



Peer Review on “Housing exclusion: the role of legislation?”

Thematic Discussion Paper

Diversity of social housing responses across Europe

Prague (Czech Republic), 8-9 October 2020

DG Employment, Social Affairs and Inclusion



EUROPEAN COMMISSION

Directorate-General for Employment, Social Affairs and Inclusion

Unit C1

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1 Introduction

In the European area, social housing provision demonstrates large variations. The disparities emerge at various dimensions; for example, the size of the social housing rental sector¹, the allocation and targeting mechanisms, the management structures, the funding instruments, and the regulatory frameworks which outline all or at least some of these basic features.

This thematic paper intends to set the scene for the Peer Review on 'Housing exclusion: the role of legislation' initiated by the Ministry of Labour and Social Affairs of the Czech Republic. The paper deals with a range of questions to serve as a frame to pave the way for legislation related implications at the national level. Thus, the primary goal of the paper is to frame the discussion on potential social housing approaches for the Czech Republic, and to better understand the actual benefits and challenges of serving social integration targets based on selected social housing solutions.

The thematic paper is based on the desk review of recently published technical reports and scientific analyses. It draws on analytical papers dealing with various aspects of social housing delivery mechanisms and housing policy related papers covering EU Member States. No primary data collection was carried out for the purposes of analysis, whereas EUROSTAT data on social characteristics of the social rented sector, and OECD data were heavily drawn upon for the sake of a more robust depiction of the current situation across Member States. There are some caveats relating the pool of data used, especially concerning the level of generalisation which can be made regarding federal states' policies and performance, and for countries with high levels of regional variations and decentralisation.

In the first part of the paper, a general comparative picture of select Member States' social tenancy sectors and practices is offered to review operating definitions of social housing. Then an overview of housing policies helps to understand the position of social housing within national and local contexts. Funding and management issues are raised also in this third section. The paper concludes with some relevant reflections for the emerging discussion on a new social housing sector regulation in the Czech context.

2 Policy context

There is broad consensus that social housing denominates a variety of actual housing provision forms across Europe and elsewhere (Scanlon & Whitehead, 2014). This has historical reasons, too. Originally, social housing was provided by charities and employers for select target groups, and starting from the twentieth century and especially in the reconstruction context after World War II, states have been taking over a crucial role in designing social housing policies and delivering services, for a broad range of groups, with a varying set of policy objectives.

In 2011, a first systemic snapshot of what social housing provision meant within the European Union, covering 22 countries, showed that social housing policy had a special position. Nevertheless, it first of all served the provision of affordable and decent housing. The countries investigated used varying housing stock sizes, with an extremely low number of social housing units in the more recent Member States like Hungary, up to a large share of the housing stock in some Western European countries (Bauer, et al., 2011). The report concluded that in most countries social housing is filling a niche between general housing policies and welfare policies.

¹ Generally, the housing systems are divided broadly into three large sectors: home-ownership sector, private rental sector and social (or public) rental sector.

For a more up to date overview, recent data set is used covering all OECD countries, which delivers nuanced details on the diversity across the countries in terms of relative share of the housing stock, the social composition of the tenants, and how states define social housing (OECD, 2019). As the review covered only select EU Member States, some complementary resources were used to fill the missing parts of a European mosaic. The following sections discuss these three main features of the social housing stock.

2.1 Definitions of social housing

Social housing is termed very differently across EU Member States. For example, in some countries it is called municipal or public housing (Austria, Estonia, Hungary), affordable housing (France), common housing (Denmark) or protected housing (Spain). The common denominator across the different terms is that this is a special stock within the rental housing sector, housing people who could otherwise not afford a private market rental. Also, public funding is involved in the production or provision of housing (Bauer, et al., 2011).

For the sake of consistent comparison, in this report, a broad definition of social housing is used, in accordance with the OECD classification: social housing is *'residential rental accommodation provided at sub-market prices and allocated according to specific rules'* (OECD, 2019, p. 1).

Scanlon et al. (2014) showed that furthermore, the differences of the social housing sectors across the countries is closely linked with the fact that social housing had historically different roles across Europe: in some countries, it served the overall population, whereas in others it targeted the most vulnerable population groups (Scanlon, et al., 2014). Nevertheless, the variations of the definition can be grouped according to a few dimensions that are linked with core features of a given country's system: (1) the rent levels, that is, social housing has rent below market rents; (2) the tenure type or ownership, that is select landlords like the state, municipalities, non-profit bodies, etc. are the owners of the stock; (3) funding, that is, state subsidies are used to build and run the stock; (4) and allocation mechanisms, that is, there are administrative procedures which define who can access the social housing stock. These components of the definition, however, do not necessarily apply to all countries, and, more importantly, only some of them constitute a given country's social housing definition.

Table 1 summarises the EU Member States' definition of social housing and shows the share of the social housing stock within that country². Beyond demonstrating the variety of the terms used to denominate the sector, the table contains information on the relative share of the stock, based on which the social housing systems can be clustered. Clustering, however, does not happen only according to the size of the sector, rather, it occurs along the functions Member States may dedicate to their social housing stock.

² The data gathered by OECD (OECD, 2019) for the social housing sector were complemented by a range of authors and resources (see extensive note below the table) to deliver an overall picture about the member states' current social housing sectors.

Table 1. Definition of social housing across Europe

Term(s) used	Definition and summary overview	Share of social housing stock around 2018
Austria	'Subsidised housing' (limited profit housing associations with state funding) and 'social housing' (municipal dwellings concentrated in Vienna - 'Vienna model of housing')	16% subsidized housing, 8% social housing**
Bulgaria	'Social housing' targets people in need, and covers affordable housing and public rented housing (subsidised by state, municipalities or housing associations)	1.5%*
Belgium	'Public housing'	8.5%*
Croatia	No official national definition	2%*
Czech Republic	No official national definition	1.4%*
Cyprus	There is no social housing tenure	0.9%*
Denmark	'General housing', social family dwellings, social dwellings for the elderly, and social dwellings for youth	21.2%

	Term(s) used	Definition and summary overview	Share of social housing stock around 2018
Estonia	No official national definition	Social housing is considered as dwellings rented to individuals in need of additional support services (e.g. dwellings adjusted for wheelchair access or supported residence of mentally challenged individuals, houses of the elderly).	1.1%
Finland	'Social housing'	Social rental housing targets residents vulnerable people. ARA (the Housing Fund of Finland) grants subsidies, grants and guarantees for housing and construction and controls and supervises the use of the ARA housing stock. The dwellings are run by municipalities, associations, and non-profit organisations. The rent of ARA apartments is cost-based (covering capital costs and the management costs).	10.5%
France	'Social housing' or 'moderate rent housing' (<i>Habitation à loyer modéré</i> , or HLM)	Social housing is housing built with public aid (tax benefits, public subsidies and loans at preferential rates) to accommodate people with low incomes.	14.0%
Germany	'Subsidised housing' or 'social housing promotion'	Housing that is publicly subsidised in order to support households that cannot adequately obtain housing on the market and need assistance.	2.9%
Greece	No official national definition	Social housing schemes used to be operated until 2009 as workers tied accommodation schemes, more recently, social housing is seen as a tool for tackling homelessness and the refugee crisis.	0.3%*
Hungary	No official national definition	Social rental housing consists of municipal rental housing. Some municipal housing is rented at market price or cost level, but mainly municipalities target vulnerable households, however, according to decentralised allocation rules.	4%

