A Comparative Study of Homelessness and Services to Meet Basic Needs

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List of Abbreviations

BRC	Bowery Residents' Committee
DHS	Department of Homeless Services
EU	European Union
GLA	Greater London Authority
HOPE	Homeless Outreach Population Estimate
MTA	Metropolitan Transportation Authority
NSNO	No Second Night Out
PIT	Point-in-time
RSU	Rough Sleepers Unit
SEU	Social Exclusion Unit
UK	United Kingdom
US	United States

ABSTRACT

People experiencing homelessness often have difficulty accessing resources to meet their basic needs for food and sanitation. However, services to meet basic needs—such as public toilets, soup runs, and day centres—have been under-explored in research concerning homelessness and the welfare state. Accordingly, relatively little is known about the ways in which these services fit into the extension of rights through the welfare state. This research examines evidence from policy documents as well as the perspectives of service providers, city government officials, and advocacy groups to investigate the following question: In what ways, if any, does the relative salience of social or civil rights in a welfare state affect the provision of services to meet the basic needs of people experiencing homelessness? Through a comparative analysis of New York and London, two major cities within the 'liberal' welfare regime, this study demonstrates that the provision of services to meet basic needs is fragmented, in both cases consisting of a mix of government, voluntary, and private provision. Additionally, the relative salience of social and civil rights affects the ways in which policymakers and service providers conceptualise poverty and need, as well as the claims advocacy groups make on behalf of people experiencing homelessness. Drawing from concepts in social citizenship and social exclusion, the analysis shows that these findings reflect differences in understandings of poverty, rights, and responsibilities in each city.

CHAPTER 1: INTRODUCTION

Services to meet 'basic needs'—such as food, water, and sanitation—have received relatively little attention in the study of social policy in modern welfare states. In large part, this is likely because most citizens of Western welfare states manage to meet these basic needs within the settings of private homes. For most people, therefore, the welfare state facilitates access to these services through the channels of housing, employment, and income assistance, enabling citizens in turn to provide for their basic needs in a private consumptive sphere.

However, for people experiencing homelessness, meeting basic needs becomes more than a private concern. Homeless people, particularly those who are unsheltered (or 'sleeping rough'), navigate a number of public and private channels to access services for the fulfilment of their basic needs. Some of these, such as soup runs and day centres, are social services targeted to homeless people directly. In other situations—particularly in order to access resources for hygiene and sanitation—homeless people have to navigate 'public' resources in spaces as varied as bus and train stations, public parks, and coffee shops. Because public toilets are provided for the general public rather than for homeless people specifically, they are rarely thought of in relation to homelessness. However, the ways in which services are designed, policed, and regulated are in many places in practice profoundly related to homelessness. The following sign, posted by the New York City Metropolitan Transportation Authority (MTA) Police outside the women's restrooms in New York's Grand Central Terminal, illustrates this point:



Grand Central Terminal, New York, NY. 2013. Photograph by author.

Inside the restroom, a sign taped over a hand dryer reminds users that 'hand dryers are for drying HANDS only.' The sign suggests that both the police and the MTA are aware that people without access to other resources will make use of the terminal's restrooms for personal hygiene activities, such as bathing or washing clothes. Accordingly, even though basic needs do not constitute a substantial area of singular focus within social policy, or even within homelessness policy, the city is involved in regulating homeless people's access to these resources.

Services to meet basic needs consist of a wide variety of resources available through private, public, and voluntary channels. Homeless people attempting to fulfil their basic needs may face a number of barriers, such as being unable to afford food or water and facing discrimination from managers of private businesses where bathrooms are located (Molotch and Noren, 2010). With respect to water and sanitation, homeless people may also make use of public resources such as water fountains and public toilets, although, as described above, there may be restrictions on the use of these resources for personal hygiene (Waldron, 2005). Finally, there are services available through state or voluntary services for people experiencing homelessness. While some of these resources

exist specifically to meet basic needs, other services embed the provision of food and hygiene resources within programmes that provide some combination of housing, education or employment training, and treatment for substance abuse.

While services to meet basic needs can be seen as encompassing food, water, and sanitation (among others) this thesis will refer to 'food and sanitation.' In practice, water is usually accessed through the same channels that are used to access food (for hydration) or sanitation (for hygiene and washing). Access to water will therefore be examined through access to these other resources, rather than as a separate issue.

