.4	5.7	16.3	115.9	1
<b>Slovak Rep.</b>	28.1	4.1	15.1	102.4	1
<b>Spain</b>	21.9	8.9	19.8	109.4	1
<b>Sweden</b>	25.8	8.3	17.9	107.9	1
<b>Estonia</b>	18.5	4.0	12.6	95.4	2
<b>Italy</b>	22.5	8.2	19.6	93.2	2
<b>Latvia</b>	21.0	6.7	10.6	105.0	2
<b>Lithuania</b>	15.0	5.6	12.2	99.3	2
<b>Malta</b>	12.4	1.7	10.9	.	2
<b>Poland</b>	20.3	6.2	17.9	96.6	2
<b>Romania</b>	17.2	10.3	17.3	85.3	2
<b>Slovenia</b>	19.0	4.9	16.0	104.7	2
<b>Bulgaria</b>	19.9	17.9	19.2	.	3
<b>Greece</b>	19.7	39.5	23.8	96.4	3

Data: OECD and Eurostat

The map in Figure 27 shows the overlap between our estimated affordability and availability of housing in European countries. It could be argued that countries that are characterized by lower housing availability and lower affordability, are experiencing more tensions in the housing market. Based on our results, Scandinavian and Benelux countries as well as France, Czechia and Austria fall into this group. Conversely, those countries with higher housing availability and affordability have more liberalized housing markets, making it easier to ensure human rights to housing. The only country that clearly falls into this category, is Italy. There are also cases, where the availability is high, but the affordability is low. In other words, housing supply is sufficient, but housing is expensive. Based on our results, this can be seen in Germany, Hungary, Spain, Portugal and Ireland. And finally, there are situations where housing availability is low, but its affordability is high; this is more common in Estonia, Lithuania and Slovenia. Thus, these results show great diversity in the European countries in terms of the housing availability and affordability as well as the relationship between them. It also

implies that the countries face different challenges that also require very different solutions to ensure housing rights.



**Figure 27. Cluster analysis: housing affordability and availability, 2018** (authors' elaboration)

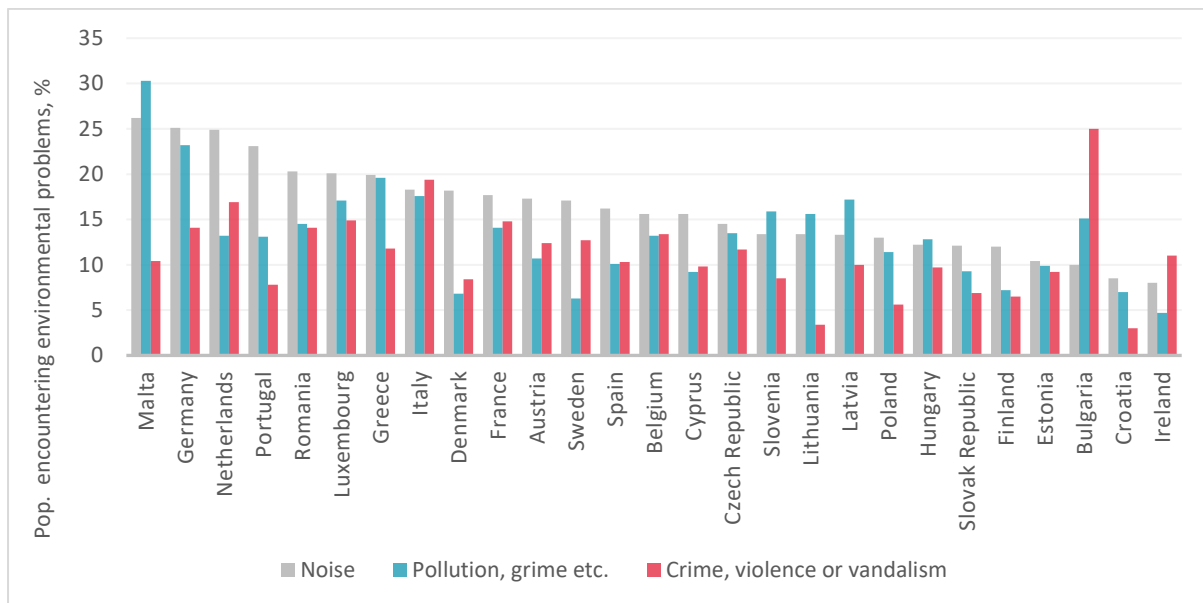
Note: Cluster 1 + Cluster 1 = lower availability and affordability; Cluster 1 + Cluster 2 = lower availability and higher affordability; Cluster 2 + Cluster 2 = moderate housing availability and higher housing affordability; Cluster 3 + Cluster 1 = higher availability and lower affordability; Cluster 3 + Cluster 2 = higher availability and higher affordability  
 Data: OECD and Eurostat

### 3.2.3 Adequacy

Besides housing availability and affordability, another important parameter to consider when assessing the right to housing, is housing adequacy. Adequacy is associated with adequate living conditions, such as security, privacy, space, lighting, temperature and ventilation, basic infrastructure, and access to facilities (such as health, food, etc.) – all provided at reasonable cost (United Nations, 2009). In short, adequacy means the right to housing of acceptable quality. This section overviews some of the problems of housing adequacy encountered by the residents of the EU Member States.

Figure 28 shows the proportion of the population facing environmental problems in/around their dwelling. For example, 25% of the population in Bulgaria and nearly 20% in Italy reported 'crime,

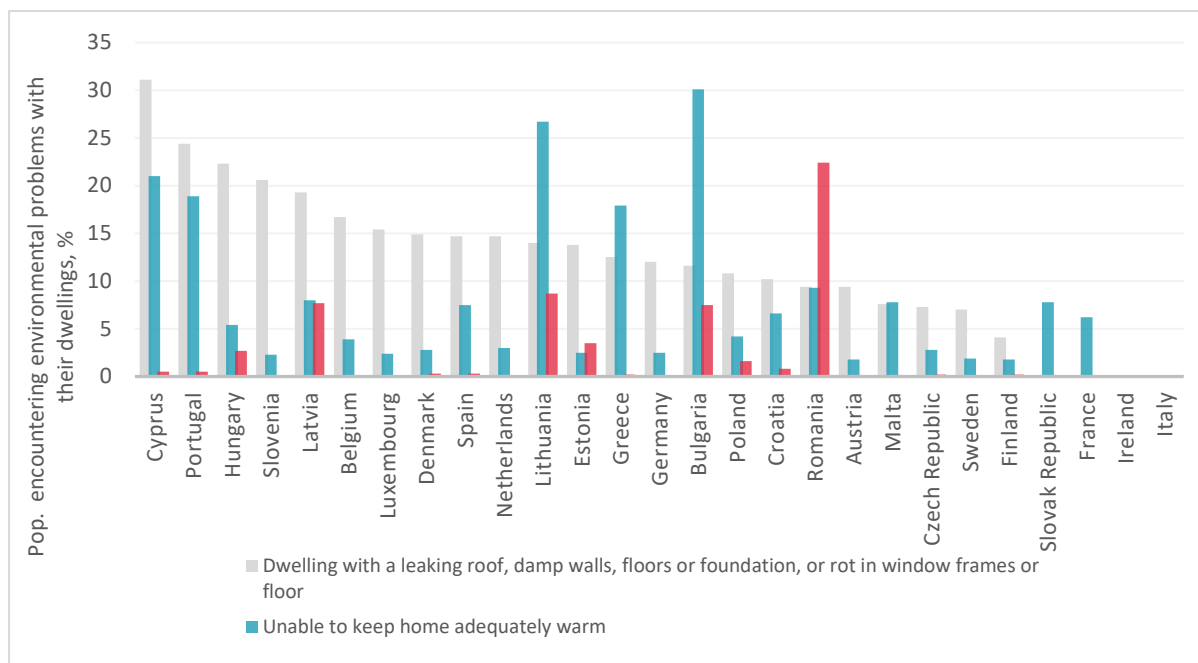
violence and vandalism’ as significant problems around their dwelling; the residents of Croatia and Lithuania face these problems the least. ‘Pollution, grime etc.’ are the biggest problems in Malta (30%) and Germany (23%), while the residents of the Nordic countries (Sweden, Denmark, Finland) together with Croatia and Ireland, are least affected by such environmental problems. Noise is reported as major issue in Malta, Germany, and the Netherlands, but it is not a significant problem in Ireland, Croatia, Bulgaria, and Estonia. In general, in countries that are more densely populated and have large cities, the living environment of people is of greater concern.



**Figure 28. Share of population encountering environmental problems in/around their dwelling, 2018**

Data: Eurostat

Figure 29 shows that the share of the population experiencing housing deprivation (i.e., problems with dwellings) varies widely across countries. This deprivation is higher in the CEE countries and in the South European countries, compared to the rest of the EU. The deprivation is lowest in the Northern and Continental Europe. The highest share of the population unable to keep their home adequately warm is found in Bulgaria (around 32%) and Lithuania (around 20%), also in Cyprus (17%), Greece (16%) and Portugal (15%). The highest share of population having neither a bath, nor a shower, nor indoor flushing toilet in their household can be found in Romania (22%). About 16–19% of the residents of Cyprus, Slovenia and Portugal, Hungary, and Latvia have experienced problems, such as leaking roofs, damp walls, floors or foundation, or rot in window frames or floor.

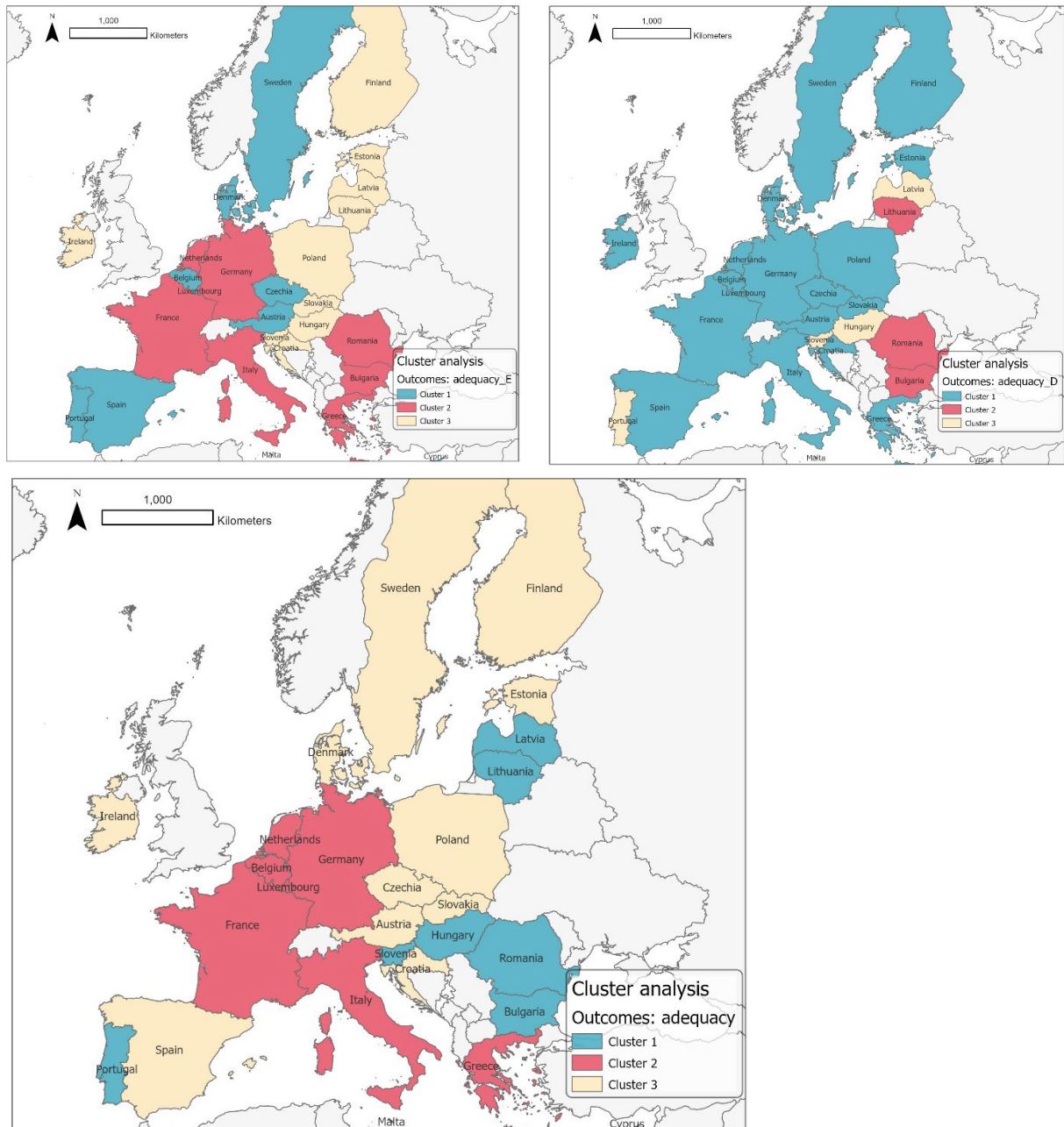


**Figure 29. Share of population encountering problems with their dwellings, 2019**

Data: Eurostat data

We performed several cluster analyses to evaluate housing adequacy in EU countries (Figure 30). The map at the top left illustrates the extent of the environmental problems around the dwelling (noise, pollution, crime etc.). The results show that residents of the CEE countries, as well as Finland and Ireland experience these environmental issues to a lesser extent (yellowish cluster), while the residents in most of the Western European countries and Balkans (red cluster) face these problems most often. The remaining countries (blue cluster) are in the intermediate position. Map at the top right illustrates problems encountered with the dwellings (leaking roof, cold apartments, etc.). The pattern presented in the map could be interpreted as follows: Romania, Bulgaria and Lithuania stand out for the lowest quality of housing (red cluster), somewhat better quality of housing is found in Latvia, Hungary, Slovenia, and Portugal (yellowish cluster). Meanwhile, the rest of Europe (and much of Europe) has rather good housing quality (blue cluster). Interestingly, the two maps (or adequacy assessment indicators) generate quite opposite results, meaning that in the European countries the quality of the environment and the quality of housing itself most of the time do not coincide. This implies that housing policy, in this regard, must also be differentiated. Finally, the map at the bottom depicts the aggregated result of the two maps. However, the results of this map are quite difficult to interpret, because of the above-mentioned outcomes; most likely the yellowish cluster associates with the higher adequacy, and blue cluster with the lowest adequacy.





