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Housing as a Universal Basic Service: lessons on realizing a right to housing from
Housing First in Europe

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Abstract

Provisioning systems as infrastructures for human need satisfaction have the potential to provide wellbeing while respecting ecological limits, depending on their design. Universal Basic Services (UBS) is a proposal for a package of public services aimed at the satisfaction of basic human needs based on universal entitlement and independent of ability to pay, while staying within planetary boundaries. UBS also encompasses housing, to which it advocates there should be a social right. However, UBS proposals have so far stayed at a conceptual level so that there are yet few concrete proposals as to how this right might be realized. The right to housing is widely recognized as a part of adequate living standards, yet in practice, universal housing provision currently does not exist in any state, owing to its double status as a need satisfier and financialized commodity. Housing First is a homelessness service model that supports people experiencing homelessness with high and complex needs to be housed based on its core principle that housing is a human right. This thesis asks what the framework of UBS can learn from Housing First about realizing a right to housing through provision. Combining expert interviews with Housing First advocates with the analysis of literature on housing and welfare, the thesis takes a social-ecological transformation perspective on housing and sustainable welfare. Based on categories for systemic change in homelessness systems identified in the analysis, it underlines the adequacy of symbiotic modes of transformation for extending these categories into visions for universalist housing provision and recommends further investigation into this approach, with an emphasis on implications for global justice.

Zusammenfassung¹

Versorgungssysteme als Infrastrukturen für die Befriedigung menschlicher Bedürfnisse haben je nach ihrer Gestaltung das Potenzial, Wohlstand zu schaffen und gleichzeitig ökologische Grenzen einzuhalten. Universal Basic Services (UBS, deutsch: ‚bedingungslose Grundversorgung‘) ist ein Vorschlag für ein Paket öffentlicher Dienstleistungen zur Befriedigung menschlicher Grundbedürfnisse auf der Grundlage eines universellen Anspruchs und unabhängig von der Zahlungsfähigkeit, wobei die planetaren Grenzen nicht überschritten werden. UBS umfasst ebenfalls den Bereich Wohnen, auf den es ein soziales Recht geben soll. Allerdings sind UBS Vorschläge bislang auf einer konzeptuellen Ebene geblieben, sodass es noch wenige konkrete Vorschläge gibt, wie dieses Recht verwirklicht werden könnte. Das Recht auf Wohnen ist als Teil eines angemessenen Lebensstandards weithin anerkannt, doch in der Praxis gibt es derzeit in keinem Staat eine universelle Wohnungsversorgung, was an dem doppelten Status von Wohnraum als Bedürfnisbefriedigung und finanzialisierte Ware liegt. Housing First ist ein Modell der Wohnungslosenhilfe, welches Menschen, die von Obdachlosigkeit betroffen sind und hohe und komplexe Bedürfnisse haben, dabei unterstützt, eine Wohnung zu finden, basierend auf dem Prinzip eines Menschenrechts auf Wohnen. In der vorliegenden Masterarbeit wird der Frage nachgegangen, was der UBS Rahmen von Housing First lernen kann, wenn es darum geht, ein Recht auf Wohnen durch Bereitstellung zu verwirklichen. Durch die Kombination von Expert*inneninterviews mit Housing First Befürworter*innen und der Analyse von Literatur zum Thema Wohnen und Wohlfahrt nimmt die Arbeit eine sozial-ökologische Transformationsperspektive auf Wohnen und nachhaltige Wohlfahrt ein. Auf der Grundlage der in der Analyse identifizierten Kategorien für systemische Veränderungen in Obdachlosensystemen, wird die Eignung symbiotischer Transformationsmodi für die Erweiterung dieser Kategorien zu Visionen für eine universalistische Wohnungsversorgung hervorgehoben und eine weitere Untersuchung dieses Ansatzes mit Schwerpunkt auf den Auswirkungen auf die globale Gerechtigkeit empfohlen.

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List of abbreviations

BAWO	Bundesarbeitsgemeinschaft Wohnungslosenhilfe
CESCR	Committee on Economic, Social and Cultural Rights
DALO	Droit au Logement Opposable
EPOCH	European Platform on Combating Homelessness
ETHOS	European Typology of Homelessness and housing exclusion
EU	European Union
FEANTSA	European Federation of National Organisations Working with the Homeless
GDP	Gross Domestic Product
IGP	Institute for Global Prosperity
LVV	Landelijke Vreemdelingenvoorzieningen
OHCHR	Office of the United Nations High Commissioner for Human Rights
OECD	Organisation for Economic Co-operation and Development
PAAVO I / II	Finnish National Programme to reduce long-term homelessness
UBI	Universal Basic Income
UBS	Universal Basic Services
UN	United Nations
UN DESA	United Nations Department of Economic and Social Affairs
UNEP	United Nations Environment Programme
WBCSD	World Business Council for Sustainable Development

1. Introduction

1.1. Research topic and interest

For most people, every day begins and ends at home. Home is where we meet some of our most fundamental human needs. These are not merely shelter in the sense of a roof over our heads, but also needs pertaining to health, security, care, autonomy and social participation. Housing thus acts as a ‘need satisfier’ for several human needs. Accordingly, it is widely recognized as a component of the right to adequate living standards, for example by The Universal Declaration of Human Rights (UN General Assembly 1948) and the International Convention on Economic, Social and Cultural Rights (UN General Assembly 1966). Yet, homelessness is a persistent phenomenon across Europe, with many more still living in insecure and insufficient housing. What is more, recent years have seen a significant increase in housing precarity. Between 2020 and 2024, house prices in the European Union (EU) rose by 48.5% and rental prices by 14.6%, with housing costs making up 38.2% of income for households below the poverty threshold – a 6.5% increase from 2020 (FEANTSA and Fondation Abbé Pierre 2024, 71).

Whereas most European welfare states offer basic access to other need satisfiers, such as public healthcare services and schooling, housing is not universally allocated by any of them. Instead, housing is commonly accessed through markets, and these produce unequal social outcomes. At the same time, housing, as well as other sectors of provisioning are faced with having to respond to intensifying ecological crises as it has become increasingly salient that human activity has led to the crossing of several of Earth’s biophysical limits (Richardson et al. 2023). This combination of social and ecological crises has spurred research that examines provisioning systems as mediators of biophysical resource use and social outcomes, and their role in satisfying human needs at a globally sustainable level of resource use (D. W. O’Neill et al. 2018). One framework for provision that has recently gained prominence in the literature is that of Universal Basic Services (UBS) (IGP 2017; Coote and Percy 2020). UBS refers to a package of public services that support people in satisfying their basic needs based on universal entitlement and independent of ability to pay. It has the ambition of doing so in a “fair consumption space” which is delimited by “social foundations” and “ecological ceilings” (Coote 2023b). UBS also incorporates housing as a public service to which governments ought to establish a “social right” (Coote and Percy 2020, 79). However, what a right to housing constitutes, much less how it is to be safeguarded, is a question to which there is no coherent answer (Hohmann 2013). Housing is a uniquely conflictive good, due to its status as both need satisfier and a commodity that has increasingly become subject to financialization (Aalbers 2016). Consequently, whereas the less commodified areas of schooling and health care

services essentially already function as UBS and would likely merely be improved and expanded within a UBS framework, the collective delivery of housing constitutes a different type and more novel type of terrain.

Housing First is an approach to solving the homelessness of people with high and complex needs. It was developed in the United States, in the acknowledgement that traditional homelessness service models that make housing provision conditional on acceptance of psychiatric treatment and abstinence from substance use, were not effective as well as dehumanizing (Tsemberis 2010). By subverting this model and providing housing first, independent of other services and with support to stay housed, Housing First could be said to effectively apply a right to housing for its target group. In this process, Housing First acutely navigates housing and welfare systems within the context of different countries. These concrete experiences of the implementation of Housing First services in European countries contain valuable information on what obstacles an approach seeking the universal provision of a good like housing might encounter. For this thesis, Housing First experts were interviewed about these experiences and what learnings they may contain for a housing UBS framework. These experiences are analyzed on components that play a role in systemic change towards ending homelessness and how these learnings can be interpreted to inform UBS strategies for housing provision.

2. Literature review

2.1. Social-ecological provisioning systems

This thesis departs from the idea that provisioning systems as essential infrastructures supporting human lives, are at the core of enabling modes of living that are socially just and ecologically sustainable. Provisioning systems can be defined as “a set of related elements that work together in the transformation of resources to satisfy a foreseen human need” (Fanning, O’Neill, and Büchs 2020, 3). A budding field of research concerns itself with social-ecological provisioning systems and their normative justifications. A basic premise that the literature agrees on is that we are living in times of ecological crisis, with authors usually invoking the human-induced transgression of the so-called “planetary boundaries”, which make up Earth’s biophysical limits within which humanity can safely live. This zone is referred to as the “safe operating space” (Rockström et al. 2009). As of 2023, researchers deem 6 out of 9 assessed boundaries to be crossed and previously transgressed boundaries to have aggravated since the previous assessment of 2015. These are “climate change”, “novel entities”, “biogeochemical flows”, “freshwater change”, “land system change” and “biosphere integrity” are now in “increasing” or “high-risk” zones (Richardson et al. 2023, 9).

The still relatively young scholarship on provisioning systems has set out to the task of defining what it means to provide good living standards while staying within the biophysical limits of the planet and therefore combine planetary boundaries with “social thresholds” to demarcate a “safe and just operating space for humanity” (Raworth 2017). Addressing the consumption side of sustainable lifestyles, authors attempt to define “fair consumption spaces” asking how we can “distribute the remaining carbon budget in a fair manner that allows everyone equitable opportunities for a life of dignity, including future generations” (Akenji et al. 2021). The “social floors” and “ecological ceilings” of this space correspond to the consumption of resources like food, housing, transportation, leisure, and consumer goods that allows for the minimal standards needed for a dignified life, capped by a maximum resource use according to ecological carrying capacity (Akenji et al. 2021, 26; Coote 2023a, 6). The same floors and ceilings are contained in the concept of “consumption corridors”, whereby the corridor signifies the fair consumption space. In consumption corridors, it is emphasized that the upper limit has the function of ensuring that the need satisfaction through consumption of some individuals does not impede on the ability of others to also satisfy their needs through consumption (Fuchs et al. 2021). Brand et. al term this social responsibility to self-limit in order to prevent living at the expense of others “societal boundaries” (2021). “Production corridors” have been proposed as a complement to consumption corridors in order to problematize the political dimension constituted by the “production of overconsumption” and what qualifies as “essential production” in the context of social and ecological crises (Bärnthaler and Gough 2023).

2.1.1. Consumption, human need and sufficiency

The concept of social floors suggests that there is a minimum amount of resource consumption that allows individuals to have a “decent living standard” (Rao and Min 2018). Most of the literature on provisioning systems appeals to a human needs-based approach as a yardstick for social outcomes. This approach draws predominantly on the work of Max-Neef and colleagues (1991) and Doyal and Gough (1991), both of which discern a limited range of universal and satisfiable needs. The universality and satisfiability of these basic needs form an important pillar of the discourse around social-ecological provisioning systems, because it provides the theoretical basis for the sufficiency approach that underpins it. Sufficiency is advocated as a part of social-ecological transformation because it aims to overcome alleged trade-offs between social and environmental goals by focusing on providing “enough for a decent life” (D. W. O’Neill et al. 2018, 93). Sufficiency defines itself in contrast to technical solutions geared at efficiency, by striving for ecological sustainability through a reduced consumption of energy and material while attaining a living standard that is ‘enough’ (Fischer and Griebßhammer 2013; Bohnenberger 2020). The sufficiency debate is interlinked with degrowth debates which equally seek alternative economics models that allow for human need satisfaction while reducing material and energy consumption (Hickel 2019). Some degrowth

scholars have even begun to refer to degrowth as the “science of wellbeing within planetary boundaries” (Kallis et al. 2025). Ample studies have been dedicated to quantifying that a sufficiency approach to provisioning need not come at the cost of reduced life quality (see Vogel et al. 2021; Millward-Hopkins et al. 2020).

2.1.2. Quantifying living well within limits

At present, no country in the world is succeeding at provisioning for basic needs within planetary boundaries. O'Neill and colleagues (2018) quantified the resource use associated with meeting basic needs of 150 nations, finding that no country meets its citizens' needs at a level that stays within global biophysical limits. The social thresholds assessed are “life satisfaction”, “healthy life expectancy”, “nutrition”, “sanitation”, “income”, “access to energy”, “education”, “social support”, “democratic quality”, “equality” and “employment”. The outcome is a striking incongruence between the achievement of social thresholds and the non-transgression of planetary boundaries. Only the Netherlands, Austria and Germany achieve all 11 social thresholds, though at highly excessive levels of resource use. On the other extreme, Sri Lanka does not cross any planetary boundaries, but also only achieves 3 social thresholds. The authors point out that it is especially the more qualitative social goals like life satisfaction, equality and social support that are associated with a high level of resource use.

“In contrast, the social goals that relate more directly to meeting physical needs (that is, nutrition, income, access to energy and sanitation) are more tightly coupled to resource use, but have much lower associated resource use in general. In fact, our results indicate that a sufficient level of performance on these four indicators could likely be achieved for all people without significantly exceeding planetary boundaries. [...] If all people are to lead a good life within planetary boundaries, then our results suggest that provisioning systems must be fundamentally restructured to enable basic needs to be met at a much lower level of resource use” (D. W. O'Neill et al. 2018, 92)

The authors address the Sustainable Development Goals (SDGs) which at present include economic growth as a goal in itself and as a foundation for human development, and call for a shift “away from growth towards an economic model where the goal is sustainable and equitable human well-being. However, if all people are to lead a good life within planetary boundaries, then the level of resource use associated with meeting basic needs must be dramatically reduced” (D. W. O'Neill et al. 2018, 93). The findings of O'Neill and colleagues and their corresponding reasoning and conclusions as to the importance of provisioning systems for making a good life within planetary boundaries feasible, inform the basic assumptions of this thesis and motivate its exploration of the various frameworks the literature has so far produced.

These frameworks explore proposals for social-ecological provisioning systems and what kind of economic restructuring would be required to operate them. These include sustainable welfare (Büchs and Koch 2017); foundational economy (Bentham et al. 2013; Foundational Economy Collective 2018); social-ecological economics (Spash 2024), sufficiency economy (Gough 2017) and systems of provisioning approach (Bayliss and Fine 2020) among others.

2.1.3. Limitations and criticism

Like any field of study, the scholarship on provisioning systems is not without limitations and criticism. As scholars of the field themselves are keen to address, the issues of what provisioning systems ought to encompass who does the provisioning and who benefits are highly political ones. Seen as “the consumption outcomes depend on the system by which a good or service is provided” (Bayliss and Fine 2020) political economy, particularly of the Marxian kind tends to be a prominent analytical strand (Bärnthaler and Gough 2023; Schaffartzik et al. 2021; Plank et al. 2021). Recurring to the sufficiency approach, it is understood that the aspiration for everyone to have “enough”, is, on a planet with limited resources, implicative of preventing anyone from having “too much” (Pirgmaier 2020). Pirgmaier calls our attention to the fundamental incompatibility of a concept like consumption corridors with capitalism as a system that lives off the sustainment of inequalities. She urges scholars to realize the subversive potential of using consumption corridor research as a tool for systemic change. How this change is to come about, by what kind of institutions and forms of power, still requires more research as Bohnenberger points to in identifying the discourse to “lag behind what would be politically feasible” (2023, 340). Provisioning systems conceptual origins in heterodox economics will be further discussed in the theoretical framework of this thesis.

From an eco-feminist point of view, Dengler and Plank criticize the provisioning systems discourse for focusing only on the monetized economy, thereby disregarding unpaid provisioning processes. Moreover, the discourse preference for a political economy lens which mostly analyses provisioning in terms of class relations, has so far ignored power relations structured by categories of gender, race (dis)ability and age, thus lacking intersectionality (Dengler and Plank 2024, 5). The authors offer that a mixture of time politics, UBS and UBI could help create a basis for the social recognition of unpaid provisioning processes, by decoupling wage labor from human wellbeing (Bärnthaler and Dengler 2023).

Bohnenberger, who reviews the literature on eco-social policy and sustainable welfare in her 2023 article, finds that whereas the normative foundations of sustainable welfare have been researched extensively, the concrete principles informing its design are yet to be established (335), and so is research on its policy instruments and institutions (336). Indeed, the literature discussed in this review so far is mostly concerned with the normative justifications of

addressing provisioning systems as a vector of social-ecological transformation but not so much their operationalization. The next section turns to this aspect, with specific focus on the subject matter of this thesis: Universal Basic Services.

2.2. Operationalizing social-ecological provisioning: Universal Basic Services

The literature concerned with meeting human needs within planetary boundaries treats of varying policy mixes made up of roughly the same group of proposals. This tends to include Universal Basic Income (UBI), Universal Basic Services (UBS), income and wealth caps, working-time reduction, job guarantee, minimum income guarantee, carbon tax, wealth tax and living wages (Kallis et al. 2025; Nenning et al. 2023; Vogel et al. 2024). Whereas the provisioning systems and sustainable welfare literature discusses most of these as complementary measures, there are wider academic debates surrounding UBI and UBS in particular, advocating and analyzing one or the other as standalone approaches. Concepts of UBI center on “a regular income paid in cash to every individual member of a society, irrespective of income from other sources and with no strings attached” (Van Parijs and Vanderborght 2017, 4), whilst UBS provides an “in-kind income” through the direct provision of “services that satisfy people’s basic needs, including health and social care, education, and basic levels of housing, food, mobility and information [...] provided to everyone through public or collective institutions according to need, regardless of ability to pay and free at the point of use” (Büchs 2021, 3). Both are proposals to extend social protection in the face of the progressive decline of the welfare state. Although UBS has emerged in some part in response and as an alternative to UBI (Gough 2019), scholars have also discussed their possible complementarity and interactions, since they are schemes of a magnitude such that they will necessarily influence one another in their design as well as performance (Büchs 2021; Coote 2021). What is more, tradeoffs between capital intended for cash transfers and capital intended for public services are deemed unavoidable (Coote and Percy 2020, 51). Nevertheless, there appears to be a broad consensus that even with a focus on only UBS, some form of guaranteed minimum income is desirable. Bärnthaler and Dengler propose that such an income could cover the consumption pertaining to needs that cannot be satisfied by UBS but are nonetheless relevant to life quality. Focusing on care and its commodification, they also propose to integrate a minimum income and UBS with time politics – a redistribution of time in light of the revaluation of social reproduction (Bärnthaler and Dengler 2023, 682).

Universal Basic Services has been pioneered in a report by the Institute for Global Prosperity (IGP) in 2017, upon which other works detailing its moral and theoretical bases have followed (IGP 2017; Coote and Percy 2020; Gough 2019). Whereas the IGP proposes UBS primarily as an investment in social infrastructures, others have since explored its potential to conceive

of a welfare state that is also environmentally sustainable. Anna Coote, a social policy scholar at the UK New Economics Foundation (NEF) is a prolific author of works embedding UBS in sustainable welfare frames. Drawing on scholarship on provisioning systems, she makes the case that UBS can be designed to provision for basic human needs while staying within a fair consumption space (Coote 2023b). She argues that this works through the principles of “prioritizing needs and recognizing limits; enlarging the sphere of public consumption; transforming service provision; and building knowledge, shaping attitudes and behaviour” (Coote 2023a). Büchs emphasizes that although UBS as a concept for collective provisioning has the potential to be made compatible with ecological ceilings – more so than UBI in its focus on cash transfers to individuals – that does not make it inherently an ecological proposal. There remains a great need for careful design, contingent on political decision-making that will shape whether UBS is environmentally sound or not (2021, 5).

2.3. Housing as a Universal Basic Service

What does it mean to deliver housing as a Universal Basic Service? The IGP report assumes following components for the delivery of “shelter services”: “(a) rent free accommodation; (b) no Council Tax obligation for social tenants; (c) utilities allowance included free of charge” (IGP 2017, 43). Working with the UK as an example, the report proposes that 1.5 million new social housing units be built and provided free of rent, council tax and utility costs for 30 years (IGP 2017, 42). A budget for covering these costs using 30-year treasuries is then proposed. Coote and Percy in *The Case for Universal Basic Services* adopt this approach, equally advocating the expansion of social housing and budgeting 0.5% of Gross Domestic Product (GDP) for the costs (2020, 116). As to a general vision of delivering housing they write:

“Our starting point is individual entitlement to housing as one of life’s necessities – a means for meeting one’s basic needs. This is a matter for government legislation to establish positive social rights as well as procedural rights, as we have noted. There is a corresponding duty to enforce the entitlement, which is a matter of collective responsibility. In whatever tenure of housing people live – social, privately rented or owner occupied – they should be able to depend on the fact that they can reside without fear of eviction, provided they meet their obligations. The responsible body, typically a local authority, must have appropriate policies, as well as adequate capacity (powers and resources), which often depend on local or national government” (Coote and Percy 2020, 79).

The authors further detail that a UBS provision of housing should align with values of security, sufficiency, sustainability and affordability. As such it is congruent with social-ecological principles for welfare and provisioning. However, their chapter on housing also acknowledges

that housing is an immensely complex good that is less self-evidently collectively delivered than healthcare or education. Other than the latter two, housing has become a highly financialized commodity (Aalbers 2016). Housing's function as a financial asset that can be accumulated is at odds with the need- and entitlement-based framework described in the above citation. In this framework, UBS advocates appeal to the consensus upon which postwar welfare states have been constructed (Coote 2021, 35). Whereas the neoliberal turn has turned housing into an individualized and marketized issue, the so-called 'Golden Age of Welfare' after the end of the Second World War saw the mainstreaming of social rights, in which social citizenship and mass housing were the norm (Reinprecht 2022, 175). UBS advocates propose to build on T.H. Marshall's postwar view of social citizenship (T. H. Marshall 1965), but criticize it for its centralized, top-down model of service delivery, calling instead for a more democratic, participative and subsidiarity-based approach in which "[p]ower is devolved to the lowest appropriate level" (Coote 2021, 34). Thus, UBS literature ventures into the domain of social rights. This thesis will not delve into the meaning of social rights in the 21st century per se, but it will hone in on the particular debate revolving around housing as a social right and how different actors are using it as a discursive device to demand greater social protection for this commodified need satisfier. Specifically, it aims to examine the tension field in which the demand for a right to housing and housing as financialized collateral collide.

2.4. The right to housing, Housing First and systems change

As Coote and Percy describe, a housing UBS would entail an entitlement and a right to housing. The right to housing is widely discursively recognized as well institutionalized. For example, it is recognized by Article 25 of the Universal Declaration of Human Rights, which states that "[e]veryone has the right to a standard of living adequate for the health and well-being of himself and of his family, including food, clothing, housing and medical care and necessary social services" (1948). However, there is a persistent discrepancy between this right and its implementation. Recent years have seen increased calls for treating housing as a right and it is high on the political agenda of national as well as supranational governments, as can be glanced from the 2021 launch of the European Platform on Combatting Homelessness (EPOCH) and the 2024 appointment of an EU Commissioner for Housing. Initiatives combating homelessness, too, have in recent years increasingly pointed to the right to housing as a pillar of their work. In the recognition of a human right to housing, homelessness can be considered a human rights violation (FEANTSA 2023). Moreover, it can be argued that homelessness and housing exclusion lead to the violation of several other human rights such as the right to liberty and security of the person, the right to freedom from discrimination, the right to privacy, the right to vote, the right to social security and the right to health (Lynch and Cole 2003).

Housing First is an example of a homelessness services scheme that appeals to and arguably ‘applies’ a human right to housing. Developed to permanently house people who are homeless and have complex needs owing to psychiatric problems and substance abuse, it is unconditional: no sobriety, no treatment nor any proof of social functionality constituting “housing readiness” is required for service users (Pleace 2016). Individuals in Housing First programs are supported as long as they need and rehoused in case of eviction. In short, Housing First programs work to provide a high and complex need group of people experiencing homelessness with housing, without expecting them to “earn a right to housing, or earn a right to remain in housing” (Pleace 2016, 29). Recent studies have assessed Housing First’s core principle of housing as a human right as a relatively radical challenge to contemporary models of social care, which tend to rely on a type of residual welfare, by which social support is offered only to the most vulnerable (Taylor, Loubière, and Auquier 2020, 376). Although the scale and success of delivery of Housing First services is variegated by context, Housing First programs on principle work to uphold a right to housing for their target group (Stadler and Collins 2023).

What distinguishes Housing First from traditional homelessness services apart from its unconditionality, is its commitment to ending homelessness rather than managing it. And with notable successes: average housing retention rates in Housing First programs stand at over 80% (Jones, Albanese, and Revelli 2022, 4). Finland integrated Housing First into its national homelessness strategy from 2008 onwards, upon which long-term homelessness fell by 35% between 2008 and 2015, or even by 50% in some cities (Y-Foundation 2017, 19). That said, Housing First’s scope remains limited in most European countries with only four countries reporting supporting 1,000 people or more in 2018 (Pleace, Baptista, and Knutagård 2019, 30). Two recent Housing First publications call for a systems change approach to housing based on the learnings from Housing First. They highlight that while Housing First programs are successful in isolation, in the wider system they mostly remain pilot projects that are added onto traditional services while homelessness numbers keep rising (Jones, Albanese, and Revelli 2022). Thus the advocates call for an examination of how homelessness keeps getting produced, and for changing governance in order to move “from a system that manages homelessness to one that aims to eliminate it” (Demos Helsinki and Housing First Europe Hub 2022, 7).