	Term(s) used	Definition and summary overview	Share of social housing stock around 2018
Ireland	'Social housing'	Social housing is defined as housing provided by a local authority or a housing association to households who are unable to provide accommodation from their own resources. Social housing support can be provided in a number of ways: i) a rented tenancy in a property owned and managed by the local authority; ii) a rented tenancy in a property leased for 10-20 years by the local authority or approved housing body; iii) Housing Assistance Payment (HAP) where a local authority will make a monthly payment to a private landlord, subject to terms and conditions including rent limits, on a HAP tenant's behalf; iv) Rental Accommodation Scheme (RAS) tenancy where the local authority arranges leases with private landlords for homes; v) a rented tenancy in homes owned and managed by an approved housing body; vi) specific accommodation for homeless people, older people and Travellers; vii) adapting existing local authority homes to meet specific household needs; and, vii) grants to increase accessibility in private homes for people with disabilities and special needs.	12.7%
Italy	'Social housing'	There are three subsectors, the traditional public housing targeting (to app. 50%) lower income households at entry points, with high privatisation shares; a new Integrated System of Funds (SIF) aimed for middle-income families; and a newly created non-profit sector. The social sector is run by a variety of entities like housing cooperation, and public bodies like municipalities.	1.7%*
Latvia	'Social houses' and 'social apartments'	A social apartment is owned or rented by a local government, which is then rented to a household that is entitled to public support. A social house is a building in which all apartments are rented to households that are entitled to public support. A social house may also be a building owned by an association or foundation tailored for people with disabilities.	0.2%
Lithuania	'Municipal housing'	Social housing is a dwelling owned by the municipality..	0.8%
Luxembourg	No official national definition	Rental dwellings owned by public developers, where rents are defined according to the composition of the household and its taxable income. Also dwellings rented through <i>Agences Immobilières Sociales</i> are considered as social rental housing.	1.6%

	Term(s) used	Definition and summary overview	Share of social housing stock around 2018
Malta	Rental dwellings belonging to the government	Normally, the dwellings get 'inherited' by the relatives of the tenants. Access is based on a centralised waiting list.	5.5.%
Netherlands	'Social housing'	Social rental housing is rented at set prices and are operated by non-profit housing associations. Tenants of social housing units are entitled to rental benefits. In 2018, nearly 70% of rental dwellings in the Netherlands were owned by housing associations, of which more than 90% are considered social housing units.	37.7%
Poland	No official national definition, but is mainly refers to municipal housing let according to social criteria, as well as social housing companies (TBS)	Social rental housing must meet following conditions: i) access to dwellings is provided on a non-market basis, based on criteria defined by public authorities; ii) at the stage of construction, reconstruction or use of buildings, entities carrying out investments use support from Krajowy Zasób Nieruchomości or public funds; and, iii) dwellings provided by entities whose main purpose is not to gain a profit.	7.6%
Portugal	'Social housing'	Social (subsidised) housing refers to public dwellings that are rented at below-market values for households on low income.	5%*
Romania	'Social housing'	Social housing is publicly-owned housing with subsidised rent, allocated to households whose economic situation prevents them from accessing market rentals or ownership.	0.8%*
Slovak Republic	'Social housing'	Social housing is housing constructed with the use of public funds, addressed to individuals who are not able to ensure housing with their own effort.	0.4%*
Slovenia	'Non-profit housing'	Households in rented housing are entitled to subsidised rent if their income does not exceed a threshold, that is 130% of their established income plus the amount of not-for-profit rent.	4.6%*
Spain	A section within 'publicly protected housing' (<i>Vivienda de proteccion publica</i>)	Dwellings let at low rent to low to middle-income households. They are mainly provided by local authorities, public bodies and publicly owned companies, although funding is virtually open also to NGOs and not for profit companies. There are different schemes in place targeting different income levels.	4%

	Term(s) used	Definition and summary overview	Share of social housing stock around 2018
Sweden	'Public housing'	In strict sense, there is no social housing in Sweden. This rental sector is run by municipal housing companies (limited companies). They serve all population groups and have a business-like operation.	39.8%***
United Kingdom: England	Social housing is defined in law (the Housing and Regeneration Act 2008) as 'low cost rental accommodation' and 'low cost home ownership accommodation'.	Low cost rental accommodation is made available for rent below the market rate, with rules to ensure it serves people whose needs are not adequately met in the commercial housing market. Low cost home ownership accommodation is made available in accordance with shared ownership arrangements, equity percentage arrangements or shared ownership trusts, with rules to ensure it serves people whose needs are not adequately met in the commercial housing market.	16.9%

Source: Table based on OECD Questionnaire on Social and Affordable Housing (QuASH), 2019 in (OECD, 2019), complemented for Austria (Mundt, 2018), for Belgium <http://www.housingeurope.eu/resource-93/social-housing-in-europe>, Croatia (Bezovan, 2012), Czech Republic (Lux & Sunega, 2017), Cyprus <http://www.housingeurope.eu/resource-100/social-housing-in-europe>, Denmark (Nielsen & Haagerup, 2017), Greece (Amitsis, 2016), Hungary (Hegedüs & Teller, 2012), Italy (Poggio & Boreiko, 2017), Malta <http://www.housingeurope.eu/resource-116/social-housing-in-europe>, Sweden <http://www.housingeurope.eu/resource-125/social-housing-in-europe>, data for social housing around 2018 from <http://www.oecd.org/els/family/PH4-2-Social-rental-housing-stock.xlsx>, * data from <http://www.oecd.org/social/affordable-housing-database/> pointing to share of 'housing with rents at reduced or subsidized price'. Used only if data from other resource were not available, ** (Mundt, 2018), *** OECD data on housing with 'rent at market price on private rental market'

Seven Member States do not have a national official definition of social housing (Croatia, Czech Republic, Estonia, Greece, Hungary, Luxembourg, and Poland), whereas social inclusion and integration functions of the sector prevail.

In some other countries, the sector encompasses a broader target population beyond vulnerable households and low-income families. Such countries refer to their sector as 'subsidized housing' (Austria), 'public housing' (Belgium and Sweden), 'general housing' (Denmark).

In the Netherlands, the 'social housing' sector denominates a large sector that also houses middle income families. Sweden runs the publicly owned sector based on business goals, too.

'Social housing' as a single term to refer to the sector is used in 10 out of 28 above-listed countries (UK, England, included). The countries, however, differ not only along the content of their definitions, but also according to the relative share of the housing stock. In some countries the social housing sector aims to tackle an explicit 'market failure' caused by the fact that households do not have sufficient means to rent or buy a dwelling. In other countries, the term 'social' refers to a sector with an affordable rent level or a subsector responding to special needs of people with disability, victims of domestic violence, and living in any kind of destitution or at risk of homelessness.

Obviously, the above definitions of social housing comprise a multitude of components. This large variation has been shown in earlier comparative studies (see also Scanlon (2014)). The variation in itself is related to the differing welfare arrangements and historical developments across the countries (Scanlon, et al., 2014).

Overall, including countries where there is no single official national definition, the sector's characterizations and definitions include five core distinguishable components:

1. ownership (various tenures, including public and private bodies, registered private landlords, associations and shared ownership);
2. allocation criteria and mechanisms (affordability challenges, income level, vulnerabilities in other domains such as health);
3. funding (investment or capital costs provided through public funding, management funded from public funds);
4. defining special priority target groups, including whether they have additional support needs;
5. controlled rent levels (cost based rent settings, below-market rent settings, rent control mechanisms).

A combination of these components prevails irrespective of the size of the social housing stock. Nevertheless, in countries with an extremely small relative share of the sector (below or around 1%), or an increasing residualisation within the social housing stock (that is, concentration of poor families, in some cases accompanied by dilapidation of the stock), one can find that it is mostly municipalities operating the stock (exceptions are Greece and Cyprus, with virtually non-existent rental provision). On the other extreme, in countries with weaker social targeting, there is a mixture of providers, including associations, and varying types of landlords (around or over 15% of the stock). In the remaining countries, specific target groups may appear or designated funding streams govern the sector.