**Figure 30. Cluster analysis for the housing adequacy; top left – environmental problems experienced around the dwelling, top right – environmental problems experienced with the dwelling, bottom – aggregated results, 2018 (authors' elaboration)**

Note: Top left: Cluster 1 – Moderate adequacy; Cluster 2 – Lower adequacy; Cluster 3 – Higher adequacy

Top rights: Cluster 1 – Higher adequacy; Cluster 2 – Lower adequacy; Cluster 3 – Moderate adequacy

Bottom: Cluster 1 – Lower adequacy; Cluster 2 – Moderate adequacy; Cluster 3 – Higher adequacy

Data: Eurostat

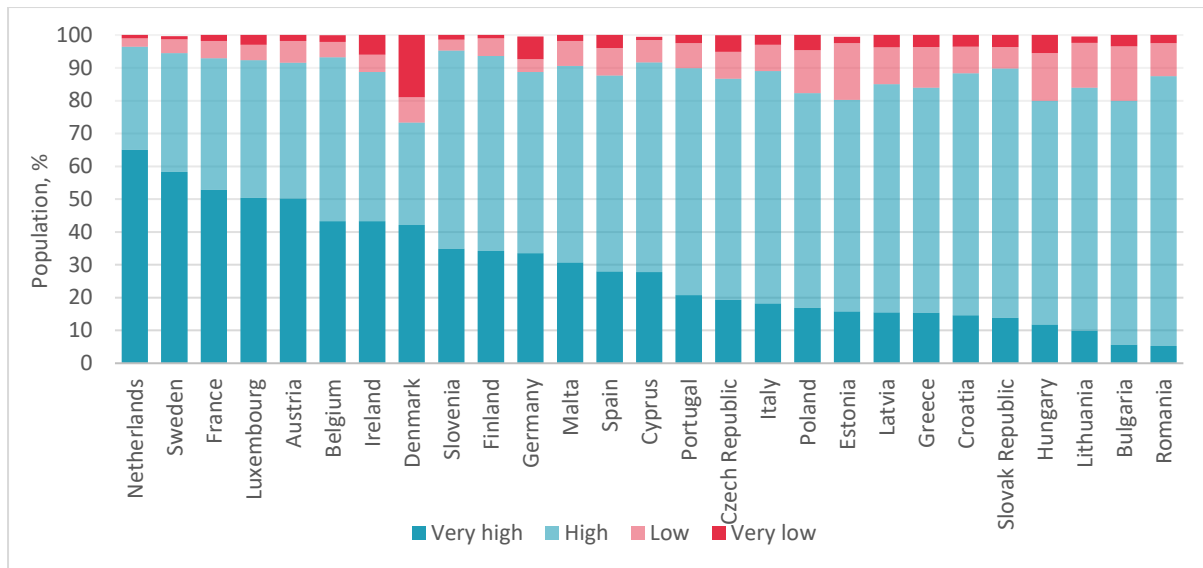


**Table 7** (supplementing Figure 29). **The results of the cluster analysis** (authors' calculation)

	NOISE	POLLUTION, GRIME	CRIME, VIOLENCE, VANDALISM	CLUSTER		LEAKING ROOF, ETC	NOT ADEQUATELY WARM	DOES NOT HAVE BATH, TOILET	CLUSTERS
Austria	17.3	10.7	12.4	1	Luxembourg	18.3	2.1	0	1
Belgium	15.6	13.2	13.4	1	Belgium	17.9	5.2	0.1	1
Cyprus	15.6	9.2	9.8	1	Denmark	16.4	3	0.4	1
Czech Rep.	14.5	13.5	11.7	1	Spain	15.9	9.1	0.2	1
Denmark	18.2	6.8	8.4	1	Netherlands	15.8	2.2	0	1
Portugal	23.1	13.1	7.8	1	Estonia	13.6	2.3	4	1
Spain	16.2	10.1	10.3	1	Germany	13.4	2.7	0	1
Sweden	17.1	6.3	12.7	1	Italy	13.2	14.1	0.3	1
Bulgaria	10	15.1	25	2	Greece	12.9	22.7	0.2	1
France	17.7	14.1	14.8	2	France	12.7	5	0.3	1
Germany	25.1	23.2	14.1	2	Ireland	11.9	4.4	0	1
Greece	19.9	19.6	11.8	2	Poland	11.6	5.1	2	1
Italy	18.3	17.6	19.4	2	Croatia	11.2	7.7	1.1	1
Luxembourg	20.1	17.1	14.9	2	Austria	10.4	1.6	0.3	1
Malta	26.2	30.3	10.4	2	Sweden	7.8	2.3	0	1
Netherlands	24.9	13.2	16.9	2	Czech Rep.	7.7	2.7	0.3	1
Romania	20.3	14.5	14.1	2	Malta	7.1	7.6	0	1
Estonia	10.4	9.9	9.2	3	Slovak Rep.	5.1	4.8	1	1
Finland	12	7.2	6.5	3	Finland	4.6	1.7	0.2	1
Hungary	12.2	12.8	9.7	3	Lithuania	14.8	27.9	9.1	2
Ireland	8	4.7	11	3	Bulgaria	13	33.7	8.9	2
Latvia	13.3	17.2	10	3	Romania	10.1	9.6	25.6	2
Lithuania	13.4	15.6	3.4	3	Cyprus	30.2	21.9	0.5	3
Poland	13	11.4	5.6	3	Portugal	26.9	19.4	0.6	3
Slovak Rep.	12.1	9.3	6.9	3	Latvia	23.5	7.5	9	3
Slovenia	13.4	15.9	8.5	3	Slovenia	22.7	3.3	0.1	3
Croatia	8.5	7	3	3	Hungary	22.5	6.1	3.4	3

Data: Eurostat

Based on the above results, the adequacy of housing is relatively high in EU countries, except for Romania and Bulgaria. The assessment of housing deprivation can be expected to largely coincide with the overall housing satisfaction rate. Indeed, Figure 31 shows that overwhelming majority of the EU households were very satisfied or satisfied with their housing in 2012. Those who were dissatisfied (rated their satisfaction as low and very low) comprised 12% of the total. Residents of Western European countries are most satisfied with their housing. The case of Denmark is exceptional, as almost 20% of the population expressed a very low level of satisfaction. This can be attributed to very critical assessments and high expectations. Residents from no other country have reported such high level of dissatisfaction, even in Eastern Europe, where satisfaction with housing is generally much lower. As expected, Romania and Bulgaria are again in last places in this respect.



**Figure 31. Distribution of population by level of overall satisfaction with the dwelling and household type, 2012**

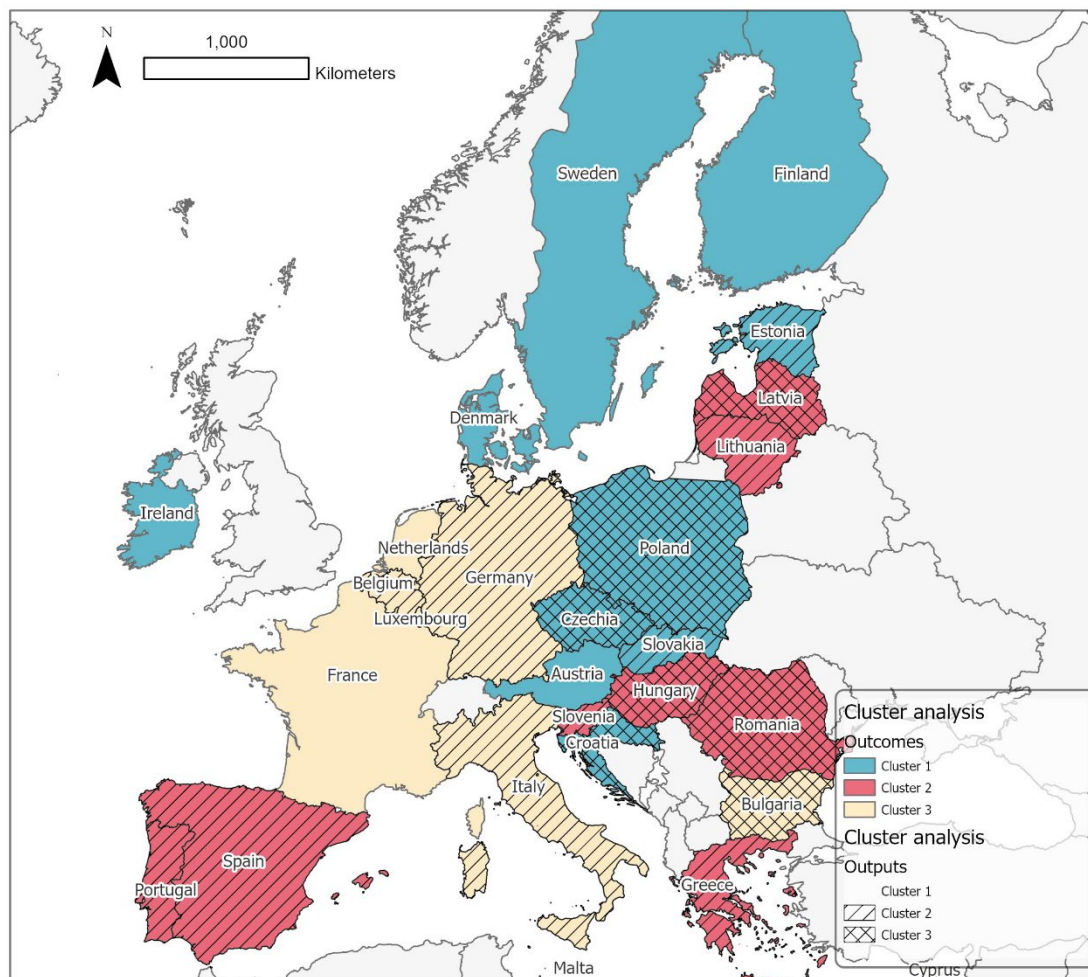
Data: Eurostat

### 3.2.4 Additional remarks

In Figure 32, we overlapped two maps – the map which visualises clusters with the output indicators (see Figure 10) with the map which visualises all outcome indicators together. Although the housing sector is too complex to allow drawing very simple conclusions, we will still try to speculate a little on the basis of the results of our study. The results could be summarised as follows:

- Medium government expenditure, large social rental housing and higher quality of outcomes (Sweden, Finland, Denmark, Ireland and Austria).
- Higher government expenditure, small social housing stock and higher quality of outcomes (Estonia and Slovakia).
- Low government expenditure, small social housing stock and higher quality of outcomes (Poland, Chechia, Croatia).
- Medium government expenditure, large social rental housing and lower quality of outcomes (none).
- Higher government expenditure, small social housing stock and lower quality of outcomes (Lithuania, Portugal, Spain, Greece, Slovenia).
- Low government expenditure, small social housing stock and lower quality of outcomes (Latvia, Hungary, Romania).
- Medium government expenditure, large social rental housing and moderate quality of outcomes (Netherlands, France, Luxembourg).
- Higher government expenditure, small social housing stock and moderate quality of outcomes (Germany, Belgium, Italy).
- Low government expenditure, small social housing stock and higher quality and moderate quality of outcomes (Bulgaria).