2.5. Research gap: advancing social security in times of precarity

In times of relative retrenchment of the classic welfare state (Greve 2018, 531), UBS and Housing First are two concepts that both try to contribute to expanding social security. Today’s housing precarity is usually traced back to the rise of neoliberal politics and economic crisis in the late 1970s, which saw the shift from a collective provision of housing to more individualized and privatized solutions and a move “from housing as a public responsibility to a function of

the market". These developments have eroded the understanding of housing as a positive social right (Reinprecht 2022, 176–77). The current moment in time is marked by the friction of two contradicting developments in the landscape of housing provision: on the one hand, inequalities are widening, the costs of living and housing are on the rise; yet on the other hand, great ambitions on advancing social rights are being formulated, in European civil society and even in EU institutions (Taylor, Loubière, and Auquier 2020, 374). It is the space between these two contradicting developments that this thesis wants to examine. What does it mean to speak of housing as a right in the current political and economic landscape and how does that play out in practice? UBS is an idealistic conceptual framework for securing basic human need satisfaction across the board. It also mostly remains at this conceptual level of human need and corresponding rights and entitlements for now, including on the issue of housing. Housing First is an initiative that very concretely works on realizing a right and entitlement to housing, if only for a small and specific target group. In doing so, it must very acutely navigate the given political, economic, social and cultural constraints offered by each locality it operates in. As such, Housing First programs² offer a microscale look into the structural barriers in the way of change in systems of housing provision. Housing First advocates emphasize that the approach is a "compass" and not a blueprint to be scaled up to solve homelessness on its own (Jones, Albanese, and Revelli 2022, 3). However, it is clear that its vision has struck a chord with governments across rich countries in Europe and Northern America, with most of them adopting Housing First programs in some form, and some adopting it into their national strategies, as has been the case in Finland and more recently in the Netherlands, Ireland and Denmark. In this sense, there is some traction for UBS' two basic tenets of *shared needs* and *collective responsibilities* (Coote 2021), though to see these principles reflected in housing policy still requires considerable change. The exercise of this thesis is thus to describe the gap between the normative and discursive advocacy of a right to housing, and the lived practice of trying to realize this right, demonstrated by the case of Housing First. The following research questions result:

Main research question

"What can the framework of Universal Basic Services learn from the experiences of Housing First about operationalizing a right to services that satisfy basic human needs?"

Subquestions

- What is the relevance of Universal Basic Services to social-ecological transformation?

² This thesis examines Housing First *programs* as the schemes involving the planning, advocating and implementing of Housing First services as opposed to the *services* themselves.

- What is the role of social rights in advancing sustainable welfare?
- Where does housing sit in the welfare state and how does that complicate public provisioning?

2.6. Chapter overview

The chapters of this thesis are structured as follows. Chapter 3 introduces the main concepts of UBS, the right to housing and Housing First. It goes more into depth about the state of the art of the research on them and discusses their interrelationships to lay the basis for later use in the analysis. Chapter 4 introduces the theoretical framework, made up of social-ecological transformation, degrowth and provisioning and human need theory, which together provide the main theoretical angle onto the topic. Chapter 5 situates housing in the welfare state, evaluating research on frameworks for housing and welfare regimes to cultivate an understanding of the history and possibilities of housing provision within the welfare state. Chapter 6 describes the methods that were used, the research process and the positionality of the author. Chapter 7 analyzes the data material from the expert interviews and establishes initial theoretical interpretations which are deepened in the discussion in chapter 8. Conclusions are drawn up in chapter 9.

3. Concepts

3.1. Universal Basic Services

3.1.1. Provenance and components

Universal Basic Services is a welfare proposal that aims to counteract the hollowing out of the postwar consensus that has occurred since the neoliberal turn. It takes inspiration from this consensus and the sentiment of collective responsibility for the wellbeing of all members of society that was contained in F.D. Roosevelt's New Deal and postwar welfare states (Coote 2021, 34). This sentiment has been undermined with the advent of neoliberalism in the late 1970s which went hand in hand with stringent reductions in public spending and taxation. Although it is deemed inaccurate to say that neoliberalism has simply reduced state intervention in favor of the market in a dualistic sense, scholars observe that the interests of private capital and of finance especially have come to be favored by the state to the detriment of public services (Fine and Saad-Filho 2017, 690). This redefinition of the relationship between the economy, the state, society and individuals has also carried with it the notion that individuals are their own entrepreneurs, entirely responsible for their own lives' successes and failures. Subsequently, social problems have increasingly been approached with individualized, financialized solutions, further burying a sense of collective responsibility (Fine

and Saad-Filho 2017, 697). Social security problems have deepened, rather than improved in the wake of the 2008 global financial crisis, as the current housing crises and cost-of-living-crises that are widespread in the affluent countries of Europe and North America show. Moreover, although public services like healthcare and education are still part of modern welfare states, their funding has often been reduced to a minimum, causing quality and capacity to suffer. This has spurred widening inequalities between those who can afford to access alternatives such as private services and those who cannot. UBS and related concepts that want to rekindle models for collective provisioning strive to “reclaim the collective ideal and rebuild the social wage” (Coote and Percy 2020, 12). UBS is made up of the following components:

1. *“Services:* collectively generated activities that serve the public interest
2. *Basic:* services that are essential and sufficient (rather than minimal) to enable people to meet their needs.
3. *Universal:* everyone is entitled to services that are sufficient to meet their needs, regardless of ability to pay” (Coote and Percy 2020, 4)

These services would either be free at the point of use or “genuinely affordable for all who need them” (Coote 2023a, 9). The best existing examples we have of this are healthcare and education, which UBS scholars propose should be learned from and improved. What makes UBS distinct from other welfare proposals is its commitment to providing access to public services across the board, since “[t]here’s no point having a better NHS³ if people keep getting ill because they are poorly housed or fed” (Coote 2023a, 9). The IGP’s 2017 report that first presented UBS includes the following services: healthcare, education, democracy and legal services, shelter, food, transport and information. Who receives these services is dependent on need: i.e. those without children will not receive childcare services, and those who are securely housed will not receive shelter services (Coote and Percy 2020, 29). Though universal, UBS is not unconditional. In terms of eligibility, Coote and Percy appeal to economist Atkinson’s (2015) concept of “resident participation”, which proposes that support can be allocated on the basis of a social contribution in the form of employment, caregiving, education or voluntary engagements (Coote and Percy 2020, 29). The idea behind this is again a kind of participative social citizenship, by which the rights and entitlements are “conferred on residents rather than on passport-holders” (Coote 2017, 16). Not all UBS can be provided completely free at the point of use and not all basic human needs can be fully satisfied by UBS, so that some form of minimum income remains necessary. Bärnthaler and Dengler’s policy mix of time politics, UBS and guaranteed minimum income, foresees a conditionality of participation similar to Coote’s conception of social citizenship: in their proposal, minimum income support is

³ National Health Service

dependent on a notion of “an awareness of our shared independence on social reproduction and care work”. For them, a basic income would require all members of society to perform “wage, reproductive and political work, as well as work on self-development” as per feminist sociologist Frigga Haug’s 4-in-1 perspective (Bärnthaler and Dengler 2023, 681; see also Haug 2022).

3.1.2. Normative foundations: collective needs and responsibilities

The conditionality of UBS and related support upon social citizenship, is based on UBS’ two key principles of “*shared needs and collective responsibilities*” (Coote 2021, 33). With respect to these two principles, UBS advocates invoke both Doyal and Gough’s human need theory (1991) and Nussbaum’s capability approach (2000). These two theories make up a framework that takes issue with neoclassical economics theory’s “ontological and epistemological preference to the wants individuals happen to have” (Gough 2019, 535). Whereas ‘wants’ are about individual preference and are theoretically infinite, needs and capabilities⁴ are two demarcated sets of components of human wellbeing that are universal and finite. Martha Nussbaum discerns three capabilities that are at the core of human wellbeing: “affiliation”, “bodily integrity” and “practical reason” (Nussbaum 2000). The significance of these capabilities is in turn entangled with categories of human need. Doyal and Gough in their canonical work *A Theory of Human Need*, describe basic human needs as objective, plural, non-substitutable and satiable (1991). Starting from needs paints a very different picture of what need satisfiers might look like than starting from wants. It implies that it is possible to discern packages of generic need satisfiers – with sensitivity to culture and context - that are bound to fulfill human needs to a point of sufficiency. Gough stresses the importance of citizen involvement and decentralized practices in order to determine need satisfiers in a way that is democratic, grounded in an empirical understanding of everyday life and based on scientific knowledge of human and planetary health (Gough 2019, 536).

A needs-based understanding of human wellbeing commands a different concept of the economy than one in which the economy is a marketplace of substitutable commodities. Instead, the economy becomes a network of ‘systems of provision’ (Bayliss and Fine 2020). This understanding also acknowledges that needs differ in their ability to be met through market transactions. Some can, but must not always, like food and clothing; some are mostly met through markets, like housing and transport; and some can almost exclusively be met in dependence on other people, like education and healthcare (Coote 2021, 34). Coote proposes that for all three different categories, we cannot ensure everyone’s basic needs get met unless we commit to a degree of collective responsibility. Hence UBS is a framework

⁴ Martha Nussbaum’s concept of capabilities differs from that of Amartya Sen’s, which is discussed in the theoretical framework.

“for exercising collective responsibility to meet shared needs, with a focus on services rather than money and goods. It involves pooling resources, sharing risks, and investing collectively – through government institutions – in social and material infrastructure to serve the public interest. As such, this agenda relates chiefly to consumption that is public or social, rather than private: services that are used by all who need them and funded wholly or partly through taxation” (2021, 34).

3.1.3. Why services and not (just) cash?

A framework of needs and responsibilities naturally leads to the question of provisioning. UBS’ focus on services and their regulation, at least in part by the state, is not to the exclusion of market provision and goods. On the contrary, authors emphasize the importance of the cooperation of public and private actors in provisioning (Coote 2021, 478). However, the emphasis is on services because other than goods, services are not separable from their producer and are not destined for ownership but for usage at the point of delivery, enabling them to address needs more directly (Coote 2021, 34; Coote and Percy 2020, 135). These features guide the attention to what is provided, by whom and for whom. Hence, there is an immediate focus on needs and distribution. This is less the case with cash transfers, like UBI. Although a greater disposable income would tend to make it easier for many households to purchase market goods and services that allow them to satisfy certain needs, there is no guarantee as to the adequacy of markets. Especially for lower income households, market goods take up a larger share of income; their transactions costs tend to be higher; and markets’ efficiency at satisfying needs is flawed due to profit incentives and volatility (Gough 2019, 539). On the other hand, cash transfers can also produce different benefits than services. Milena Büchs (2021) compares UBS and UBI on their ability to meet four sustainable welfare criteria: planetary boundaries, needs satisfaction, fair distribution and democratic governance. She finds that in terms of needs satisfaction, UBI might generally be regarded as less stigmatizing and paternalistic than UBS (which would require some means- and needs-testing) and could reduce dependency on employment, which, especially in cis-heterosexual partnerships, may favor the financial independence of women (2021, 4). In the area of democratic governance, cash transfer schemes like UBI could enhance participation by freeing up time otherwise spent in wage labor. UBS, in turn, could be more adept at generating benefits for lower income households, since they disproportionately lose out on income spent on market-provisioned goods and services. UBS is also more adaptable to ecological design, though both UBS and UBI could lead to aggregate increases in energy and material throughput. Additionally, UBS could create secure jobs in governmentally supported sectors of provision and deal with its risk of paternalism through citizen involvement and user-led approaches in the design of provisioning systems. Büchs underscores that the performance of both UBS and UBI in all four criteria are heavily dependent on the institutional management of their respective risks. She

also emphasizes that the regulation of markets is crucial to both UBI and UBS, for instance because public provision would still require some market purchases and regulation could address market failures that are relevant to both approaches (2021, 4). As previously concluded, UBS advocates tend to advise its combination with cash benefits in order to cover the full range of human needs and even find that UBS and UBI could be complementary (Büchs 2021). However, the emphasis is on services because these are at their core dedicated to the collective responsibility for shared needs, whereas capital and markets are not.

3.1.4. Bridging theory and practice in UBS

While the normative grid of UBS and sustainable welfare at large has been well established in the literature, publications plotting out practical applications are still more scant (Bohnenberger 2023). Of course, rich proposals for collective provisioning exist for single systems of provision, like housing or transport, but not yet many under the banner of UBS. Fewer examples are available for the applications of UBS - then again, a complete cross-sectoral blueprint for the transformative systemic change envisioned by UBS is neither feasible nor necessarily desirable, owing to the immense complexities at hand. The first task of concepts like UBS is therefore to point out these complexities and formulate some principles, which is what has so far happened in the field. Coote and Percy stress that UBS is not a silver bullet but a complex proposition that needs to address questions of responsibility, power, ownership, funding, participation, conditionality and entitlements and not least the role of the state (Coote and Percy 2020, 20). Acknowledging that the answers to these questions will vary by context, they contend that all UBS should share some common features: *responsibility* should ultimately lie with democratically elected governments; *power* should be devolved to the lowest appropriate level; *ownership* will be spread over many different actors just as they are now but with a shared “clear set of enforceable public interest obligations”; *funding* should enable services to be accessible and affordable to all; *participation* should take place in all processes of design and delivery of services; *conditionality* and *entitlements* will be structured by rules centered on fairness and inclusivity; and the *role of the state* will be to “ensure equality of access, set and enforce standards, raise and invest funds, and coordinate functions between services” (Coote and Percy 2020, 33–34).

So, what might various UBS operating with these standards look like in practice and how will they be paid for? Healthcare and education are often cited examples of services that deliver on UBS promises when functioning well. Coote and Percy dedicate one chapter to care and one to housing, transport and information. For the sake of giving insight into their proposal that remains concise while doing it justice, only the care chapter will be considered here. Pertaining to care, their proposal includes radical improvements in health care and schooling to begin with. The authors also expand into high quality childcare, coming in at about 3% of GDP to

provide for services free, which they argue would be compensated for through increases in employment, tax revenue and reduced income support. Additionally, spillover effects for society as a whole could be significant, since parents can go to work whilst their children are well tended to and prepared for education (Coote and Percy 2020, 64–65). A UBS adult social care system would focus on preventing need and providing long-term care insurance (LTCI) that includes both medical and social care services. The authors refer to the example of Germany, which has an LTCI in place that legally anchors budget, contribution rates and eligibility criteria. This scheme has managed to minimize increases in costs to 0.8% of salaries 25 years after its inception. The UK on the other hand, which does not include long term social care in its funding system is set to face almost a 1% of GDP increment in cost in the next decades (Coote and Percy 2020, 71).

The 2017 IGP report explores proposals for transport, information, shelter and food. Since shelter has been described in this thesis' literature review, the following will only briefly summarize the Institute's idea of information services which is perhaps a less conventionally imaginable public service. The proposed service package for information services includes broadband, a basic telephone package and a TV license. The authors use a 2014 Living Costs and Food Survey (LCF) to estimate aggregate costs for information services. They conclude a cost of between 16.5 and 19.9 billion pounds sterling to provide each household with information services that are free at the point of use (IGP 2017, 31). Financing this service would use either tax rate increases or reductions in Personal Allowance (IGP 2017, 37). There could be a progressive distributional effect, in which the value of information services is higher at a smaller proportion of income for poorer households (IGP 2017, 35).

3.1.5. Desired outcomes and limitations

UBS advocates frame its intended outcomes in terms of *equality*, *efficiency*, *solidarity* and *sustainability* (Coote and Percy 2020; Gough 2019). Regarding *equality*, models have shown that households in the lowest income deciles stand to benefit most from the expansion of public services, with the potential to reduce income inequality by an average of 20% (Verbist, Förster, and Vaalavuo 2012). The strengthening of low-income households and their improved access to public services can also be expected to have ripple effects both within households and for society at large: on the one hand, access to housing, education, care and so on would protect low-income households against “accumulating risks and vulnerabilities”, on the other, reduced inequality has been shown to benefit society on the whole by preventing a host of social and health problems (Coote and Percy 2020, 36). *Efficiency* is a tough variable to measure in the case of public services, however, it has been argued that ‘social return on investment’ (SROI) could be greater in a system where resources are allocated to through needs-based services (Gough 2019, 539). Provisioning systems based on the universal needs of all members of

society is contrasted by scholars with “appropriating systems [which] extract rents to satisfy the *wants* of a small section of society (e.g. a wealthy elite), at the expense of efficient social provisioning” (Fanning, O’Neill, and Büchs 2020, 8). UBS’ ambition for *solidarity* is about nobody falling through the cracks of the system for a want of money, and fostering again the sense of “mutual interdependence” that has been weakened by the neoliberal imperatives of individualism and competition (Coote 2017). Although some have argued that extended public services can ‘crowd out’ social capital, studies of Nordic-style welfare regimes that provide more public services give evidence to the contrary, showcasing higher levels of social capital (Van Oorschot and Arts 2005). Finally, UBS wishes to deliver on *sustainability* by enabling consumption that stays within ecological limits while by for sufficiency. Coming back to the literature on provisioning systems, UBS is part of a discourse around a “fair and just operating space for humanity” in which provisioning systems crucially mediate between biophysical resource use and social outcomes (D. W. O’Neill et al. 2018).

Since the introduction of UBS in 2017, there have yet been few published critiques, though there are obviously many possible concerns to be paid attention to with a vision of such scale. It is beyond the scope of this thesis to treat each of these critiques in a sophisticated way. Some, like the risk of paternalism and centralized power have come up already. Coote and Percy add to them concerns about power and competence of governments; decision making; profiteering by big corporations; meeting resistance; and affordability (2020). Of course, the extent to which UBS could deliver on its objectives while mitigating risks of adverse outcomes, is to a large degree down to matters of governance, and this governance would have to be sensitive to great complexity for it to be truly inclusive, emancipative and sustainable, both within societies as well as on a global scale. The field of research around the governance of public provisioning is still growing, therefore the process of making proposals more robust is ongoing. This involves publications about the democratization of provisioning systems (Steinberger et al. 2024), levels of public support for eco-social policies (Koch 2022), estimations of costs - Coote and Percy project an additional 4.3% of GDP in annual expenditure for most OECD countries to realize the full bandwidth of their UBS proposal - (2020), perspectives on responsibility for change (Kreinin, Mamut, and Fuchs 2024) as well as perspectives on global justice (Hickel and Sullivan 2024). Despite these efforts, much more research remains to do be done if UBS is to further establish itself in and beyond academia.

3.2. The right to housing

3.2.1. Social rights and their significance to welfare

The proposal of UBS builds on the idea of social citizenship, involving social rights that essentially constitute a “right to welfare” (T. H. Marshall 1965). Social rights are the “rights of people to achieve their basic needs”; they enable citizens to lay claim to services that satisfy

these needs, such as healthcare, food, education and housing (Landau 2016). Historically, social rights and more generally the rise of the modern welfare state tend to be traced back to the 19th century. At this time, the first urban social policies emerged to offset the social risks brought on by the processes of industrialization and urbanization that marked capitalist modernization. Contrary to the parish-run, charitable social supports that preceded the industrial revolution, the ‘social question’ that accompanied industrialization spurred the institutionalization of welfare policies in which access to services was a right, rather than charity (Kazepov et al. 2022). Social rights have since been enshrined, for instance in national constitutions and case law, as well as The Universal Declaration of Human Rights (UN General Assembly 1948) and the International Convention on Economic, Social and Cultural Rights (UN General Assembly 1966). In 2024, EU leaders renewed their commitment to the European Pillar of Social Rights by signing the La Hulpe Declaration (European Commission 2024). This notwithstanding, the justiciability of these legal recordings of social rights tends to remain limited in practice. Yet, the rhetorical claiming of social rights and the right to housing in particular has if anything become more prevalent in recent social struggle. This begs the question of what the significance of social rights is for social change. To address this question for the case of housing first requires an understanding of what the right to housing is and how it might be put into practice.

3.2.2. What is the right to housing and how can it be applied?

What exactly the right to housing is, is difficult to say (Hohmann 2013, 231), though this is not for a lack of ideas. Many proposals have been made, both as to what the entitlements of the right to housing are, as well as to what enforcing it could look like. Proposals tend to agree on the idea that housing should be more than just four walls; a right to housing should be a right to ‘adequate’ housing. A 1991 comment of the UN Committee on Economic, Social and Cultural Rights (CESCR) on the UN Covenant of 1966 clarifies that adequate housing is not “merely having a roof over one’s head [...] [r]ather, it should be seen as the right to live somewhere in security, peace and dignity”. The comment further specifies that adequate housing needs to fulfill factors of security of tenure, availability of services, affordability, habitability, and accessibility (United Nations 1991, 2). This has since been extended with minimum criteria of accessibility, location, cultural adequacy and protection against forced evictions (OHCHR 2000). These factors add up to a concept of adequate housing as a home that forms the basis for one’s ability to participate in society (Hohmann 2013, 8). States are required to *respect, protect and fulfil* the right to adequate housing (OHCHR 2000), as they are required to with human rights in general (UN General Assembly 1948).

The main tenets of the above are echoed in Coote and Percy’s case for a UBS entitlement to housing. Their main requirements are for housing to be secure, sufficient, sustainable and

affordable. Their definition of sustainability ties in the former two: “sufficiency within planetary boundaries and security for generations to come” (2020, 82). Acknowledging that more often than not, social rights fail to be upheld integrally, the authors nonetheless see a role for social rights as an argumentative support for progressive initiatives. In the ideal case, they would see the enforcement of social rights through their accompaniment by ‘procedural rights’ that help people recognize and claim benefits they are entitled to (2020, 31).

Attempts at making the right to housing justiciable are not new. A prominent example of a national attempt at a justiciable housing right is that of France. In 2007, France introduced a law called the *Droit au Logement Opposable* (DALO), the ‘enforceable right to housing’. Social unrest due to consecutive events involving the deaths of residents of substandard housing and long-term homeless encampments in Paris contributed to the mounting pressure that preceded the passing of the law. Constitutional and legal systems promoting the right to housing had already been in place in France, however DALO became the first law enabling citizens to hold the state liable for failing to provide housing to those in need (Taylor, Loubière, and Auquier 2020, 379). Since 2007, its effects have been assessed as restricted (Taylor, Loubière, and Auquier 2020; Lévy-Vroelant 2015). DALO applications can be made under three cumulative conditions: firstly, applicants have to be permanent residents or national citizens. Secondly, one has to provide proof of having been denied access to all available measures, showing inability to house oneself. And lastly, applicants have to be eligible for social housing. Hence the conditions for application replicate existing restrictions to access to housing. Nevertheless, the first year DALO was in operation saw over 6000 applications per month (Direction de l’habitat, de l’urbanisme et des paysages 2015; Taylor, Loubière, and Auquier 2020, 379). In 2015, an average of 50% of applications were rejected (Lévy-Vroelant 2015, 105). 27% Of applicants were eventually re-housed, though it is worth noting that around 20% refused rehousing proposals on the basis of concerns about location and rent costs, indicating faults in the allocation system (Lévy-Vroelant 2015, 103). In terms of liability, the state effectively faced little concrete consequences when not able to provide or when providing lacking housing. It would tend to justify these failures by citing insufficient means to uphold the right (Taylor, Loubière, and Auquier 2020, 380).