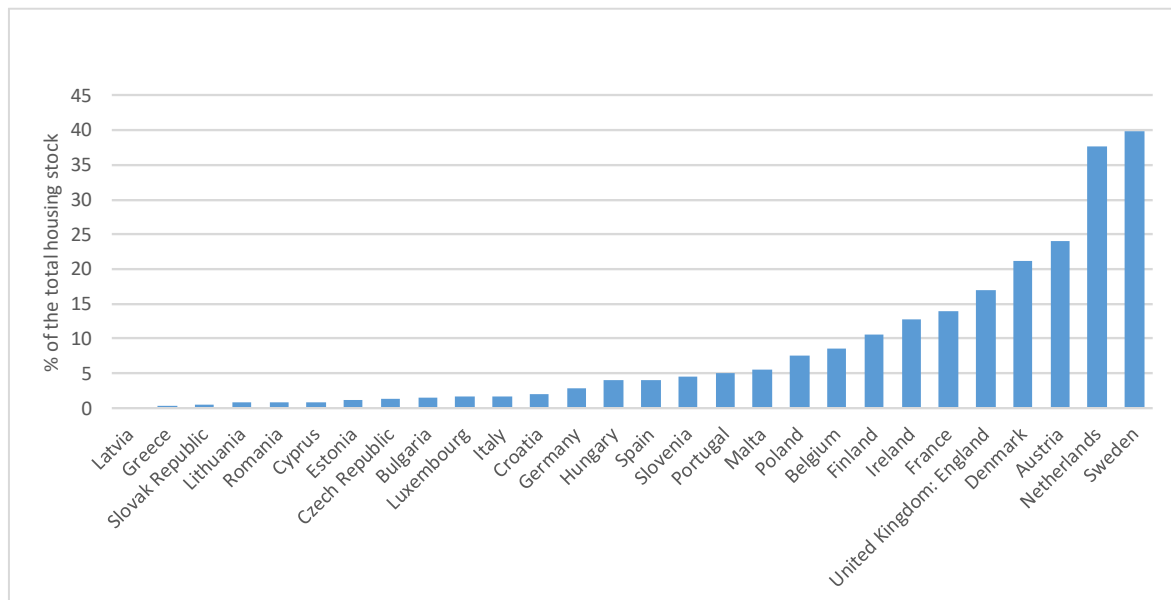
2.2 Share of social housing tenure

The share of social housing tenure in itself within a housing system indicates what share of the sector is kept under closer public regulation and control. That is, what share of the housing stock is governed through a specific set of regulations, is overseen by specific social policy goals, is incentivised through public funding, and what sector provides households with a potentially stronger protection living as social tenants (especially in case the private rented sector related regulations are weaker).

Figure 1 depicts the share of the social housing sectors for around 2018 across the European Union (for some countries it includes the figures on the share of households renting in the subsidized sector in case there were no available data for the social rented sector, see also Table 1. Definition of social housing across Europe).

As shown, 17 out of the total EU Member States have less than 5% share of social housing, 9 countries have a stock above 5% and below 25%. The Netherlands and Sweden represent special cases with a share above a third of the total housing sector.

Figure 1. Relative share of the social housing sector within the total housing stock across the European Union, around 2018



Source: OECD (2019), complemented by Mundt (2018) for Austria

In the North European context, the historic provision targeted at mainstream working households – a universal model - from the seventies, has increasingly addressed the housing needs of more vulnerable families, whilst maintaining a strong public responsibility for providing adequate housing for broad groups of the population (ibid.). These countries belong to the wealthier European countries (Scanlon, et al., 2015).

In former socialist countries, the restitution and privatisation of the stock brought about quick residualisation (Hegedüs, et al., 2013), with local authorities struggling to serve the neediest households and develop new institutional and financing models for an efficient social housing sector.

The Southern welfare states seem to have maintained a mixture of 'social' provision through both rented sector and ownership related measures, like benefit schemes for ownership in Spain, and rental schemes based on a variety of providers in Italy.

In the last few decades, with the development of data structures and income and tax registration systems, redistribution related public programs could be shifted in part

from supply to demand side subsidies. Thus, it became an option to pull out from the direct provision of affordable adequate housing and to diversify the pool of provision for housing vulnerable or low-income households, for example housing them in the private rented sector with the help of housing allowance schemes. Furthermore, Whitehead (2017, p. 18) observes that even in countries 'that have historically gone for a more universalistic approach we see very similar patterns to countries that have more obviously targeted their assistance', meaning that the social inclusion role of the stock has gained increased importance across all European countries, irrespective of the actual share of the stock.

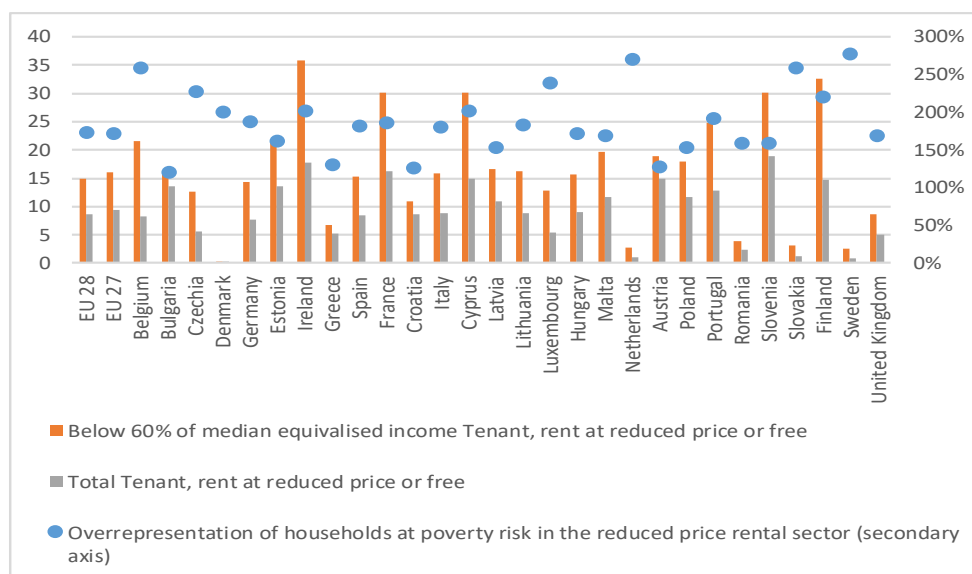
2.3 Social composition of tenants

The poverty risk faced by households across different tenure types in the European area shows that several sub-sectors of the housing systems house more vulnerable households. Typically, living in the private rented sector affects more households at poverty risk, whereas the ownership sector houses the better-off. Within the rented sector, the below-market price rented sector represents a special case: across all countries, this sector lodges comparably more households at risk of poverty than any other sector (at the same time, affordability within the sector is comparably better, see EUROSTAT (2018, p. 73)).

Whereas at the EU level approximately 8-9% of all households live in the reduced price rental sector, approximately 15% of all households at the risk of poverty are found in these tenancies. The highest relative overrepresentation is found in Belgium, the Czech Republic, Luxembourg, Finland (note that EUROSTAT applies a different definition compared to the above in the case of the Netherlands and Sweden, still, the overrepresentation ratio is among the highest in these countries, too).

On the other hand, in some countries, the system seems to be more universalistic. That is, the rented sector at reduced prices houses households with *and* without poverty risk to a largely similar level. Such Member States include Bulgaria, Croatia, Latvia, Austria, Poland, Romania and Slovenia (and Greece, note that EUROSTAT applies a different definition compared to the above).

Figure 2. Share of households in the rented sector at reduced price of free, in the case of households at the risk of poverty and in total (2018)



Source: EUROSTAT *ilc_lvho02*, own calculations. Note that EUROSTAT applies a different definition compared to OECD (relevant in the case of Netherlands, Sweden, Greece), still, the overrepresentation ratio is among the highest in these countries, too.

The data in Figure 2 visualises that the overrepresentation of households on incomes below the poverty threshold is prevalent across all Member States in dwellings with rents at reduced price or free (which largely covers the social housing sectors).

Beyond EUROSTAT data on the composition of households regarding the poverty risk faced in the reduced price rented sector, some qualitative information published in Scanlon, et al. (2015, pp. 5-6) shows the composition of social housing tenants across select European Member States. They find that there is a variation across the countries, but,

'broadly speaking, it is the old and the young who live in social housing: pensioners and single-parent families are heavily overrepresented in almost all countries, while couples with children are underrepresented. In all countries social tenants have lower than average incomes – and often much lower. Nowhere does the income distribution in social housing reflect that of the population as a whole. Indeed the income divide between social housing and other tenures is generally increasingly sharp. Importantly this is true even in those countries with universalist housing traditions such as Sweden and the Netherlands.'