It is remarkable that the countries were found to fall into all (except one) categories listed above. This reaffirms the fact that European countries, despite their convergence in terms of individual housing indicators, still retain some differences, which are largely defined by housing regimes being associated with the welfare state models. These results also reaffirm the different challenges faced by EU countries. Some countries should be more concerned about how to deal with accessibility issues, while others should focus more on the affordability or adequacy issues. Therefore, one solution designed for all countries is not suitable at all when it comes to finding solutions to secure housing rights in European Union countries.



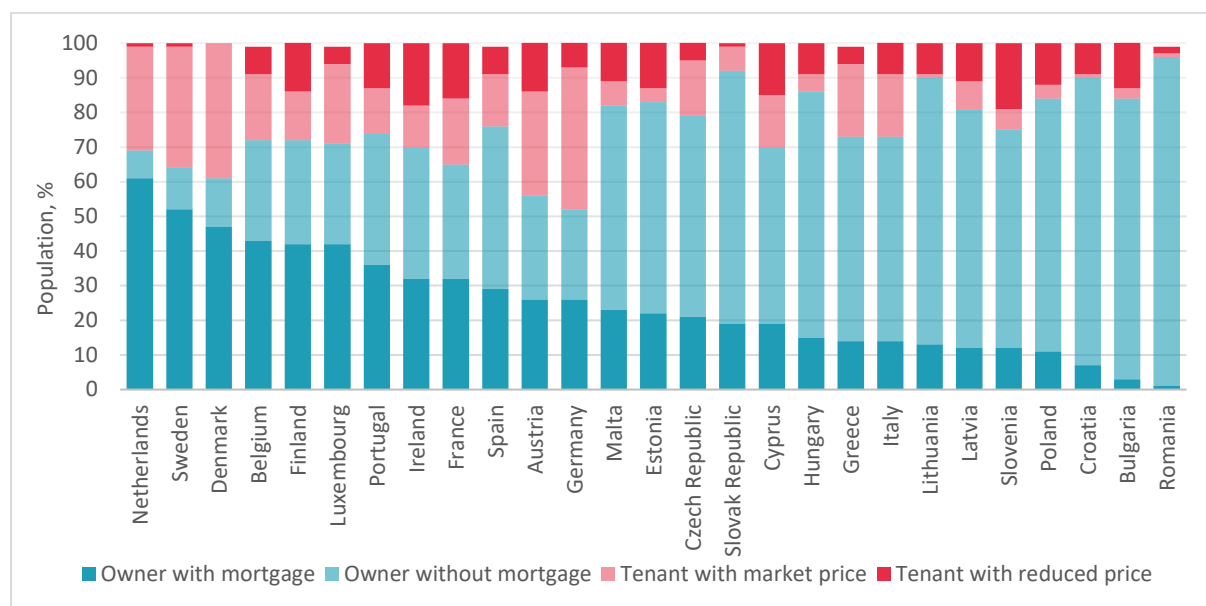
**Figure 32. Cluster analysis: output and outcome indicators, 2018 (authors' elaboration)**

Note: Cluster 1 + Cluster 1 = Medium government expenditure, large social rental housing and higher quality of outcomes; Cluster 1 + Cluster 2 = Higher government expenditure, small social housing stock and higher quality of outcomes; Cluster 1 + Cluster 3 = Low government expenditure, small social housing stock and higher quality of outcomes; Cluster 2 + Cluster 1 = Medium government expenditure, large social rental housing and lower quality of outcomes; Cluster 2 + Cluster 2 = Higher government expenditure, small social housing stock and lower quality of outcomes; Cluster 2 + Cluster 3 = Low government expenditure, small social housing stock and lower quality of outcomes; Cluster 3 + Cluster 1 = Medium government expenditure, large social rental housing and moderate quality of outcomes; Cluster 3 + Cluster 2 = Higher government expenditure, small social housing stock and moderate quality of outcomes; Cluster 3 + Cluster 3 = Low government expenditure, small social housing stock and higher quality and moderate quality of outcomes

Data: Eurostat and OECD

In addition to all the indicators discussed above, more attention should be paid to the ownership structure, as it has the greatest impact on the other indicators. European societies in general are

homeowners' societies, but there are clear differences between countries (Figure 33). In the Benelux and the Nordic countries, owners with mortgages predominate. Meanwhile, in the Eastern, Central and Southern Europe, the majority of people live in their own homes without mortgages. More mixed pattern in terms of forms of tenure status can be found in Germany, Austria, France, Ireland. In the Continental Europe (Belgium, Luxemburg, France, Germany), the distribution is more even between ownership with and without mortgage holders. Among tenants, in many countries, there are more of those who rent at a market price than those who rent at the reduced price. Renting at a reduced price is more common in the CEE countries (Slovenia, Ireland, France, Cyprus). The structure of housing in European countries, as we see it now, has been in the process of shaping up for a long time, and influenced by various historical events and housing policies, discussed in Section 2.



**Figure 33. Distribution of population by tenure status, 2018**

Data: Eurostat data

Overall, in Section 3, we examined the relationships between and within the output and outcome indicators. Table 8 provides a full layout of the relationships between the selected indicators, showing that those relationships are very diverse. We will not discuss them in detail, as the most meaningful correlations have been discussed above. However, it is worthy of attention that the tenure status has the most (with respect to numbers) correlations with various other indicators, specifically with the overcrowding rate, age at which young people leave parental household, housing cost over income index, housing cost over income, housing deprivation, among other. However, as we have learned, this does not necessarily suggest that some types of tenure (e.g., owners without mortgages) have more advantages over other types of tenure. It is also interesting (we have also discussed this above), that the level of government expenditure has very few significant relationships with other indicators.

**Table 8. Correlations between output and outcome variables (authors' calculations)**

	General government expenditure on housing and community amenities	Social rental housing stock (% of total housing stock)	Overcrowding rate, %	Average age of young people leaving the parental household	Housing costs over income, total	Housing costs over income, mortgage	Housing costs over income, rent	Housing cost overburden rate, %	Average household expenditure on housing, water...	House price to income ratio	Share of population living in a dwelling with a leaking roof, etc.	Share of population unable to keep home adequately warm, %	Share of population having neither a bath, nor a shower...	Tenure status: owner	Tenure status: owner with mortgage	Tenure status: owner without mortgage	Tenure status: tenant	Tenure status: tenant rent at market price	Tenure status: tenant rent at reduced price or free
General government expenditure on housing and community amenities	1	-0.259	0.356	0.369	-0.043	.469*	-0.287	-0.222	-0.337	-0.069	0.190	0.183	0.227	0.334	-.428*	.432*	-0.334	-0.375	0.142
Social rental housing stock (% of total housing stock)	-0.259	1	-0.335	-.456*	0.359	-0.234	.467*	-0.066	.417*	0.278	-0.167	-.407*	-0.240	-.499**	.663**	-.660**	-.499**	.552**	-0.189
Overcrowding rate, %	0.356	-0.335	1	.446*	-0.241	-0.145	-0.320	0.241	-0.196	-.577**	-0.179	0.321	.619**	.640**	-.715**	.758**	-.640**	-.501**	-0.204
Average age of young people leaving the parental household	0.369	-.456*	.446*	1	-0.328	0.227	-.553**	0.045	-.507**	-0.160	0.049	.455*	0.155	.545**	-.690**	.698**	-.545**	-.597**	0.198
Housing costs over income, total	-0.043	0.359	-0.241	-0.328	1	.554**	.801**	.449*	.443*	0.002	0.089	-0.058	-0.273	-.481*	.450*	-.513**	.481*	.567**	-0.263
Housing costs over income, mortgage	.469*	-0.234	-0.145	0.227	.554**	1	0.039	0.105	-0.066	0.016	0.317	0.170	-0.320	-0.045	-0.056	0.016	0.045	-0.028	0.147
Housing costs over income, rent	-0.287	.467*	-0.320	-.553**	.801**	0.039	1	0.314	.525**	0.006	0.031	-0.222	-0.189	-.476*	.608**	-.613**	.476*	.572**	-0.282
Housing cost overburden rate, %	-0.222	-0.066	0.241	0.045	.449*	0.105	0.314	1	0.067	-0.145	-0.037	0.352	0.052	-0.139	-0.095	-0.003	0.139	0.293	-0.357
Average household expenditure on housing, water...	-0.337	.417*	-0.196	-.507**	.443*	-0.066	.525**	0.067	1	0.222	-0.359	-.532**	-0.345	-.451*	.559**	-.569**	.451*	.551**	-0.290
House price to income ratio	-0.069	0.278	-.577**	-0.160	0.002	0.016	0.006	-0.145	0.222	1	0.365	-0.244	-.534**	-.424*	.478*	-.509*	.424*	0.370	0.056
Share of population living in a dwelling with a leaking roof, etc.	0.190	-0.167	-0.179	0.049	0.089	0.317	0.031	-0.037	-0.359	0.365	1	0.286	-0.029	-0.086	-0.013	-0.031	0.086	-0.038	0.257
Share of population unable to keep home adequately warm, %	0.183	-.407*	0.321	.455*	-0.058	0.170	-0.222	0.352	-.532**	-0.244	0.286	1	0.299	0.314	-.463*	.444*	-0.314	-0.355	0.138
Share of population having neither a bath, nor a shower...	0.227	-0.240	.619**	0.155	-0.273	-0.320	-0.189	0.052	-0.345	-.534**	-0.029	0.299	1	.576**	-.518**	.600**	-.576**	-.463*	-0.156
Tenure status: owner	0.334	-.499**	.640**	.545**	-.481*	-0.045	-.476*	-0.139	-.451*	-.424*	-0.086	0.314	.576**	1	-.616**	.860**	-1.000**	-.889**	-0.085
Tenure status: owner with mortgage	-.428*	.663**	-.715**	-.690**	.450*	-0.056	.608**	-0.095	.559**	.478*	-0.013	-.463*	-.518**	-.616**	1	-.932**	.616**	-.698**	-0.274
Tenure status: owner without mortgage	.432*	-.660**	.758**	.698**	-.513**	0.016	-.613**	-0.003	-.569**	-.509*	-0.031	.444*	.600**	.860**	-.932**	1	-.860**	-.863**	0.139
Tenure status: tenant	-0.334	.499**	-.640**	-.545**	.481*	0.045	.476*	0.139	.451*	.424*	0.086	-0.314	-.576**	-1.000**	.616**	-.860**	1	.889**	0.085
Tenure status: tenant rent at market price	-0.375	.552**	-.501**	-.597**	.567**	-0.028	.572**	0.293	.551**	0.370	-0.038	-0.355	-.463*	-.889**	.698**	-.863**	.889**	1	-0.380
Tenure status: tenant rent at reduced price or free	0.142	-0.189	-0.204	0.198	-0.263	0.147	-0.282	-0.357	-0.290	0.056	0.257	0.138	-0.156	-0.085	-0.274	0.139	0.085	-0.380	1

Note: significant correlations are in blue; darker color indicates stronger correlation

Data: Eurostat and OECD

### 3.3 Discussion and conclusions: Outputs vs Outcomes

In this section, we have carried out a comparative analysis of the state of the housing rights in the countries of the European Union. We selected the most relevant housing indicators, which were divided into output and outcome indicators according to the general framework of the EuSocialCit project. We then examined the relationships between and within these output and outcome indicators. To summarize our results and obtain more information on the similarities and differences between countries, we used cluster analysis. In addition, we compiled maps so that we could visually see the groups of countries that are formed according to various housing parameters, i.e., share certain similarities in terms of the state of the housing rights.

The results show that the relationships between output and outcome indicators are ambiguous. It is not the case that the more states invest in housing, the better the results. One possible reason is that the investment effect has a time lag. However, many other links can be found between and within output and outcome indicators. One of the most important indicators, which is highly related to many others, is the form of home ownership. For instance, it is quite obvious that in countries with higher ownership rate, the affordability of housing is higher, but other housing parameters are worse: higher overcrowding rate, more problems with the physical parameters of housing (housing deprivation). In Western countries, there is more available social housing, which helps those living in poverty to secure a certain standard of living, but at the same time housing policies in these countries increasingly promote home ownership. Social housing is almost non-existent for those living in poverty in the CEE countries, so although the majority of low-income population live in their own homes, these homes are of poor quality.