Taylor and colleagues compare the case of France with that of Scotland and Finland (2020). Scotland celebrated initial successes after the implementation of its 2003 Homelessness Act. Intended to make the right to housing truly universal, the Act phased out priority needs assessment, so that by March 2013, all applicants came to be assessed as priority need. Yet, the Act’s overall efficacy at reducing homelessness was eventually curbed by factors like insufficient housing supply, reduced funding due to the global financial crisis and changes in the political landscape. Similar to the French case, structural barriers hence blocked the way

to an enforceable right to housing, calling into question the effectiveness of a rights-based approach to housing justice anew (2020, 383–84). Finland presents a different case as the only European country where homelessness numbers are decreasing. However, its approach to the right of housing is different from that of France and Scotland. In France and Scotland, the focus has been on individual rights, though in Scotland the effort did not concentrate on making it enforceable. In Finland, individual rights have not played a significant role in national strategy. Rather, its success at fighting homelessness is attributed to the political buy-in of a broad range of actors and high levels of expenditure: Taylor and colleagues show that, while the countries have a comparable GDP per capita, Finland spent nearly seven times more per homeless individual than France (2020, 384). Comparing the three countries, the authors stress that in all three countries there has been a strong effort to strengthen the right to housing, however, the efficiency as well as efficacy of leveraging the right legally have to be questioned. Although the aspiration of a justiciable right to housing is a valiant one, the structural discrimination of individuals experiencing homelessness and housing precarity is not absent from courts. It is also questionable whether, in the face of insufficient funding, spending should go towards long-winded and costly processes of legal claims on the right to housing:

“it is important to question the utility of investing time and effort in advancing a legal right to housing without first securing other important victories in terms of political commitment and a broader consensus on tackling homelessness, and crucially on tackling the problems that lead to homelessness in the first place—which are, above all other factors, issues of housing supply and economic inequality. Although the individual pathways to homelessness vary greatly, the overwhelming evidence demonstrates that homelessness is most associated with poverty” (Taylor, Loubière, and Auquier 2020, 386)

The difficulty of enforcing social rights is of course not to the overall discredit of their importance and the importance of exercising them through various institutions, including law. Litigation is and remains a crucial practice in the struggle for justice. If anything, recent years have shown increased momentum for movements holding states accountable, for example through climate litigation, reparations to formerly colonized territories or cases arguing for rights of nature. Even if it is often hard or inconsequential to penalize the non-compliance of states, successful cases tend to make waves by sparking debate about the duties of states to uphold fundamental rights. In this regard, the advancement of social rights, even if only discursively remains an essential part of toolkits for systemic change. Some notable examples include Ecuador becoming the first nation to enshrine rights of nature in its constitution; climate nonprofit Urgenda successfully suing the Dutch State for its failure to reduce CO₂ emission; or the German case of *Deutsche*

Wohnen & Co. Enteignen which secured a majority support in a referendum for socializing housing by appealing to a clause in the constitution.

In the arena of housing, attempts at legal enforcement of entitlements have often addressed individual rights, even if in the name of an effort to ultimately make this right universal. Cases revolving around protection from eviction, housing those in acute need, or other situations in which legal action is the last resort to protect people from housing deprivation testify to the residual nature of modern housing welfare. The appeal to the right to housing can therefore be understood as part of attempts to “re-politicize the housing question as a matter of common interest and social security” (Lévy-Vroelant 2015, 108). According to Hohmann in his book *The Right to Housing: Law, Concepts, Possibilities*, the tensions that come to the fore when analyzing the role of the right to housing in effecting social change, is exactly what gives it its charge. The right to housing and its various interpretations and visions are expressions of “struggles to determine and recreate the relationships among the state, society and individual” (2013, 249). Rather than striving for a homogenous concept of the right to housing, one should see the right to housing as a “prism through which to view the complex conflicts and contested questions about the shape of the world, and the boundaries of the possibilities for change and stability within and across societies” (Hohmann 2013, 249).

3.3. Housing First

3.3.1. What is Housing First?

Housing First is a homelessness service model that was first developed by Sam Tsemberis at the non-profit organization Pathways to Housing in New York in the 1990s. The model is based on intensive case management services intended for people with “high and complex needs” due to psychiatric illnesses, often co-occurring with substance abuse (Pleace, Baptista, and Knutagård 2019, 10). It is designed in recognition of the fact that the traditional supportive housing, called “Linear Residential Treatment” or the “staircase model”, has not been effective for this target group (Tsemberis 2010, 13). The staircase model is intended to prepare homeless people to become ‘housing ready’ by first requiring them to participate in psychiatric treatment as well as proving sobriety. Each step on the staircase represents a part of the program that individuals have to complete in order to be offered housing (Pleace 2016, 13). By the 1990s, the staircase model was increasingly proving itself to be unsuitable to keeping individuals with psychiatric and addiction problems in housing: many service users were unable to progress through the program or were evicted again for failing to adhere to strict rules requiring them to stay in treatment and abstain from substances. Moreover, the model raised concerns about the stigmatizing and coercive nature of offering housing only as a reward for performing as an exemplary citizen (Tsemberis 2010, 14). After all, the same would never be demanded of regular ‘tenants’ on the housing market; that would violate their rights. Hence

Housing First came to be conceptualized based on housing as a basic human right and with that the inversion of treatment first, housing last, to housing first, treatment optional. In Housing First programs, service users are intensively supported with all that is needed to house them rapidly and keep them housed, but with no conditionality on partaking in treatment or upholding sobriety. It offers mobile support that visits people in their own self-contained apartments with a regular rental contract, separating housing from health services (Pleace 2016, 15). This thesis focuses on European Housing First services.

3.3.2. The normative principles of Housing First: the right to housing and user choice

The Pathways Model to Housing that became the first Housing First model, was developed in the context of cities in the United States. In 2016, a multi-national team of experts published a guide in cooperation with Sam Tsemberis, to introduce readers to Housing First in the European context. This guide provides an overview of core principles and describes examples of how Housing First works in practice. Eight core principles are introduced, the first of which is “housing is a human right”. The others are: “choice and control for service users; separation of housing and treatment; recovery orientation; harm reduction; active engagement without coercion; person-centred planning; and flexible support for as long as is required” (Pleace 2016, 13). The guide specifies that the Housing First understanding of a right to housing combines two definitions of this right: first, the CESCER’s definition of housing as an individual’s entitlement to housing that fulfills criteria of affordability, habitability, availability of services, accessibility, location, cultural adequacy and legal security of tenure; and second, the definition given by the European Typology of Homelessness (ETHOS) which distinguishes between physical, social and legal requirements. “The physical domain centres on having one’s own living space, in other words, your own front door to your own home, which is under your exclusive control. The social domain covers the space and privacy needed to live a normal life as an individual, a couple or a family. The legal domain echoes the international definition of a right to housing, i.e. security of residence that is legally protected” (Pleace 2016, 29). As Housing First is intended for people that are seen as particularly ‘difficult’ to house owing to their high and complex needs, what is essential about this combined definition of a right to housing is its function of destigmatizing Housing First service users as entitled to a “normal life” and being expected to uphold their side of a tenancy “in the same way as any other person renting a home would be” (Pleace 2016, 29). The tenets of this definition are echoed by the other core principles, which emphasize value placed on respect for the autonomy of individuals and support towards housing sustainment, wellbeing and social integration on the service

users' own terms. "Consumer choice"⁵ (Tsemberis, Gulcur, and Nakae 2004) and "self-determination" are seen as the foundation of recovery (Pleace 2016, 30).

Evidence has played an important role in Housing First becoming an influential turning point in homelessness policy. The key message that Housing First programs are able to communicate to political decisionmakers is: it works. At an average retention rate of over 80%, the vast majority of service users is successfully housed long term (Jones, Albanese, and Revelli 2022, 4). Another case that is often made for Housing First is an economic one: not in all, but in many cases, Housing First can be more cost-efficient than traditional services. Depending on available system infrastructures in different locations, Housing First can imply an initial increase in expenditure because it inserts people into services like healthcare they have not previously used (Pleace, Baptista, and Knutagård 2019, 61). However, in many contexts, Housing First has the potential to create a cost-benefit surplus by avoiding individuals' recurrent hospitalizations, shelter costs and contact with the justice system, while promoting their social integration and wellbeing (Pleace 2016, 21–22).

3.3.3. How Housing First works in Europe today

In 2019, Housing First services operated in 19 European countries. 11 of these countries had national homelessness strategies and out of them, 9 countries had integrated Housing First into their national strategies (Pleace, Baptista, and Knutagård 2019, 16). Data on Housing First is not yet uniformly collected and reported, so that the extent of programs is not always precisely known. In 2019, only four out of 19 countries reported supporting 1,000 or more individuals (Pleace, Baptista, and Knutagård 2019, 30). However, this may not be representative of the role of Housing First in individual countries, since the implementation of Housing First varies widely across contexts. For instance, Finland and Denmark are two of the most progressive and successful adopters of Housing First. Both countries have integrated its philosophy into their national strategies, but precisely this ingrainment makes it harder to extract coherent data on the scope of their services (Pleace, Baptista, and Knutagård 2019, 31). Housing First services were considered "established" in Denmark, Norway, and Finland, "increasingly quickly" in Sweden, the UK, France, Italy and Portugal, "increasing slowly" in the Netherlands, Belgium, Czech Republic, Austria, Slovenia and Spain and "no increase" was reported for Hungary, Romania and Lithuania (Pleace, Baptista, and Knutagård 2019, 34).

Services, their extent, their funding and their "fidelity" to the principles of Housing First vary widely across contexts. Two core factors of success are the availability of quality affordable housing and funding. In a 2019 evaluation of Housing First services in Europe, Pleace and colleagues found that amongst 19 assessed countries, only Finland and Ireland reported

⁵ "Consumers" is sometimes used in North American services, while the European guide speaks of "users"

having sufficient funding levels. Only Italy reported having enough housing available for Housing First and the vast majority of respondents reported finding housing for their programs to be “always difficult” (2019, 40–46). Most housing for Housing First is currently sourced in the social housing sector, with the private rental sector being more challenging to tap into (Jones and Fritz 2023, 8). The extent to which countries adhered to the core principles of the Housing First model, termed “fidelity”, was highly variegated across the evaluated countries, underlining the need to assess program efficacy at national or smaller scale (Pleace, Baptista, and Knutagård 2019, 28). Furthermore, Housing First programs are at present only accessible to those who are also eligible for regular social welfare services, excluding people lacking valid documentation.

3.3.4. Housing first and systems change

In 2024, the European Federation of National Organisations Working with the Homeless (FEANTSA) estimated that 1.287.000 people in Europe sleep rough, stay in night shelters or in temporary accommodation (FEANTSA and Fondation Abbé Pierre 2024). Their *9th Report on Housing Exclusion* paints a picture of overall increased housing insecurity in the EU: in 2023, over 58.6 million people (13.1%) were affected by social and material deprivation, which is up 3.1% from 2020 (2024, 69). House prices rose by 48.5% and rental prices by 14.6% since 2015 (2024, 71). What’s more, housing costs as a proportion of household’s disposable income saw a 6.5% hike since 2020 and made up as much as 38.2% of income for households below the poverty threshold in 2023 (2024, 78).

In this context of worsening housing precarity, there has been a recent orientation of Housing First publications towards promoting “systems change”. In their 2022 paper on Housing First and systems change towards ending homelessness, Jones and colleagues at the Housing First Europe Hub inquire what it would take to apply the lessons learned from Housing First successes to understand what pushes individuals into housing precarity and housing exclusion (Jones, Albanese, and Revelli 2022, 3). The result of their inquiry which includes a cooperation with Finnish thinktank Demos Helsinki, is that systems change largely hinges on shifting the very goal of the system, in this case meaning: “[a] structural and operational shift in the *governance* of homelessness...from a system that manages homelessness to one that aims to eliminate it” (Demos Helsinki and Housing First Europe Hub 2022, 7). The authors identify a shift from Housing First as policy to Housing First as governance as essential. They define governance as “a matter of how the interconnections between *all the involved actors* work” (2022, 8). The analytical chapter of this thesis will adopt this paper’s characterization of homelessness systems and their governance.

4. Theoretical framework

4.1. Social-ecological transformation

The principal theoretical lens guiding this thesis, rather than a single body of theory, is the concept of social-ecological transformation, which is an umbrella term that “describes political, socioeconomic, and cultural shifts resulting from attempts to address the socioecological crisis” (Brand and Wissen 2017b, 1). Social-ecological transformation has arisen to take issue with what political scientist Ulrich Brand has termed the “new critical orthodoxy” of the use of the word ‘transformation’ in sustainability discourse (2016b). From the early 2010s, the intensification of global ecological crises saw increasing numbers of reports published by international organizations that use the word transformation to signal the need for change that goes beyond managerial and incremental solutions. Whereas previously, the changing of the global environment had been attributed to direct and indirect ‘drivers’, these reports began to speak of ‘transformation’ (Brand 2016a, 504). In light of projections for the world population to reach 9 billion in 2050 and climate change accelerating, transformation was discussed as the antidote for “business as usual” (WBCSD 2010). The envisioned transformations centered on ideas of a “green economy” (UNEP 2011), a “green great technological transformation” and “sustainable development” (UN DESA 2011). The idea of this type of ‘green economy’ was guided by a decoupling of GDP growth from carbon emissions, so as to arrive at “climate-friendly development” spurred by technological innovation and resource efficiency (WBGU 2011, 16). This vision was summed up by the then UN Secretary General Ban Ki-Moon as follows:

“Rather than viewing growth and sustainability as competing goals on a collision course, we must see them as complementary and mutually supportive imperatives. This becomes possible when we embrace a low-carbon, resource-efficient, pro-poor economic model” (Ban in UN DESA 2011, iii)

The core feature shared amongst the reports is a belief in economic growth as necessary and reconcilable with the environment. Brand, who is a leading scholar of social-ecological transformation, criticizes this vision of transformation on four grounds: 1) it argues for strong regulatory frameworks while neglecting power relations; 2) it assumes the possibility of *absolute* decoupling of economic growth from environmental harm when only *relative* decoupling has been observed (Parrique et al. 2019); 3) against the background of neoliberal open-market policies, the resources required to achieve a green economy lead to deindustrialization and neo-extractivism in the Majority World⁶; and 4) it denies the “imperial

⁶ The author uses the term ‘Global South’, but this thesis gives preference to the word Majority World, to better reflect that globalized inequalities between population groups are structural rather than

mode of living” (Brand and Wissen 2017a), i.e. the normalization of access to cheap commodities that are produced at the expense of human suffering and the environment (Brand and Wissen 2017b, 3). Hence, the “new critical orthodoxy” of this use of the term transformation consists in that which it does not question. Approaches to transformation that try to ‘green’ the economy lead to the partial “ecologizing” of existing relations, without overcoming their destructive bases (Brand and Brad 2019, 282).

The discussion of what transformation should constitute and how it can be assessed is complex and still emerging, however critical scholars of social-ecological transformation agree that it will entail a fundamental reconfiguration of the values underlying modern economic systems (Nalau and Handmer 2015). The term transformation is often used interchangeably with ‘transition’ in public sustainability discourse; however, their etymologies expose a crucial difference that points to the essence of transformation. Whereas the root of transition refers to a “crossing over”, transformation is about a change of shape (Eckersley 2021). Transformation is also frequently employed in allusion to Karl Polanyi’s famous notion of *The Great Transformation*, by which he described the deep restructuring of society that occurred with the establishment of industrial capitalism and market economies (Polanyi 2001 [1944]). In this use of the word, transformation alludes to the order of magnitude of the required change.

Although there is no single definition of social-ecological transformation, the debate as it has been advanced in German-speaking academia, agrees on the usefulness of approaching the concept with critical social theory so as to repoliticize sustainability (Brand et al. 2021; Pichler 2023; Görg et al. 2020). Other approaches to the concept include that of social metabolism (Görg et al. 2020; Schaffartzik et al. 2021), political ecology and social ecology (Görg et al. 2017), political economy, transition research and practice theories (see Brand and Wissen 2017a, 3–6) as well debates on degrowth (Asara et al. 2015; Barlow et al. 2022). There is a general plea amongst these disciplines for transdisciplinarity and to read the challenges of transformation with an emphasis on the interdependence between society and nature (Görg et al. 2017). In this context, the origins of ecological crisis are traced back to “multiple crisis”, that is both social and ecological in nature and thus cannot be addressed by environmental policy alone. Rather, they point to a deeper crisis of values, which includes but is not limited to how society relates to nature and the dominant capitalist mode of production (Brand 2016a). Brand proposes a mixture of critical social theory concepts that are helpful in arriving at a critical ontology of transformations, including a Marxian understanding of the capitalist mode of production; Gramsci’s work on hegemony as rule through consent; governmentality by Foucault, regulation theories; feminist economist concepts of the care economy and theories

geographic and to challenge the hegemony of worldviews attributed to the ruling classes of the ‘West’ which demographically and socio-economically make up a minority. See (Alam 2008).

on imperialism and post-colonialism (Brand 2016b, 26). These concepts help shed light on the relations that underly the multiple crisis, which is why Brand argues that he is not against visionary claims of transformation, but that they must avoid the risk of perpetuating crisis by failing to understand how it came about. What results are plural approaches to social-ecological transformation that share an understanding that desirable transformation paths are irreconcilable with the capitalist mode of production.

4.2. Degrowth and social-ecological provisioning

An approach that can be subsumed under the umbrella of social-ecological transformation is degrowth. Degrowth represents an antithesis to the green economy which insists on GDP growth as the main economic marker of prosperity and progress. As the name suggests, degrowth stands for a move away from the growth imperative that structures economies and society on the one hand, and an inquiry into the alternatives on the other. With that, it is fundamentally about the “new political-epistemic terrain” looking to transcend reform towards a “radical emancipatory social-ecological transformation” (Brand 2022, 41). Its roots go back to the 1970s publication of the *Limits to Growth* report (Meadows et al. 1972; see also Daly 1973) and the early contours of ecological economics which drew on ecological science in order to stipulate the biophysical limits to economic activity (Georgescu-Roegen 1971). The ecological critique of growth economics was joined by the culturalist critique of post-development thinkers and political ecologists who criticized the lack of engagement of the sustainable development paradigm with its implications for society (Asara et al. 2015, 376). In combination, these critiques have provided the basis of degrowth thought. One of degrowth academia's main pursuits has been to refute the green economy's premise of the possibility of endless growth through gains in efficiency, notably by decarbonization of energy supply. This premise builds on the idea of the possibility of absolute decoupling of material and energy throughput from economic growth. Though it has been argued that some relative decoupling can be observed as GDP growth has at times been faster than rates of energy and material use, there is to date no conclusive evidence of absolute decoupling, which signifies a decline in throughput whilst GDP increases (Vogel and Hickel 2023; Haberl et al. 2020; Parrique et al. 2019). Instead, it is proven that GDP growth, which relies on an increase in material and energy throughput, is tightly coupled to environmental destruction (Wiedenhofer et al. 2020). It is emphasized that degrowth scholarship's objective is not to prove absolute decoupling is impossible, but that the pathway there is too slow to achieve climate mitigation scenarios for 1.5°C global warming by virtue of the green economy's reliance on growth. It is proposed that planned reductions in economic throughput are the more direct road to halting ecological crises (Kallis et al. 2025, 66). Rather than being about lowering GDP therefore, degrowth is concerned with the ethical downscaling of material and energy throughput to safeguard human wellbeing within planetary boundaries. Because capitalist economic systems are premised on

the imperative of a global annual growth rate of 2-3% GDP growth per year (Binswanger 2015), degrowth is often conflated with recession. However, the opposite is true, as degrowth is essentially about the inquiry of how to divert economic systems from economic growth towards economies centered on wellbeing, care and solidarity “by design, not disaster” (Victor 2008). It recognizes that growth-based economies are inherently colonial and imperial by their need for the extraction and appropriation of cheapened resources and human labor power from the Majority World (Hickel et al. 2022; Trettel Silva 2022; Dorninger et al. 2021), as well through equating development with GDP growth and subjecting the Majority World to ways of life-making and epistemologies (de Sousa Santos 2015). As a discourse that mostly takes places in the European context (Weiss and Cattaneo 2017), degrowth has been criticized for its blind spots from decolonial and feminist perspectives (Rodríguez-Labajos et al. 2019; Nirmal and Rocheleau 2019; Dengler and Lang 2022). From these perspectives, degrowth has been urged to position itself as one among many transformational discourses, or as part of an epistemological pluriverse that promotes alternative imaginaries of social-ecological wellbeing (Escobar 2015; Kothari et al. 2019).

Recently, degrowth scholarship has turned towards the question of provisioning as a direct interrogation of what infrastructures are necessary to secure high levels of human wellbeing within ecological limits. This academic discourse is rooted in heterodox economics and understands provisioning systems as the intermediary between resource use and social outcomes (D. W. O'Neill et al. 2018; Jo and Todorova 2017; Bayliss and Fine 2020). Marxist political economy is a common theoretical lens informing heterodox economics studies of provisioning that show that

“individual preferences play only a small part in determining who gets what. Production and consumption do not take the form of a market tending towards some equilibrium. Rather, outcomes emerge from contested social relations embedded in longstanding structures and processes” (Bayliss and Fine 2020, 97).

While mainstream economics characterizes consumption as an individual, preference-based practice, heterodox economics sees it as a social practice, structured by social relations and consumption norms. Therefore, the design of provisioning infrastructures can intervene into social outcomes. What heterodox economics scholars propose is an intervention into provisioning systems that allows for the accommodation of human needs within ecological limits (Millward-Hopkins et al. 2020; Vogel et al. 2021; Steinberger et al. 2024; Rammelt et al. 2023; Fanning, O'Neill, and Büchs 2020). Adopting a needs-based approaches to human wellbeing, they have proposed to “redefin[e] economics as social provisioning to meet needs” (Spash 2024, 125). It is emphasized that the transformation towards needs-based economies will require a large-scale redistribution of resources, since access to resources and energy in

current global relations are characterized by a “Great Inequality”, in which the world’s wealthiest countries are the sole net importers of material and energy flows in the global economy while all other countries are net exporters (Dorninger et al. 2021; see also Rammelt et al. 2023). By extension, it is only by some having “too much” that others have “too little” (Rammelt et al. 2023). The question lingering between too much for some and too little for others is what constitutes ‘enough’ for ‘everybody’. For this, the social-ecological literature on provisioning systems has so far built on theories of human need.

4.3. Human need theory

Conceptualizations of human wellbeing play an important role in informing sustainability frameworks. The problems that are examined under the social-ecological transformation umbrella are fundamentally about how conceptions of human wellbeing inform varying degrees of ‘weak’ or ‘strong’ sustainability, in terms of how well these conceptions can keep with ecological limits. The classical debate on human wellbeing splits perspectives into two branches: hedonism, which is about the individual pursuit of pleasure towards a subjective sense of happiness, and *eudaimonia*, which originated from Aristotle and refers to the good life as constituted by a range of factors for wellbeing (Fuchs et al. 2021, 12). This might include things like health, political participation, meaningful relationships and personal freedoms. Where hedonism and eudaimonia crucially differ is that, whereas hedonism sees these factors as a means towards the end of feeling good, the eudaimonic tradition interprets them as constituents of wellbeing that “we feel good about fostering ... because we believe they are of value” (J. O’Neill 2006, 171). Hence, it is not merely about experiencing positive feelings, but about how we feel about the things we do towards that experience. Eudaimonic philosophies have been taken up by various theories of development and wellbeing. Amartya Sen’s capability approach is a famous example (Sen 1999b). Sen rejects classic utility-based development concepts, problematizing the use of consumption levels as an indicator of wellbeing. He defines wellbeing as ‘capabilities’, that encompass ‘functionings’, which boil down to “what she or he manages to do or be” (Sen 1999a, 12). However, Sen’s approach is explicitly preference-based; it stresses freedom of choice and does not propose any universal set of functionings that provide a basic level of human wellbeing. Thus scholars writing about social-ecological provisioning identify that “once planetary boundaries require societal boundaries, CA [capability approach] leads to impasse” (Bärnthaler, Novy, and Plank 2021, 8). Instead, preference is given to human need theory based on the works of Manfred Max-Neef and colleagues (1991), and Len Doyal and Ian Gough (1991). Max-Neef’s human scale development approach puts forward a range of needs and need “satisfiers” with the latter contributing towards the satisfaction of one or more needs. In making the distinction between needs and need satisfiers, Max-Neef makes it possible to discern needs that are finite, categorizable and universal across cultures and time. Need satisfiers on the other hand are

context-specific, how well they take care of a need depends on the setting in which it occurs. A basic example might be that, though most humans have an objectively determinable daily caloric need, this need might be more adequately met through bread in one society and with rice in the other. Building on this distinction, Doyal and Gough have proposed a theory of human need that centers on the basic needs of health and autonomy that make up “the universalizable preconditions for non-impaired participation in society (1991, 54). Participation was later added as a basic need in itself for being “our most basic human interest”, underlining the social character of human wellbeing (Gough 2017, 42). These basic needs require what they call intermediate needs, which are material resources like “water, nutrition, shelter, education and healthcare” as well as immaterial factors like “security in childhood, significant primary relationships, physical and economic security; and embracing the two, a safe environment” (Gough 2019, 535).

The core feature of Doyal and Gough’s theory of human need that sets it apart from preference-based approaches to wellbeing like Sen’s capability approach, is its “*universalizability*” (Gough 2020, 210). It defines needs as objective, plural, non-substitutable, satiable, cross-generational and not least, as making an ethical claim that preferences do not (Gough 2017, 45–47). The universality of Doyal and Gough’s human needs makes it possible to distinguish between collective needs and individual ‘wants’, since wants, unlike needs, are subjective, infinite, substitutable and by virtue of their infiniteness, theoretically insatiable. Through their universalizability, basic human needs provide a sufficiency-oriented approach to sustainability because it allows for the identification of a level of resource use that is ‘enough’ to satisfy these needs that can be generalized to a global level (Bärnthaler and Gough 2023). It thus becomes possible to identify levels of resource use to provide sufficiency within planetary boundaries. Distinguishing wants from needs politicizes the ‘private’ realm of consumption, by exposing how the need satisfaction of some, impedes the need satisfaction of others (Bärnthaler, Novy, and Plank 2021, 8). Human need theory has become an important building block of social-ecological provisioning systems scholarship, that defines these systems by their ability to satisfy universal needs as opposed to “appropriating systems” that “extract rents to satisfy the *wants* of a small section of society (Fanning, O’Neill, and Büchs 2020, 8).