They highlight that for example single parents and single adults are priority groups in Denmark, England, Germany, Hungary, Ireland, Scotland and Sweden. In all countries, income levels of tenants are lower than for the average households (with the exception of the housing associations' sector in Austria, where it is more middle-income tenants).

Already five years back, before the large immigration waves and the humanitarian crisis across select Member States, Scanlon, et al. (2015) reported that social housing served as a resort for migrant families and households with ethnic minority backgrounds. This can be seen as a result of improved targeting towards more vulnerable households and a shift away from serving lower income employed households, because it is especially these groups who cannot access (private) market housing due to affordability, or for example, discrimination (Lux, et al., 2018).

Entitlement conditions largely rule who can actually access the sector. The eligibility criteria for social housing varies across EU Member States – last but not least due to the variance of governance structures. Governance structures may diverge relating the levels how eligibility criteria are framed, set and executed. The recent data collection of OECD (2019) reveals that despite the variance, there are a few common patterns across the different clusters within Europe (countries with a minimal, a medium and a high share of stock).

Table 2 sums up some main findings. A detailed table in the annex contains all EU Member States related responses from the quoted OECD questionnaire.

As the table shows, in some countries, there are fewer and less rigid eligibility criteria set than in others, and, depending on the levels of decentralisation, municipalities may create additional or individual rules, both in terms of granting access to the sector, and priority groups to grant access to social housing.

Table 2. Allocation and eligibility criteria for social housing in selected EU Member States and the UK

CRITERIA	CONDITIONS APPLIED	COUNTRIES
Criteria assessed in selecting eligible households	All are eligible	Denmark, Estonia, Luxembourg, Portugal
	Income threshold	Austria, Bulgaria, Czech Republic, Germany, Hungary, Ireland, Latvia, Lithuania, Malta, Netherlands, Slovakia, Slovenia, UK
	Citizenship/ Perm. Resid.	Estonia, France, Germany, Hungary, Ireland, Latvia, Malta, Portugal, Slovenia, UK
	Household composition/size	Austria, Estonia, Ireland, Latvia, Malta, Portugal, Slovenia, UK
	Housing situation	Czech Republic, Estonia, Hungary, Ireland, Latvia, Poland, Slovenia, UK
	Other	suitability of dwelling – Finland. no arrears – Ireland, municipalities setting further criteria – Hungary, Poland, Portugal, UK
Criteria for priority allocation to eligible recipients	Time on waiting list	Austria, Bulgaria, Denmark, Estonia, Finland, France, Hungary, Ireland, Latvia, Lithuania, Netherlands, Slovenia
	Income level	Czech Republic, Finland, Hungary, Latvia, Luxembourg, Netherlands, Portugal, Slovenia
	Disability	Austria, Bulgaria, Czech Republic, Denmark, Finland, France, Ireland, Latvia, Lithuania, Luxemburg, Malta, Portugal, Slovenia, UK
	Elderly	Bulgaria, Czech Republic, Denmark, Ireland, Latvia, Luxembourg, Portugal, Slovenia
	Housing situation	Austria, Czech Republic, Denmark, Finland, Hungary, Ireland, Luxembourg, Malta, Netherlands, Portugal, UK
	Household composition/ size	Czech Republic, Hungary, Finland, Latvia, Portugal, Slovenia,
	Other	select priority groups (e.g. homeless people, refugees, victims of domestic abuse, people with disabilities) explicitly mentioned – France, Ireland, Latvia, Malta, Portugal, UK local allocation priority criteria apply – Austria, Denmark, Netherlands, Poland, Slovakia, UK

Source: OECD (2019), complemented for Hungary by the author. Countries reporting on their allocation rules were Austria, Bulgaria, Czech Republic, Denmark, Estonia, Finland, France, Germany, Ireland, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Slovakia, Slovenia, and UK (England)

The table shows that only a few countries grant 'universal access' to their social housing sector within their legislation (like Denmark, Estonia, Luxembourg, Portugal). Even in these countries, there are some prioritised groups, for example based on citizenship and household size or characteristics. Moreover, further local allocation criteria may apply like in Portugal.

Income thresholds feature the most important allocation condition across Member States, even though in some countries local municipalities may actually define the eligible income levels (e.g. in Hungary in some cases minimum income levels are expected from prospective tenants to ensure sustainability of rent payments). A few countries investigate the household composition – referring to living situations with comparably higher poverty risks. Also, the individual housing situation are assessed in a few countries to grant access to destitute households (or, to prevent that relatively 'wealthy' families who are owners of housing units elsewhere access the housing stock, like in Ireland and Poland).

In select countries there are some prioritised groups among the eligible households. Given that in many countries social housing allocation is organised based on administrative procedures like waiting lists, priority is given to households who have been waiting for comparably longer times. A lot of Member States observe this regularity in the practice of social housing companies and associations, or municipalities responsible for the allocation of the stock (Austria, Bulgaria, Denmark, Estonia, Finland, France, Hungary, Ireland, Latvia, Lithuania, Netherlands, Slovenia). Disabled people and elderly tenants are prioritised across a few countries, with a few more focusing on serving disabled households. A few countries included in their descriptions of prioritised groups homeless people (or those being at risk of becoming homeless), victims of domestic violence, and refugees (France, Ireland, Latvia, Malta, Portugal, UK). At the same time, one must note that local practices may vary across municipalities.

In some countries, and across countries, or, in some municipalities if the stock is managed locally, the rental contracts are prolonged without reassessment of eligibility. This may limit the turnover of the stock and challenge accessing housing by new vulnerable households with emerging housing needs.

3 Social housing policies

The role of the social housing sector differs strongly across countries. Whitehead (2017, p. 11) points out that generally, social housing serves 'increasing total provision; allocating to those in need; providing rent and/or income subsidies to those unable to afford adequate accommodation; and by effective management and enable access particularly to jobs, services and an adequate environment.' Thus, it is primarily a welfare function which is performed through the stock (as she terms: 'often distributional rather than efficiency'), except for situations of emergent shortages – e.g. in after-war contexts or demographic emergencies.

We can observe that the tenants' composition has been shifting towards more vulnerable households across Europe. At the same time, especially after the 2008 financial crisis period, so throughout the past ten years and with the recovery of the economy and the housing markets, reduced affordability of the private rental sector affected more and more middle-income households (Haffner, et al., 2018). Some of these households created increased demand for more affordable housing. Responses to this demand are diverse: launching of demand side subsidies and various provision forms (social rental agencies, mixed ownership schemes), and increasing the supply of below-market rent housing targeting middle-income families have been on the agenda.

Moreover, there is a diversity of providers. This is partly related to recent developments across a few EU Member States (Scanlon, et al., 2015). Social housing is provided indirectly through various private stakeholders in Germany and increasingly in Ireland, and via a range of non-profit companies in Sweden and the Netherlands, or, as a transitory solution, by making use of failed market investment stock in Portugal where in return to increasing affordable supply, banks run for state subsidies. Pooling of the stock, so operating both higher cost and cheap housing, to

enhance efficient management and financing (which is prohibited in Denmark (see Nielsen & Haagerup (2017), but promoted elsewhere) is one of the drivers for housing a larger diversity of income groups for public benefits (Bauer, et al., 2011). Pooling actually can serve the creation of mixed communities and less residualisation, but often only at the trade-off of targeting (Poggio & Whitehead, 2017).

In urban regeneration models, like in the Netherlands and Sweden, the conscious creation of mixed communities helped prevent stigmatisation. This is important as discrimination and stigmatisation is linked with poverty and marginalised ethnic groups – many of whom are residents in social housing. Poorly designed allocation policies – ‘selective allocation’, so poor are housed among poor - and short-term interest driven management policies often create dubious outcomes and segregation.

In the following sections, rent setting and affordability issues are discussed, then we deal with funding and investment. An overview of the diversity of providers is given in the consecutive chapter.

3.1 Rents and affordability

The social housing sectors within the European area do not only diverge according to definitions and target groups, but also according to rent setting schemes.

As Whitehead (2014) shows, rents are generally set according to

- cost of construction;
- value of the dwelling;
- income of the tenant households;
- the area and estate;
- and in a combination of these elements.