Our results show that European countries differ significantly in terms of many housing (output and outcome) indicators. First, there is a visible division between Eastern and Western parts of Europe. Closer inspection reveals that the clusters seen on the maps (these clusters identify more homogenous groups of countries) more or less reflect the housing policies in different welfare state regimes, as discussed in Section 2. This is an important finding, because when we compare European countries in terms of individual housing indicators, the differences between the countries are narrowing over time (see Figure 3, Figure 11, Figure 17, etc.). This reaffirms the fact that the European countries, despite their convergence in terms of individual housing indicators, retain significant differences, which are largely defined by housing regimes associated with welfare state models. These results also suggest the different challenges faced by the countries: some countries should be more concerned on how to deal with accessibility issues, while others should focus more on affordability or adequacy issues. Therefore, “one size fits all” is not at all suitable for finding solutions to secure housing rights in the European Union countries. Until now, housing support policies have focused mainly on low-income people, young people, families with children and the elderly. More complex solutions are needed; housing should be addressed through such areas as employment, education, inequality, segregation, inclusion, migration, etc.

Further research in this area should take into account the following limitations that we have encountered in this study:

- There is a lack of data to allow to do a more detailed comparative analysis of the European countries, and to provide a reliable statistical model. It is often difficult to synchronize Eurostat and OECD data.
- The housing sector is too complex to be described by a dozen indicators, and the analysis of which would allow simple conclusions to be drawn.
- Correlation does not imply causation. When interpreting the results of correlations, we must be aware about the cause-and-effect relationship.
- It should be borne in mind that apart from the differences between countries, there are big differences within countries, especially regarding the rural-urban division. It is likely that the use of data at the aggregate level does not fully reveal the scale of the problems and obscure some of the links between the indicators.
- The definition of the social housing varies greatly from country to country. This makes it difficult to interpret the results of the quantitative study, because a number of questions arise what is the share of social housing in the total housing stock, who finances it, who supervises it, who lives there, and how much does it cost – everything is different.
- Housing markets depend on the institutional contexts, such as financial systems and legal systems. Comparative studies should take this into account.



## 4. Housing rights in six selected EU countries

In this section, we analyse six countries, which represent different geographical clusters and policy traditions in more detail. The aim of the sub-task is to evaluate the state of housing rights in selected countries according to Individualised power resources (the Normative, Instrumental, and Enforcement), which constitute a core of analytical approach of the EuSocialCit project. For our analysis, we have chosen to analyse:

- *Denmark*, representing social-democratic welfare state regime
- *Netherlands*, representing mix of conservative-corporatist and social-democratic regimes
- *Lithuania* and *Poland*, representing post-communist or hybrid welfare state regime
- *Belgium*, representing conservative-corporatist welfare state regime
- *Spain*, representing Southern European/Mediterranean welfare state regime.

Before moving to the case studies, we review normative resources related to housing rights at the global, regional, and local.

### 4.1 Normative resources

Normative resources, that provide legislative base related to the housing rights, can be found on different levels, ranging from global to local. Respectively this legislative base is documented and monitored by different organizations, ranging from the intergovernmental organizations, such as the United Nations, to the bodies of the local authorities. Within the areas of their interest, all these organizations help to promote and protect the housing rights through various declarations, legal norms protocols, or by providing assistance and expertise related to housing rights.

#### 4.1.1 Global

At the global level, the legislative measures are directed to fundamental housing rights and could be considered as part of the universal human rights. The United Nations (UN) is an umbrella organization for many international legal instruments. In 1948, the UN proclaimed the *Universal Declaration of Human Rights* (1948) which was the first document of global significance that established the rights to adequate housing. Later, rights to adequate housing were also recognized in the *International Covenant on Economic, Social and Cultural Rights* (UN General Assembly, 1966), *United Nations Human Settlements Programme* (United Nations, 1978) and *United Nations Housing Rights Programme* (United Nations, 2002). The *Geneva UN Charter on Sustainable Housing* (United Nations Economic Commission for Europe, 2015) is non-legally binding document, whose goal is to support member States in ensuring access to decent, adequate, affordable, and healthy housing for all. Moreover, in 2015 the UN set the *Sustainable Development Goals* (United Nations 2021d), that are intended to be achieved by 2030. One of the goals is to “Make cities and human settlements inclusive,

safe, resilient and sustainable”, and it has a specific target, which aims to ensure adequate, safe, and affordable housing for everyone. Shortly thereafter, in 2016, the New Urban Agenda (United Nations, 2021c) was adopted by the UN in order to accelerate the implementation of the broader goal as well as the specific target related to housing. In addition, other UN treaties include articles on housing targeting the rights of women, children, refugees, migrants, and persons with disabilities (more information can be found in *Housing Rights Watch* (UN Housing Rights, 2021)). Finally, *Housing and health guidelines* set up by the World Health Organization (2018) provides recommendations to promote healthy housing for a sustainable and equitable future.

#### 4.1.2 Regional/European

In this study, we focus on the European (Union) countries, thus on the regional level we will look at the legislative measures that directly affect European countries. Although the housing problems are not as fundamental in this region as they are in many other parts of the world, the normative base related to the housing rights (and human rights in general) and to the regulation of these rights, is one of the most advanced in Europe. At the European level, along with the UN-based instruments, the rights to housing are protected through the Council of Europe, unifying 47 European countries. The Council of Europe seeks to maintain and further realise human rights and fundamental freedoms, thus complementing UN activities. One of the most important achievements of the *Council of Europe* (2021) is the *European Convention for the Protection of Human Rights and Fundamental Freedoms*, drafted in 1950 (Council of Europe, 1950). This document does not explicitly mention housing rights, but several articles refer to housing exclusion, poverty, and homelessness. The human rights defined in the Convention are enforced by the *European Court of Human Rights* (2021). The *European Social Charter*, adopted in 1961 (Council of Europe) and revised in 1996, complements the *European Convention on Human Rights*, and is focused on economic and social rights, such as employment, housing, health, education, social protection, and welfare. The Article 31 of the Charter is specifically dedicated to “The right to housing”. The application of the Charter is monitored by the *European Committee of Social Rights* (European Committee of Social Rights, 2021) (in the framework of this project, the latter represents instrumental and enforcement resources).

#### 4.1.3 European Union

In addition to the legislative measures intended for all European countries, the members of the European Union have established additional tools to protect the fundamental rights as well as housing related rights at the level of the EU. The *Treaty of the European Union* (European Union, 1992), originally signed in Maastricht in 1992, emphasises the values such as freedom, equality, tolerance, solidarity, and justice. The *Charter of Fundamental Rights of the European Union* (European Union, 2012), which was drafted in 2000 and entered into force in 2009, among other fundamental rights, presents the right to housing assistance as a measure needed to combat social exclusion and poverty. The *European Pillar of Social Rights* (European Commission, 2021), launched by the European Commission in 2017 is a tool enshrining 20 principles to protect social rights. One of these principles, called “Housing and assistance for the homeless”, deals with i) access to social housing and housing assistance; ii) forced eviction of vulnerable people; iii) services to the homeless. The report on *Access*

to decent and affordable housing for all, issued by the European Parliament in the early 2021, recommends an integrated housing strategy to guarantee social, accessible and affordable housing in the Member States.

Formally, the attention to the housing rights is increasing at all levels, and the efforts are being made to put housing rights ahead of market interests.

#### 4.1.4 National level

Among EU countries, the right to housing is guaranteed constitutionally in Belgium, Finland, Greece, Italy, Netherlands, Poland, Portugal, Slovenia, Spain, and Sweden. Additionally, countries France, Latvia, and Lithuania have ratified the European Social Charter Article 31 on the Right to Housing (Council of Europe, 1961). We could assume that if the state undertakes to provide housing in accordance with the Constitution or the Charter, then the share of social housing is correspondingly higher. However, as can be seen in the Figure below, this relationship does not hold true in many cases. For example, in Austria and Denmark, which have relatively strong social housing sector, the right to housing is not guaranteed or ratified, while in Greece, Spain or Belgium their Constitutions' guarantee the right to housing, but the share of social housing is marginal. This suggests that normative power resources can play only a symbolic value. They have to be supported by other instrumental and enforcement resources to make a difference.

COUNTRY	HOUSING GUARANTEED IN CONSTITUTION	HOUSING RATIFIED IN THE SOCIAL CHARTER (Article 31)	SHARE OF SOCIAL HOUSING
Netherlands	Yes	Yes	37.7
Sweden	Yes	Yes	18.0
Finland	Yes	Yes	10.5
Slovenia	Yes	Yes	6.4
Italy	Yes	Yes	4.2
Portugal	Yes	Yes	2.0
Spain	Yes	Yes	1.1
Poland	Yes	No	7.6
Belgium	Yes	No	4.2
Greece	Yes	No	0.0
France	No	Yes	14.0
Lithuania	No	Yes	0.8
Latvia	No	Yes	1.9
Denmark	No	No	21.2
Austria	No	No	20.0
Ireland	No	No	12.7
Malta	No	No	5.5
Hungary	No	No	3.4
Bulgaria	No	No	3.0
Germany	No	No	2.9
Romania	No	No	2.3
Croatia	No	No	2.0
Slovak Republic	No	No	1.6
Luxembourg	No	No	1.6
Estonia	No	No	1.1
Czech Republic	No	No	0.4
Cyprus	No	No	0.0

**Figure 34. Normative consolidation of housing rights and the share for the social housing**

Data: Council of Europe, 1961; Eurostat 2021

Below are excerpts from the constitutions of the investigated countries' that mention housing rights.

**Belgium.** Belgium's Constitution *guarantees the right to housing*; Article 23: "Everyone has the right to lead a life in keeping with human dignity (...) The right to decent accommodation" (The Belgian Constitution, 2021).

**Denmark.** The Denmark's Constitution *does not guarantee the right to housing*, and this right is not included in the national law. The related provisions of the constitution states that dwelling and the right of property shall be inviolable (Denmark's Constitution, 1953).

**Lithuania.** The Constitution of the Republic of Lithuania *does not guarantee the right to housing*, but the related provisions state that "Property shall be inviolable", "The rights of ownership shall be protected by law", "The home of a human being shall be inviolable" (Articles 23 and 24) (Constitution of the Republic of Lithuania, 1992).

**The Netherlands.** The Constitution of the Kingdom of the Netherlands *guarantees the right to housing*; Article: 22§2: "It shall be the concern of the authorities to provide sufficient living accommodation" (The Constitution of the Kingdom of the Netherlands, 2008).

**Poland.** The Constitution of the Republic of Poland *guarantees the right to housing*; Article 75§2: "Public authorities shall pursue policies conducive to satisfying the housing needs of citizens, in particular combating homelessness, promoting the development of low-income housing and supporting activities aimed at acquisition of a home by each citizen" (The Constitution of the Republic of Poland, 1997).

**Spain.** The Spanish Constitution *guarantees the right to housing*, Article 47: "All Spaniards are entitled to enjoy decent and adequate housing. The public authorities shall promote the necessary conditions and shall establish appropriate standards in order to make this right effective, regulating land use in accordance with the general interest in order to prevent speculation" (The Spanish Constitution, 1978).

It can be stated that there is no clear link between better housing rights and their embedment in the constitutions. For instance, in Denmark people enjoy high housing rights, however, these rights are not embedded in the constitution, while Polish constitution guarantees the housing rights to all citizens, but, based on our comparative analysis of the state of the housing rights in EU countries, housing rights are not well secured in Poland.

## 4.2 Housing rights and the ideal-typical welfare state models

In addition to normative resources that provide legislative base related to the housing rights, individualised power resources also include instrumental resources and enforcement resources. All together they constitute a core of analytical approach of the EuSocialCit project. In this study instrumental resources may be associated with the instruments through which the EU countries support housing as a social right by facilitating citizens in accessing affordable and adequate housing, providing shelter for the homeless, etc. Typically, this includes activities of the housing associations, public authorities or non-governmental organizations. Enforcement resources are dedicated to the enforcement of the housing rights, i.e., to protect the interests of the individuals as provided by the law. Enforcement resources most often are overseen by the tenants' unions, housing communities, social housing associations, court of justice.

Next, we will study six countries according to their individualised power resources: normative, instrumental and enforcement.

### 4.2.1 Social-democratic welfare state regime

#### **Denmark**

The Danish housing policy system can be attributed to the social-democratic housing policy regime as delineated by Hoekstra (2003) (see Table 1). In this regime, the state plays an important role in the housing production, allocation and price determination. However, the Danish housing policy has an important and specific feature, which makes it unique. In Denmark, the non-profit Housing associations play a major role in the housing production, allocation and price determination. Non-profit housing associations are semi-autonomous entities, which are economically subsidized and legally regulated by the state. However, they are owned and organised collectively by the association members themselves (Vestergaard and Scanlon, 2014). These associations protect collective housing stock not only from the market, but also from the state intervention (e.g., from the state's attempts to privatize the social housing stock). The non-profit housing sector requires at the same time the state's income to flow as yield protection from the market. Thus, as stated by the Vidal (2018, p. 17), "it is within this contradictory position that Denmark's common housing sector continues to navigate".