5. Situating housing in the welfare state

In *The Case for Universal Basic Services*, Coote and Percy point to housing as “a matter for government legislation to establish positive social rights” (2020, 79). By positive social rights they refer to T.H. Marshall’s concept of social rights, in which the state takes responsibility for “the whole range from the right to a modicum of economic welfare and the security to the right

to share to the full in the social heritage and to live the life of a civilised being according to standards prevailing in the society” (1987, 8 [1950]). There is a claim for a ‘universal’ type of welfare. Types of universal access to services in healthcare and education, however minimal, are basic to most welfare state models. Housing, however, presents a more complex case since its distribution largely takes place in markets. The disparaging means of households to access housing through these markets lead to grave housing inequalities, including housing deprivation and exclusion. Yet, housing is commonly talked about as a social or human right. Understanding this discrepancy requires an excursion into the development of the position that housing has so far occupied in the welfare state. Essentially, it means to understand what can reasonably be expected of states to be able to provide within the highly complex, multifaceted and individual contexts they operate in. A string of housing researchers has previously attempted to theorize the relationship between welfare and housing ‘regimes’. This chapter provides an overview of their work and relies on the recent edited volume by Grander and Stephens, which provides a synthesis of past works and places the study of housing and welfare regimes into the present-day context of systems that are part of a globally financialized world (2024).

5.1. The peculiarities of housing

For decades now, social policy scholarship has tried to understand how states intervene into capitalist markets, yet the interrelationship between housing and the welfare state remains disputed (Grander and Stephens 2024). Since housing is a basic need that is fundamental to both the survival and thriving of every individual, it could be argued that the state should surely offer social protection in this area. However, markets, not states tend to be the main distributors of housing. To what extent this is desirable and how to manage resulting misallocation of housing is the topic of longstanding debates in the study of housing and welfare. These debates have often taken on a rather dualistic character, as is most famously demonstrated by the literature’s referral to housing as either a “wobbly pillar” by some scholars (Torgersen 1987) or a cornerstone of the welfare state by others (Beveridge 2014 [1943]; Malpass 2008). Although there exists common agreement among housing scholars that housing should be treated as a part of welfare systems, it has often been observed that in practice, housing has rarely held a very central position in them (Olsen 2018, 382). Instead, it has always had an “ambiguous and shifting status on the margins of the welfare state” (Harloe 1995, 2). Unlike healthcare and education, housing is not provided universally in any state. This has to do with some of the characteristics that set housing apart from common social services.

Housing is a unique good. Examining some of its defining features helps to understand why reducing a discussion of its distributional mechanisms to “state against markets” is too simplistic (Borevi and Bengtsson 2015, 2600). For one, housing as a commodity is commonly

perceived as an individual good: in classical economic terms it is “complex and indivisible” and “heterogeneous”, because consumer demands for housing depend on multiple characteristics that cannot be substituted for by other characteristics. Additionally, housing is “spatially fixed”: its location cannot be moved and the features of the space surrounding a dwelling are often at least as important as those of the dwelling itself (Bengtsson 2001, 258). These characteristics of housing correspond to categories of ‘need’ where the state is discussed, and to ‘demand’ where the market takes center stage. Demand or ‘choice’ and needs are then constantly at odds in housing policy, because attempts at catering to every household’s needs may interfere with the market autonomy that is associated with ‘choice’ and ‘demand’. Consequently, state allocation of what is deemed an individual good is likely to be experienced as paternalistic (Bengtsson 2001, 259). However, it is also salient that housing markets, much like other markets, are all but level playing fields. Access to housing is structured by the ability to pay as well as rules and hurdles that can be distinctly discriminatory. Additionally, the supply side of the housing market is largely driven by exchange value rather than use value, making it unlikely that actors on this side will focus on providing quality affordable housing. As a result, lower income, marginalized households are often relegated to inadequate housing (Olsen 2018, 380). It is this tension between housing as an individual commodity as well as a public good, that leads Bengtsson to conclude that by and large, there is “political consensus about the idea that providing correctives to the market is what housing policy is all about” (2001, 264). Housing is in many ways the sum of social relations, which is why housing policy, like any other social policy, is concerned with addressing social problems (Böhmer, Holm, and Jacob 2021). How this should be done, exactly what correctives ought to encompass is another layer of the debate and more contested than in social services like healthcare, education and pensions. Torgerson has noted that these policy areas have clearer standards that delineate when institutions are responsible and what measures are expected of them. They also have hierarchies of trained professionals, like boards, advisors and directors, that ensure the uninterrupted delivery of services (1987, 117). While these standards and repercussions for failing to enact them, are not wholly absent from housing policy, they are much less pronounced (Olsen 2018, 383). For example, it would be much more self-evident that a healthcare provider be held accountable, should they provide a patient with inadequate or damaging treatment, than it would for institutions of housing to be held accountable for failing to house people. The persistence of homelessness in wealthy nations testifies to that. Though other welfare sectors have in recent decades also become framed in market logics to some degree, this has been more limited than for housing. A pivotal difference is that ultimately, “the provision of schooling and healthcare to citizens, unlike housing, remains a responsibility of the central and local state” (Bengtsson 2024, xiv).

5.2. The study of housing and welfare

The study of the relationship between housing and welfare has developed over the past few decades. Scholars of housing have pointed out that housing was often not addressed by comparative welfare studies (Kemeny 1995). This has mainly been accredited to a lack of data, as the central role of markets makes it difficult to capture commensurable data (Bengtsson 2024, xiv). Much to the chagrin of many housing scholars, housing also did not figure in one of the most influential works on welfare state typologies to date: Gøsta Esping-Andersen's *The Three Worlds of Capitalism* (1990). In this work, he distinguishes between three types of welfare state "regimes" - liberal, conservative and social-democratic. In a nutshell, these regimes can be described as follows: "the liberal regime is based on market mechanisms, the social democratic regimes have relied heavily on state measures and conservative regimes on the civil society and the family" (Grander and Stephens 2024, 246). Though his approach has since been criticized for its shortcomings, housing scholars have been and are still finding it useful to map housing onto welfare regimes, or to come up with housing regime typologies that take inspiration from Esping-Andersen's groupings. For instance, the 2024 *Routledge Handbook of Housing and Welfare* still departs from Esping-Andersen's concept of a "welfare regime" on the grounds that the "concept encompasses not only arrangements for taxation and social security but also labour markets and how economies are organized. Thus, the concept provides for a deeper analysis in which distinctive housing systems can emerge in parallel to these wider welfare systems" (Grander and Stephens 2024, 3). The framework of analyzing housing and welfare in tandem is referred to as "housing-welfare regime" framework (Grander and Stephens 2024, 17).

As noted above, the difficulty of analyzing housing's embedding in the broader welfare state is to a large degree due to the double status of housing as both a surplus-generating commodity and basic need satisfier. Since housing access is individually purchased in markets, it cannot be well compared to health and schooling, which citizens tend to be entitled to at small or no cost and provided with collectively. Early studies of housing and welfare instead focused on housing tenure as an indicator of how developed a welfare state is. Jim Kemeny in his notable work in this area, argued that societies with high levels of homeownership had relatively weaker welfare states, since homeowners would have an interest in lower levels taxation and social expenditure, whereas societies with high levels of tenants of rental housing would naturally favor higher levels of state subsidies for rental housing and by proxy a stronger welfare state (1995). Models based on tenure have since been disputed, because the causal inverse relation between homeownership and strength of social welfare was disproven (Olsen 2018, 381; Blackwell and Kohl 2019). Another influential school of thought has been that of convergence theory, which posits that over time, national housing systems will inevitably converge through their responses to economic developments, emphasizing state intervention in response to

crises in particular. For example, Harloe (1995) argued that the rise of Fordism stimulated the political will to invest in mass public housing, which accordingly fell with the decline of Fordism and progression to post-industrial times. Structural economic drivers are still cited as constituents of welfare regimes, and although these undeniably shape welfare regimes, Grander and Stephens indicate that the “continued diversity of welfare regimes and housing systems points to the importance of the distinctive national institutional structures through which they are mediated”. To illustrate, they appeal to the widely varying responses of states to the 2008 global financial crisis (2024, 17).

5.3. The significance of 'width' in housing-welfare regimes

Many of the housing-welfare typologies that have been conceived of since the 1990s share a basic subscription to principles put forward by Esping-Andersen. Most prominent is Esping-Andersen's distinction of welfare state types by the varying “degree to which individuals, or families, can uphold a socially acceptable standard of living independently of market participation”, which he refers to as “decommodification” (1990, 37). Esping-Andersen further discussed the welfare state as “a system of stratification. It is an active force in the ordering of social relations” (Esping-Andersen 1990, 23). Together, social stratification and decommodification are deemed interconnected drivers of degrees of equality and inclusion in welfare states (Grander and Stephens 2024, 24). Housing scholars have defined various categorizations that more or less describe housing-welfare regimes' ability to mediate equality outcomes in housing. Kemeny proposed the influential distinction between so-called “unitary” and “dualist” rental markets. Unitary markets, which he later termed “integrated” markets, are rental markets that cater to all income groups through offering high quality housing, with secure tenure and competitive rents. In this way, they are able to compete with homeownership which is why Kemeny argued that how the rental market is structured, can shape the whole housing system (Grander and Stephens 2024, 19). Dualist markets consist of two separate systems: the “more or less unregulated private rental market and public means-tested allocation system” (Kemeny 1995, 50). In a dualist system, the cost-based rental sector is “residualized”: the supply of rental contracts is of lower quality and is made available only to lower income households. In this system, forms of tenure and provision become differentiated between the public and private rental systems to a degree that owner occupation becomes the more desirable tenure to those who can afford it (Kemeny 1995, 59). Bengtsson has similarly offered that social outcomes in housing systems are largely down to the “width” of housing-welfare regimes, that is, “the policy field of a certain sector can be defined as a the share of the sector towards which the state policy is directed” (Bengtsson 2001, 269–70). He distinguishes between “universal” or “wide”, and “selective” or “narrow” policy fields. Like Kemeny's unitary rental markets, Bengtsson's idea of a universal housing policy, is that it would enable citizens to access good quality housing on a single, integrated housing market. Selective housing policy

would be targeted at lower-income groups only. Similar dichotomies that figure in the literature are “comprehensive” and “social”, vs. “institutional” or “residual”, which Bengtsson argues are often loose definitions of the degree of state intervention into housing markets (Bengtsson 2001, 266).

5.4. Housing-welfare regimes and their implications for a right to housing

The ways housing-welfare regimes are structured are fundamental to the way a right to housing may be thought of. It is important to reemphasize that ‘decommodification’ – which retains an analytical function in the framework – is different for housing than it is for services like education and healthcare. Since it has been established that it is not readily feasible nor desirable to fully deliver housing outside of markets due to its special properties as an individual consumer good as well as a public good, the ‘decommodification’ of housing takes place *within* markets. In this case, it “refers to the *extent* that people can obtain housing independent of their position or participation in the labour market” (Olsen 2018, 382). This definition of housing decommodification ties into modern interpretations of a social right to housing. Bengtsson argues that if for Marshall, social rights were the right to “share to the full in the social heritage and to live the life of a civilized being according to standards prevailing in the society” (1987, 8 [1950]) then by extension, in a society where the prevailing standard is to access housing through markets, then a modern and non-paternalistic interpretation of a social right to housing is the ability of citizens “solve their housing question through voluntary transactions in the market” and for the state to foster this ability (Bengtsson 2001, 265). He further applies this to the distinction between “universal” and “selective” housing policy. In universal types of housing-welfare regimes, the state supports the market agency that is required for citizens to obtain a decent standard of housing allowing them full membership of society. In this sense, universalist housing policy conforms to Marshall’s notions of citizenship and social rights. Selective housing policy on the other hand, divides housing into two separate systems, one of which is the unregulated private market and the other the ‘protected’ and regulated social sector. If the purpose of the latter is to secure citizens with a minimum housing standard, then according to Bengtsson it follows that in selective policy, the right to housing “implies a legalistic safety net for households that find it hard to cope in the market” (Bengtsson 2001, 262). Reinprecht observes that the understanding of housing as a social right has changed over time: whereas social housing was an entitlement of citizen workers in the so-called Golden Age of welfare capitalism, they must now prove their need for support. Subsequently, the right to housing is no longer the ‘positive’ right Marshall imagined, but more of a “programmatic” right, whereby the state only intervenes in the event of market failure (Reinprecht 2022, 177). Ultimately, the precise meaning of the right to housing must always be defined socially, as the interplay of the state, citizens and markets (Bengtsson 2001, 255). It follows that this relationship is never static, but varies across contexts of time and space.

5.5. Historical developments and the currency of housing-welfare regime typologies

There currently exists no state that provides housing universally and this is not surprising when observing the developments that have occurred since the neoliberal turn. If housing-welfare regimes are at a simplified level about a qualitative characterization of state intervention into markets, then the last decades have definitively seen a skewing of housing systems towards the expansion of the market sphere. Market mechanisms have been favored by dramatic shifts in policy towards deregulation, liberalization, privatization, corporate tax breaks and incursions into social security. Although most states have undergone severe welfare retrenchments over the past 50 years, how they have been mitigated by state interventions has varied significantly (Olsen 2018, 380). Paul Balchin, who applied Esping-Andersen's welfare state typologies directly to housing politics, remarked that the effort of categorizing was hindered by the fact that by the 1990s, neoliberal trends had taken hold virtually everywhere (Balchin 1996). The increased market orientation of housing politics has led some to rechristen housing politics "housing market politics" (Egner 2019, 98). A crucial development is that housing has become strongly tied up in markets, one expression of which is what Doling and Ronald have termed "asset based welfare" (2010). In the dissolution of social security systems, housing in the form of homeownership has become a new safety net for citizens. This has led to waves of "recommodification" of public and state-provided social housing (Olsen 2018, 386). The Right-to-Buy scheme in Great Britain is often cited as an illustration of how swiftly policy schemes can enable this recommodification and with it the wiping out of whole segments of social and public housing stock. The scheme, which was instated in 1980, allowed tenants of council housing to buy their dwelling, leading to the rapid decline of supply in the sector and a steep rise in homeownership (Richter and Demirkol 2021, 201). Eased access to mortgages too, has contributed to making homeownership available to greater parts of the population, with the result that homeownership rates have increased and with it rates of indebtedness. Grander and Stephens (2024) bring together case studies of 15 countries worldwide and conclude that the general trend in the housing systems examined is one of increasing commodification at the expense of rental housing, especially social rental housing. They also observe that many housing regimes have become more detached from national welfare schemes and more embedded in global financialized housing markets (Grander and Stephens 2024, 263). This development has made the connections between housing, welfare and inequality more visible than before (Richter and Demirkol 2021, 206–7). While middle-class households have taken on more debt, lower-income households have remained unable to access homeownership and instead must compete on an increasingly restricted rental market. Some traditional homeownership societies like the UK and Australia have also been seeing a decline in homeownership, as real estate prices have outstripped mortgage credits (Grander and

Stephens 2024, 263). There is generally a growing “middle group” that is falling through the cracks of the housing system as they neither have enough income for the mainstream housing market, nor do they qualify for housing supports (Grander 2023). This also concerns newcomers like young people and immigrants, who are increasingly struggling to access the formal housing market. Consequently, growing groups of people have to resort to substandard housing with insecure tenure, giving rise to a so-called “housing precariat” (Dorling 2015). In the extreme case of housing exclusion, the expansion of this “middle group” also implies the growth and diversification of populations of people experiencing homelessness.

What can be said about the usefulness of housing-welfare regime typologies in this fast-changing environment? Some of the canonical publications on the framework like those of Kemeny, Harloe and Malpass date from the 1990s and 2000s but still inform its principles. The relationship of housing to wider welfare regimes continues to be meaningful. Because welfare regimes still fundamentally shape distribution of income and wealth through labor market institutions, taxation and social protection schemes, they remain informative of “distributional tendencies that influence how housing is consumed and distributed” (Grander and Stephens 2024, 311). Scholars have continued to propose new adaptations to existing frameworks or propose new ones, a noted one of which is Schwartz and Seabrooke’s Varieties of Residential Capitalism framework which attempts to explain different economic systems by looking at housing within the established Varieties of Capitalism typology framework (Schwartz and Seabrooke 2008). Recent scholarship places particular value on accounting for the complexity brought on by globalization and financialization in the housing-welfare literature. Matznetter has argued for the integration of Varieties of Capitalism, welfare regimes and housing and path dependence (2020). Blackwell and Kohl have advocated a greater emphasis on historical sensitivity and are also supportive of “path dependence” perspectives that help understand how housing and welfare regimes today are historically contingent (2019). Yet others have dismissed the use of housing regime typologies as an overly value laden and generalizing exercise (Ball 2020). This thesis sets store by housing-welfare regime frameworks and their typologies as a useful auxiliary in the effort to put names to the structures shaping access to housing and the interplay of different drivers and actors in housing systems and beyond. With the *Routledge Handbook on Housing and Welfare*, Grander and Stephens provide one of the most comprehensive and recent works of literature, bringing together decades of housing scholarship. They posit that regime approaches have reasonably become the dominant framework through which to view housing systems internationally and propose a multi-layered housing regime framework that integrates ‘layers’ that the literature has pointed to as being significant to a more robust understanding of housing-welfare regimes (Figure 1). Most importantly, they give greater significance to “macro-level drivers” like globalization and macro-economic policy. In their model, these macro-level drivers sit atop the “middle-range” national

level sector regimes that present the core of the model and are divided into consumption, production and exchange spheres, below this are regional and local housing systems. The three spheres of the middle range are framed in the context of the wider welfare regime, that for Grander and Stephens is more influential in terms of distributional outcomes than rental markets are for Kemeny. Rather, in their model, the housing system “can replicate, counter or reinforce the pattern of income distribution created by the wider welfare regime” (Grander and Stephens 2024, 33)

For Grander and Stephens, welfare regimes thus set the context for housing regimes. They note that welfare regimes everywhere have undergone profound changes from the macro-level drivers of globalization and financialization, diluting their distinctiveness as recognizable types. In many countries, Kemeny’s dichotomy of unitary versus integrated system has been weakened as governments have embraced financial deregulation. With the integration of national housing markets into global financialized markets, new profit-driven actors have been introduced on both the supply and demand side. This increasing complexity has made it harder to read housing and welfare regimes, necessitating analyses that look at governments within the macro-economic system. The authors stress that mere description of institutional frameworks and policies cannot explain how they operate or “what policy can – and cannot – achieve”. “Identifying systems on the basis of the role of the state, market and households may allow for categorization; but only understanding how they *interrelate* with one another provides an explanation” (Grander and Stephens 2024, 322–24, emphasis added).

- Macro-level drivers:
- Globalisation
 - Macro-economic policy, including the enhanced role of central banks (“really big finance”)

Middle-range national level sector regimes

Spheres of housing production, consumption and exchange

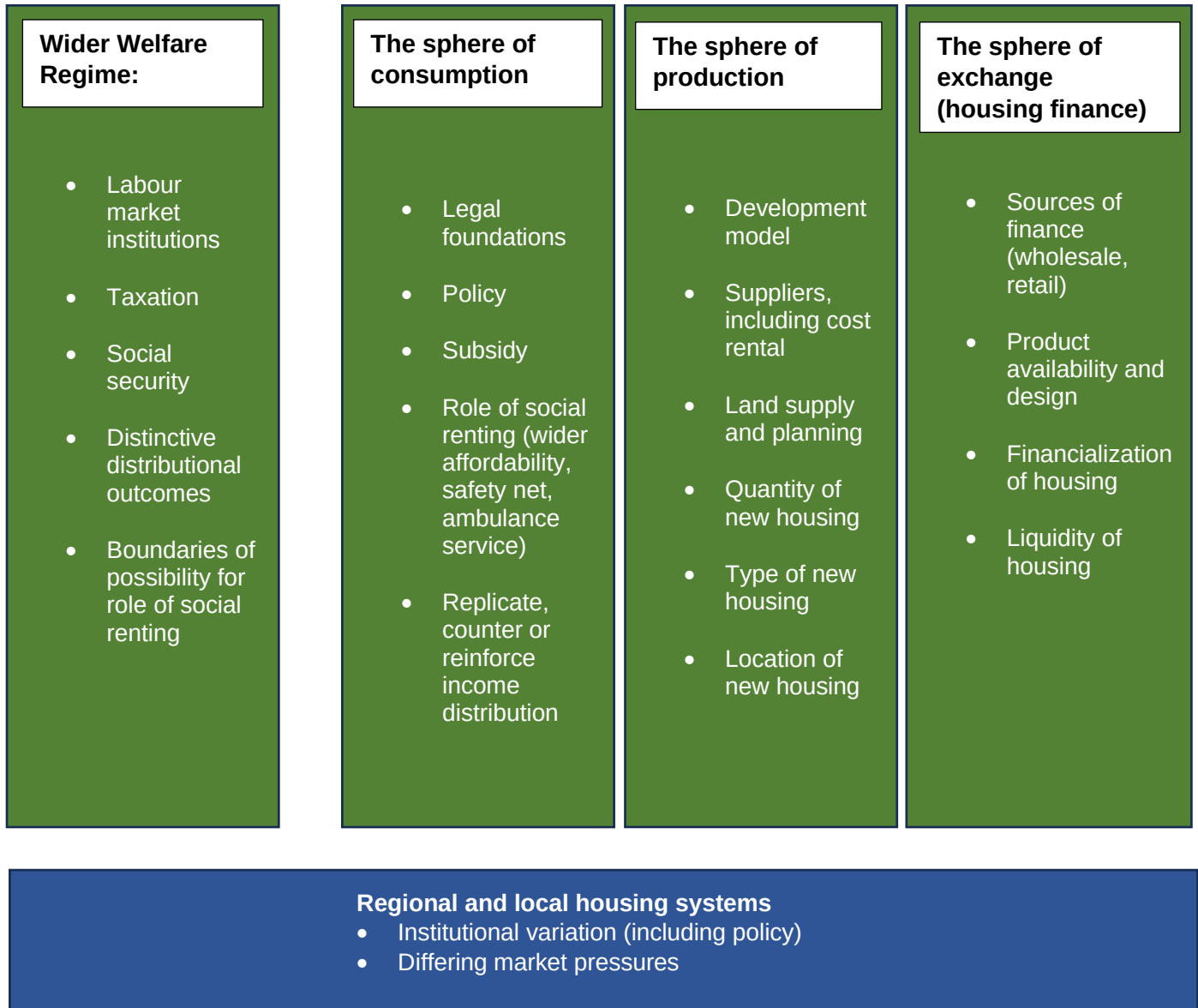


Figure 1: Typology of multi-layered housing regime framework. Adapted from Stephens (2020).

6. Methodology

This master's thesis uses two main methods: qualitative literature analysis and semi-structured expert interviews analyzed through qualitative content analysis.

6.1. Qualitative literature analysis

The first method of this thesis is the qualitative analysis of literature. Peer-reviewed secondary sources including journal articles and books were retrieved from the catalogue of the University of Vienna and Google Scholar, and analyzed thematically to identify key themes. Policy papers and reports were found through the Google search engine and analyzed in the same way. Through an iterative search process, key themes were identified and narrowed down. The bibliographies of peer-reviewed journal articles often provided novel sources that had not been found through search engines. Literature search and -review formed the basis of the research process and continued throughout. Search languages have included English, German and Dutch. All translations into English are declared to be the author's own unless indicated otherwise. Citations were managed with Zotero, the citation style is consistent with the 17th edition of the Chicago Manual of Style, formatted author-date. Apart from the assistive use of DeepL for translations, no use was made of AI tools.

6.2. Semi-structured expert interviews

Interviews were chosen to gain insight into the practices of Housing First experts. Qualitative interviews serve the purpose of “understanding [...] the situational interpretations, motives for action, self-interpretations, experiences or everyday theories of certain actors - individuals, groups or organizations” (Dannecker and Vossemer 2014, 154). A semi-structured format was chosen to accommodate the spontaneous emergence and development of topics that were of importance to the interviewees. Facilitating a natural conversation was conducive to a better understanding of the interviewees' current challenges and priorities in their work, which the interviews aimed to collect insights about. Semi-structured interviews are often the format of choice for interviews with experts for this reason (Dannecker and Vossemer 2014, 159). In their search of “accurate reports of what interviewees have experienced” the interviews were “experience-focused” (Brinkmann 2014, 297).