In some countries the rules are set by the central governments (most often the states specify price levels, not the formulas or structures to create price levels). In other countries, municipalities or providers may decide on the rents. The OECD (2019) data collection’s main lesson is that there are sub-sectors within the social housing system with alternate rent setting regulations. This is mainly due to the variance of institutional settings governing the stock, such as numerous players, different levels of decentralisation, historical developments, liberalisation, the level of emphasis on the wealth aspects of housing, etc..

Table 3 summarises the main results of the OECD data collection. One must note that there is an important caveat of the evidence. It remains unclear what share of the social housing stock falls under each rent regime, and whether diversifying the rent system has an impact on the tenants’ composition. Nevertheless, the table reflects well on how parallel systems can function within one country.

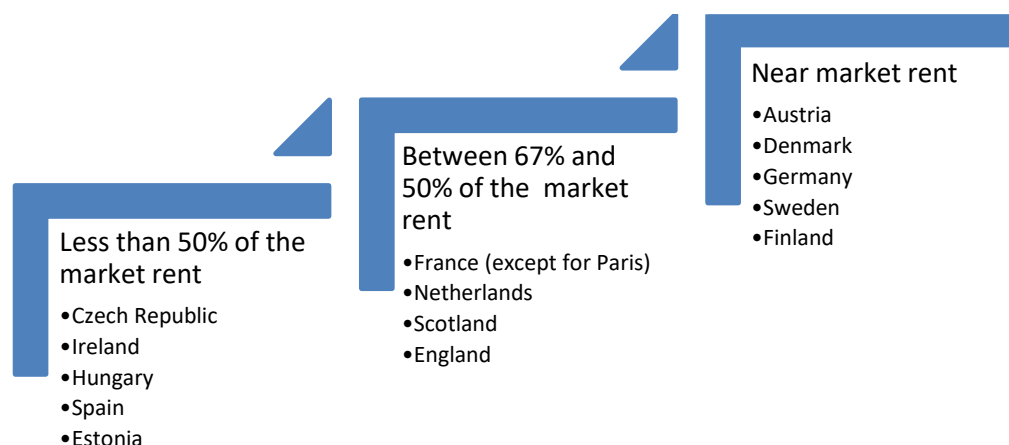
Table 3. Rent setting systems across selected EU Member States and the UK

	Mechanisms and characteristics	Countries
Rent setting system:	Market-based	Germany, Hungary, Ireland, Slovenia, UK
	Cost-based	Austria (with entry deposit), Czech Republic, Denmark, Estonia, Finland, France, Hungary, Latvia, Slovakia
	Income-based	Bulgaria, Latvia, Luxembourg, Malta, Portugal, UK
	Utility-based	Hungary, Ireland, Latvia, Lithuania, Netherlands, Poland, UK
Rent increase system:	Regularly increased	Austria, Denmark, Finland, France, Germany, Hungary, Ireland (with income of tenants), Latvia, Lithuania, Luxembourg, Malta, Netherlands, UK
	Not regularly increased	Bulgaria, Czech Republic, Estonia, Hungary, Latvia, Lithuania, Poland, Portugal, Slovakia, Slovenia

Source: OECD (2019), complemented for Hungary by the author.

For some countries, the OECD collected data on social rent as percentage of market rent. Such data were available for Austria, Estonia, Finland, France, and England (UK). These data were complemented with the help of the data collection conducted by Whitehead (2014, p. 322) for Denmark, Germany, Sweden, Netherlands, Scotland (UK), Czech Republic, Ireland, Spain and Hungary.

Figure 3 shows that there is a large variance also in terms of rent levels compared to the market rent across the countries – ranging from near market rents in comparably large social rental sectors like Austria, Denmark, Sweden, to fractions of the market rent levels like in Hungary and Spain. In between the two extremes, Netherlands, France and the UK represent a transition.

Figure 3. Rent levels in social housing in selected EU Member States and the UK

Source: OECD (2019), Whitehead (2014)

Affordability within the reduced price rental sector varies across countries. The housing cost overburden rate as produced by EUROSTAT proves that tenants in the private rental sector are especially prone to high housing cost to income ratios. However, due to the increasing presence of vulnerable and poor families in the recent past, relatively high housing cost overburden rates are widespread also within the social or affordable - as per statistical definition reduced cost or free - rental sector across EU Member States. In some countries, there is a connection with the increasing unaffordability of the private rented sector (Padley & Marshall, 2018).

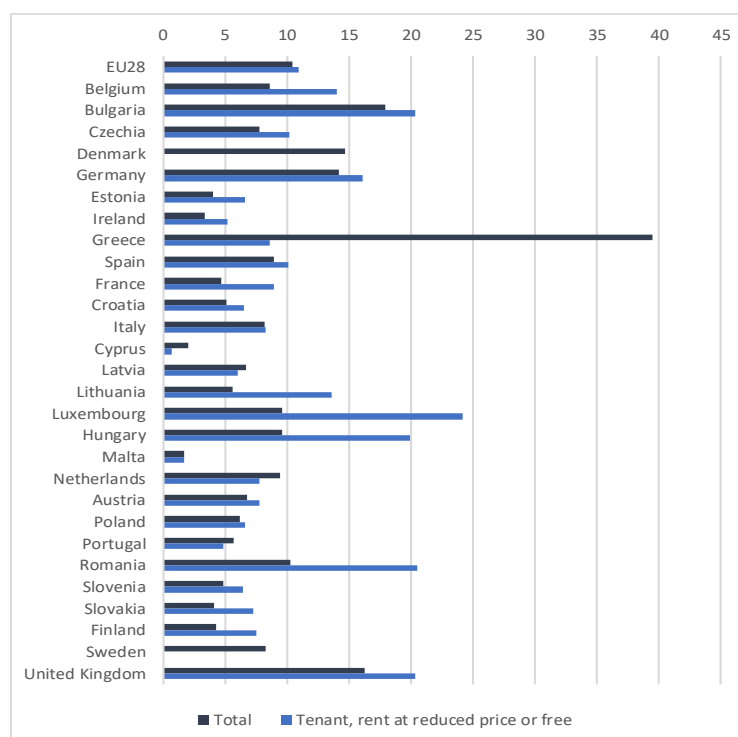
Figure 4 demonstrates that the overall affordability of the reduced price rental sector may still cause a problem for a considerable proportion of households, even though the sector related 'declared' policy goals are often enhanced affordability and security (see section on definition for more details).

In countries with a non-traditional arrangement of the social housing stock, housing cost overburden seems slightly more balanced. Greece, Cyprus and Malta belong to this group (the reduced price rental sector is more affordable or as affordable as housing in general). In the Netherlands, the reduced price rental sector is relatively more affordable than housing in general (note that there are no data for Denmark and Sweden with similar provision systems). Similarly, affordability is more preferential in this tenure in Portugal and Italy.

In Poland, Germany, Bulgaria, Spain, Austria, UK, Croatia, Slovenia (and in the public sector in general in Czech Republic), the index suggests that the reduced price rental sector is more or less balanced with the overall housing sector in terms of housing cost overburden.

In the remaining countries there is a considerable gap, which may be connected with the overrepresentation of vulnerable households with affordability problems in a residualised social (reduced rent) sector.