As it comes to other features of the social-democratic regime, they are highly present in the Danish housing policy system. One of the important features is a high housing decommodification, which is achieved due to a large share of social housing and also due to generous object and subject housing subsidies for large targeted groups. The state seeks to guarantee a high and universal housing quality to all. At present, as indicated by Housing Europe (2021, p. 50), the share of social housing in Denmark is 21%, the private rental housing consists of 26%, and the owner-occupiers consist of 49%. But we should keep in mind, that "the public housing in Denmark has not taken the form of a stock of state-owned social rental housing. Only 2% of the housing stock is owned by the State" (Vidal, 2018: 2).

The large share of the rental housing stock shows that the unitary rental system dominates in Denmark, when both private and social rental housing sectors are integrated into one system, and

compete with each other to lower the price for housing. As it comes to the numbers of homeless people, they can be considered quite low. Nevertheless, the data provided by the Homeless World Cup Foundation (2021) show that since 2009 there is an increase in homeless people by 1,600 persons. Young people aged 18-29 are especially affected by the homelessness. The latest count marked 6,635 homeless people in Denmark (Hus Forbi, 2017 quoted by Homeless World Cup Foundation 2021).

#### Normative power resources

At the European level, the 'European Pillar of Social Rights' provides the normative power resources for the housing rights at the soft level.

The right to housing is not stated in the Danish constitution as well as the housing is not ratified in the European Charter article 31. However, in Denmark, the social housing is regarded not only as an integral part, but a central part of the Danish welfare state. It is untouchable and cherished by the whole society (Andersen and Munk, 1994; Kristensen, 2002).

A social housing provision in Denmark has never been a concern for national or local authorities. It consists of housing for rent provided at cost prices and ensured by non-profit housing associations (Vestergaarda and Scanlon, 2014). The national organization of co-operative housing associations, is also an important housing provider. The housing associations are characterised by the participatory democracy, a sense of solidarity and limited profit (Sørvolla and Bengtsson, 2018).

Thus, the most important principle of Danish social housing is the high degree of tenant involvement. This principal dates back to the beginning of the twentieth century and is set in the 1984 Law on Tenants Democracy (Vestergaarda and Scanlon, 2014).

Apart of social housing, the Danish government provides direct supply subsidies for new housing, namely supports new social, rental housing with subsidized loans as well as cooperative housing. For the owner-occupied housing, the government provides the tax deductions on interest. Housing allowances are given mainly to tenants, according to their housing needs and housing cost. The government also provides subsidies for housing rehabilitation and urban renewal (Andersen and Munk, 1994; Kristensen 2002).

#### Instrumental power resources

As stated by Vestergaarda and Scanlon (2014, p. 78), "there are about 580 housing associations, which as of January 2012 owned 7700 estates with a total of 544 645 dwellings (mostly family-sized apartments). The housing associations vary enormously in size, ranging from those with over 40 000 units to those with fewer than 10". Municipalities pay a supervisory role; they approve the housing associations and their decisions (Vestergaarda and Scanlon, 2014). The municipalities are responsible for finding housing for its citizens (Kristensen, 2002). Dwellings are allocated via open waiting lists, of which the municipalities control 25% of dwellings. Municipalities also control the approval of new build projects. State subsidies are provided by the central state and the municipalities (Vidal, 2018).

The housing associations share a nationwide organisation: the National Federation of Housing Associations (Boligselskabernes Landsforening), which provides services (education, consulting services, etc.) to the individual associations and sections. It also participates in negotiations with the Ministry of Housing about the conditions of the housing sector (Kristensen, 2002, p. 258).

A study by Vidal (2018) claims that the state involvement in the housing cooperative sector has increased over time and at present much of the autonomy has been lost. The sector is governed “through a multi-scalar “tenant democracy” system and elements of co-governance with the municipal and central State” (Vidal, 2018: 9).

#### Enforcement resources

The Tenant’s Union (Lejernes Landsorganisation, LLO) ensures the enforcement resources. It protects the housing sector from the market and from the state (Vital, 2018).

The Danish National Association of Housing Communities for Elderly People (LVGO) is important to ensure the right to housing in the older age. The older cohousing has been a grassroots initiative, just as cohousing in Denmark, which is supported by the LVGO (Bamford, 2005).

Overall, the Danish housing policy is rather unique. It exhibits a very high tenant involvement, though “the tenant democracy in the running of the estates and associations” (Vestergaarda and Scanlon, 2014: 77). This is a reason why the housing sector in Denmark up to now has not undergone any significant privatization and marketization, as in some other EU countries (e.g., the UK).

#### ***The Netherlands***

Based on the theoretical part, and referring to Hoekstra (2003), the Dutch housing policy system can be described as modern corporatist regime that occupies intermediate position between the social-democratic and the liberal welfare state regimes. It implies that both the state provision of welfare services and market provision of welfare services play an important role in housing policy. The rental housing sector in the Netherlands can be characterised as a unitary rental system, where the market rented sector compete with the social rented sector.

The results of our comparative analysis of EU countries have shown that the housing system in the Netherlands is facing challenges related to the shortage of affordable housing, event despite its large sector of the social housing. However, the level of satisfaction with housing is the highest in the Netherlands – 97% of the population reported very high or high level of satisfaction. Among the experts, researchers, and general public the Dutch housing affordability and accessibility are considered as increasingly threatening.

The Netherlands has an exceptionally high level of de-commodification, which is a legacy from the post-war period. In 2018, the social rental housing stock accounted for 37.7% of the total housing stock (Eurostat, 2021c). Most of it (approximately 75%) is owned by non-profit housing associations supported by supply-side state subsidies (Kadi and Musterd, 2015). According to Boelhouwer (2020: 453), a large share of social housing is an important achievement of the past, but “the current Dutch housing policy makes too little use of this unique sector”. Moreover, Boelhouwer argues that the



current Dutch housing market increase social inequalities. In his policy review paper (Boelhouwer, 2020), he provided an overview of the Dutch housing market by summarising the key issues: 1) rising housing shortage; 2) restricted accessibility of home ownership (due to limited supply of new buildings and eligibility criteria for mortgage loans); 3) difficult position of the middle-income groups (their income is too high for social rented sector, but too low for a mortgage); 4) affordability issues for low-income renters; 5) increasing spatial segregation (low-income groups concentrate in social housing and the attractive areas are inhabited exclusively by the rich). The author states that a fundamental reform is needed in the housing market to deal with (increasingly) undesirable situation.

The policy pressures at the local, national, and even the EU level put the housing issues high on the political agenda in the Netherlands. Changes are already taking place, mainly in a form of a shift towards the private rental housing (Hochstenbach and Ronald, 2020). Since the 1990s policies have been increasingly evolved around the promotion of home ownership, and, in general, housing market is increasingly influenced by the market principles (Kadi and Musterd, 2015). But still there is a lot of state regulation. According to Hochstenbach and Ronald (2020), the recent rental market restructuring can be described as ‘regulated marketization’ and ‘regulated deregulation’, which does not imply a smaller state, but rather that new regulation helps to ensure continued state enforcement.

Tensions in the housing market are reflected in the homelessness statistics: The number of homeless people has doubled in the last 10 years and now stands at about 40,000 (or 2.3 per 1000 inhabitants) (Statistics Netherlands, 2019). The overwhelming majority of homeless are men (84% in 2018), and nearly half have non-western background. Homelessness is relatively high and increasing among young (18-30 years) people: between 2009 and 2019 their number increased as much as three times. The reasons of the increase in homelessness lie in a shortage of affordable rentals; for example, the waiting list for social rental housing in Amsterdam is over 13 years, while in Utrecht it is over 10 years.

The Dutch have a strong tradition of regional and urban planning, aiming for inclusive and sustainable cities. The Dutch are also famous for their innovative and original solutions. The problem of housing shortage and affordability is addressed in innovative, experimental ways. For example, shared housing (such as that aimed at students and young professionals) is a growing but a relatively new phenomenon in the Netherlands (Uyttebrouc *et al.*, 2020). There is also a programme, which offers free accommodation for students in a nursing home, in exchange students spend some with the elderly inhabitants. Housing crisis is also addressed by intensive new constructions – there is an ambition to build 1 million new homes by 2031; most of them would be affordable prefabricated modular houses.

#### Normative power resources

In the Netherlands, the right to housing is constitutionally guaranteed, and the European Social Charter is ratified, including Article 31 on the Right to Housing. However, according to Vols and Kusumawati (2020), “Dutch legislation does not contain a fundamental right to housing, as such. However, the Dutch Constitution lays down the obligations for authorities to provide sufficient living accommodation, and holds that the State is responsible for adequate housing and its distribution.” These obligations have been laid down in a number of laws decrees and subordinate legislation by

Dutch Housing Policy (2021). The main rules on renting and letting housing are set out in The Dutch Civil Code, The Dutch Residential Tenancies Rents (Implementation) Act, The Dutch Residential Tenancies (Rent) Decree, The Dutch Residential Tenancies (Rent) Implementation Regulation, The Dutch Fluidity Rental Housing Market (Measures to Facilitate Movement) Act 2015. Dutch government decides on nationally applicable housing allowances, regulates, supervise, and subsidise housing associations, carries out urban renewal programs, therefore it plays an important role in the rented sector (Vols and Kusumawati 2020). For example, The Housing Act 2015 obliges the associations to rent nearly all their premises to the lowest income households. Strict tenant protection and shelter for victims also contribute somewhat to tackling homelessness (Vols and Kusumawati, 2020).

To facilitate accessible owner-occupied housing market for vulnerable groups and consumers in vulnerable situations, the Dutch Housing Policy has the Home ownership Guarantee Fund, which is responsible for the policy and implementation of the National Mortgage Guarantee (NHG). As specified by the Housing Policy, “A mortgage with NHG limits the financial risks of an owner-occupied home for the consumer. It provides a safety net in the event of divorce, incapacity for work, unemployment and the death of a partner. At the same time, the lender is given security if the consumer can no longer meet his or her obligations, and the house has to be sold with a residual debt.”

#### Instrumental power resources

In the Netherlands, the instrumental resources are ensured at the national, municipal and partly institutional levels.

The rent benefit (huurtoeslag) is a government contribution towards the rental costs. It was initially designed for households with average earnings although most recipients are at the low-income level. Eligibility for the rent benefit, and the amount received depends on age, household composition, the rental price and the combined incomes of the household. Social housing organisations may set their own rent policy within the limits of the national rent regulations.

There are no specific financial schemes for first-time buyers, except for National Mortgage Guarantee or tax benefits. As of January 1, 2021, buyers aged between 18 and 35 no longer have to pay the 2% transfer tax.

Dutch government provides households with the subsidies for the production of renewable energy in the Netherlands.

Municipalities are responsible for the development and the coordination of local homelessness policies. In April 2017, the Association of Netherlands Municipalities, together with several organisations that are responsible for social housing, protected housing, mental health programmes and social work, initiated the ‘Home again’ action programme. There are several social organisations that help homeless by providing temporary shelters, assistance, information, and food, e.g., Salvation Army, The Youth Information Point, Bed, Bath and Bread. The programme Housing First is also used

as an addition to the range of shelter options. It is run by an NGO and is fully funded by the Netherlands' government.

#### Enforcement resources

The Rent Tribunal (Huurcommissie) is a national, independent and impartial agency, which can mediate and adjudicate on disputes between tenants and landlords about rent levels, maintenance and service charges.

Aedes is the national organisation promoting the interests of practically every social housing organisation in the Netherlands, on all possible fronts.

To sum up, the housing policy seems to be very much developed in the Netherlands, but the availability and affordability of housing remain key issues. Normative, instrumental and enforcement recourses are particularly targeted at more vulnerable groups in society (the low-income, homeless). Paradoxically, while the home ownership is being promoted, there are almost no financial benefits for this. Most of the housing policy is concentrated on the national level, and thus, uniform standards (e.g., rent allowance) are applied; there is a suggestion to regionalise housing policies (Boelhouwer, 2020). The contemporary Dutch housing market is criticized, as it cannot ensure housing availability and affordability.