The interviews were held with employees of European NGOs specializing in knowledge dissemination and coordination of Housing First programs and were in this sense deemed experts on the status quo of the development of Housing First in Europe. Who is considered an expert is often problematized in development studies since who is granted the status of ‘expert’ shapes knowledge production (Dannecker and Vossemer 2014, 162). Since the 1990s, the understanding of who can be an expert has expanded, in a trend that challenges the boundary between experts and lay people, contributing to the debate on democratizing

'expertise' (Bogner, Littig, and Menz 2009, 3). This shift can be attributed to "new (global) network-like negotiation processes of knowledge production to include the people actively involved in shaping public affairs. These include, for example, NGO representatives who have (often) acquired their expertise outside their professional role" (Bogner, Littig, and Menz 2009, 7). This type of expert can be expected to possess so-called "process knowledge", which is to say they have practical experience resulting from their frequent and repeated engagement with specific processes the interviewer wants to know about (Bogner and Menz 2009, 46).

The persons interviewed were affiliated with the following organizations:

- Bundesarbeitsgemeinschaft für Wohnungslosenhilfe (Vienna, Austria)
- Y-Säätiö / Y-Foundation (Helsinki, Finland)
- Housing First Nederland (Utrecht, The Netherlands)
- Housing First Europe Hub

6.3. Design of the interview process

An interview guide (see appendix 3) was developed before each interview and sent out to the interviewee for their preparation. All interviewees received a consent form which they read and signed prior to the interview. Each individual guide comprised the following components: warm-up questions, questions about the person's profession, questions about their current work projects, stakeholder mapping questions and finally, the research question, asked in a vernacular way. Thus the guide was built up towards the "operationalization of the research questions through guiding questions" (Dannecker and Vossemer 2014, 159).

Each interview guide was structured to bring up roughly the same topics to the interviewees: their current priorities in their work; the state of the programs they oversee; their appraisal of the state of Housing First in their respective country or countries of expertise; their appraisal of the most important stakeholders in their field of work; their appraisal of the role of the right to housing to their work; how they would define their Housing First model, also with regard to fidelity; their view on systemic solutions to homelessness; and their outlook on the status quo on homelessness and housing politics. These questions were also intended to engage with the three categories that make up a "homelessness system": actors, processes and values (Demos Helsinki and Housing First Europe Hub 2022). This analytical framework, which is explained at greater length in the analytical chapter, has been chosen for two reasons: 1) they are perceived as relevant by experts in the field, from whose knowledge the interviews intend to draw; 2) they function as the "main categories" required to conduct structured qualitative content analysis after Mayring (Mayring and Fenzl 2022).

6.4. Coding and qualitative content analysis

The analytical process of this thesis is set up to adhere to the principles of the widely used qualitative content analysis as described by Philipp Mayring. This “category-led” approach works by testing categories that are distilled from the research question against the utterances of interviewees. Other than grounded theory and other approaches that are more open, qualitative content analysis has a strict model of rules that requires the whole process to be “theory-driven”. By this, Mayring means that the “state of research on the subject matter and object and comparable subject areas is systematically taken into account in all procedural decisions” (Mayring 2022, 52). This also pertains to the categories, which are defined *before* the coding process, although novel categories can be carved out during it too. The technique chosen for this thesis is the structuring or deductive category approach. As is in the name, it has the purpose to discern certain structures in the material that allow for interpretation. For this technique, a coding guide is created that gives a definition of the category and what text elements can be grouped into it, “anchor examples” which are concrete text samples that exemplify the category, and coding rules that put forth criteria for a text element to fall into that category and not another (Mayring 2022, 96). The coding guide for the thesis can be found in the appendix.

The coding took place in 3 rounds, the first of which served to group statements into the main categories of actors, processes and values. This round also included the definition of subcategories. The second and third rounds had the goal of sharpening the subcategories, making sure they were grouped under the right main categories, finding statements that had been overlooked and further finetuning the groupings according to the coding rules when some had been miscategorized.

6.5. Limitations

One of the principal limitations of this analysis is that the selection of case study countries is not very heterogeneous: it might have painted a different picture to include more Central, Eastern and Southern European countries which have historically built rather different welfare regimes from the Western and Nordic states. All three national organizations are in countries that have a history of relatively strong social housing sectors. The interview- and written data provided by the Housing First Europe were therefore a valuable extension of the national organization cases, adding a bird’s eye view over all of Europe to the analysis.

It must also be noted that the discussions cited in the literature as well as from the interviews pertain mostly to urban contexts, as Housing First services tend to concentrate in cities. The choice to conduct interview experts comes to some degree at the cost of including perspectives that are closer to the ground, such as those directly employed in service provision. However,

the experts in their roles as overseers also have the strength that they can incorporate these perspectives into their expertise whilst being at a higher plane of systemic complexity concerning the state of policy and politics around Housing First programs.

6.6. Positionality

For the purposes of describing my positionality, I will switch from a third-, to a first-person account. An important facet of my positionality, apart from the distinct privileges I hold as a young, white, able-bodied, cis-female, financially supported person, is that my research interest is markedly driven by a degrowth perspective. The interest arose in the course of my involvement with the association Degrowth Vienna, where needs-based provisioning and Universal Basic Services recently became a topic of interest as a possible degrowth ‘strategy’ towards social-ecological transformation (Barlow et al. 2022). Degrowth is a scholar-activist movement that is often criticized for having mostly white, young, academic proponents (Frauenlob et al. 2017, 46). There is good reason for this, because many of these advocates come to degrowth through “self-problematization”, recognizing that they are part of unjust structures that privilege them, yet are difficult not to reproduce because they are hegemonic (Eversberg and Schmelzer 2016). Of course, it is not without problems for a relatively powerful social group to want to redefine what the economy should be about. Degrowth is controversially discussed for its risks of elitism and blindness to the realities of “normal people” and the ‘majority world’ (Wøhncke 2021). My research is not exempt from navigating these flaws and blind spots of the degrowth field, but does necessarily remain limited to an explorative inquiry into the feasibility of a more or less utopic vision.

The endeavor to green economies in the ‘Global North’ has in recent decades led to new and reinforced colonial and imperial relations with resource-rich countries of the ‘Global South’. This has also been termed “green extractivism” which has been the most visible in the so-called Green Transition promoted by the European Union (Voskoboynik and Andreucci 2022). I originally intended this thesis to include an assessment of what the hypothetical establishment of housing as a UBS would imply for these relations in terms of “ecologically unequal exchange” (Dorninger et al. 2021; Hickel et al. 2022). However, I sadly found it to be beyond my skills and the scope of a master’s thesis to conduct a quantifiable evaluation of this, since it is highly complex to plot the outcomes of existing provisioning systems, let alone the outcomes of hypothetical provisioning systems resulting from UBS which has not been developed beyond the conceptual level. Outcomes in power relations resulting from the appropriation of materials by rich countries from poorer countries must nevertheless always be reflected in any strategy for social-ecological transformation, no matter how theoretical this effort remains, which is why it will have some space in the discussion.

7. Analysis

In the previous chapter, it has been concluded that the ideologies underlying different housing and welfare regimes have become diluted in the wake of globalized macro-level changes. Grander and Stephens suggest that one might well refer to them as “legacy regimes”, however, at the same time they observe that the “crucially distinctive distributional patterns” that welfare regimes put out have stayed largely the same (2024, 322). They consider welfare regimes to set the context for housing regimes; therefore it remains relevant to interpret outcomes in housing systems in tandem with their relationship to welfare regimes. It is useful to note here, that the authors distinguish between ‘systems’ and ‘regimes’ in terms of a regime “representing the *cause* of the system, while the system represents the design and operation of the institutions” (2024, 312). Since Esping-Andersen’s welfare state typologies rely on different political ideologies that contain views on the organization of society and its institutions, regimes can be understood to stand for the underlying “logic” or “set of organizing principles” that explain the design of particular systems (2024, 312). Any tangible understanding of housing systems must therefore result from a reading of the dynamics between actors within the context of the multi-layered regime:

“Reading welfare regimes and housing regimes, and the relationship between them has become more complex as the world has become more integrated. It has become simply impossible to understand housing systems from within. Describing institutional frameworks and policies will not explain how they operate. It is the dynamic relationship between actors within the contexts of the wider welfare regime and macro-level context that drives systems. Identifying systems on the basis of the role of the state, market and households may allow for categorization; but only understanding how they interrelate with one another provides an explanation” (2024, 324).”

If the crux of explaining housing systems is in the *interrelationships* of actors within wider welfare regime and macro-level contexts, then how to set about describing these interrelationships? The object of study of this analytical chapter is not just housing systems at large, but housing in the context of Housing First programs. As such, it is not just ‘normal’ access to housing that is being examined, but access to housing within so-called “homelessness systems”. In their collaborative report, Demos Helsinki and the Housing First Europe Hub draw on systems change research to define a homelessness system as being made up of actors, processes, and core values:

“*Actors* can be national or local policymakers, housing or service providers, foundations, civic associations, researchers, practitioners such as activists or volunteers, and homeless people. *Processes* refer to those specific policies and programmes that are adopted at the national or local level. *Core values* point to cultural,

political and operational assumptions that might affect the perception and interpretation of the homelessness phenomenon at large” (Demos Helsinki and Housing First Europe Hub 2022, 7, italics added)

Citing Donella Meadows’ famous work on leverage points in systems, the publication lays out that some of most substantial systems change is catalyzed through changing the goal of the system. In line with Grander and Stephens ideas about understanding housing systems, the authors declare that merely employing policy analysis is not enough, rather, the focus should be on governance as a matter of “interconnections between *all the involved actors*” (2022, 8). Their resulting definition of homelessness systems change is: “A structural and operational shift in the *governance* of homelessness...from a system that *manages* homelessness to one that aims to *eliminate* it” (2022, 7).

7.1. Bridging theory and practice, right and reality

It is the objective of this thesis to gain an understanding of the systems that Housing First programs try to realize a right to housing within and extrapolate this to wider housing and welfare regimes in order to map out the landscape in which a housing Universal Basic Service can or cannot ‘work’. It therefore adopts the above understanding of homelessness systems as an analytical framework. The categories of ‘actors’, ‘processes’ and ‘values’ (shortened from core values) are useful groupings between which interactions and interrelationships can be described that can help construct an image of the gap between the normative, discursive claim to a right to housing and the lived practice of trying to attain it. The right to housing is an important component that directly relates to the entitlements that are fundamental to the conception of housing as a UBS. Since UBS so far remains a very idealistic and conceptual framework, the analysis of the interviews with Housing First experts serves as a ‘reality check’ of what structures can be expected to stand in the way of any initiative that seeks to realize such entitlements. Like this, the analysis tries to describe the space between concept and practice, right and reality, with the aid of the characterizations of this space by the interviewees.

The expert interviews have been designed to engage with the categories of actors, processes and values as experienced by the experts. The interviews were then coded along these categories to produce an image of the interrelationships that make up the homelessness systems of the experts’ respective localities. Common themes within these categories describe the various enabling and disabling factors that programs ran into. Though naturally these factors do not always neatly fit into one category and there is much overlap, the analysis is structured by the categories for purposes of clarity. In a synthesis of the three categories and how they interact, commonalities between the interviews are brought together in order to discuss the interviewees’ views on the right to housing and the structural barriers in its way.

7.2. Actors

What actors are essential in the successful implementation of Housing First programs? Who may be more likely to support and who may be more likely to block efforts, and who is not yet at the table that should be? Many different stakeholders are involved in Housing First programs in very different ways, ranging from political decisionmakers, to building and social housing associations and other homelessness service providers. Interviewees converged on several tendencies that they identified as the most important in how conducive they are to success in implementing Housing First programs. These pertain to the level of governance Housing First is adopted at; the ministries it falls under; political will in political decisionmakers; housing parties; and beyond that individual trailblazers, advocacy networks and other allies.

7.2.1. Getting the implementation level right: centralized over decentralized

Housing First programs are adopted and organized at different levels of governance. Sometimes this is the state level, but more often programs are implemented at the level of cities or municipalities, all with their individual approaches, resources and rules (Pleace, Baptista, and Knutagård 2019, 16). The interviewees pointed to the level of implementation as one of the most important factors of success for Housing First (I1, 4; I2, 35; I3, 12). More specifically, national level cooperation and the adoption of Housing First into national homelessness strategies were seen as especially positive. Among the three countries considered, Finland has so far gone farthest in integrating Housing First into its national strategy. This is considered a positive factor in its success: “the strength of the Finnish model is that we have national level cooperation” (I2, 35). The Finnish model is a comprehensive approach that is similar to Housing First in principle, but whose development actually predates that of the US Pathways model. The Finnish government started to buy apartments in large numbers starting in 1985 in its early efforts towards ending homelessness, however, it did not abandon the staircase model in homelessness services until it introduced its first National Programme to reduce long-term homeless (PAAVO I) in 2008 (Y-Foundation 2017, 16). It would go on to reduce long-term homelessness by 35% until 2015 (Y-Foundation 2017, 19). In no other country has Housing First become this central to national strategy as in Finland, though it must be noted that Housing First is a component of the Finnish model that is on the whole distinctly housing-led, which is to say that housing is always at the center of responses to homelessness (Pleace, Baptista, and Knutagård 2019, 60).

Things look different in the other countries examined. In Austria, Housing First programs and homelessness services, housing and social services in general were thus far the responsibility of federal states or sometimes even local governments (I1, 4). This made for highly individual systems:

“So that is also a hindrance, that homelessness services are organized at the federal level. It means there are nine different systems, nine different federal governments, that make their own decisions, nine administrative levels, that all bring their own perspective on homelessness and ending homelessness into their decision-making. That of course makes it harder to say, ‘we generally do it this particular way now’, the way Finland did, for example. Finland adopted a national strategy, they said ‘we do Housing First in all of Finland now, period’” (I1, 13).

After successful pilots from 2021, Austria launched a national Housing First program in October 2024 that will stay in place until 2026. Although with the newly elected government, it is uncertain whether the program will be renewed after 2026, it is a positive development to have a national, legally secured guideline that defines target groups, standards and funding flows for Housing First in Austria (I1, 3). These were previously very different across Austria’s federal states. Eligibility, for instance, is defined more broadly in the national program than it has been in certain regional programs. The *Lebenshaltungs- und Wohnkosten-Ausgleichs-Gesetz* (LWAG; EN: Livelihood and Housing Cost Compensation Law) which contains guidelines that legally underpin Housing First in Austria requires applicants to fulfill the following criteria: primary residency in Austria; homelessness (which goes beyond rough sleeping to include those in precarious and insufficient housing); need for support due to incapability to end one’s own homelessness; being of legal age; desiring one’s own contracted housing unit; proof of income or lack thereof; long-term perspective to retain the housing contract (BMASGPK 2024, 14–16). In contrast, before the national program was launched, Salzburg used to require applicants to prove comorbidity (co-occurring physiological and/or psychological medical conditions) (I1, 11). This national guideline makes it possible for applicants to apply for Housing First with institutions in their region or locality with the same criteria.

In the Netherlands, the national approach of Finland is regarded as more advantageous than the Dutch decentralized approach (I3, 12). Having the central government feeling responsible for a national strategy towards ending homelessness is seen as a substantial advantage: “in Finland they made it national policy right away, so it’s been on the agenda for four consecutive policy cycles, whereas in the Netherlands it’s been adopted only now” (I3, 7). The Dutch ministries of health, social affairs and housing together presented a National Action Plan on Homelessness at the end 2022 (Rijksoverheid 2023). It integrates a Housing First approach and has the ambition to end homelessness in 2030. Promising as this sounds, at Housing First Nederland the plan is so far perceived as “paper tiger”, for a lack of direction and funding from the central government (I3, 6). Central governments can also play a role in coordinating between regional and local organizations, and a lack of such coordination was cited as a problem in the case of Germany (I2, 35). In this case, the presence of a “shared agenda, like

this is what we do” is considered “essential” (I2, 36). In conclusion, the central government is identified as an important actor in directing efforts, guidelines and funding, however, the adoption of a national strategy is not enough to ensure the effectiveness of this actor. The role of national strategy will be further discussed under processes.

Even if central governments can potentially pull much weight, regional and local governments were also highlighted by interviewees for playing an important role. Capital cities like Vienna or Helsinki have initially had their own approaches to Housing First that have sometimes become an example to other cities. In Vienna, where Housing First has been an established part of homelessness strategies for the past ten years, programs are certain to continue past the expiry of the new law in 2026, whereas in other parts of Austria their continuation is not guaranteed (I1, 5). Local governments can also have a high level of autonomy that can be conducive to positive results and simultaneously makes it more important that they be on board for any efforts to coordinate Housing First at a larger scale and find consensus (I2, 36). Municipalities can be especially important to convince to let Housing First projects operate (I3, 24). All in all, in 2019 there were more countries in Europe that had regional, municipal or local homelessness strategies than there were that had national strategies, which Pleace and colleagues attribute to the principle of subsidiarity (2019, 17).

7.2.2. The “right” ministries and interministerial cooperation

At the level of central government, it matters what ministry has responsibility for coordinating Housing First. This concern was most prominent in the Netherlands, where Housing First is currently in the hands of the health ministry. Even though the National Action Plan on Homelessness is a cooperation of health with social affairs and housing, Housing First Nederland would rather it fall under the Ministry of Housing and Spatial Planning, because “that actually already implies that homelessness would be a healthcare problem and not a housing problem...the current minister for housing says homelessness is not my problem, that’s not in my portfolio. Well, then you really have a long way to go. And in Finland they see that differently, there it is part of housing policy” (I3, 15). At the European advocacy level, it is observed that it is important to have officials from the “right ministries” joining discussions on Housing First depending on who controls housing allocation and who can connect with other ministries that need to be involved, like health, finance, justice and others (I4, 9). Some of these interministerial cooperations can be even more meaningful than who has executive responsibility, as is exemplified by France, which made Housing First a national strategy through interministerial cooperation that was kicked off by the health ministry (I4, 10). Yet other countries lack a ministry for housing. Denmark is seen as a positive example of ministerial management of Housing First: “So Denmark renamed its ministry. They merged social affairs and housing. So it’s a ministry for social affairs and housing. And I think that that also was a

big win for the whole idea of putting Housing First as the foundation of your response to homelessness” (I4, 10).

7.2.3. Politics and political decision-makers

Political decision-makers have the power to structure policy agendas, making them highly important actors to win over. The case of Austria makes this particularly salient, where a recent change in government has made it uncertain whether the national program will be continued after 2026. This would require an active decision to do so. Housing presents a complex topic in which it can be especially hard to promote legal change that can meaningfully further Housing First efforts. Accordingly, “it is long and hard work to bind policy makers to this topic. They are political decision-makers that regularly change. That means one has start from the beginning over and over to lobby for these themes” (I1, 15). Politics are ever shifting and in recent years, many countries have seen a move towards the right on the political spectrum, which all interviewees mentioned as a concern for the future of Housing First. In Finland, the political discourse on housing is shifting towards individual rather than collective responsibility for the first time in decades and a decrease in affordable housing (I2, 18; 42). In the Netherlands, the new far-right coalition abolished a regulation (the ‘LVV’⁷) that provides undocumented migrants with shelter and food while their cases are processed. Although the target group is but a few dozen people, it signals an animosity towards the most vulnerable that affects the work of Dutch Housing First initiatives, who can soon expect an increase in homeless migrants whom legislation does not allow them to assist (I3, 13). As housing crises and shortages intensify everywhere, it becomes more and more challenging to argue for aiding these vulnerable groups. Some compare the situation to an emergency room: many people are in need but whom to help first, the person with a broken leg or the one with a bleeding head wound? (I4, 4). Here the question is, if there are many people in need of housing support, then how to argue for prioritizing people experiencing homelessness. In search of answers to this question, some have begun to look for answers in academia, for instance in transition studies (I3, 17). Similarly, the Housing First Europe Hub has used Meadows’ (1999) concept of leverage points for systems change in their train-the-trainer programs to show practitioners how their work makes an impact (I4, 14).

7.2.4. Housing partners

Housing First programs work with a plethora of different housing parties to access housing for their service users. Some of the most important partners named by interviewees are the non-profit, municipal and social housing sectors and building associations (I1, 14; I3, 16; I4, 9).

⁷ Landelijke Vreemdelingenvoorziening (EN: national provision for foreign nationals) see also: <https://www.dienstterugkeerenvertrek.nl/over-dtv/leidraad-terugkeer-en-vertrek/opvanglocaties/de-landelijke-vreemdelingenvoorzieningen-lvv>

They tend to be easiest to get on board because it is their aim to offer affordable housing to many population groups without a profit orientation (I1, 14). Currently, most of the housing for Housing First is supplied by the social housing sector (Jones and Fritz 2023, 8). The Finnish Y-Foundation which was founded to tackle housing shortages and was an early adopter of Housing First, has taken matters into its own hands. Starting to acquire housing in the late 80s and in the 2000s, the organization also began to build its own rental housing. It is now the country's fourth largest landlord and the largest non-profit housing provider.

It is harder to tap into the private rental market, which does not have an interest in limiting profit (I1, 14). However, housing shortages across Europe are putting a strain on social housing sectors, with demand exceeding supply. Hence Housing First also tries to mobilize the private rental sector, for instance through projects that connect people seeking affordable housing with private landlords in search of tenants and explaining the advantages of providing private housing for Housing First (Jones and Fritz 2023, 8). The Housing First Europe Hub has a webpage explaining what housing providers and private landlords can expect when renting their property to Housing First tenants (Housing First Europe Hub 2025). They may be concerned that these tenants will not pay rent on time or display socially undesirable behaviors. One of the most important facets of convincing property owners, therefore, is that Housing First tenants come with a "support system. So it's, in fact, safer and easier and less risky, because people come, you have someone you can call if something goes wrong, if the neighbors are really, you know, cranky, you can reassure them that this person is getting the support that they need" (I4, 17).

There are of course also actors that have a stake in traditional homelessness assistance models, such as those who run shelters (I1, 13). Whereas it has been a central part of Finland's strategy to convert shelters into self-contained housing units, this will be harder to do in other countries. This has been the case in the Netherlands, where Housing First at times collides with an advocacy organization for shelters because their interest in shelter services is at odds with the permanent housing solutions of Housing First. These organizations are seen as "parties that are part of the regime and with that uphold the status quo, which hinders our work" (I3, 16).

7.2.5. Trailblazers, (unlikely) allies and getting as many actors around the table as possible

Sometimes, single individuals can help to get change on the way. In Finland, a former mayor of Helsinki is credited with pushing hard to get Housing First on the political agenda of several Finnish cities: "he was very active, very even aggressive ... he personally called to some of the cities like, 'really, you're not going to be part of this? I think you should reconsider' ... so in a sense it was also power using power in a very effective way to reach a goal" (I2, 23). Other

umbrella organizations play an important role in bringing together stakeholders that are interested in cooperating, for instance the Austrian Federation of Limited-Profit Housing Associations (GBV) (I1, 15). Platforms like the Housing First Europe Hub bring together Housing First advocates and practitioners for exchange. The Hub also represents a space for “ambitious thinking ... and reflection” on ending homelessness and to show advocates that get bugged down by the day to day of “headbutting against people who don’t want to change to try and make an impact here in this housing system piece” that they are in fact having an impact (I4, 14). In their train-the-trainer workshops, the Hub works with Donella Meadows’ *Leverage Points, Places to Intervene in a System* (D. Meadows 1999) in order to show practitioners who feel overwhelmed and out of touch with the effects of their work that “you are, you are having an impact on the system, because if you’re getting 10 more apartments for people who were formerly homeless, 10 years ago that didn’t happen” (I4, 14).

Another important factor that came to the fore is that change is seldom about getting a single, important stakeholder on board. More than anything, it is about getting as many different actors as possible to join the table. Similar to the interministerial cooperations described earlier, some of the most successful Housing First programs have involved a great variety of actors, some of which may not come to mind right away when thinking of solving homelessness. This is illustrated well by the case of Milwaukee in Wisconsin. As told by an interviewee, the city of Milwaukee started its Housing First program without a systems change vision. However, over time, a multitude of incremental changes led to the involvement of a broad spectrum of actors: not just housing actors, but also health care departments, police and parks departments.

“And so just by starting with a program and not having any kind of systems vision in order to make it successful and say we’re going to solve this problem in our city, they had to involve the systems. And, you know, I don’t think Milwaukee, Wisconsin is a particularly sort of like shining light of like social welfare leftism. But they were the only way to sort of solve that social that that visible problem of visible homelessness was to say we start with the housing and we start bringing in all of those actors that need to play a role” (I4, 12)

Similarly, the letter of intent for PAAVO II, the second government program integrating Housing First to reduce long-term homelessness in Finland was signed by The Ministry of Social Affairs and Health, The Ministry of Justice, The Housing Finance and Development Centre of Finland (ARA), Finland’s Slot Machine Association (RAY) and The Criminal Sanctions Agency. These cross-sectoral cooperations also play a role in reviewing the costs of reducing long-term homelessness, because the initial increase in housing costs can be accounted for in savings elsewhere, such as in expensive emergency services and shelter costs (Y-Foundation 2017, 68).