This research aims to address the paucity of literature studying services for basic needs in contemporary Western welfare states, as these constitute an important issue for the welfare of people experiencing homelessness. It takes concepts such as social citizenship, which have more often been applied to the study of other issues within social policy and applies them in order to understand the often complex ways in which cities make decisions about services such as food, water, and toilets.

The factors affecting how different governments undertake and regulate the provision of services to meet basic needs merits further exploration. In this direction, the present study compares two major developed cities in order to understand their approaches to services to meet the basic needs of homeless people. Both cities are wealthy cultural and economic centres of their respective countries and are embedded within 'liberal' welfare regimes that take similar approaches to the provision of welfare. Furthermore, in spite of its affluence, each city contends with large-scale homelessness, and has done so through the development of a 'homelessness sector' in which state, state-contracted, and voluntary providers endeavour to address the needs of homeless people. This gives both these cities depth and intrigue as sites for the study of homelessness in the urban context. These similarities facilitate comparative analysis along the dimension of a key difference: the salience of social rights, which have historically been a stronger component of social citizenship in the UK than in the US.

This research asks the following question: in what ways, if any, does the relative salience of social rights or civil rights in a welfare state affect the provision of services for the basic needs of people experiencing homelessness? Services to meet basic needs can be thought of as social rights, falling under the welfare state's broader responsibility

to provide for the health and well-being of its citizens. Accordingly, this thesis will examine the role that the greater salience of social rights has played in the provision of services to meet basic needs in London. It will also investigate the ways in which factors such as the social exclusion of homeless people and notions of the responsibilities that accompany rights under social citizenship affect the availability and accessibility of services provided for homeless people. While the US has had a relatively weak tradition of social rights, it has developed a much stronger tradition of civil rights emphasising individual liberties, freedom from government interference, and the upholding of rights through the court system (Koh, 2003). This thesis will explore the ways, if any, in which this alternative rights tradition has affected the provision of services for the basic needs of homeless people.

This thesis will adopt a working definition of homelessness as lacking regular access to the resources for the fulfilment of basic needs in a personal residence. This highlights the relationship between homelessness and basic needs, focusing on those who rely on public services (whether accessed through charitable or governmental providers) in order to fulfil their basic needs for food and sanitation. In the context of the comparative study being undertaken, this definition falls closest to the American definition of 'unsheltered' or 'street' homelessness or what is more commonly referred to in the UK as 'rough sleeping.' Both of these are defined by sleeping outdoors or in areas 'not meant for human habitation' (Homeless Link, 2013, p. 5; United States Department of Housing and Urban Development, 2008, p. 4).

Homelessness has been a significant issue in both New York and London in recent decades, and rough sleeping in particular has presented itself as a policy challenge. Compared with homeless people living in shelters or temporary accommodation, who tend to live within homeless families, the population of rough sleepers contains a much higher proportion of single adults. Data from London's Homeless Link report that in 2012-2013, 88% of rough sleepers in London were men, and 58% were ages 26-45 (CHAIN and Broadway, 2014). Fewer than half (47%) were British by nationality. Additionally, 41% had support needs related to alcohol, 28% related to drugs, and 44% had mental health support needs. These were overlapping categories: 31% of rough sleepers had no support needs. In terms of prior institutional

affiliations, 32% of rough sleepers had been in prison at some point, 10% had been in the armed forces, and 10% had been in care. The major factors that resulted in rough sleeping varied widely, but the most frequent included relationship breakdown (18%), eviction (17%), and leaving a settled home to seek work (15%). Furthermore, of the rough sleepers counted, 75% slept rough only once, suggesting that the population is dynamic and that most do not experience entrenched, long-term rough sleeping (ibid.). New York City does not keep comparably detailed data on unsheltered homeless people. However, research from other sources provides support for the trends observed in London—namely, that unsheltered homeless people tend to be mostly male and middle-aged, and have a high prevalence of substance abuse and mental health problems as well as history of incarceration and participation in the armed forces. A significant difference is the high proportion of immigrants sleeping rough in the UK as compared to the US (ibid.).