#### 4.2.2 Conservative-corporatist welfare state regime

##### **Belgium**

According to many housing indicators analysed above, the Belgian housing policy system could be described as corporatist regime. However, previous studies (e.g., Hoekstra, 2013) noticed that it is not the pure corporatist regime. Belgium has a small social rental sector that is rather heavily regulated by the state, and the substantial market rental sector that is poorly regulated by the state. These are characteristics of the dualist rental system. At the same time, the Belgium supports home ownership by providing social loans and premiums, particularly for families with children, which is a strong characteristic of conservative-corporatist regime. Thus, according to Hoekstra (2013, p. 13), „Belgian housing policy can be interpreted as a mix of liberalism and conservative-corporatism“.

Belgium, as a federal state, has self-governing regions: The Flemish Region, the Walloon Region and the Brussels Region. As it is stated in the report of the Social Housing in Europe (Housing Europe, 2010): “Since 1980 the Regions are fully responsible for their own housing policies and for the allocation of funds from the regional budgets. Nevertheless, some aspects are still a competence of the Federal State, such as guaranteeing the right to a decent housing, setting interest rates and general fiscal policy, and regulating the lease of primary residence. Currently, the main housing policy priorities in Belgium are as follows: construction of social housing by the public sector within the budgetary limits imposed by the Regions; priority to improving the existing housing stock; increasing dwellings for rent or sale at ‘social’ price; public policies targeting vulnerable people; fostering private initiative; integrating housing policy into urban renewal and social cohesion programmes; strengthening the role of local authorities; monitoring and evaluation.” According to Winters and

Heylen (2014, p. 541), “Although the three regions largely share the same policy, there prove to be varying housing outcomes. Differences in general income levels and poverty levels between the regions are reflected to a significant extent in housing outcomes.”

In Belgium, the housing system is more favourable to property ownership. Around 71% owns their dwelling, 19.5% rent at the market price and 9.5% is the social rental housing (Eurostat, 2021). In the Flemish Region and the Walloon Region, social housing is also provided for sale (Housing Europe, 2010).

Homelessness policy in Belgium also follows regionalized structure, thus the statistics and the trends at the national level are not clear. In Brussels region, for example, the homeless population has risen sharply, and the new record was set recently at 5,313 people (The Brussels time, 2021).

#### Normative power resources

In Belgium, the right to housing is constitutionally guaranteed, and although the European Social Charter is ratified, Article 31 on the Right to Housing (along with several other Articles) is not ratified.

Housing is also regulated through the Belgian Civil Code, Tax law, Regulatory and environmental law, etc. Housing is a regional competence; therefore, the regions have their own normative elements. For example, Flemish housing code, which “distinguishes four essential housing elements: availability/access, affordability, quality and security of tenure” (Moons, 2016, p. 285)

#### Instrumental power resources

“In Belgium, a variety of providers are involved in the social housing sector: municipalities, public companies, foundations, co-operatives and non- and for-profit organizations. Different providers operate in different parts of the country. This can be explained by the historical origin of the providers: each of them is entitled to provide housing in certain municipalities” (Housing Europe, 2010).

Social housing is the responsibility of the regions. The conditions thus vary from one region to another.

There is a great variety of housing support measures in Belgium and its regions, some examples are as follows:

*Social (mortgage) loan.* If certain conditions are met, it is possible to borrow money cheaply by taking a social loan for the construction or purchase of a home. For social loans, the social housing company (Brussels Capital Region, Flemish Region or Walloon Region) or Umbrella organizations of recognized social loan credit companies have to be contacted.

There are also *tax benefits*, which depend on the region and the specific property.

The *Housing Fund* grants advantageous mortgage loans to families with a medium or low income. The Housing Fund also gives an extra energy loan on top of mortgage loan to improve the energy performance.

The *rent allowance* for prospective tenants, who are registered on the social housing lists, is regional financial assistance, which aims to cover part of the rent borne by some of them.

*Home renovation allowance* (Facade enhancement allowance, energy allowance) and community allowance by the Brussels-Capital Region.

*Relocation allowance for homeless*. The rehousing allowance is an aid, which aims to enable people who are in the process of coming out of their homeless situation, to move into adequate housing while partially bearing the cost of rent and, possibly, of moving in.

*Premiums for heating* (Flanders) are for those who in their homes install an energy-efficient heating system.

Home care and shelter for the elderly is also provided by Flanders (Flanders).

#### Enforcement resources

Belgium has strong tenant's rights, and it is difficult for a landlord to evict a tenant. Tenants can take the landlord to a tribunal in case their requests (e.g., to extend the lease) are not fulfilled. If the landlord sells the property, the new owner must respect existing rental agreements.

The *tenants' association* (syndicats de locataires/ huurdersbond) provides advice and can act as a mediator on behalf of tenants in any cases of disputes or disagreements with landlords. If the dispute cannot be reconciled, the matter will go to the courts (Expatica, 2021).

In conclusion, the complex and multi-level government structure in Belgium also leads to a complex housing policy. Each region is responsible for its own housing policies and allocation of funds from the budget. And while such decentralization helps bring policy closer to specific local needs, it contributes to the loss of control and lack of coordination; moreover, it becomes difficult to compare Belgium with other countries. As in many other countries, in Belgium housing affordability is increasingly challenging, especially for younger generations.

### 4.2.3 Southern European/Mediterranean welfare state type

#### **Spain**

The Spanish (as well as Portuguese, Italian and Greek) housing policy system is attributed to the Southern European/Latin RIM housing policy regime (Allen, 2006). Under this housing policy, there is relatively little state regulation and influence on housing market or spatial planning, while family plays an important role in housing provision. Currently, Spain has a high share of home ownership (76%) and small sector of social rental housing (1.6%), and the rest is rental market. The percentage of owners and renters was equal in 1950, but since the 1960s the housing policy has promoted home ownership (by subsidies, tax reliefs and low interest rates), and by 2021 the home ownership rate reached its peak at 82%. Recently, this gap in the housing market has narrowed due to an increase in the housing prices, stricter criteria for obtaining mortgages and shift in the housing policies that aim

to strengthen rented sector to better meet the need for affordable housing (Hoekstra and Saizarbitoria, 2010; Allen, 2006).

Looking back to the results of our comparative analysis of the EU countries, it can be concluded that Spain, along with other RIM countries, is somewhere in the middle in terms of housing availability, affordability, and adequacy. However, in Spain, as in other case study countries, the tensions in the housing sector are rising, and the most acute problems are housing affordability and low supply of rental (public and commercial) housing (Álvarez-Román and García-Posada 2021). This is particularly problematic for the young population, as the level of unemployment is high among them; unsurprisingly, children stay longer in their parental household (average age was 29.5 in 2019). The Spanish housing market has been hit hard by the 2009 economic crisis, which resulted in an exponential increase in housing subsidies for low-income households. The Covid-19 pandemic has been another shock to the housing market, with the most vulnerable groups being young people and immigrants, who were (are) already facing major challenges due to the small and unaffordable rental housing sector before pandemic. As a response, the Prime Minister Pedro Sanchez proposed (in 2021 October) to offer a state allowance (€250 a month) to young people; this could also encourage them to leave parental household (BBC, 2021).

The estimated homeless population in Spain is 23,000–35,000 people and it is on the rise. Most homeless people are men (80%), and the average age of a homeless person was around 43 years in 2012 (38 years in 2005) (Feantsa, 2019). There has been an increase in the number of people in inadequate and insecure housing due to the economic and financial crisis. Moreover, during the last decade the number of mortgage foreclosures has been increasing, thus homeowners are increasingly confronted with homelessness (Feantsa, 2019). Therefore, in March 2018, the Spanish government published the new State Housing Plan for 2018-2021, aiming “Through a series of schemes to support rental housing, urban rehabilitation and renovation, the Plan seeks to facilitate access to housing for the most vulnerable groups, and to reactivate employment in the construction sector. The aim is to strike a new balance in access to housing, currently excessively based on ownership and on the production of new dwellings.” (Housing Plan in Spain for 2018-2021)

One of the distinctive features of the Spanish housing is “a long-standing tradition of providing social or subsidized owner-occupancy housing, generally referred to in Spain by the acronym VPO (Vivienda de Protección Oficial—Officially Protected Housing).” (Hoekstra and Saizarbitoria, 2010, p. 131). Spain has very different social housing policies from other EU countries. In most of the EU countries social housing is provided in the form of rent, while in Spain it is provided as subsidised owner-occupied housing. It is targeted towards medium- and low-income households (Hoekstra and Saizarbitoria, 2010).

The housing problems in Spain could be summarised as follows: having very high prices; having problems of affordability and accessibility for the first-time buyers. The government clearly promotes owner-occupied sector through its policies (providing subsidized owner-occupancy dwellings), but at the same time marginalises rental sector (Hoekstra and Saizarbitoria, 2010).

### Normative power resources

In Spain, the right to housing is constitutionally guaranteed, and the European Social Charter is ratified, including Article 31 on the Right to Housing. However, as E. Viladecans Marcal and G. Ouasbaa (2021: online) argue: “Article 47 of the Spanish Constitution acknowledges the right of all citizens to have decent and adequate housing. It also establishes that the government must ensure that this right is made effective for all the people. However, there was no institutional framework (such as public housing) that provided high-quality affordable housing to all citizens. Rather, most citizens relied on the private market to provide owner-occupied homes.” S. Olea Ferreras (2021, online) shares the same view: “In Spain, human rights-based public policy about housing does not exist and housing is seen as an economic investment.” Similarly, Hoekstra and Saizarbitoria (2010, p. 129) states that „Spanish housing policy has yet been unable to fulfil the provisions of this constitutional mandate”.

In 2021, the first State Housing Law in the history of Spanish democracy has been approved. The law was passed to address the lack of affordable housing in many parts of Spain (inspain.news, 2021).

In addition to the national level, housing policies in Spain are also designed and implemented by the regional (17 Autonomous Communities) and local governments (more than 8,000 municipalities). Regional governments control most of the housing policy (Sparks, 2020). The role of the private sector is also important in urban development processes (Viladecans Marcal and Ouasbaa, 2021).

Tenant’s rights and eviction are regulated by the State rental law.

### Instrumental power resources

According to E. Viladecans Marcal and G. Ouasbaa (2021), “housing subsidies in Spain can be divided into two groups. First, the so-called “stone subsidies” are intended to increase the availability of affordable housing for rent and for sale. Second, the government provides direct financial subsidies to people to help them pay rent or purchase a house.” According to the above-mentioned authors, the Housing Plan of 2018-2021 eliminated the subsidies that promoted home ownership and instead introduced rent subsidies for young people (under 35), the elderly (65 and above) and those with low income.

Some COVID-19 policies have been designed specifically for housing sector, such as mortgage payment moratoriums, rental assistance, the suspension of evictions for vulnerable families as well as automatic extension of rental contracts to avoid any abusive increase in prices during the crisis (Viladecans Marcal and Ouasbaa, 2021; Measures for tackling..., 2021).

The problem of homelessness in Spain is being tackled by the Spanish National Homelessness Strategy (approved by the Parliament in 2014), and by the cooperation between the government and NGOs. Different autonomous regions also develop their own strategies and legal frameworks to tackle homelessness (Feantsa, 2019).

### Enforcement resources



Spain has undergone significant changes/updates regarding enforcement resources in recent years. According to Viladecans Marcal and Ouasbaa (2021), in 2017 the tenants' unions that were launched in Barcelona and Madrid, and in 2020 Catalonia became the first region to implement a rent control program to address "tight housing market" conditions (in January 2021, the Constitutional Court proposed to declare rent control unconstitutional) (Viladecans Marcal and Ouasbaa, 2021).

There are some grassroots organizations in Spain, which help to ensure the enforcement resources. One of them is PAH (Plataforma de Afectados por la Hipoteca), which emerged in response of declining affordability during the global financial and economic crisis of 2008. The PAH seeks to defend homeowners from eviction and ensure their ability to secure housing, even if they are not able to pay temporary housing loans (Sparks, 2020). Another organization, which helps to ensure enforcement resources is Observatori DESC. According to Sparks (2020), "Observatori DESC is a human rights center that works to dismantle the devalued perception of social rights, the rights to housing, work, education, health and food, in relation to civil, political, and patrimonial rights. In 2011, DESC together with PAH released a project during which they collected legal advice to defend the right to housing and energy, meant to serve those families already suffering eviction processes and struggling to access energy.

To sum up, while all power resources are found in Spain, one of the obvious discrepancies is that the right to housing is guaranteed in the constitution, but an institutional framework to help provide people with affordable housing is not developed. An important feature of the Spanish housing market is the small rental sector, including the existence of public rental sector. For many years, in Spain, public policies promoted private ownership, which has resulted in a severe shortage of both commercial and public rental housing. Recently, a lot of attention has been paid to housing availability and affordability, and these problems have a strong focus in the State Housing Plan. The impact of this Plan on the housing market is not yet clear.