7.3. Processes

In the definition of homelessness systems used by the Demos Helsinki and Housing First Europe Hub report, processes make up “specific policies and programmes that are adopted at the national or local level” (2022, 7). Although policies and programs are evidently important in shaping outcomes in homelessness systems, it may not always be possible or helpful to try and trace back system characteristics to particular official measures. In the analysis of the interview data, it became clear that rather than a single policy measure or program, it has often been a bundle of measures shaped by attitudes towards housing and homelessness (see the ‘values’ chapter) that end up laying the foundations for what Grander and Stephens call the “boundaries of possibilities”, which essentially are “both the limits to the options available to lower-income households in the housing market and to the ways in which social or cost rental housing can operate” (2024, 311). This amalgamation of attitudes, policymaking, programs and other directions taken in the system result is similar to what housing studies refer to as ‘path dependence’. Path dependence is akin to institutional ‘lock-in’ effects, in which historical developments in housing provision, that are themselves subject to degrees of contingency, lead to the decreased feasibility of certain institutional pathways (see Bengtsson and Ruonavaara 2010). The subcategories scrutinized in this chapter are therefore rather broad. They capture red threads named by the interviewees as guiding how easy or difficult it is to promote Housing First in different places. The most important factors discerned were the scope of the welfare states preceding the implementation of the Housing First program; how ‘systemic’ the vision behind its implementation was; the incentivizing strategies at play in winning over important actors; and fidelity to the original US Pathways to Housing model.

7.3.1. *Pre-existing welfare structures*

To be able to offer housing and support, Housing First programs need to have access to various resources, the foremost of which are housing and care. Starting with the former, it is obvious that the availability of affordable housing is crucial for Housing First operations. Access to affordable housing remains one of the key challenges for Housing First projects across Europe. The very fact that Housing First often remains at a project level that is ‘added’ onto existing staircase model services, is identified by The Housing First Europe Hub as “the most pernicious and intractable barrier to systems change”, that underscores the need for a complete turnaround of approaches to homelessness, from managing to ending it. They highlight the fact that Finland, with the Y-Foundation as a large-scale non-profit landlord and a robust supply of affordable housing remains a lone progressive example is a sobering reminder of the still small scope of Housing First (Jones, Albanese, and Revelli 2022, 12). This is confirmed by the narrations of the interviewees, as well as numerous publications that underline the dire need for affordable housing. The Finnish model focuses on prevention of

homelessness, which is made possible by its reserve of affordable housing that is large compared to supply in other European countries (I2, 8). Rapid re-housing and housing retention becomes a lot easier when the housing is readily available. In Finland, there has been strong state guidance of social housing construction since the Second World War that has been successful at creating social mixing (I2, 17). Austria too, still benefits from its extensive social era, in which a large amount of the current social housing supply was constructed. It is observed that “we [Austria], still live off a system that has functioned extremely well for many decades. There has been a strong political commitment for investing in housing and keeping this housing affordable. This was always a strong priority, especially in Vienna, but also in other cities in Austria, and that is why many regard Austria with envy” (I1, 20). In contrast, the Netherlands struggles with gaping housing shortages: “Finland built a lot, they really invested in housing construction, whereas we of course pretty much left it to the market, so that’s a big difference” (I3, 13). Indeed, although the Netherlands has a relatively rich history of social housing, the social rental sector has been steadily restricted since the neoliberal turn. In 2010, the country even abolished its ministry for housing, only to be reinstated in 2024. Grander and Stephens, in the conclusions chapter of their volume on housing and the welfare state, note that the social consequences of the financial deregulation of housing have been cushioned the best where supply has been supported, citing milder outcomes in Austria as well as in Finland (Grander and Stephens 2024, 323).

Those countries with more comprehensive welfare states, also have better possibilities to insert Housing First service users into existing welfare services. The comparison of the United States to rich European countries shows this well. Whereas the US Housing First model often works with teams of their own specialists to support service users, in Europe

“it works much more around the sort of idea that I think - sometimes it’s called critical time intervention or like intense intensive case management - where you say, OK, this person is now in their home and our housing first team will be the brokers for them to all of the mainstream services. So that instead of having a psychologist on our team, what we have is a Housing First worker who then makes sure that that person can get an appointment with a psychologist in a clinic or in an urgent care clinic” (I4, 12)

Multidisciplinary teams are resource heavy, making it harder to talk about systems change in the US than in Europe, where Housing First is able to tap into existing resources that can be reallocated (I4, 8). In Finland, Housing First “help[s] people to find their place in the system ... especially in Europe, where we still have fairly universal and good services” (I2, 7). A 2023 study commissioned by the European Parliament concludes:

“Housing First should inform all dimensions of an effective homelessness strategy but it will fail or be challenged by a lack of housing supply, inadequate access to mental

health, health and social care systems and a welfare system that cannot meet the costs of adequate housing and prevent after housing cost poverty” (O’Sullivan et al. 2023, 47)

7.3.2. The systemicness of the approach to implementation

Previous sections have discussed the importance of things like having a variety of actors around the table and integrating Housing First into national strategy. However, praxis shows that even the best of intentions can remain just that what one interviewee called a “paper tiger” (I3, 6). Housing First as a successful approach has garnered great interest over the past years, though it remains challenging to make the transition from managing to ending homelessness as this requires systemic change. This cannot happen as long as Housing First projects are “added on” to traditional models. As the case of Milwaukee shows, there need not be a systemic vision to begin with when starting to implement Housing First, but there are many barriers to be overcome that require commitment from a broad coalition of actors (I4, 12). The interviewees describe two cases that illustrate this gap between discursive aspirations and lived practice. Both pertain to funding, which can be quick to show where priorities lie:

“We have been integrated into the National Action Plan on Homelessness, though at the moment we still view that as mostly a paper tiger. There is little direction from the government and the financial means – to paint you a picture – there are 385 million euros per year still getting invested in shelters and 65 million extra per year have been made available to make the change from shelters to housing. I think you can do the math on how much more money goes to shelter than to housing, the solution, about 6 times. So, yes, it is national policy but in practice and in the execution, we see that for example through the absence of a financial stimulus, that the change is not going the way we would like it to” (I3, 6)

A similar case was described in France, which shows that the precarity that comes with the project-based nature that Housing First often remains confined to is a hindrance to lasting change and effectively impeding the very essence of Housing First which is the offering of long-term support to service users. At the time of interview, it was only possible to acquire a year of funding at a time for Housing First programs in France. Shelter-based responses on the other hand were still able to sign contracts with the government for 15 years (I4, 3). One interviewee pondered whether Housing First principles and an accompanying shift to a systemic approach would be more readily accepted if they would target people with less high and complex need as well. “Maybe that would have been easier, but people still have an image of homeless people as outsiders that are best put away in industrial zones at the edge of the municipality or something” (I3, 10). What is signaled here, is the value- or cultural shift that needs to occur

in order to make systemic change possible, since the 'Othering' of people experiencing homelessness leads to the perpetuation of the acceptance of fellow citizens remaining unhoused. This will be treated of in more detail in the "values" chapter. The cases described above demonstrate that a certain amount of readiness and commitment to restructuring funding and other resource allocation with the need for systemic change in view are essential for successful Housing First programs. However, at present

"Having Housing First written into homelessness strategies is not enough to guarantee that Housing First will be used for homeless people with high and complex needs. The results of the survey show that the strategy can be put in place, but in practice Housing First is not used very often or only operates in a few areas" (Pleace, Baptista, and Knutagård 2019, 20)

7.3.3. Incentivizing strategies

If adopting Housing First on paper has not been enough to see it put into practice, then what have been the incentives encouraging actors to start doing so? The main issues that were addressed in the interviews were the following: addressing politics across the spectrum; cost-saving arguments; financial carrot and stick incentives; the importance of evidence; and the 'housing as a human right' argument. Granted that a political shift to the right has been a concern for Housing First programs, the question arises how to argue for Housing First with different political actors. One approach would be to "tailor your advocacy depending" (I4, 11). It is suggested that for actors on the left, arguments that are about helping out larger groups of the population and those facing the most extreme forms of social exclusion is appealing because "they kind of want to float the boat for everybody on the left" (I4, 11). Whereas actors right of center may be more interested in achieving a "quick political win" by removing rough sleepers from the streets (I4, 8). In both cases, it is deemed important that the principles of Housing First are easy to understand: housing, not complicated staircase support schemes solves homelessness. The message is that "people themselves maybe have high and complex needs, but that solving their homelessness, that's not hard" (I4, 8). This sentiment may be ingrained already in the public view of homelessness in some places more than others. In Finland "the political will was maybe easy to build because question wasn't, in a sense, politicized, it was something that everybody agreed on" (I2, 22). This interviewee warns that "this issue is endangered to become too politicized and then it's hard to find consensus" (I2, 37). What the two highlighted perspectives of arguing for Housing First across the political spectrum and depoliticizing the question of ending homelessness have in common, is a certain acknowledgment of plurality of values. In a recent paper, Parsell and colleagues offer that often, people agree on what is morally just, they merely arrive there via different processes of reasoning. Consequently, "ending homelessness through scaling up affordable housing must

be framed as progress toward a type of society that is widely perceived as desirable, drawing on a range of ‘moral foundations’ that appeal to people across the political spectrum” (Parsell et al. 2025, 14). This has also been referred to as “value pluralism” (Watts-Cobbe and Fitzpatrick 2025).

Cost-saving and cost-effectiveness arguments are often mentioned in the Housing First literature as important in winning over political decisionmakers. In Finland, it was a key argument for center rightwing housing minister Jan Vapaavuori (Invisible People 2023 (12:07-13:04); I2, 22). It is acknowledged that evidence regarding cost-effectiveness in Housing First has been mixed and data is not robust. In 2019, only seven out of 17 countries running Housing First services had data on cost-effectiveness (Pleace, Baptista, and Knutagård 2019, 50). The general idea of saving costs through Housing First is that of investing in housing individuals rather than repeatedly having that individual coming into contact with expensive shelter services, justice and emergency healthcare. There is robust evidence for cost efficiency through replacing traditional homelessness services with Housing First in Finland, France and the UK (Pleace, Baptista, and Knutagård 2019, 61). Most often, the contexts in which Housing First does not save money, are those where individuals are inserted into welfare services they previously did not have access to, causing them to show up in statistics where they would not have before. It therefore makes sense that cost-saving arguments are least powerful in places where welfare systems are not robust. For instance, in some Eastern European countries it can appear

“cheaper not to do anything, then these people never touch the system ... then they don’t count in your statistics around health care or around social welfare or around housing, because sometimes when people come in from outside of all of our systems and need intensive support, they actually cost more initially. So, yeah, so in Eastern Europe, we never talk about the financial aspect very much, because it’s very hard to make the case that accessing housing on the private market and providing support is going to be cheaper than a quite inexpensively run shelter. Whereas, in Western and Northern Europe, absolutely the financial argument makes complete sense, so you can absolutely use that” (I4, 5)

The emphasis on the cost-saving argument has been criticized for reproducing to some extent a focus on acute help for high-need individuals, rather than expanding the principle of a basic human right to housing across the population (Taylor, Loubière, and Auquier 2020, 376). “However, while Housing First will not necessarily always save money (though it may often be more efficient), the ultimate test of effectiveness is in addressing the high human costs of homelessness and this is an area in which Housing First is consistently effective” (Pleace, Baptista, and Knutagård 2019, 61).

The financial carrot and stick incentives can be summed up as ‘those who do Housing First get funding and those who do not bear the costs themselves’. In Finland, this initially helped get cities on board for PAAVO I, as the state helped finance the change by funding half of the 200 new employees’ salaries (Y-Foundation 2017, 19) (I2, 23). In Denmark, Housing First became part of the national homelessness strategy in 2009, however, years later it was discovered through a survey that nobody was actually implementing it (I4, 6). This was turned around with a financial incentive in which municipalities received money from the central government for every individual that they moved from temporary shelter into housing and support within three months, whereas they carried the costs themselves if they failed to house the individual (I4, 6). A financial snowball effect took place in Scotland when a social enterprise raised money for Housing First, which the government subsequently matched, providing municipalities with the resources to get Housing First set up, kickstarting the establishment of services and spurring a cultural shift towards ending homelessness (I4, 6). Hence, financial incentives can provide an important nudge to get Housing First services set up where they previously struggled to be put into practice after adoption of the strategy on paper.

Apart from the concept of Housing First being easy to understand, it is also one of the best studied responses to homelessness there is (I4, 2). There has been a notable shift in the discourse on homelessness over the past 10 to 15 years from homelessness as a wicked problem that seems impossible to solve, to that “homelessness can be ended with housing and not with other forms of shelter or something temporary” (I1, 12). This shift is felt distinctly by those who have been in the field for this amount of time, that in the sector itself, the opinion that people need support to become housing-ready first has become much less present (I1, 12; I4, 8). Partnerships with academia and other knowledge institutes have been an important propeller of reports that advocates can call upon to argue for Housing First. In the Netherlands, Housing First Nederland has partnered with universities and cooperated with them for its funding (I3, 15). Evidence does not only address costs, but also social integration, health, mental health and addiction, and tends to be varied, but positive (Pleace, Baptista, and Knutagård 2019, 61). Interviewees feel that the availability of this internationally researched evidence gives them strong argumentative support: “it works, it is cost-effective and also good for the wellbeing of people, so, how could you resist that?” (I2, 25).

The argument of housing as a human right is a somewhat different variable that is fickle across contexts. Although “Housing is a human right” is the very first core principle listed in the *Housing First Europe Guide*, it is not always straightforward to wield for advocates. Easy to understand as a principle, there is no unitary code to refer to as to what this right should consist of. “What does one have a right to, to what form of housing, who defines this housing, who gets to define it or change it?” (I1, 16). In some contexts, the right can be called upon more

acutely. This has been the case in Finland, where extreme cold in fall and winter led to the deaths of many homeless sleeping rough (Y-Foundation 2017, 23) (I2, 20). For Dutch advocacy, it has been central to its perspective on intermediary rental constructions. In these agreements, individuals access public housing through a contract with a health care partner. This health care partner, not the tenant themselves has a contract with the housing provider. Whenever the individual fails to uphold the conditions of the health care contract, they also lose their housing contract. 2024 also saw the instatement of a law to end the drafting of fixed-term rental contracts. However, an exception has been made for homeless people, who still get a temporary contract (I3, 20). This again reflects discrimination and stigmatization of people experiencing homelessness that must be overcome in order for a human rights argument to be taken seriously.

Fidelity is a guiding principle in the evaluation of Housing First programs. A service that does not follow the core principles is deemed not to be Housing First. Furthermore, a service's performance is always assessed in tandem with fidelity in order to see how high or low performance relates to fidelity. The success of European Housing First programs has so far been linked with high fidelity to the core principles (Pleace 2016, 63). Interviewees, however, showed themselves somewhat skeptical of the concept. Although one must of course be able to distinguish Housing First programs from other responses to homelessness, some were skeptical of the role fidelity plays in the development of Housing First and its funding. "Money goes to the organizations who do the original model... so of course we also have to be diplomatic and careful if we want to have an impact... it's kind of a product or trademark" (I2, 13). "We are a bit critical of this fidelity, we understand that it might be a good tool ... but we must keep in mind that we want to end homelessness, not develop the Housing First model" (I2, 12). In the Netherlands, almost no service providers were said to work with high fidelity, and that some even operate with intermediary rental agreements (I3, 24). In Austria, the core principles according to the European Guide are respected, though the American approach in which target groups are people experiencing long-term homelessness and with comorbidities has been "decidedly not adopted, because we don't see the point in saying someone has to be in the street for as long as possible and be in a bad as possible state before we house them" (I1, 9).

7.4. Values

In the Demos Helsinki and Housing First Europe Hub report on systems change, transformation of homelessness systems is understood to be about "steering actors, restructuring their processes, and challenging their values". These values are about "cultural, political and operational assumptions that might affect the perception and interpretation of the

homelessness phenomenon at large” (Demos Helsinki and Housing First Europe Hub 2022, 7). The two main value shifts that were discussed by the interviewees were a shift in the perception of people experiencing homelessness and the dominant discourse of individual merit and homeownership as consumption norms in housing. The core values underlying these two issues are entwined with ideology, which is fundamental in the aim of shifting the goal of a system and with that, its outcomes for not only the most vulnerable, but for the population at large.

7.4.1. Perceptions of homelessness

What does a person experiencing homelessness look like, why are they without a home and why do we accept homelessness? Perceptions of homelessness play an important role in how homelessness is approached in society. Interviewees speak of an enduring stigmatization of homelessness, as something that is the person’s “own fault” (I3, 25) or a “personal choice” (I4, 8). The image of the ‘average’ person experiencing homelessness remains quite uniform and is slow to catch up to a reality that is much more diverse:

“if you look back 30, 40 years ago, then the image of the lion share of homeless people was an older man with addiction and multiple morbidities .. but in the past decades the image of homelessness has changed. The group has become much broader, much more diverse, which also means that not every person has addiction- or psychiatric problems or is repeatedly or long-term homeless” (I3, 7)

It is suggested that this image allows people without an experience of homelessness to “not have to identify with it” (I3, 25). Although there are by now many people experiencing housing precarity or exclusion that are active in the workforce, the dominant image of people experiencing homelessness is one of individuals that are not. This conflicts with traditional housing models for people experiencing homelessness in which housing must be “earned” (I3, 14). This differential treatment also becomes clear from the philanthropic connotation of traditional homelessness services that Housing First wants to shift: “rather than a very charitable approach that says, ah, from the goodness of our hearts, we’re going to help these poor people. It’s: no this is a person, an individual, who needs support to be able to live well in our society” (I4, 1). The understanding of homelessness as a social rather than an individual problem has improved over the last 10 to 15 years in Europe. Some interviewees have been able to observe this shift during their time in the field, with not as many of their peers talking about the need to support people to become housing ready. Yet, they also remark that this value shift is far from completed (I1, 13; I4, 8). The same way that evidence can help progress this shift through showing that by far most Housing First service users stay housed

successfully, they feel that there is often a focus on the percentage that does not manage to stay in their housing and that this undermines trust in Housing First. In some cases, cooperations with housing partners suffered because of this preoccupation with a minority of unsuccessful cases (I1, 13; I3, 10). One organization has gone as far as making an analogy between homelessness and cancer, as a way to underline that homelessness is rarely a personal choice and to show its cost-effectiveness: “certain cancer treatments have a success rate that in proportion to costs is much worse than investing in solving homelessness, because people that experience long-term homelessness on average have 30 fewer healthy years to live. That really gets to people because, like, oh, cancer is never someone’s own fault, but homelessness is still seen as a person’s own fault” (I3, 25).

Some conclude that ultimately, who gets access to housing is a “strongly ideological question” (I1, 18) and a “manifestation of failed social policy” (I4, 8). The main type of discourse that comes up here is that taking care of one’s housing needs is seen as principally an individual responsibility (I2, 40). Even in countries where housing is in the constitution as something citizens have a right to, it is usually the case that countries are only expected to “promote” an individual’s ability to secure housing themselves (I2, 39). The road to earning housing is through waged labor (I3, 14). Liberalization trends would have that this is “fair” (I4, 38) and that anyone who falls through the cracks did not work hard enough. This also helps to explain that a common misunderstanding about Housing First is that it is about giving people “free housing” (I4, 1). Which – though untrue because Housing First tenants pay regular rents – incites outrage because it is considered unacceptable to house people “just like that” (I3, 10). These underlying values of individual responsibility for one’s wellbeing and the importance of work in earning a level of wellbeing are reflected in traditional homelessness services. In the Netherlands, there is the so-called *zelfredzaamheid* – meaning self-reliance and literally translating to the ‘ability to save oneself’ - criterion for access to night shelters: those who are of reasonable health, have documentation and no significant morbidities can be turned away. (I3, 8). Having managed to apply for housing, people experiencing homelessness are expected to jump through a great number of hoops to “prove one’s deservingness of housing” (I3, 8). In Finland, the only country where homelessness number are on the decline, the value component of its success is attributed to a sense of “public responsibility” for the wellbeing of individuals (I2, 30).

Perceptions of homelessness are crucial to what measures are seen as appropriate in dealing with it, and what is meant by dealing with it. The fact that Housing First remains at a project level in most countries and that the majority of funding is still allocated to temporary shelter services is telling in this regard, since homelessness cannot be ended with shelters (I3, 7).

As the examples given by interviewees show, the perception of homelessness remains markedly narrow, even if it has improved in recent years. Homelessness can be many things other than sleeping rough. This is why the European Federation of National Organisations Working with the Homeless (FEANTSA) has developed the European Typology of Homelessness and housing exclusion (ETHOS) “as a means of improving understanding and measurement of homelessness in Europe, and to provide a common ‘language’ for transnational exchanges on homelessness”. It consists of 13 operational categories that fall under four main categories⁸:

- rooflessness (without a shelter of any kind, sleeping rough)
- houselessness (with a place to sleep but temporary in institutions or shelter)
- living in insecure housing (threatened with severe exclusion due to insecure tenancies, eviction, domestic violence)
- living in inadequate housing (in caravans on illegal campsites, in unfit housing, in extreme overcrowding)

(FEANTSA 2025)

7.4.2. Consumption norms in housing: merit and homeownership

How homelessness is perceived cannot be separated from dominant ideologies on housing in society. This includes ideas on what kind of housing is desirable and how it is to be attained. In many countries, this is homeownership that is to be earned through individual merit. Even in Austria, which has exceptionally high rates of renters, there exists “an extremely strong homeownership discourse” (I1, 18). Even if homeownership is out of reach for large parts of the population, it is “sold that way politically, that you can protect yourself from homelessness, old age poverty and so on, with property” (I1, 19). In the Netherlands, as well as in Finland, the new, more right-leaning governments are keen to emphasize that “work must pay off” and that a good life is to be earned (I3, 14; I2, 40). At the same time these countries are seeing a reduction in affordable housing and the crossing out of policies meant to support the most vulnerable, as in the case of the Dutch abolition of the LVV provision for undocumented migrants (I2, 18; I3, 14). Social housing, on the other hand, has a status as being reserved for those who need assistance in accessing housing. One interviewee refers to a need for more social housing, “but not this kind of marginalized, stigmatized social housing, but good quality affordable housing” (I2, 8). Rather than a type of housing that there should be plenty of and “everyone has a right to access” (I4, 16), the view of social housing as stigmatized and lower on the ladder of desirable forms of housing is in line with the primacy of sedentarism and

⁸ The full typology can be accessed at <https://www.feantsa.org/download/ethos2484215748748239888.pdf>

homeownership in public discourse on housing. The changing status of social housing from a solution for the masses to a “residual” one in which “social” becomes connoted with “vulnerable” is a distinct development that has taken place since the neoliberal turn (Reinprecht 2022, 17–18).

7.5. Synthesis: system components and their consequences for the right to housing and systems change towards ending homelessness

The analysis has identified several categories that influence how well Housing First programs can work to end homelessness (Table 1). This section aims to assess the identified categories on how they interact and the role they play in enabling or blocking a right to housing and a systemic reorientation from managing to ending homelessness.

Actors	Processes	Values
Implementation level, directive potential of central government	Access to existing welfare infrastructures	Perceptions of homelessness
The right ministries and interministerial cooperation	Systemicness of the approach to implementation	Consumption norms in housing
Political decisionmakers	Incentivizing strategies	
Housing partners		
Trailblazers, allies and involving a plurality of actors		

Table 1: Categories resulting from the analysis, grouped by system components

What can be observed across the different categories, is the tendency that a more universalist and pluralistic approach to implementing Housing First yields the most impact. Properties of universality and pluralism can be found in all three system components. They relate to how comprehensive the approach to implementation is and this is distinct in the involvement of various actors, the processes around implementation and the values underlying them. These three components are co-constitutive, as they all shape each other. The results on actors, pointed to the importance of a strong role for central governments, with all interviewees agreeing that having cooperation directed, funded and legally underpinned at the national level, was a factor for success in Finland. In Austria, the prospect of a national program was welcomed for the sense (temporary) coordination and security it gave. Whereas in the Netherlands, an absence of guidance by the central state was seen as an impeding factor. Universality and pluralism also mattered with regard to every other actor, both at and below the national level: from ministries and political decision-makers to housing partners, local and

regional governments, and a variety of individuals and coalitions. The range of actors that have a stake in housing and homelessness is as vast and complex as the systems they operate in. This is why in terms of processes, approaches that have addressed a plurality of actors have been the most effective. Key factors in facilitating these processes have been the simplicity of the message of Housing First, the use of financial stimuli in implementation, the international evidence available on the effectiveness of Housing First and either tailoring advocacy to the political orientation of actors or finding arguments that appeal to actors across the political spectrum. The pre-existence of welfare infrastructures was a strong advantage, since Housing First needs to be able to give service users access to not just housing but also health, social and other services to fulfill its purpose of offering housing *and* support. Some countries mentioned in the interviews demonstrated that on top of these process factors, it was important to arrive at a systemic approach to housing, whether this is before, during or after initial implementation processes. Finland is again a positive example in how it rolled out its national homelessness strategy with the aim of ending housing. However, in many other countries, the results showed that a national level pledge to Housing First on paper does not necessarily translate to implementation in practice. Unless there are mechanisms put in place that incentivize actors to choose housing-led approaches over temporary solutions like shelters, it cannot be expected that Housing First can be anything more than a project-based supplement to existing services. Values, then, interact with actors and processes every step of the way. In the words of one interviewee “politics shape society and vice versa” (I4, 12). More specifically, there is an interplay in which housing policy is shaped by country-specific ideas on how welfare services are organized in a society, while at the same time, housing relations shape the understanding of what the state should be responsible for with its welfare services (Richter and Demirkol 2021, 206). Perceptions of homelessness and the public discourse on consumption norms in housing are important constituents of what can be expected of state welfare services and housing policy. In all interviews, the continued stigmatization of homelessness and the primacy of homeownership and individual merit were attributed with impeding structural changes favoring the ending of homelessness. Although interviewees saw positive changes in this direction, it was also concluded that this “cultural shift is far from complete” (I1, 13).