Figure 4. Housing cost overburden rate across EU Member States and the UK, in the whole housing sector and in the rental sector at reduced price or free, %, 2018



Source: EUROSTAT, *ilc_lvho07c*

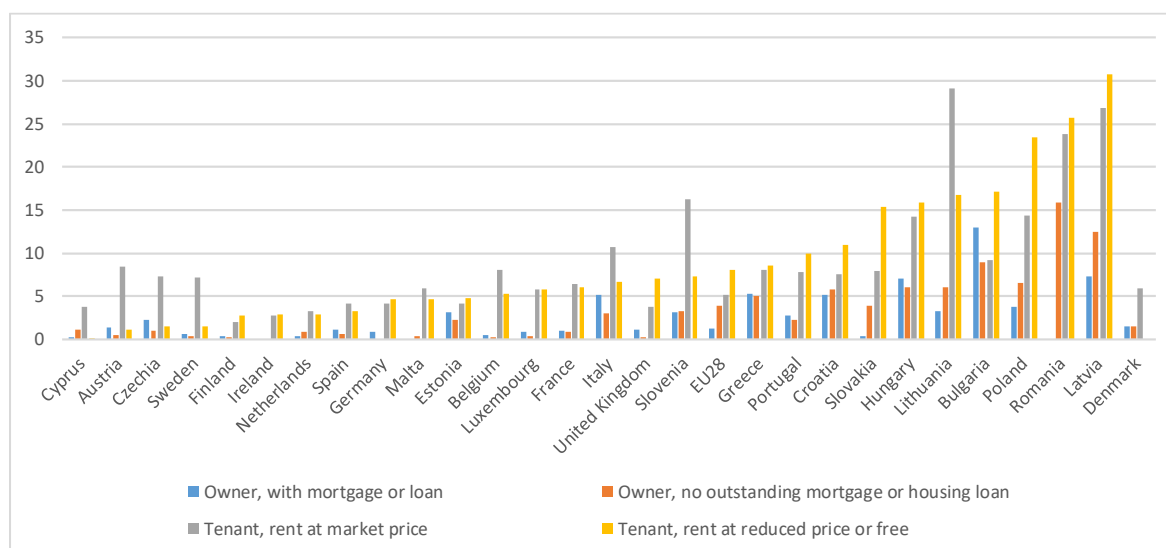
3.2 Living conditions within the sector

The quality of the dwellings within the reduced price rental sector suggests that there is a further issue to be discussed. Whereas some countries define a minimum standard of housing which are put on the market, including the housing stock which can be rented out in the social housing sector, in many Member States housing deprivation within the social housing stock is higher than in other forms of housing. This is even more interesting, as historically 'Europe's patchwork systems of social housing originally shared a common ambition: to provide good quality housing for the families of waged workers' (Lévy-Vroelant, et al., 2014, p. 289). Moreover, also the EU defines social housing as a service which should enhance improving quality of life and provide social protection (Bauer, et al., 2011).

The levels of severe housing deprivation are higher in the reduced price sector (even in countries with a universal or generalist social housing system), compared with the ownership sector, and, with a few exceptions, the privately rented sector.

Figure 5 shows the 2018 severe housing deprivation rate for EU Member States across their tenures. The indicator shows the percentage of population living in an overcrowded dwelling which may have poor amenities (leaking roof, no bath/shower and no indoor toilet), or is considered too dark.

Figure 5. Share of households within select tenure types facing severe housing deprivation, %, 2018



Source: EUROSTAT, *ilc_mdho06c*

In more than half of the Member States, the general severe housing deprivation rate is low and this shows that the overall housing quality is adequate. At the same time, in most of the countries, the rented sectors' quality is inferior to the ownership sector. In all new Member States except for Czech Republic, the data show that, compared to EU average, more households are hit by severe housing deprivation in virtually all tenancies. The social (reduced price) sector is characterised by especially low quality; it is a residualised sector in most Central European Member States.

3.3 Funding and investment issues

As discussed in the section on the definitions of social housing across Europe, there is a broad range of funding mechanisms that create the stock and maintain social housing provision at local and national level.

There is broad consensus that national governments provide some form of subsidies to landlords (which may be among others local governments too) to make sure that affordable housing is created and maintained (Whitehead, 2014). Direct supply-side grants paid for developers are not the only support anymore and now there are diverse financing instruments, including interest-rate subsidies, capital grants, guarantees etc., which often include the conditionality of more efficiency and improved targeting.

In her systematic review, Whitehead (ibid.) recalls that the combination of the three main mechanisms of funding (rent revenues³, loans, public subsidies) depends on the balance of financing and subsidies. Subsidies granted by the states have to be complemented from the two other resources in ways that the housing remains affordable for the tenants. Moreover, income-related subsidies (demand side subsidies) can ensure tenants actually pay the rent, thus, ensuring the financial stability of landlords (and further investment, if needed). The picture is pretty complex and it is not very easy to compare the state of the art across countries.

With the deregulation of the financial markets, more private financial products were made available to invest into affordable housing in many countries. Often public lending and guarantee schemes were also initiated (at the international level, the Council of the European Investment Bank funded projects for social housing for marginalised ethnic groups across Europe). Netherlands and England are quoted as key examples for relying on such financial schemes. The Norwegian Husbanken, the Finnish ARA are also special funding stakeholders.

The ongoing privatisation of the stock serves a further revenue for a variety of providers. Equity finance is actually created by selling off parts of the existing stock to sitting tenants to provide the capital for new investment, or, at the same time, to lift government responsibilities from funding the stock.

Moreover, as Whitehead (2014) shows, a range of countries developed mixed and alternative schemes, like England, France, Denmark, and Germany, which in part are complemented with new institutional structures. Germany stands out because of relying to a large part on private equity in social housing provision.

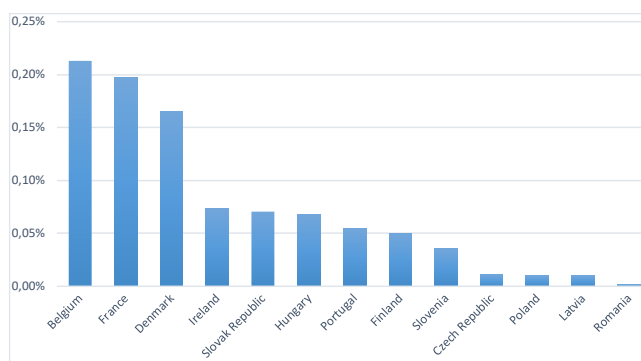
The pressure on public finances and hence withdrawing from various forms of subsidising social housing developments is reported across whole Europe. Thus, there is a legitimate financial driver for less investment in the sector. We observe that, with a few exceptions, the shrinking of state subsidies went along with the reduction of the stock. In select countries, among them also the Czech Republic, housing allowance schemes still ensure an income stream in the sector which may prevent downscaling.

Whitehead (2014) reports that there are further special financing mechanisms in many countries. Social housing investment is often located on land granted by public authorities for free or at very low cost, hence ensuring more affordable capital costs. Also, in some countries, developers have to keep a certain share of the new housing stock as affordable housing (see e.g. Spanish inclusionary planning system).

The share of public subsidy, as pointed out above, differs across EU Member States. The most recent OECD data collection reports that the range of such funding is between 0,001 % in Romania to over 0,2% in Belgium (data were available only for select EU member states, see Figure 6).

³ In section 3.1, we reviewed the rent setting mechanisms.

Figure 6. Government spending as % of GDP in selected EU Member States, around 2016-2018



Source: OECD (2019)

One must note that whereas the European Union does not have an explicit framework to guide social housing policy formation, it has been applying a combination of tools that effectively impact on service delivery and funding mechanisms, both in terms of running of and investing into the stock. It does so, although, as shown above, social housing is positioned close to the social policy realm, in which, theoretically, the European Union relies on single Member States' responsibility and competence.

However, social housing has a special feature, and therefore it is dealt with under completion law and state aid regulations. Given that it functions within the general housing market, supplying households with accommodation they would otherwise have to acquire in the open market, it may create competition with other housing market players like real estate investors (Czischke, 2014).

In this respect, universalistic systems vs. targeted systems are especially complicated to be assessed regarding the balance of fulfilling services of general interest and whether the providers are being compensated for their incurring costs 'proportionately'. The common rule is that social housing providers do not represent a distortion to the market if 'they are supplying housing for disadvantaged groups which due to income constraints are unable to obtain market housing' (ibid. p. 338).

However, the realities of the Member States, as shown previously and discussed in the forthcoming sections, are more complicated. The diversity of the national (and local) models of provision, and settings like the size of sector and targeting or allocation, created room for specific ruling initiatives, like in the case of Sweden, Netherlands, and more recently a discussion was launched also in the Czech Republic.

The two countries with large social housing sectors (the Swedish sector is also termed as 'social housing') have gained attention approximately twenty years ago. In Sweden, the public and the private sectors are operated basically at similar rent levels. Since 2007, the municipal companies were cut off state subsidies to adhere to the European ruling. The Netherlands historically had a pooling of the social housing sector, where the housing associations had market oriented development activities and served vulnerable households at the same time. Improved targeting was introduced in 2011 to make sure that poor households access the sector, and state guarantees got limited to activities of services of general economic interest (Czischke, 2014).