#### 4.2.2 Post-communist or hybrid welfare state type

##### **Lithuania**

Lithuania is one of the EU countries in which housing has become an exclusively private responsibility since 1990s. As noted earlier in this report, the home ownership constitutes about 93 percent. This is among the highest numbers in the EU, as Lithuania is only outnumbered by Romania (97%). Lithuanian housing policy can be attributed to the post-communist housing policy regime. In this regime, there is little state regulation (at both central and local levels). Market dominates in price determination, housing allocation and production. Family also plays an important role, especially for helping young people to obtain their first housing. Commodification is high, but only for those who buy in the market after 1990s. For those who obtained their housing during the privatization, the commodification can be considered being low. However, in Lithuania price for heating, cold and warm water is high, which puts many people living alone on a modest pension or other social benefits into the risk of poverty.

One way to measure the state of housing rights in a given country is to look into the homelessness statistics. There are no official statistics on the numbers of the homeless in Lithuania. However, there



is statistical information on the numbers of people residing in shelters and accommodation for the homeless. In 2017, according to Statistics Lithuania, there were 2494 people residing in the accommodations (hostels) for the homeless. According to Lazutka' *et al.* (2019) comprehensive report on homelessness in Lithuania, there were 4,400 homeless people in Lithuania in 2017; based on the 2019 data (Lazutka *et al.*, 2019), it was only around 1.6 homeless persons per thousand inhabitants in Lithuania. These numbers are much lower if we compare them to many other EU countries (see Homeless World Cup Foundation, 2021). One of the reasons to explain the low numbers of homeless in Lithuania is the massive privatization which was carried out in Lithuania, during which almost everyone had a possibility to buy a home at a very low price. The massive privatization in Lithuania created a dualistic housing system, which favours the home ownership and marginalizes social housing as a safety net for the most vulnerable. At the same time, however, it has created a safety net for many through a massive home ownership society in which family's ties play an important role, and social assistance programs (national and local) for the most vulnerable populations (Aidukaite, 2021).

#### The Normative power resources

Lithuania has ratified the Charter of Fundamental Rights of the European Union (article 31), in which housing is mentioned as a social right. These are, however, soft laws, which are not legally binding. At the national level, the important normative power resources are regulation of social assistance benefits (means-tested) for low-income families/single persons, such as compensation for housing utilities (cold and hot water, and heating). The regulations allow many families and individuals pay their housing utilities and keep their homes warm. This also helps to ensure the fundamental right to not lose your housing due to inability to pay for communal utilities.

Yet, in recent years, Lithuania implemented a regulation of rent subsidy for low-income individuals/families. Under this regulation, low-income individuals/families can receive a subsidy, which compensates part of the rent in the private rental market.

Since the commodification of housing is high for young home buyers, the Lithuanian government implemented regulations which help young families to buy their first house. Young families which meet certain criteria (income, age, number of children) can receive a subsidy to buy their first house. Young families with children can apply to cover 10-20 percent, depending on the number of children, of the price of the dwelling which they want to buy. However, the rules are strict: family's income cannot exceed the state supported income, they should have at least one child, and no other housing property ownership. Recently, since 2018, the government implemented additional initiatives to encourage young families to settle down in the remote regions of Lithuania. The government gives subsidies to all young families willing to buy their first home in the regions of Lithuania, irrespective of their income. It covers from 15 to 30 percent of the credit depending on the number of children, with the ceiling also applied. The purpose of this initiative was to revitalize Lithuanian regions and to reduce emigration. In both cases of support to young families, the state promotes home ownership.

The COVID-19 crisis stimulated the debate and the need to address this important social policy field. Accordingly, access to social housing and related assistance has been improved. The waiting time for social housing has been shortened from 5 to 3 years. If at the end of the term, the municipality is not

able to provide social housing for an individual or a family, then it has to reimburse the actual rental price of suitable housing rented on the market. At the same time, the minimum basic amount of compensation for the part of the housing rent was increased from 23 to 32 euros per month per person, when the useful floor area per person or family member is 10–14 square meters. All these measures will continue to remain in place after the pandemic ends (LMSSL, 2020).

The important normative resources are the legislation and implementation of social housing policy: construction, allocation, management, rent policy. However, social housing is very low, and constitute less than 2 percent in Lithuania.

#### Instrumental power resources

In Lithuania, the instrumental resources are ensured at the national and local levels. Ministry of Environment of the Republic of Lithuania is responsible for the general regulation of housing construction, housing maintenance and modernization policy, and spatial development policy. Ministry of Finance of the Republic of Lithuania is responsible for managing the state's shares of housing loans and subsidies. The Lithuanian Ministry of Labour and Social Security (SADM) is drafting legislation. SADM is responsible for legislating and implementing a social assistance policy, which relates to housing, namely, regulation of social assistance benefits (means-tested) for low-income families/single persons, such as compensation for housing utilities (cold and hot water, heating). SADM is responsible for legislation and implementation of social housing policy, and the State's support for housing purchase and rent policy (LSADM, 2021).

In Lithuania, municipalities have special departments, responsible for municipal and/or social housing; they can also establish enterprises to take care of housing. Municipalities are responsible for payment of housing benefits. Municipalities (LAU1) in Lithuania are responsible for local housing policy development. They decide on new constructions, construction and administration of social housing. Also, local municipalities administer and distribute the social assistance benefits (related to housing, such as compensation for housing utilities (heating, cold-hot water)).

There is LAU2 level, which is constituted of parishes/counties. They were established to connect the needs of people at the neighbourhood level with the local government. However, they play an insignificant role in housing policy.

Moreover, NGOs are providing shelter for the homeless. There are 25 hostels in Lithuania, which offer temporary housing for the homeless. They offer not only housing facilities, but also provide various rehabilitation services to help them to return to the "normal life", e.g. to find a paid job and stable housing.

#### Enforcement resources

The major resources of enforcement are the court of justice, i.e. litigation. Civil society sometimes is involved in the litigations in the housing policy field. They fight illegal constructions close to their vicinity (Aidukaite, 2016, 2018). These are local community organizations, which are mobilized via

public initiative. Housing self-management organizations (apartment blocks or house owners' organizations/partnerships) solve issues related to housing management and administration.

Overall, the normative, instrumental and power resources are quite scarce, however, they function adequately. As stated by previous study (Aidukaite, 2021), in Lithuania, there are no conflicts around housing, except for community organizations, which fight against illegal construction close to their vicinity, solve environmental problems, improve infrastructure in their neighbourhood (for more see Aidukaite, 2016, 2018). But nothing more conflicting arises, as regards social housing and homelessness. One reason that can be related to this is the presence of „safety buffers” (normative and instrumental power resources), while the other is being the existence of „safety” net, which is produced by massive privatization.

### **Poland**

Housing policy in Poland experienced similar processes as in Lithuania, however, the major difference was/is that less public/social sector was privatized. Therefore, Poland still has quite extensive public/social sector, if compared to Lithuania. The share of social housing is 7.6%, while in Lithuania it is only 0.8%. Housing policy in Poland can be attributed to the post-socialist housing policy regime. If we measure the decommodification of housing by looking into the share of social housing, the decommodification can be considered higher in Poland than in Lithuania. However, when it comes to homelessness statistics, the situation is less promising. According to data available at the Homeless World Cup Foundations (based on FEANTSA, 2019 data), in 2017, there were 33,408 homeless people in Poland. However, the real number may be much higher. In 2017 around 25% of the homeless population had been in the same situation for over 10 years, meaning the average length of homeless durations is on the rise (FEANTSA, 2019 quoted by Homeless World Cup Foundation 2021).

### The Normative power resources

Housing as a social right is entrenched into the Polish Constitution. The Constitution explicitly refers to housing rights, and thus obliges public authorities to develop policies for the supply of adequate housing for all citizens (Glocker and Plouin, 2016, p. 5). At the EU level, the 'European Pillar of Social Rights' provides soft law for a right to adequate housing. However, Poland has not ratified the European Social Charter, Article 31.

On the national level, the important document is the National Housing Programme. On 27 September 2016 the Council of Ministers adopted Resolution no. 115/2016 on the adoption of the National Housing Programme (Ministry of Development and Technology 2021). As stated in the webpage of the Ministry of Development and Technology (2021), the National Housing Programme (NHP) is one of the autonomous tools to implement the Responsible Development Plan. As a strategic document, it defines the assumptions of the state's housing policy in the perspective of 2030. It has three main objectives, that can be shortly summarised as enhancing housing rights for people with moderate and low income. The emphasis here is put on rental flats' development.

Nevertheless, Mantey (2021) states that “regarding council and social housing in Poland <...> today there is no clearly defined government policy supporting the development of housing, including

council and social housing. There is no housing development strategy. Instead, this issue is included in the Human Capital Development Strategy” (Mantey, 2021). Furthermore, Mantey (2021) states that there is a lack of sufficient financial support from the state for local authorities to implement housing policies. Social housing and programs to combat homelessness receive too little attention.

There were several major programmes administered and financed by the Ministry of Infrastructure and Development administer programs, of which some are still active: Housing for the Young, the modernisation and renovation support programme, financial support for the emergency housing programme; former programmes – The Family’s Own Home programme (Rodzina na Swoim), the predecessor of Housing for the Young; additional pre-transition liabilities stem from support for loan repayment and guarantee bonus, which aim to mitigate the negative impacts of the transition for people who repay housing loans taken up prior to 1992; and also to people saving via the so-called housing saving booklets, which is a refund of part of the VAT paid by natural persons related to construction materials for the construction of a house (Glocker and Plouin, 2016, p. 9-10). These programmes are criticised for reaching only a limited number of recipients. These are mainly the lowest-income households or medium to high-income groups. A large number of households who fall in between are not benefiting of any of these programmes (Glocker and Plouin, 2016).

#### Instrumental power resources

National and municipal (gminas) authorities are the primary public actors in housing policy in Poland, with the decentralisation of housing spending occurring at the time of the transition. Until 2016, the former Ministry of Infrastructure and Development was the primary ministry responsible for housing in Poland (Glocker and Plouin, 2016, p. 7).

Municipalities are responsible for the following: Social housing; housing benefits, which are means-tested, granted to the beneficiaries and paid directly to the administrator of the building; rental units in municipally-owned dwellings, which are managed by municipal governments and offer below-market rent; emergency housing, which accommodates the very poor and homeless persons; technical infrastructure and communal services related to housing (Glocker and Plouin, 2016).

In Poland, the main burden of responsibility for meeting housing needs rests on the local authorities and the municipalities (Mantey, 2021). The local municipalities work on legislation and implementation of council and social housing policy, namely construction, allocation, management, rent policy. Council and social housing are also provided by the TBS housing (Towarzystwa budownictwa społecznego), which are non-profit building associations (Glocker and Plouin, 2016; Mantey, 2021).

#### Enforcement resources

In Poland, the enforcement resources include the court of justice, which permits the process of litigation. Contrary to Lithuania, Poland has quite extensive enforcement resources provided via urban mobilization (see a Jezierska and Polanska, 2018; Polanska, 2018; Piotrowski and Polanska, 2016). These are ensured by tenant’s movements organizations and squatter activists (the use of property without the owners’ permission). Previous research (Polanska and Piotrowski, 2015, p. 274) shows

that Poland is quite “extraordinary on the map of squatting in post-socialist Europe, and a considerable number of tenants’ organizations are active in the country”. Yet, the squatters and tenants’ activists are forming alliances to enforce the housing rights. There are more than 40 associations (stowarzyszenia) of tenants registered in Poland today (Jeziarska and Polanska, 2018).

To sum up, the main normative, instrumental and enforcement resources are in place in Poland. The major aim of the housing policy in Poland is to support home ownership. As it is stated in Glocker and Plouin, in 2015, “nearly 70% of total national government spending on housing aimed to support home ownership programmes (Housing for the Young and Family’s Own Home); just 5% of national resources were spent with the objective of supporting rental housing, through a programme targeting very low-income and vulnerable households. The major rental programme, TBS, was discontinued in 2009; at the time of writing, the government was in an advanced stage of discussions for a programme to replace the TBS. Moreover, National Development Bank (BGK) has developed a Rental Housing Fund with a budget of PLN 5 billion to support rental housing” (Glocker and Plouin, 2016: 21).

### 4.3 Discussion and conclusions: housing rights

In this section, we have reviewed the instruments through which the EU supports housing as a social right. We have also evaluated the state of housing rights in the selected countries according to Individualised power resources (the Normative, Instrumental, and Enforcement), which constitute a core of analytical approach of the EuSocialCit project.