7.5.1. The meaning of a right to housing in Housing First

The immense complexity of the systems that Housing First operates within and the many barriers put in its way, beg the question what the right to housing practically means for its advocates. As its very first core principle, it is the moral foundation of the approach, but what role does it have in the everyday practices of advocates and what can be understood from this about the role of the right to housing in their work and for change at large? Although the Netherlands and Finland have constitutions that state a degree of responsibility of the state in making sure its population is housed, neither of interviewees from these countries referred to

that in their advocacy (I2, 39; I3, 30). Instead, the right to housing for them is about highlighting the humanity and deservingness of their target group of people with high and complex needs and in that way equalizing them to regular citizens. By flipping the idea of solving homelessness with housing first rather than treatment first on its head, the person and their rights, not their atypicalities are put at the center. It is the idea, that people, no matter what problems they are dealing with are “worthy of housing” (I2, 4) that advocates want to “lodge into the political imaginary” (I4, 20). They want to do away with the “illusionary, ludicrous narratives” that portray homelessness as self-chosen and “to say there must be access for people to housing and for our target groups we create access with Housing First and for everyone else access should also be possible via subsidized housing, via allocation guidelines, via legal entitlements” (I1, 22). This destigmatization is at the core of the right to housing: it is a human right, and people experiencing homelessness are as human as everybody else. By extension, the right to housing in Housing First represents an entitlement to a ‘normal’ life, in that “there is no condition different than for any other citizen, so you have to pay your rent and you make sure you don’t cause any disturbances” (I3, 20). The support that Housing First service users receive is support that aims to enable them to live self-determinedly in society, which is reflected in the core principles of “choice and control for service users”, “active engagement without coercion”, but also “separation of housing and treatment” since conditionality of housing upon compulsory treatment would violate a right to housing (I3, 20).

One of the strengths of Housing First is that it makes the right to housing a bit more tangible because of how specific its target group is. It is hard to define what the right to housing is when “housing only” is the topic of debate, because who is to say what criteria exactly must be met for housing to be sufficient, affordable and desirable for regular consumers in the market? Housing First on the other hand, is housing and support for people that need support to access housing, and here the right to housing consists in breaking down the barriers to this access guided by the principle that housing is a human right (I1, 21).

“local governments, national governments, can say, ah, yeah, but we’re not going to give free housing to people. But that’s not what a right to housing means. A right to housing means people have the right, they should be able to enjoy their right to live in like dignity and safety, security, privacy and all those things that go with it” (I4, 1)

The approach of Housing First of enabling service users to be regular tenants in the market corresponds to Marshall’s idea of social rights as being allowed “to live the life of a civilised being according to standards prevailing in the society” (1987, 8 [1950]) and in tandem with that, it corresponds to Bengtsson’s ideas of a modern, non-paternalistic social right to housing as that which enables citizens to “solve their housing question through voluntary transactions in the market” (Bengtsson 2001, 265). Rather than being given free housing as a form of

charity, Housing First service users are supported to pay their own rent and thus participate in 'normal' tenant practices.

7.5.2. Housing First, the development of welfare states and systems change

Not only do politics and society shape one another, as previously described, housing is also manifestly an expression of social relations. Social relations are mediated by welfare states, as Esping-Andersen describes when he terms the welfare state “a system of stratification” (1990, 23). Welfare states are always in flux and this is mirrored by the interviews, in which predominantly Austria and Finland refer to themselves as having had strong welfare states that benefit them to this day. All interviewees also voiced concern towards increasingly rightwing governments and their consequences for social policy. It appears that what Bengtsson terms the ‘width’ of the welfare state provides crucial conditions for the possibility of ending homelessness. Those with comprehensive welfare infrastructures in place have a better substrate for Housing First services. In this view, it makes sense that Finland, with its strong Nordic welfare state and robust affordable housing supply is closest to attaining this goal, though it remains the exception.

On the other hand, there are the bold discursive advancements of social rights in institutions. For example, one interviewee points out that EPOCH, the European Platform on Combatting Homelessness that was initiated in 2024 with co-funding by the European Union, was “outside the realm of possibility” 20 years ago (I4, 15). Although the developments discussed in the interviews predominantly centered on the mid-tier spheres of housing production, consumption and exchange as depicted in Stephens’ multi-layered housing regime framework (2020) (Figure 1), the effects of the macro-level drivers of globalization and macro-economic policy were reflected by the interviewees’ perceptions of the problem of homelessness and its solutions. Along with the reported tendency in the field of increased openness towards ending homelessness with housing and slight improvements in moving away from the idea of homelessness as a personal choice, the interviewees showed an increased interest in more complex, or rather, systemic thinking about the problem of homelessness. This is demonstrated by the interest expressed by Housing First advocates in transition studies (I2, 17) and systems leverage points (I4, 14) in the search of where and how to make impact in complex systems. This development could be understood to be in line with the developments going on in many welfare states. With the curtailing of welfare services, reduced social spending and increased privatization and globalized financialization, real estate has become an important asset for households as well as international financial actors, whilst others have become excluded from it entirely. With housing precarity and exclusion expanding across new and more diverse social groups, Housing First advocates have begun using Desmond Tutu’s words about there coming “a point where we need to stop pulling people out of the river. We

need to go upstream and find out why they're falling in" (cited in Jones, Albanese, and Revelli 2022, 3). In this case, the aim is not just prevention of housing exclusion but a transformation of the system that generates housing exclusion. Housing First's creed is to end homelessness with housing, but it remains a specific approach to solving the homelessness of a specific group of people that also requires support. It is not 'housing only' and it is not 'housing for all' and it is important to make that distinction (11, 21). However, it is precisely this distinction that has the potential to open up debates about what housing and a right to it should encompass. As housing precarity worsens, more and more people fall into the river that do not need support, but they do need affordable housing. By succeeding in providing housing for a group that is notoriously 'difficult' to house, Housing First opens space to think about why people fell into the river and how to take responsibility for keeping them from doing so:

"And sometimes there's a bit of pushback like yeah, you can't solve homelessness with Housing First and then we just say, here's an example of how you can solve some people's homelessness, and doesn't that make you think you could solve more homelessness?" (14, 15)

8. Discussion

8.1. UBS, Housing First and the shared pursuit of universalist housing welfare

Evaluations of Housing First identify finding sufficient supply of adequate, affordable housing and finding reliable funding as the two key challenges to developing Housing First into the mainstream response to homelessness of people with high and complex needs in Europe (Pleace, Baptista, and Knutagård 2019, 60). This is echoed by the interviews conducted for this thesis, which underline a need for pre-existing welfare infrastructures including supply of affordable housing and a commitment to Housing First that is reflected not only in funding, but also in its strategic integration into homelessness strategies at multiple governance levels and a shift in values towards ending homelessness based on a human right to housing. Housing First advocates have argued that overcoming these challenges requires systemic change (Jones, Albanese, and Revelli 2022) as well as a universalist approach to welfare (Parsell et al. 2025). Citing the example of Finland, which to date has become the most effective at lowering levels of homelessness through growing its affordable housing supply and fostering a universalist welfare state, advocates propose that

"ending homelessness – especially broader forms of homelessness beyond rough sleeping – requires transformation to fundamental domains of society, including housing and social welfare systems. In this way, ending homelessness must be seen as part of a larger and more fundamental conversation about values and what people

deserve, on the one hand, and what responsibility we owe to fellow humans, on the other hand (Parsell et al. 2025, 2)

Although it remains crucial to distinguish between Housing First *philosophy* and Housing First *services* (Pleace, Baptista, and Knutagård 2019, 61), it can be reasonably said that Housing First's *philosophy*, as per its core principles of housing as a human right and something that should support individuals' autonomy in living socially integrated and dignified lives, closely corresponds to UBS scholars' Coote and Percy's idea of housing as a need satisfier to which there ought to be a social right (2020, 79). Recalling that UBS scholars refer to Marshall's understanding of a social right as that which permits citizens to take part in social heritage and a life that is civilized according to standards prevailing in society (1987, 8 [1950]), UBS and Housing First share a perspective on housing that identifies that "shared needs" translate to "collective responsibilities" (Coote 2021). However, there remains a wide gap between this normative understanding of housing and the reality of housing systems and the prominent role of markets in them. This gap is marked by the tension consisting in housing's double status as a need satisfier as well as an individual market commodity. Choice and need are therefore ever in competition in housing, which is what has prompted housing scholars to refer to housing as the "wobbly pillar under the welfare state" (Torgersen 1987; see also Borevi and Bengtsson 2015). Consequently, many housing and welfare scholars have tried to theorize the kind of interventions needed to ameliorate the inequalities produced by the commodification of housing. Whereas approaches like UBS and Housing First work towards a more universalist provision of housing which is likely to imply a greater degree of decommodification through stronger state intervention into markets, the current trend is rather one towards increasing commodification as housing finance becomes a larger chunk of what dictates housing production, consumption and exchange (Blackwell and Kohl 2019; Grander and Stephens 2024). This has consequences for how a right to housing can be advocated for and 'applied'. Returning to Bo Bengtsson's distinction between universal and selective housing policy, universal housing policy would support individuals' market agency in obtaining decent housing through markets. In this case, the state lowers thresholds to access *across* housing sectors. In selective housing policy, the housing sector becomes split into an unregulated private market and a protected and regulated social sector. According to Bengtsson, in the latter situation, a right to housing looks like a "legalistic safety net" for households that have no other means of accessing housing (Bengtsson 2001, 262). This expression of selective housing policy in the face of heightened commodification can be observed across Europe where many governments offer this type of legalistic safety net in the form of last-resort, residual types of support to underprivileged households or in the unsuccessful case of DALO in France.

But what drives the commodification of housing and are there ways to effect change in the opposite direction towards decommodification and a more universalist approach to a right to housing such as it would reflect the philosophies of a right to housing of UBS and Housing First? Answers may be found in examining what ‘drives the drivers’ of systems. Here, Grander and Stephens’ definition of regimes as the *cause* of systems becomes relevant again. They see wider welfare regimes as setting the context for housing regimes. Welfare regimes, in turn, are notably shaped by different political ideologies, as exemplified by Esping-Andersen’s famous categories of liberal, conservative and social-democratic welfare regimes (1990). These ideologies consist of “views about how society should be organized and the institutions that need to be designed and built to create it” (Grander and Stephens 2024, 312). It follows that in order to understand barriers to systemic change in housing, it is imperative to understand the ideologies underlying housing and welfare regimes. These relate to the core values examined in the interviews, that are in constant interaction with housing actors and processes, which thus cannot productively be analyzed in isolation of the values that they are driven by and vice versa. Hence, the rest of the discussion will be structured as follows: the next section deepens the understanding of housing as commodified; the third section offers a political economy understanding of the centrality of capitalist ideology to housing; the fourth section discusses the significance of the growth dependence of welfare; the fifth section discusses the value of symbiotic modes of transformation for housing; the sixth section answers the research question, detailing three lessons UBS can take from Housing First; and the concluding section briefly outlines limitations and considerations for future research.

8.2. The limitations to the decommodification and universal provision of housing

Given the tensions that arise between the use and exchange value of housing through its commodification, it would be understandable to look for ways to promote its decommodification. According to housing and welfare research, “the welfare state both creates and dampens social stratification and ... this is clearly connected to the degree of (de)commodification, i.e., how households can uphold a socially acceptable living standard independently of labour market participation” (Grander and Stephens 2024, 24). This process would mostly occur through the provision of public services, in which states withdraw these services from market logics to deliver them “as a matter of right” (Olsen 2018, 382). A greater degree of decommodification would thus correspond to a greater degree of households’ abilities to satisfy their basic needs independent of markets, which in itself would be desirable. However, decommodification must be approached in a more nuanced way than simply states versus markets (Borevi and Bengtsson 2015, 2600). Provisioning scholars point to the importance of recognizing that commodities are highly heterogeneous, with housing presenting

a particularly unique case. Housing is immobile and consumed where it is produced; it takes up a significant part of household expenditure; and is subject to historically, socially and culturally inflected consumption norms that are highly dynamic (Bayliss and Fine 2020, 81). The heterogeneous nature of different commodities implies that the systems by which they are provisioned are equally heterogeneous. Inattention to the peculiarities of individual systems risks the “fetishization of certain institutional forms (i.e. the state, for-profit corporations, anarchist collectives, etc.) or particular scales (i.e. the local, regional, etc.)” (Hall and Schafran 2017, 9). It is generally questionable whether decommodification is possible in sedentary capitalist economies to which imperatives of property and accumulation are inherent. Foundational economy scholars Hall and Schafran have proposed that housing’s main problem is not so much its status as a commodity, but rather the lack of regulation on profits made off such an essential good. Arguing that “high-yield seeking capital will always exist” they put that intervening into the provision of basic need satisfiers must be about *how much* profit on *what item* is accepted, according to a “moral hierarchy of profit” (Hall and Schafran 2017, 17). On the significance of profit, Michael Harloe has argued that opportunities for profit within essential provisioning tend to relate negatively to decommodification, which past any limited stage is apt to incite “intense resistance” (Harloe 1995, 3). Socialization of housing or its withdrawal from unregulated markets in other ways would threaten opportunities for capital accumulation more than other policy domains would, due to the extraordinary profitability of private property (Olsen 2018, 383).

Another limitation to the decommodification of housing is that it is not guaranteed to produce the outcomes that are generally sought after in the curtailing of market forces. Bärnthaler and Dengler point out that in times of Fordism, the relative decommodification of housing, education and health cut living expenses for large parts of populations, giving way to private mass consumption. They therefore argue that an approach like UBS that also decommodifies certain need satisfiers, cannot stand on its own but needs to be complemented by other restrictions on expansive production and consumption cycles (Bärnthaler and Dengler 2023, 680). Others have argued that the decommodification of housing is too often confined to social housing, ignoring other policy instruments capable of weakening market forces, or even that housing markets themselves should be considered as having potential for decommodification through their redistributive effects on pensions and other welfare services (Malpass 2008). Hence, although decommodification remains an important concept in research on housing in relation to welfare, it is no independent variable for social outcomes in housing. Public provision alone does not tell us much about the quality of housing, nor about the distribution of other welfare services and resulting human wellbeing. As previously pointed out, housing as a commodity is entangled in capitalist relations to which ownership models and accumulation are integral. It will remain extremely challenging to develop a more universal provision of housing as long as

these relations stay upright. The next section therefore further examines these relations and the role of ideology in them, to build an understanding of what possibilities for change are currently discernable.

8.3. Political economy of housing: the role of capital ideology

In the ‘values’ chapter of the analysis, many of the interviewees pointed to the primacy of certain narratives around homelessness and housing. These centered on the stigmatization of homelessness as individual failure and the ideals of merit and homeownership. These narratives were observed as impediments to systemic change in homelessness strategies, even if these strategies had progressed in other increments. Such ‘narratives’ or ‘values’ can be traced back to ideologies that underlie welfare regimes and with that, shape the design and operation of housing systems. However, regardless of the different ideologies underlying varying welfare regimes, housing, unlike healthcare and education is not universally provided in any welfare state. Esping-Andersen, who distinguishes between three ideologically different welfare regimes, remarks that even the most highly developed social-democratic regimes such as Sweden, have not been able “to manufacture a solidaristic housing policy” (Esping-Andersen 1988, 246). Why this is the case can be insightfully studied by taking a political economy approach to housing, which reads housing as tied up with the capitalist mode of production that pervades all modern welfare states.

Political economy as it is referred to in much of the social sciences today is notably based on Marx’ and Engels’ critique of classical economy, which lacked a distinction between use and exchange value of commodities and subsequently lacked the capacity to interpret the economy’s interaction with social and political contexts (Sarbo and Wolf 2021, 84). This contextualization makes it possible to analyze housing not just as a value object, but as an ideology-laden structure in society. Geographers Aalbers and Christophers draw upon Marxian political economy to construct a framework for a political economy of housing in which the principal analytical category is that of capital (2014). Their aim is to show the role of housing in political economy through three mutually constitutive “modalities” of capital: capital as process of circulation; capital as social relation; and capital as ideology. Through this framework, the authors show that housing is “implicated in the contemporary political economy in numerous critical, connected, and very often contradictory ways” (2014, 374). One such contradiction exemplifying the interaction of the first two modalities is that of production and social reproduction in housing. Housing plays a significant role in the circulation of capital because housing itself presents a vessel of wealth. As housing wealth is accumulated by some more than by others, unequal social relations result. However, as housing also constitutes a crucial locus of social reproduction of the labor force, it is also in capital’s interest to ensure that the affordable housing reserve is large enough to support social reproduction which is a

precondition for further production and capital accumulation. The authors argue that this contradiction is an important part of what lends calls for a right to housing persistent currency, while also demarcating the boundaries of social conflict as to how much housing inequality “society’s have-nots will tolerate whilst still contributing to the circulation and reproduction of capital” (2014, 381). The rest of this section will focus on housing’s relationship to the third modality of capital as ideology because of its distinctive potential to structure and stabilize the other two. Aalbers’ and Christophers’ central argument for this modality, is that housing is fundamental to the ideological institution of capital because housing both “*epitomizes*” and “*buttresses*” its three central components of the centrality of private property, the primacy of markets and the imperative of wealth accumulation (2014, 384).

Thomas Piketty in his work *Capital and Ideology* defines ideology as “a set of a priori plausible ideas and discourses describing how society should be structured. An ideology has social, economic, and political dimensions. It is an attempt to respond to a broad set of questions concerning the desirable or ideal organization of society” (2020, 3). The process of ideologies becoming dominant in society and their role in stabilizing social relations is referred to as hegemony (Gramsci 1971). Ideas and discourses on property, markets and accumulation both pervade and are shaped by housing. Concerning property, Ronald’s seminal *Ideology of Homeownership* shows how “tenure practices are not benign but support a particular alignment or interaction of social and power relations” (2008, 8). Neoliberal housing politics and property ideology together have served to make homeownership hegemonic, so that owner-occupied households have been structurally economically privileged (2008, 16). Property can dramatically affect opportunities for political participation, with some countries even offering citizenship rights to new homeowners (Aalbers and Christophers 2014, 384). Though Ronald warns for ideology concepts that use ideology as a positivist, coherent marker that overdetermines social relations, he contends that homeownership has fundamentally restructured “relations among individuals, families, jobs and welfare, the market and the state” (2008, 16). Even in the present day, where homeownership is out of reach for increasingly many, the trend of cost-rental societies converting towards homeownership societies through fiscal nudging and discourse continues (Grander and Stephens 2024, 259). This notwithstanding the fact that the promised benefits do not always become true for new homeowners of more moderate incomes. Indeed, more recent buyers are increasingly at risk of disadvantageous volatilities of housing markets, destabilizing housing as a security asset for individual households (zu Ermgassen et al. 2022, 7).

Ideologies of homeownership and property are inextricably linked with wealth accumulation, which is facilitated by privatization through the “enclosure” of public resources (Aalbers and Christophers 2014, 386). Aalbers and Christophers posit that the fact that housing is so often

discussed by categories of tenure, in itself testifies to the ideological skewing towards owner-occupation, even when states claim to promote equality of tenures. While the most commodified forms of housing, most prominently homeownership, are normalized, the less commodified forms, particularly social rental, are devalued. Consequently, “the commonly accepted labels for different housing segments and different residents reflect deeper socially constructed distinctions between haves and have-nots, deserving and undeserving residents (and labourers), property owners and property subjects, public and private, and state and market” (2014, 388). All the while, neoliberalist components of capitalist ideologies serve to distance consumers from social relations and naturalize them by framing the world in terms of market interactions. In the context of welfare retrenchments, citizens have been encouraged to act as entrepreneurs accumulating assets to safeguard their own welfare. Thus, ideologies have contributed to establishing production and consumption norms while obscuring their underlying social relations (Bayliss and Fine 2020, 155). The combination of this normalization with the encroachment upon public goods and services by capital has made it exceedingly difficult to escape modes of living that generate and reinforce social inequalities (Brand and Wissen 2017a).

8.4. Growth dependence of welfare

Aalbers and Christophers see housing as fundamental to capital ideology because of how it both embodies and stabilizes its three main components of property, markets and accumulation imperative. A further factor that complicates universalist models of housing provision pertains to the very core of capitalism itself, which is the imperative of economic growth. The welfare state's dependence on economic growth has been identified as one the main barriers to sustainable welfare (Corlet Walker, Druckman, and Jackson 2021; Büchs and Koch 2017; Bohnenberger 2023; Kreinin et al. 2024). Welfare and economic growth are historically tightly coupled. During the consolidation of welfare states after the Second World War, social expenditure came to be seen as a catalyst for economic growth by elevating aggregate demand. The improved social outcomes and macro-economic performance that followed provided a basis for the persistent reputation of GDP growth as a “silver bullet” for all matter of social and economic challenges (Corlet Walker, Druckman, and Jackson 2021, 1-2). However, welfare systems also come under pressure when economic growth falters. The growth dependence of welfare systems is driven by processes of rising demand for welfare, rising labor costs and rent-seeking, which are processes that are traditionally compensated for through increased economic throughput (Corlet Walker and Jackson 2021). However, the ways economic growth is stimulated have changed since the post-war era with a new special role for housing and finance. Whereas the primary drivers of post-war growth were increases in productivity and wages, a new “growth regime” has arisen that is “driven by financial services and debt-fuelled consumption. This debt is often leveraged against housing, especially where

real wage growth is low or negative, making continued house price inflation foundational to the economy” (M. Marshall, Hincks, and Powell 2024, 46). Reisenbichler has observed that some Anglophone countries have turned housing financialization into a “growth strategy” by promoting house price growth through tax breaks and public guarantees on mortgages (Reisenbichler 2020). Another, more generic expression of the primacy of the growth imperative in housing is the dominant policy response of housing expansion as a solution to undersupply, rather than sufficiency-oriented solutions such as a more efficient use of existing stock, retrofitting and reducing the demand for housing as a financial asset (zu Ermgassen et al. 2022). The construction of new housing and the economic activity that gets stimulated by everything that is required in an around it, like building materials and furniture, but also nearby facilities and infrastructures, feeds into economic growth and is therefore viewed positively (Olsen 2018, 379). The problem with welfare states’ “virtuous circle” of ever increasing production and consumption, is that it comes with a “vicious circle of ecological collapse”, by requiring increased natural resource inputs while intensifying ecologically destructive outputs (Hirvilammi 2020, 7). Hence, sustainable welfare scholars have argued for the organization of social protection independent of growth. At present, the question of how post-growth welfare can be organized still requires extensive research. The main challenges at hand concern matters of funding; overcoming growth dependencies and lock-ins within welfare systems; addressing increasing demand as well as costs – particularly in health – and the politics needed for such a transformation of welfare states (Corlet Walker, Druckman, and Jackson 2021).

8.5. Strategies for systems change in housing provision: UBS and Housing First as symbiotic modes of transformation

The previous sections have outlined structural obstructions to a more universalist provision of housing that responds to a right to housing based on human need. All three of them, the intractable commodification of housing, the role of capital ideology in the political economy of housing and the growth dependence of welfare, go back to the current growth-based form of capitalism underpinning modern economic systems. These structures add up to a welfare state that is at once a decommodifying and (re)commodifying force to citizenship: whilst welfare states can intervene to limit market forces to secure wellbeing in the short run, they are also dependent on growth to generate wellbeing, which, paradoxically, in the long run is bound to undermine wellbeing (Büchs and Koch 2017, 129). The literature on social-ecological provisioning systems and sustainable welfare recognizes growth-based economies as a crucial barrier to overcome, yet its inquiry into strategies for degrowth-oriented planning and provisioning is still relatively young as various scholars have highlighted (Bärnthaler 2024; Savini 2024; Kallis et al. 2025). However, a plethora of publications in and beyond degrowth academic spheres have already proposed many different solutions that vary in scale and how

they relate to power. Barlow and colleagues in *Degrowth & Strategy: how to bring about social-ecological transformation* (2022) have proposed a “strategic canvas for degrowth” that is based on the logics of transformation defined by Marxist sociologist Erik Olin Wright (2010; 2019). These can be briefly described as follows:

“*Ruptural transformations* seek a direct confrontation or break with existing institutions and social structures. *Interstitial transformations* involve building new forms of social empowerment on the margins of capitalist society, usually outside of spaces dominated by those in power. *Symbiotic transformations*, in turn, are aimed at changing the existing institutions, and growing power within the current system so as to ultimately transform it” (Chertkovskaya 2022, 57).