In their recent review, Elsinga and Haffner (Elsinga & Haffner, 2019) summarise the impact of the European Commission's ruling on the Dutch and the German social housing sector. They discuss that in the Dutch case, especially with the financial pressure in the aftermath of 2008, stricter targeting and tax disincentives to maintain a sizeable stock have contributed to a decrease of the stock - along a more

transparent functioning by dividing operations regarding the socially targeted activities. In Germany, the design and running of the general supply subsidy scheme, which allows private providers to fulfil social housing functions, has been decentralised to local levels, which contributed to a reduced supply of social housing. Although the role of the central state grew again with the refugee crisis, thus refocusing the social housing agenda on an emerging need, the response to affordability issues is seen as insufficient. As the authors conclude, it is unclear whether the Dutch changes were primarily due to the EC's intervention or parallel processes also contributed to a narrower targeting of the sector and thus to a growing affordability issue, which has been also more prevalent recently in Germany.

EU funding flowing into social housing investments remain marginal compared to the relative size of the stock. Nevertheless, in the Central and Eastern European context, investments into thermal insulation, and in upgrading of stock in the framework of urban rehabilitation projects played out as important initiatives. Targeted (and integrated) projects in very deprived neighbourhoods could also make use of ERDF for direct social housing construction in a number of countries, like Hungary, Bulgaria and Romania, often coupled with a rather weak desegregation conditionality⁴.

3.4 Management structures

The management structures of the social housing stock are as diverse as the definitions of social housing. Historical developments of service delivery, institutional structures, funding arrangements, licensing etc. have created an abundance of management solutions across EU Member States. Key players that are the backbones of service delivery are listed in a mapping report on social services of general interest of ten years ago (Bauer, et al., 2011), and are summed up in Table 4.

Table 4. Social housing service providers in the EU Member States and the UK around 2011

Country	Service providers
Austria	Providers entitled by the Promotion Schemes of the Federal Provinces (municipalities, limited-profit housing providers, for-profit providers for owner-occupied housing in all provinces and for rental housing in some of the provinces)
Belgium: Brussels Region	The SLRB (the regional body in the Brussels Capital Region) and 33 approved social housing providers (SISP)
Belgium: Flanders	102 approved social housing providers (SHM) supported by the VMSW (Flemish Social Housing Company)
Belgium: Wallonia	The SWL (the regional body governing the local providers in Wallonia) and 68 approved social housing providers (SLSP)
Czech Republic	Municipalities (responsible for running, developing and refurbishing the social housing stock). Since 2009, for-profit and non-profit private investors are also eligible to develop new long-term social housing with the use of state subsidies. Temporary (crisis) social housing is provided by non-profit NGOs.
Denmark	Social housing associations
Estonia	Service providers are municipalities though there is a legal option to include other organisations.

⁴ See Guidance for Member States on the use of European Structural and Investment Funds in tackling educational and spatial segregation, EGESIF_15-0024-01.

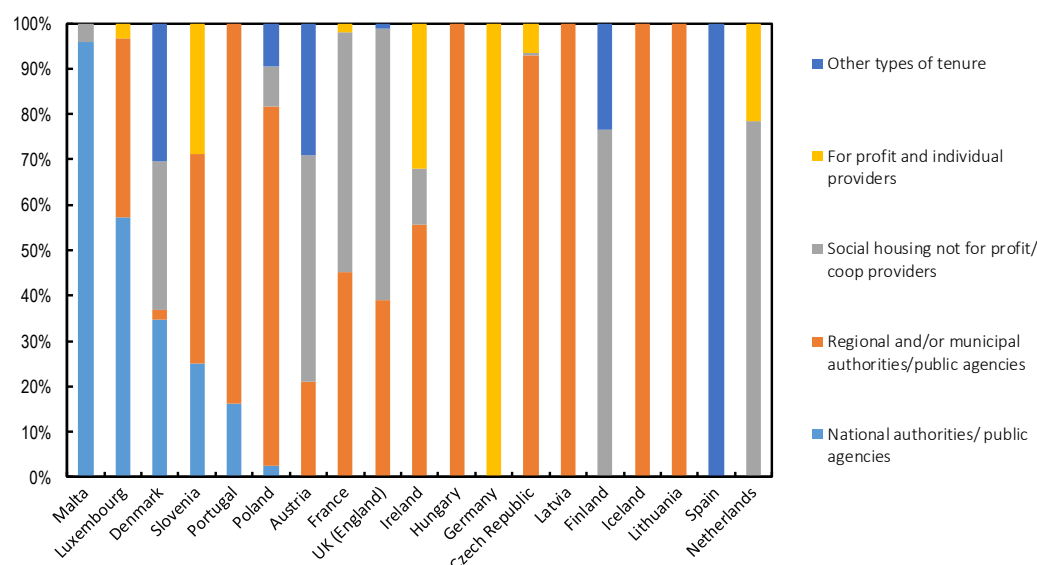
Country	Service providers
Finland	Housing companies
France	HLM (habitation à loyer modéré) operators and semi-public enterprises
Germany	Companies and cooperatives receiving subsidies for the promotion of social housing
Hungary	Municipalities via their departments or their established property management institutions/organisations
Ireland	The housing providers (local authorities and approved housing bodies)
Italy	Municipalities, local public providers acting at the provincial level, and housing cooperatives and private providers
Latvia	Municipalities
Netherlands	Social housing organisations
Norway	Municipalities are mainly responsible for providing the service.
Poland	Municipalities privates and non-profit providers including TBS (Polish Chamber of Commerce of Low Cost Social Housing), housing cooperatives (type of tenement), NGOs, institutions which need staff accommodation
Portugal	Municipalities and Social Security is also responsible for a residual number of social dwellings.
Romania	Municipalities (via their departments or managed by municipal companies)
Slovakia	Municipalities and their management companies
Slovenia	The non-profit rental stock is managed by the Municipal Housing Fund (non-profit housing company of the municipality).
Spain	Local authorities + public and private promoters.
Sweden	The local Municipal Housing Companies
UK: England	Social landlords themselves + the Tenant Services Authority
UK: Scotland	Social landlords themselves + the Scottish Housing Regulator

Source: Excerpt from table 1.4.2 published in Bauer, et al. (2011).

The table lists only the stakeholders, whereas the actual service provision may be organised directly in-house or outsourced. In most countries there is a combination of these modalities, depending on the size of the municipalities, the stock, the regional regulations, etc.

More recently, the OECD collected data on the relative importance of providers within a Member State according to the size of the stock they run (OECD, 2019). The report concludes that if public authorities/municipalities are the main provider, regularly, the social rental sector is small (like in the Central and Eastern European countries). In the case of countries with a relatively large stock, the non-profit sector takes a leading role in provision. In some countries, there is coexistence (like Austria), which may be linked with an inner 'division of labour' or stratification of the stock. Furthermore, in some countries, the state also plays a direct role in provision. Figure 7 summarises the findings.

Figure 7. Share of total social rental housing stock by type of providers in selected EU Member States and the UK, 2016-2018



Source: Excerpt from the data table as published in OECD (2019)

4 Conclusions

The thematic paper highlighted that there is no unique definition in the social housing sector which could apply to all Member States, as well as no common management or funding schemes, let alone structural settings across the EU. Regional variations within countries further blur the picture. The variation has good reasons: historical and political developments contributed to flourishing solutions and approaches. Beyond the diverging patterns, in many EU countries one can observe a stepwise change of social housing policy: there is a shift in delivery focus and improved targeting towards vulnerable groups, often coupled with shrinkage of the stock and changes in the subsidy structures.

A recent summary on policy developments by Housing Europe (2019) highlights that the European Commission has taken position about the potential effects of the emerging shortage of affordable housing. Some Member States (Ireland, Germany, Latvia, Luxembourg and Slovakia) have been encouraged for the first time ever in 2019 to focus investment specifically on affordable and/or social housing. This is happening in a context when 'social rental policies have pushed social rental housing to move towards market rents' (Haffner & Elsinga, 2018, p. 17), and other more business driven mechanisms, like shifting to closed-ended instead of open-ended or indefinite rental contracts.