The analysis of the selected EU countries showed that the EU has a very scarce instruments by which it can support the housing rights. The provision and implementation of housing rights are mainly the responsibility of national states’, and most often they are being ensured at the local/municipality level.

Table 9 summarises the major features and regulations of the Individualised power resources, which constitute the housing rights in the six selected EU countries, representing ideal-typical welfare state regimes/models.

We detect that better social rights exist in those countries in which housing is ensured not only by the municipalities, but also by other providers, such as non-profit housing associations, cooperatives, and non-for-profit organizations. This is the case for Denmark, the Netherlands and Belgium. These countries also have larger public/social rental sector (except Belgium, which has higher private rental sector). In those countries, in which social rental sector is small, the government support is mainly concentrated to subject subsidies, e.g., support for home buyers, support for renters at a very low income, and maintenance support to cover housing utilities for people in vulnerable situations. This can be seen in Lithuania, Poland, and also Spain.

As noted, we do not see a strong relationship between the normative power resources (global and the EU) and better social rights. Countries, which ratified the European Social Charter, including Article

31 on the Right to Housing, are not necessary the ones which have better housing rights. For instance, the Article 31 is not ratified by Denmark and Poland. However, these countries have very different housing policy systems. Denmark can be considered as a country with the best developed housing rights, which are reflected in a large social housing sector and better housing availability, affordability and adequacy. While countries, which ratified the Article 31, such as Belgium, the Netherlands and Lithuania, also have quite different housing systems.

Countries, which support private ownership and provide support for those who are in the most vulnerable situation, such as Lithuania and Poland, and to some extent also Spain, have the highest overcrowding rates and higher housing deprivation (see Table 8). While those countries which focus on the protection of tenants, and provide public/social housing through various non-profit organizations, have better indicators when it comes to overcrowding and housing deprivation. These countries are Denmark, the Netherlands and Belgium.

Overall, our study shows that in order to increase the housing rights and ensure better housing availability, affordability and adequacy, we need to expand the public/social rental housing sector. The tenant's involvement in social housing sector management is crucial to shield the sector from the State (its attempts to privatize and stigmatize) and the market (increase in prices).

Another important finding is that countries, which focus their attention on protecting the rights of renters in the rental market, have a better situation as it comes to affordability and availability. This is the case of the Netherlands and Denmark.

Our report does not show a clear link between homelessness and individualized power resources. All countries have in-place instruments to combat homelessness. For instance, Denmark and the Netherlands have much better resources to combat homelessness than Lithuania. But we see a much lower number of homeless people in Lithuania than in Denmark or the Netherlands. It seems that other important factors can explain the homelessness increase or decrease, such as demographical conditions (increased migration, high number of young people leaving parents' home, depopulation). Yet, we cannot deny the need for expanding social rental sector.

### ***Recommendations***

- In order to improve the housing rights around the EU, we need to support the expansion of public/social housing sector. This should be done with the help of the non-profit organizations.
- It is important to increase the regulation in rental markets, and to enhance the protection of tenant's rights.
- The grassroots initiatives in housing, such as housing associations uniting tenants, cooperative housing, housing self-management organizations should be especially encouraged and supported. The Danish success in shielding the social rental sector from the state and the

market is based on the active tenants' involvement in the running of the estates and associations.



**Table 8. Comparative indicators for selected countries**

	BELGIUM		DENMARK		SPAIN		LITHUANIA		POLAND		NETHERLANDS	
	2007	2018	2007	2019	2007	2018	2007	2018	2007	2019	2007	2018
<b>Expenditure on housing policy (percentage of GDP) in 2007 and 2018</b>	0.4	0.3	0.3	0.2	0.9	0.5	0.3	0.5	0.8	0.6	0.5	0.3
<b>Home ownership %</b>	72.9	72.3	67.1	60.8	80.6	76.3	89.4	89.9	62.5	84.2	66.6	68.9
Home ownership (without loans) %	33.5	28.9	14.8	14.0	48.6	46.9	83.5	77.3	59.7	72.0 (2019)	8.4	8.3
Home ownership (with loan) %	39.4	43.4	52.3	46.8	32.0	29.4	5.8	12.6	2.9	12.2	58.1	60.5
<b>Housing for rent %</b>	<b>27.1</b>	<b>27.7</b>	<b>32.9</b>	<b>39.2</b>	<b>19.4</b>	<b>23.7</b>	<b>10.6</b>	<b>10.1</b>	<b>37.5</b>	<b>15.8</b>	<b>33.4</b>	<b>31.1</b>
Housing for rent (market price) %	18.6	19.4	32.9	39.1	10.7	15.3	1.2	1.2	2.6	4.2	33.1	30.2
Housing for rent (reduced price or free of charge) - social housing %	8.5	8.3	0.0	0.0	8.6	8.4	9.5	8.9	34.9	11.6	0.3	1.0
<b>Households living in overcrowded dwelling - overcrowding rate %</b>	<b>3.8</b>	<b>5.7</b>	<b>7.4</b>	<b>10.0</b>	<b>5.8</b>	<b>4.7</b>	<b>52.5</b>	<b>22.8</b>	<b>52.3</b>	<b>37.6</b>	<b>1.9</b>	<b>4.1</b>
Housing deprivation: cracked roof, swollen floors, windows, moldy walls, cracked windows %	14.2	17.9	10.6	14.9	19.0	15.9	25.2	14.8	37.5	10.8	18.3	15.8
Housing deprivation: Lack of flush toilet %	0.7	0.9	0.0	0.3	0.3	0.2	20.2	10.6	6.2	1.7	0.0	0.0
Housing deprivation: without a stationary shower or bath %	1.0	0.4	0.8	1.8	0.4	0.2	18.3	10.0	7.1	2.1	0.3	0.1

Data: Eurostat and OECD

**Table 9. Individualised power resources, which constitute the housing rights in selected EU countries representing ideal-typical welfare state regimes/models**

INDIVIDUALIZED POWER RESOURCES	BELGIUM	DENMARK	LITHUANIA	NETHERLANDS	POLAND	SPAIN
<b>Normative power resources: major features and regulations</b>	<p>The right to housing is constitutionally guaranteed, and although the European Social Charter is ratified, Article 31 on the Right to Housing is not ratified.</p> <p>Housing is a regional competence.</p>	<p>‘European Pillar of Social Rights’.</p> <p>In Denmark, social housing is regarded as an integral part of the Danish welfare state and, as such, nearly untouchable (Kristensen 2002, 255).</p>	<p>‘European Pillar of Social Rights’.</p> <p>Housing ratified in <i>The Charter of Fundamental Rights of the European Union</i>.</p> <p>Regulation of social assistance benefits (means-tested) for low-income families/single persons such as compensation for housing utilities (cold and hot water, heating).</p> <p>The legislation and implementation of social housing policy: construction, allocation, management, rent policy.</p> <p>Regulation of a rent subsidy for low income individuals/families.</p> <p>The regulation and implementation of subsidies for young families with children to buy their first housing.</p>	<p>The right to housing is constitutionally guaranteed, and the European Social Charter is ratified including Article 31 on the Right to Housing.</p> <p>In the Netherlands, the rules on renting and letting housing have been laid down in a number of laws, decrees and subordinate legislation. The main ones are:</p> <ul style="list-style-type: none"> <li>• The Dutch Civil Code</li> <li>• The Dutch Residential Tenancies Rents (Implementation) Act</li> <li>• The Dutch Residential Tenancies (Rent) Decree</li> <li>• The Dutch Residential Tenancies (Rent) Implementation Regulation</li> <li>• The Dutch Fluidity Rental Housing Market (Measures to Facilitate Movement) Act 2015</li> </ul>	<p>Constitution explicitly refers to housing rights and thus obliges public authorities to develop policies for the supply of adequate housing for all citizens (Glocker and Plouin, 2016, p.5).</p> <p>‘European Pillar of Social Rights’.</p> <p>National Housing Programme.</p> <p>The Human Capital Development Strategy.</p> <p>The legislation and implementation of social housing policy: construction, allocation, management, rent policy.</p> <p>Regulation of the Ministry of Infrastructure and Development administer programs: Housing for the Young, the modernisation and renovation support programme, Financial support for the emergency housing programme.</p>	<p>The right to housing is constitutionally guaranteed, and the European Social Charter is ratified including Article 31 on the Right to Housing.</p> <p>In Spain, human rights-based public policy about housing does not exist and housing is seen as an economic investment (Ferrerias, 2019), however major changes are taking place since recently.</p>
<b>Instrumental power resources: major features and regulations</b>	<p>A variety of providers are involved in the social housing sector: municipalities, public companies, foundations, co-operatives and non-</p>	<p>The municipality, is responsible for finding housing for its citizen (Kristensen 2002, 255). Subsidies aimed at owner-occupied as well as rented</p>	<p>Municipalities have special department/s responsible for municipal and/or social housing, or they can establish an enterprise to take care of housing.</p>	<p>Instrumental resources are ensured at the national, municipal and partly institutional levels.</p>	<p>Municipality is responsible for: social housing, Housing benefits, which are means-tested, granted to the beneficiaries and paid directly to the</p>	<p>A new State Housing Plan has been approved in Spain for the period 2018-2021 (SHP 2018-21). Since the 1980s, three-year State Housing Plan have played a</p>

	<p>profit organizations (Housing Europe, 2010a)</p> <p>Social housing is the responsibility of the regions, thus the conditions vary from one region to another.</p> <p>Although the three Belgian regions largely share the same policy, housing outcomes differ.</p> <p>Social (mortgage) loans are given when certain conditions are met for the construction or purchase of a home (social housing companies or Umbrella organizations of recognized social loan credit companies)</p> <p>The Housing Fund grants mortgage loans to families with a medium or low income; extra energy loan to improve the energy performance.</p> <p>The rent allowance for prospective tenants registered on the social housing lists.</p> <p>Home renovation allowance and community allowance.</p> <p>Relocation allowance – homeless.</p>	<p>housing (Kristensen 2002, 256).</p> <p>Social housing in Denmark is organised in non-profitable housing associations. The housing associations share a nation-wide organisation: the National Federation of Housing Associations (Boligselskabernes Landsforening) which provides services (education, consulting services, etc.) to the individual associations and sections. It also participates in negotiations with the Ministry of Housing about the conditions of the housing sector (Kristensen 2002, 258).</p>	<p>Municipalities are responsible for payment of housing benefits.</p> <p>NGOs providing shelter for the homeless.</p>	<p>The rent benefit (huurtoeslag) is a government contribution towards the rental costs.</p> <p>Housing associations are responsible for the social housing.</p> <p>Municipalities are responsible for the development and the coordination of local homelessness policies.</p>	<p>administrator of the building; Rental units in municipally-owned dwellings, which are managed by municipal governments and offer below-market rent; Emergency housing, which accommodates the very poor and homeless persons; Technical infrastructure and communal services related to housing.</p>	<p>crucial role in the definition of housing policies in Spain, establishing the State’s housing policy priorities.</p> <p>The multi-level governance structure of housing policies in Spain means that regional governments implement the State Plans, but also maintain broad powers to develop their own policies in this domain.</p> <p>Social housing is mainly financed through funding from the National Housing Plan and to a lesser extent from regional plans as well as borrowing from private credit institutions (Housing Europe, 2010b)</p>
<b>Enforcement resources: regulations</b>	<p>Court of justice</p> <p>The tenants’ association</p>	<p>The Tenant’s Union (Lejernes Landsorganisation, LLO).</p>	<p>The court of justice - litigation.</p>	<p>The Supreme Court</p>	<p>The court of justice - litigation.</p> <p>Squatting.</p>	<p>The Supreme Court</p> <p>The tenants’ unions</p>

	<p>The forum for tenancy cases is the justice of peace court is a judicial sub district</p>	<p>The Danish National Association of Housing Communities for Elderly People (LVGO).</p>	<p>There are local community organizations which are mobilized via a public initiative. Housing self-management organizations (apartment blocks or house owners' organizations/partnerships ).</p>	<p>The Rent Tribunal (Huurcommissie) is a national, independent and impartial agency which can mediate and adjudicate on disputes between tenants and landlords about rent levels, maintenance and service charges.  Aedes is the national organisation promoting the interests of social housing organisations in the Netherlands.</p>	<p>The Act on the Protection of Tenants' Rights (2001/2010), the Act on Housing Cooperatives (2000) and the Act on property rights (1994). Housing Cooperative movement. Tenants' Mutual Assistance Association. Polish tenants' organizations.</p>	<p>"PAH (Plataforma de Afectados por la Hipoteca) campaign for housing rights.  Observatori DESC is a human rights center that works to dismantle the devalued perception of social rights, the rights to housing, etc.</p>
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