It is the symbiotic transformations that this discussion wants to hone in on based on the research results of this thesis. When it came to addressing the political spectrum in promoting Housing First, interviewees pointed to the importance of tailoring advocacy to political actors as well as finding consensus past political orientations and building broad coalitions of stakeholders as factors for success (see section 7.2.5.). Rather than ruptural or interstitial modes⁹ of transformation, the strategies mentioned most by Housing First advocates gravitate towards symbiotic modes of transformation. Housing First and its work in the existing homelessness services landscape arguably represent a symbiotic mode of transformation. It functions within this landscape, depending on funding from institutions and serving as a relatively small-scale complement to the traditional establishment of shelter- and treatment-oriented services. However, disproportionate to its minor position in terms of resources compared to the larger players in homelessness services, Housing First has achieved a remarkable change to the narrative of how homelessness should be approached. Proving its effectiveness with international evidence, it has become part of the homelessness vocabulary of national governments across Europe. A recent journal article by Housing First advocates also adopts Wright’s transformation logics to explicitly argue for the use of symbiotic approaches to transformation towards ending homelessness:

“Given that many voting citizens, along with powerful real estate and property developers, materially benefit from commodified housing, achieving the transformations to promote more affordable housing must be progressed in a way that does not challenge their interests. Rather than challenging the commodification of housing that is unrealistic, positive collaboration (Wright, 2010) is required whereby the transformed society includes a flourishing housing sector whereby the state, elites, and the majority all benefit from

⁹ Modes of transformation is employed by Barlow et. al in lieu of “logics” or “strategies” of transformation to help describe how transformations happen without equating them to coherent strategies (2022, 57)

commodified housing and support enabling sufficient de-commodified housing” (Parsell et al. 2025, 15)

Their call for “positive collaboration” without explicitly challenging vested interests, is echoed by other recent publications that have examined approaches to transforming housing and other provisioning systems. Kreinin and colleagues in an expert and stakeholder study on structural barriers to transforming provisioning systems, identified “Trojan-horse” methods for change, made up by policies that weaken the importance of the economic growth paradigm (2024, 12). Buch-Hansen and others, in a study on eco-social policy proposals in Sweden, found that proposals for UBS and UBI were far more popular than proposals that were aimed directly at restricting the wealth of elites, like taxes on living space, flights, income and wealth (Buch-Hansen, Koch, and Nesterova 2024, 120). Bärnthaler and Dengler making a proposal for combining cash transfers, UBS and time politics as a response to care crises suggest the “necessity for alliance-building to collaborate within pre-existing (actualized) structures *against* them, strengthening and expanding already-existing de- and un-commodified domains, building new ones, and weakening the commodified capitalist domain dominated by profit and accumulation imperatives” (2023, 686). Social-ecological transformation discussions have often emphasized the importance of interstitial and symbiotic modes of transformation because they can be enacted within the current system to shift power relations (Petridis 2022, 160). Combined, they can act as “non-reformist reforms” that can be implemented within systems, but will eventually destabilize their foundations, as opposed to conventional reforms, which may produce some positive effects but do not challenge the foundations of systems (Gorz 1967). The conventional type of reform is subject to co-optation such as greenwashing (Pirgmaier 2020), or can even aggravate inequalities, an example of which is “ecological gentrification” resulting from housing retrofitting (Dooling 2009). It has been proposed that for transformations or non-reformist reforms to be emancipatory, they need to reflect bottom-up social movement demands; contribute a set of emancipatory moral principles; help build democratic institutions; and have a place in the current society, as well as in the desired society (Petridis 2022, 165–66). UBS is a good candidate to align with these principles and a “strategic centrepiece” for degrowth, because of its focus on “objective material interests”, targeting commonsensical demands for basic levels of material wellbeing independent of ideologically mediated values (Bärnthaler 2024, 8). The next section explores how the practical experience of Housing First implementation can further inform prerequisites for the operationalization of social rights through provisioning

8.6. Lessons from Housing First on realizing a right to housing for UBS

Returning to the research question of this thesis: *“What can the framework of Universal Basic Services learn from the experiences of Housing First about operationalizing a right to services*

that satisfy basic human needs?” three lessons are discerned based on the combination of the data material and literature.

- Building comprehensive coalitions is key
- Generating broad consent for transformation lies in the universality of the claim
- Repoliticizing provision necessitates symbiotic approaches to top-down power

The research gap identified at the beginning of this thesis concerns the gap between the recent surge of discursive ambitions towards the bolstering of social rights, including a right to housing on the one hand, and the observed reality of increasing housing inequalities and the expansion of population groups experiencing housing precarity on the other. This discussion has so far invoked political economy interpretations of some of the mechanisms underlying this gap. They underline the all-pervading logics of capital that come to expression through the intractable commodification of housing; the growth dependence of welfare; and housing’s role as both exemplary and reproductive of capital ideology’s main constituents of property, markets and accumulation imperative. The commonalities between UBS and Housing First as symbiotic modes of transformation were then discussed. Expanding on these discussions, the following interprets three lessons for the framework of UBS based on Housing First experiences of struggle for implementation.

8.6.1. Building comprehensive coalitions is key

The case of Housing First has demonstrated that getting a broad coalition of actors together to effect change is essential. Finland has illustrated this best through its comprehensive and integrated approach to homelessness involving many different actors. Other cases too attributed success to cooperations between diverse stakeholders at different levels of governance. Demos Helsinki’s comparative analysis of four highly variegated approaches to governance in Housing First showed that capacity building across policy sectors and levels was one of three most important factors for success (Demos Helsinki and Housing First Europe Hub 2022, 17). There has been an emphasis on the need for symbiotic modes of transformation by “working alongside rather than against critical stakeholders” (Parsell et al. 2025, 16). UBS qualifies as a symbiotic approach to social-ecological transformation as the regulation of provision will to a large degree be a state affair, necessitating changes within the state. However, it has been demonstrated that at present, welfare states are entangled with the growth-based economy so that rent-seeking mechanisms continue to structurally superimpose needs. Housing in particular presents a complex case to intervene into because of its commodification, yet as Hall and Schafran have pointed out, the problem with that is more that of excessive rent-seeking than its status as a commodity itself (Hall and Schafran 2017, 17). Learning from Housing First in this situation would mean for UBS to actively engage with

a plurality of stakeholders, including profit-oriented housing actors to cooperate on universalist housing provision.

8.6.2. Generating broad consent for transformation lies in the universality of the claim

The analysis has shown that the strength of Housing First's appeal to a human right to housing lies in its power to shift dominant narratives and imaginaries around homelessness. By successfully housing a stigmatized and marginalized group in society, Housing First breaks with neoliberal values of individualized success and failure and restores its target group to full and entitled citizens. In doing so, it exposes the tensions inscribed in housing between use and exchange value, between production and reproduction, between wants and needs, and between provisioning and "appropriating" systems (Fanning, O'Neill, and Büchs 2020). As one interviewee described, Housing First's claim to a right to housing is not a "charitable approach", but an appeal to the inherent deservingness of people to live well in society. Housing exclusion can be viewed as one of the gravest breaches of this right, which is why it is fitting and potent for this appeal to come from an approach to homelessness. Though the services are meant for a specific target group, the philosophy can be extended to all of society, to stimulate debate on what constitutes sufficient, secure and affordable housing and how to safeguard it. As Hohmann has described, the right to housing is not so much about the search for a unified codex as it is about visions and interpretations that highlight "struggles to determine and recreate the relationships among the state, society and individual" (2013, 249). These struggles come to the fore in the universalist demands of Housing First and UBS alike. Echoing Bengtsson's distinction between selective and universal housing policy, Lévy-Vroelant summarizes the current interpretations of the right to housing as follows:

"At the moment, the treatment of housing deprivation proceeds in two quite different directions: individual rights consolidation for targeted right-holders, on the one hand, and tentative attempts to re-politicize the housing question as a matter of common interest and social security on the other. The first direction distributes protections according to a selective (juridical) path submitted to possibly divergent appreciations and to unequal capabilities; the second tends to construct universal (socio-political) norms and attempts to restore equity and social cohesion. Together, these two directions illustrate the tension currently active in our post-welfare societies" (2015, 108)

It must be reemphasized that Housing First is in no way perfect at achieving all of its desired social outcomes, which is where the distinction between Housing First services and its philosophy has to be made once more. Services do remain constrained to "right-holders" as they are plainly legally limited to assistance to those meeting certain documentation requirements. What is more, though a human right to housing is Housing First's first core principle, this does not mean that it is 'rights-based' and works with the framework of

international human rights law (Collins and Stout 2021). Housing First services are also inevitably flawed, as they will sometimes fail to uphold their own principles and fidelity to them. However, its philosophical orientation on systemic change towards ending homelessness in the name of a right to housing reflects Lévy-Vroelant's characterization of an approach that repoliticizes the housing question based on universal demands to welfare. This universality is further reflected in factors that interviewees have underlined as success factors: it is easy to understand, evidence-based and appeals to value pluralism. The potential of UBS as a strategy for social-ecological transformation stems from the same universal type of claim to "objective material interests", namely those of human need (Bärnthaler 2024). Considering that environmental policies are often connoted with restriction and loss of individual consumption freedoms, Bärnthaler stresses that "measures taken to address the climate crisis should be named as social improvements" rather than the other way around (2024, 6). A step up from universality, would be for UBS to deliver on human need theory's promise of "*universalizability*": in order to contribute to true social equity, UBS proposals must answer to the challenges that ecological limits pose to global and intergenerational equity by making the services it provides universalizable across space and time (Gough 2020, 210). Implementing this aspect into UBS proposals will require more research that quantifies global relations of resource exchange and integrates this into planning processes.

8.6.3. Repoliticizing provision necessitates symbiotic approaches to top-down power

The results show that a range of incentivizing strategies were at play in successful adoptions of Housing First. Compared to cost-saving arguments, addressing political orientations, evidence and human rights, only the financial carrot and stick incentives present a concrete institutional 'nudge'. Parsell and colleagues show that such institutional nudges have been pivotal in establishing Finland's housing-led and Housing First strategy. One of its most important transformations, the conversion of shelters into permanent supported housing units, was realized through 50% state investment grants on both the conversion as well as the salaries of 200 newly hired support workers (Parsell et al. 2025, 11). The authors also highlight that Finland's affordable social housing stock is supported by building on public land owned by the state or city and secured by state guarantees and subsidized mortgage loans. Of new housing, 25% must be social housing (2025, 10). Although it is stressed that Finland's conditions of strong welfare cannot be transferred to other, weaker welfare states, its case underlines the "importance of using both pressure and support from central government to cajole traditional service providers to move along a path towards helping to end rather than manage homelessness" (2025, 16). It also shows that to some extent, the cultural shift or value shift towards ending homelessness only occurs with implementation, which was similar in the cases of Denmark and Scotland that were briefly discussed in the analysis. This again demonstrates that Housing First harnesses the right to housing, not discursively, but by *doing*

the right. What the above-described cases illustrate is that strong direction and funding from central government are vital, thus reaffirming the need for symbiotic approaches to top-down power in housing.

For UBS, it is clear that the state must take a central regulatory role in provisioning, however, human need theory's requirement of "democratic priority setting" (Bärnthaler, Novy, and Plank 2021, 12) also signals "a new dynamic between 'bottom-up' and 'top-down' politics, and significant changes in the culture and practice of public authorities" (Coote and Percy 2020, 31). This new dynamic has not yet been spelled out in UBS literature. For the wider literature on social-ecological provisioning, research on "eco-social institutions" is as of yet at a rudimentary stage and the role of the welfare state tends to be discussed as "compensatory" rather than transformative (Bohnenberger 2023, 331). This is also reflected in degrowth literature, which has an ambiguous relationship to top-down initiatives. Though advocating for mostly local bottom-up approaches based on grassroots organizing, it tends to produce policy proposals of which the majority have a national top-down focus with government as a main locus of change (Cosme, Santos, and O'Neill 2017). Although the role of the state and other top-down forms of power remain debated, concepts converge on "a view of state architectures as ideologically permeable" and therefore capable of connecting civil society with politics (Corlet Walker, Druckman, and Jackson 2021, 9). To take this argument even further, Bärnthaler (2024) suggests that strategies for social-ecological transformation cannot be effective while remaining limited to opposing power and focusing on *counter*-hegemony, but themselves have to strive to become hegemonic. This he characterizes as "a compromise-mediated process that sometimes also integrates antagonistic classes and social groups" and he emphasizes the need to deepen the understanding of symbiotic modes of transformation (Bärnthaler 2024, 8).

Returning to the example of Finland, it could be argued that the "enduring political consensus around egalitarian, inclusive values" underlying its universalist welfare state signals that these values are more established as cultural hegemony in the Finnish context than they are elsewhere (Parsell et al. 2025; see also Fitzpatrick and Stephens 2014). This is also reflected in the comment of the Finnish interviewee who said "this [housing] issue is endangered to become too politicized and then it's hard to find consensus" (see section 7.3.3.). Here, the idea of politicization interfering with consensus in fact depoliticizes the concept of consensus, which – when there is really no such thing as an unpolitical consensus - one could argue can only be conceived of if this consensus is itself hegemonic. If that is indeed the case in Finland, then that would support the argument to strive for broad consent and comprehensive coalitions in order to make the values underlying UBS hegemonic so as to mimic Finland's success. Like

this, UBS, which takes inspiration from the post-war consensus on welfare, could establish its own social-ecological consensus for the 21st century.

8.6.4. Limitations and further research

This master's thesis is restricted in scope and has therefore been inherently selective in various aspects. Apart from the empirical data being limited to four expert interviews, it has had to utilize a narrow understanding of highly complex concepts like welfare and wellbeing, institutions, ideology and power relations. These concepts and their interrelationships are the objects of continuously evolving research. This thesis contains elements of projection and extrapolation in its analogizing of Housing First and UBS. It has also frequently extended research on housing and welfare into the domain of homelessness and vice versa, without having a profound understanding of how homelessness systems compare to housing systems. In sum, this thesis approaches housing at a systemic level but has therefore often stayed at the surface of its myriad constituent variables and drivers.

Concerning the ecological sustainability aspect of UBS, the analysis has mostly stayed at a deductive level of reasoning on its potential to reduce environmental harm by being sufficiency-oriented. However, this remains dependent on how services might be designed and what political decision-making processes are involved, so that more research on how to guide these processes towards strong sustainability is still needed (Büchs 2021, 5).

A final but crucial limitation is that little of anything concrete could be said about what UBS visions mean for global justice. The broad understanding of global justice used here refers to Ulrich Brand und Markus Wissen's "solidary mode of living" which seeks to counteract the "imperial" mode of living's mechanism of "externalizing its socially and ecologically problematic conditions and consequences". Working towards a solidary mode of living means to visibilize these externalizations and to strive for a "solidary mode of (re)production, [which] must change the highly fragmented supply and value chains and their embedded imperatives of capitalist valorization" (Brand and Wissen 2017a, 202). The aspect of global justice in this thesis has remained limited to the assumption of the "universalizability" (Gough 2020, 210) of human need and therefore the possibility to distinguish between "essential" versus "excess" production and consumption in order to derive globally generalizable socially and ecologically sustainable levels of production and consumption (Bärnthaler and Gough 2023). There are many problems with this idea that are subject to debates on decoloniality, which problematize the Minority World imposition of standards against the background of historically uneven development owing to its brutal appropriation of resources, labor power and bodies from the Majority World. Configuring social-ecological policy in the world's richest countries should no longer proceed in isolation from its implications for the Majority World if global inequalities and relations of colonialism and imperialism are to be redressed in the long run. Putting numbers to unequal

exchange is a good start to visibilizing externalizations (Dorninger et al. 2021; Hickel et al. 2022). Such calculations should be established as an integrated part of research and policy design, especially those of scale that source resources and labor power from the territories of economically less powerful countries. Further research should therefore conceptualize frameworks that are 1) in close dialogue with Majority World conceptualizations of global justice; 2) and transdisciplinary, safeguarding systemic views of strategies that have systemic consequences. As Piketty has written, “today’s democratic disarray stems from the fact that, insofar as the civic and political sphere is concerned, economics has cut itself free from the other social sciences” (2020, 1039). The same need for closer correspondence applies to the natural and the social sciences (Brand et al. 2021).

9. Conclusions

This master's thesis has addressed the discrepancy between discursive advancements of ambitions to foster social rights as a pillar of welfare states and the lived reality of expanding housing precarity and exclusion. Focusing on housing, it has juxtaposed two approaches to housing provision that both contain a claim to a right to housing: housing as implied in the conceptual proposal of Universal Basic Services (UBS) and the lived practice of the Housing First approach to homelessness. Departing from provisioning systems as crucial mediators between biophysical resource use and social outcomes (D. W. O'Neill et al. 2018), it has taken a social-ecological transformation approach with a theoretical emphasis on sustainable welfare, degrowth and human need theory. Building on the UBS understanding of housing as a basic need satisfier to which governments ought to establish a right (Coote and Percy 2020, 79), it has asked what UBS can learn from Housing First experiences of realizing such a right for its target group of people that are experiencing homelessness and have high and complex needs. Based on expert interviews with Housing First advocates, the thesis has derived categories that related to the extent to which Housing First programs could be successfully implemented. These were grouped by the three components of actors, processes and core values whose interrelationships make up homelessness systems (Demos Helsinki and Housing First Europe Hub 2022). To deepen the understanding of what a social right to housing means, housing's position within the welfare state was examined. From this inquiry, it has been concluded that housing as a component of the welfare state is deeply inscribed by the tensions between its status as both a basic need satisfier, as well as a financialized commodity. Invoking welfare regime theory and housing studies helped produce an image of the relationship between housing and welfare, in which housing systems are shaped by wider welfare regimes as well as global macro-economic drivers (Grander and Stephens 2024). Taking a political economy perspective, the welfare state itself was found to be closely entwined with financialized and growth-based capitalism, providing a partial explanation of the fact that universal provision of housing does not exist in any welfare state, even those with the most socially oriented welfare regimes. Although the ideologies underpinning Esping-Andersen's welfare regimes differ, it was found that they are categorically trumped by the ideology of capital. Housing is a unique good, because as central as it is to human wellbeing, it is also one of the most commodified elements of welfare states (Harloe 1995) and has even been said to "epitomize" capital ideology by its embodiment and perpetuation of property, markets and accumulation as the core features of the institution of capital (Aalbers and Christophers 2014). Since one of the most important analytical categories in welfare research is the ability of welfare states to "decommodify" its citizens, that is, how well they can satisfy their basic needs independent of labor market participation, classical analyses of housing and welfare tend to center on degrees of state intervention into housing markets. However, it has been identified

that the combination of the intractable commodification of housing, the role of capital ideology in the political economy of housing and the growth dependence of welfare, together show that a “markets against states” perspective is not productive. Instead, it has focused on the *interrelationships* of actors within wider welfare regime and macro-level contexts. Through this focus it has identified the usefulness of symbiotic modes of transformation, in which institutions are transformed cooperatively from within. These findings are consistent with the results of the analysis of Housing First. In answer to the research question, combining the categories for systemic change distilled from the data material with findings from the literature substantiated the need for 1) building comprehensive coalitions reflecting a plurality of values; 2) generating broad consent for transformation by addressing this plurality through the universality of the transformation’s claim; and 3) approaching the repoliticization of provision symbiotically and in acknowledgement of the need to work with top-down power in order to achieve bottom-up demands.

UBS and Housing First both seek systems change by shifting the goal of the system. For both approaches this means to navigate the tension field between rent-seeking, appropriating systems and provisioning systems. As tempting as it is to look for “magical leverage points” in systems, the reality of change tends to be more complex than that (D. Meadows 1999). What UBS and Housing First both contribute towards shifting the goal is that they work at shifting the ‘values’ or ‘imaginaries’ informing these goals. Housing First does this concretely by the way it shows that ending the homelessness of people who in traditional systems qualify as not ‘housing ready’ can be as straightforward as starting from unconditionally supporting these people to be and remain housed. By defying narratives of deservingness and disproving institutionalized “boundaries of possibilities” (Hohmann 2013, 249; Grander and Stephens 2024, 311), Housing First bolsters the right to housing.

UBS can learn from this by harnessing its capacity for symbiotic modes of transformation and by addressing “objective material interests” that come about through human need as a matter of improved social outcomes (Bärnthaler 2024, 8). It can generate broad consent through the “value pluralism” (Watts-Cobbe and Fitzpatrick 2025) contained in the universality of its claim. It can build comprehensive coalitions to advance this claim and should work together top-down forms of power to access the institutional nudges that can establish a consensus on bottom-up demands. These findings signal the need to gain a better understanding of symbiotic modes of transformation and the compromises that might be involved. Rooted in human need theory and sufficiency, UBS can help quantify and qualify social-ecological human wellbeing. More insight into political strategies to get there is needed and this notably includes the need to deliberate how UBS frameworks can better consider their implications for global justice, as well research into how service design can support strong ecological sustainability. Reflecting global

justice in UBS research by assessing its effects on relations of unequal exchange, could then contribute towards a kind of strong 'social sustainability'. For this it is imperative that the social sciences foster transdisciplinarity, notably with economics and the natural sciences, to advance critical and emancipatory social-ecological transformation.

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11. Appendix

11.1. Interview data table

Interview no.	Date	Interviewee role	Location	Length	Abbreviation
Interview transcript 1	31.10.2024	Social worker and project manager at BAWO	BAWO Office, Vienna	48:36	I1
Interview transcript 2	08.11.2024	Postdoctoral researcher at Y-Foundation	Online	1:10:35	I2
Interview transcript 3	29.11.2024	Project officer at Housing First Nederland	Housing First Nederland office, Utrecht	44:06	I3
Interview transcript 4	12.12.2024	Research coordinator at Housing First Europe Hub	Online	1:07:41	I4

11.2. Coding guide

Category	Definition	Anchor example	Coding rules
C1: Actors	“Actors can be national or local policymakers, housing or service providers, foundations, civic associations, researchers, practitioners such as activists or volunteers, and homeless people” (Demos Helsinki and Housing First Europe Hub 2022, 7)	“Well, of course the local governments because, well, in Finland, like in other cities or in smaller cities, they have high autonomy. So it's important that they are on board” (I2, 34)	The utterance has to distinctly pertain to the institutional landscape and its actors and stakeholders and how they and their roles or functioning enable or block the successful implementation of Housing First programs
C2: Processes	“Processes refer to those specific policies and programmes that are adopted at the national or local level” (Demos Helsinki and Housing First Europe Hub 2022, 7)	“We’ve been adopted into the National Action Plan but we as of this moment we mostly consider that a paper tiger. There is little direction given by the government and also the funding is disproportionate” (I3, 6)	The utterance has to distinctly pertain to conditions, rules and boundaries resulting from policies, programs and other official, written guidelines.
C3: Values	“Core values point to cultural, political and operational assumptions that might affect the perception and interpretation of the homelessness phenomenon at large” (Demos Helsinki and Housing First Europe Hub 2022, 7)	“In the end I would say it is a strongly ideological question and less so, so, it is a human rights questions of course ... but in essence they are ideological themes” (I1, 18)	The utterance has to distinctly pertain to <i>unwritten</i> rules and assumptions that are value-based and can be implicit or explicit but are perceived by interviewees to be relevant drivers of decision-making.

11.3. Interview guide

Interviewee background

- Please elucidate your background, how did you come to work at [organization]?
- What is your current role?
- What projects are you part of?

General

- What goals is [organization] currently working towards?
- What point is [organization] at with extending HF past high need service users?

Housing First in [country]

- What's the status of HF in [country],
- What goals is [organization] currently working towards and how is it going?
- What HF model does [country] refer to, Pathways? HF Europe Guide?
 - Does [country] have other role models?
- What factors have favored the success of Housing First in [country]?
- What factors have made it more difficult?

Actors

Stakeholders & coalitions

- What are the most important stakeholders you (do not yet) work with?
- What alliances do you consider especially important?
- What stakeholders tend to be difficult to get on board that would make a big difference towards overcoming bottlenecks?

Incentives

- How would you categorize incentives to engage with HF? (Financial, humanitarian..?)
- What incentives have been most effective in the past and which are used now?

Processes

- How do you view the current political moment in Europe?
 - Rise of right-wing governments
 - EPOCH, EC Commissioner
- How do you make sense of the discrepancy between the increasing calls for a right to housing vs. the progressive hollowing out of the welfare state?
- What policies do you see as important building blocks for a right to housing: e.g. policies that aim at more secure tenures, enlarging social housing stock etc.

Core values

- Cultural shift: what kind of mentality towards homelessness do you encounter that needs shifting?
 - How do you work on shifting it?
- To what extent would you say the right to housing represents an ideological shift?
 - What efforts do you know trying to leverage it, legally or otherwise?

Housing for all

- Where, in your opinion, are some of the most important levers for achieving a right to housing for all?
- Which system components would you emphasize? (actor/process/values)
- Which are the greatest inhibiting factors?