In generalist or universal social housing systems, there is an important risk mitigating potential, as shown in the example of Austria in the aftermath of the 2008 crisis: Mundt (2018, p. 5) sees this as the social housing sector's 'ability [...]to act as a buffer against house price swings, and thereby to increase economic and social resilience. [...] It has also helped to prevent *marginal* home ownership, that is the expansion of homeownership towards households that cannot afford it without high- risk mortgages'.

In targeted or residual social housing sectors, such potential is limited. Still, the social housing sector is key in the alleviation of the affordability gap of at-risk households. The box on effective local level approaches includes some core features of schemes, so as to serve as teaser and inspiration.

Box: Effective local level approaches in tight social housing systems with high support needs tenants

In very residual social housing sectors the composition of tenants is characterised by equally strong concentrations of poverty and destitution. While such 'very social housing' (Scanlon, et al., 2015) arrangements ensure effective targeting of the poor, often times they can barely serve long-term integration goals due to under-investment and segregation.

There is a richness of local solutions and measures to address needs of vulnerable households (for more details see e.g. FEANTSA (2019)). For example, within the Homelab cooperation, the Polish Habitat for Humanity NGO, established a social housing agency programme to tackle long waiting lists of the social housing sector and discrimination in the private rental sector. The scheme combines rental housing support, employment services and social work within a single institutional framework called Social Rental Enterprise. The support workers are key to ensure that tenants access services they need. Within the same partnership, RomoDrom NGO, the Czech partner piloted housing inclusion of Roma families who through their settled housing and floating support (ongoing social workers assisting the households according to their needs and coordinating necessary services for them) could find employment and stability. A part of the housing stock was accessed through the municipal stock, similarly to the Hungarian NGO, From Street to Home Association's pilot project.

These schemes show that an effective composition of floating services tailored to the needs of tenants is a precondition to ensure maintaining housing in close-to-market segments and for discriminated vulnerable households. Essentially, enhancing access to mainstream services and housing support is complemented with continuous tailored social work and individual counselling.

The shortage of the social rental sector in light of rising needs has necessarily created room for a combination of solutions: applying demand side subsidies to ensure sustainable funding streams within the social housing sector, drawing on private rental or low-cost home-ownership schemes, and making use of integrated services for the most excluded ones, is present across the EU. Thus, regulations which can accommodate such combinations of needs and complementary service design are highly relevant in the current European context.

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6 Annex

	CRITERIA ASSESSED IN SELECTING ELIGIBLE HOUSEHOLDS:						CRITERIA FOR PRIORITY ALLOCATION TO ELIGIBLE RECIPIENTS						
	All are eligible	Income threshold	Citizenship/ Perm. Resid.	Household composition /size	Housing situation	Other	Time on waiting list	Income level	Disability	Elderly	Housing situation	Household composition / size	Other
Austria	No	Yes		Yes	No	..	Yes	No	Yes	No	Yes	No	Allocation schemes vary by provider; in the case of <i>Wiener Wohnen</i> , there are fast-track procedures for urgent cases
Bulgaria	No	Yes					Yes	No	Yes	Yes	No	No	
Czech Republic	No	Yes		No	Yes	Social situation of the applicant for housing (age, health condition, Roma communities, people leaving institutional housing, prison, etc.), special arrangements for disabled and elderly	No	Yes	Yes	Yes	Yes	Yes	
Denmark	Yes	No		No	No	..	Yes	No	Yes	Yes	Yes	No	The municipality can assign households to social housing, which takes priority of waiting list.
Estonia	Yes	No	Yes	Yes	Yes	Priority to young families and essential workers in the capital area (e.g. teachers, doctors, nurses)							

CRITERIA ASSESSED IN SELECTING ELIGIBLE HOUSEHOLDS: CRITERIA FOR PRIORITY ALLOCATION TO ELIGIBLE RECIPIENTS													
	All are eligible	Income threshold	Citizenship/Perm. Resid.	Household composition/size	Housing situation	Other	Time on waiting list	Income level	Disability	Elderly	Housing situation	Household composition/size	Other
Finland	Yes	No		No	..	Household selection is based on suitability and financial needs assessed on the basis of the applicant's housing needs, wealth and income	Yes	Yes	Yes	No	Yes	Yes	
France	No	..	Yes	No	No		Yes	No	Yes	No	No	No	Homeless; people at risk of eviction; people with temporary accommodation; persons in unhealthy or unfit accommodation; households with children in overcrowded or indecent dwellings; disabled; victims of domestic violence; etc.
Germany	No	Yes	Legal residency of at least 1 year	No									

	CRITERIA ASSESSED IN SELECTING ELIGIBLE HOUSEHOLDS:						CRITERIA FOR PRIORITY ALLOCATION TO ELIGIBLE RECIPIENTS						
	All are eligible	Income threshold	Citizenship/Perm. Resid.	Household composition/size	Housing situation	Other	Time on waiting list	Income level	Disability	Elderly	Housing situation	Household composition/size	Other
Ireland	No	Yes	Yes	Yes	Yes	Must not have previous rent arrears; and there must be no suitable alternative accommodation available to the household	Yes	No	Yes	Yes	Yes	No	Housing situation: homeless, overcrowding, housing conditions
Latvia	No	Yes	Yes	Yes	Yes		Yes	Yes	Yes	Yes	No	Yes	Priority to people who are victims of natural disasters, as well as to households that have been evicted and are: low-income, elderly, disabled, taking care of a dependent child/elderly or disabled person, and/or several other specific cases.
Lithuania	No	Yes					Yes		Yes				..
Luxembourg	Yes	No	No	No	No		No	Yes	Yes	Yes	Yes	No	
Malta	No	Yes	Yes	Yes			No	No	Yes		Yes	No	Victims of domestic violence living in shelters, people leaving institutionalised care
Netherlands	No	Yes					Yes	Yes	Yes	No	Yes	No	Allocation is largely determined at municipal level

	CRITERIA ASSESSED IN SELECTING ELIGIBLE HOUSEHOLDS:					CRITERIA FOR PRIORITY ALLOCATION TO ELIGIBLE RECIPIENTS							
	All are eligible	Income threshold	Citizenship/ Perm. Resid.	Household composition/ size	Housing situation	Other	Time on waiting list	Income level	Disability	Elderly	Housing situation	Household composition/ size	Other
Poland	No	Yes		No	Not holding legal title to another dwelling	Income thresholds and any additional specific criteria set by the municipalities							
Portugal	Yes	No	Yes	Yes		Additional criteria set by the municipalities	No	Yes	Yes	Yes	Yes	Yes	Asylum seekers and refugee are eligible for social rental housing in the same terms as national citizens. There is also a priority allocation for victims of domestic violence/abuse.
Slovak Republic	No	Up to 3 times of the minimum living standard		No	No		No	No	No	No	No	No	Criteria are set by the municipalities and vary locally
Slovenia	No	Yes	Yes	Yes	Yes		Yes	Yes	Yes	Yes		Yes	

	CRITERIA ASSESSED IN SELECTING ELIGIBLE HOUSEHOLDS:						CRITERIA FOR PRIORITY ALLOCATION TO ELIGIBLE RECIPIENTS						
	All are eligible	Income threshold	Citizenship/ Perm. Resid.	Household composition/ size	Housing situation	Other	Time on waiting list	Income level	Disability	Elderly	Housing situation	Household composition/ size	Other
United Kingdom: England	No	varies across local authorities	Yes	varies across local authorities	varies across local authorities	Application is open to all British citizen or a citizens who have the right to stay in the UK for an unlimited time. Allocation by local authorities according to own criteria	No	No	Yes	No	Yes	No	Local authorities must give 'reasonable preference' to people who are homeless; people living in overcrowded, unsatisfactory or insanitary accommodation; people who need to move on medical or welfare grounds, including grounds relating to a disability; and people who need to move to avoid hardship to themselves or others. Additional criteria can be set at local level.

Source: OECD (2019)