The sizes of the overall homeless populations in London and New York are rather difficult to compare, given the definitional and methodological differences in each city's measurements of homelessness. New York distinguishes 'sheltered' (within the city shelter system) from 'unsheltered' homelessness and, within the category of sheltered homelessness, between families with children, adult families, and single adults. As of April 2014, the Department of Homeless Services reported 52,309 individuals living in the New York City Shelter System, with 10,308 of these being single adults (New York City Department of Homeless Services, 2014a). The 2013 Homeless Outreach Population Estimate (HOPE) count of homeless people sleeping outdoors resulted in an estimated 3,180 unsheltered homeless people in New York (down from 3,262 in 2012). This is thought to be a significant underestimate of the number of people sleeping rough in New York over the course of a year, though no measurement of this figure exists (Coalition for the Homeless, 2004).

In the 4th quarter of 2013, there were 42,430 households in London in temporary accommodation under the 1996 Housing Act. A 2013 'point-in-time' (PIT) estimate similar to the HOPE count registered 543 rough sleepers in London. This represents a small proportion of the annual rough sleeping figure, estimated to be 6,347 in 2012-2013 by the London CHAIN database, which collects data on all the rough sleepers who are

encountered by street outreach teams (Thames Reach, 2014). It is also represents a significant decrease from the late 1990s; in 1998, the Social Exclusion Unit estimated that 1,850 people slept rough on a given night in London (Office of the Deputy Prime Minister, 1998).

Comparing the 'point-in-time' estimates between London and New York is difficult not only because the accuracy of PIT estimates is highly dependent on their methodology and estimation techniques but also because these estimates will be affected by the dynamics of rough sleeping in each city. For instance, if rough sleepers in New York are more 'entrenched' than those in London, where they tend to move off the street more quickly (Thames Reach, 2014), then point-in-time estimates in the two cities will represent different proportions of the overall annual unsheltered population. However, the figures indicate at minimum that levels of rough sleeping are higher in New York than London as of 2013, and that London has contended with similarly high figures as recently as the late 1990s and early 2000s.

For the purposes of this study, it is sufficient to say that each city has had to grapple with homelessness on a scale large enough to warrant both political attention and the mobilisation of considerable resources towards the issue. Rough sleeping represents a small but nevertheless substantial proportion of homelessness in both New York and London. Both cities have developed systems of measurement and service provision that treat family homelessness differently from single adult homelessness, and rough sleeping as an even more specialised issue.

The research question will be addressed through the analysis of two complementary bodies of data: a documentary analysis of official policy documents as well as 'grey' literature related to homelessness and services to meet basic needs; and interviews with key informants in homelessness service provision, advocacy, and city governance in each city. The structure of the thesis is as follows. Chapter Two outlines the conceptual framework of the thesis as well as its key concepts: basic needs; civil and social rights; rights and responsibilities in social citizenship; and social exclusion. Chapter Three discusses the comparative research design and methodology. Chapter Four lays out the historical development of homelessness policies in London and New York as well as each city's contemporary homelessness sector; it also offers preliminary

findings on the availability of services to meet basic needs. Chapter Five presents the findings related to the research question, while Chapter Six analyses these within the frameworks of social citizenship and social exclusion.

CHAPTER 2: CONCEPTUAL FRAMEWORK AND REVIEW OF THE LITERATURE

2.1 Overview and Introduction of Conceptual Framework

Understanding how different countries approach the provision of welfare is particularly important for comparative research. This section outlines the conceptual dimensions of the comparison between the US and the UK that forms the basis of this study. The US and the UK, while both considered to be 'liberal' welfare regimes (Esping-Andersen, 1990), have different social citizenship traditions. In particular, the UK has developed a stronger system of social rights, while the US has favoured strengthening civil rights, with minimal government involvement in the provision of welfare. Additionally, social exclusion has become a salient concept in social policy within the UK, while it has failed to achieve the same significance in the US. These developments have consequences for the provision of services to meet the basic needs of homeless people.

The conceptual framework of this thesis is taken from the notion of social citizenship as the extension of civil, political, and social rights to citizens under the welfare state (Marshall, 1950). This thesis will understand services to meet basic needs as falling under the umbrella of social rights, as part of the welfare state's broader responsibility for health, security, and well-being. The comparative case study employed in this study will therefore help to illustrate the ways, if any, in which the relative salience of social rights affects the provision of services to meet basic needs for homeless people. While provision of services to meet basic needs may be expected to be stronger where social rights are more salient, several factors, such as the social exclusion of homeless people and the expectation of contribution to the welfare state, may in practice limit homeless people's access to services. This thesis will also consider what role the salience of civil rights, or individual freedoms, plays in affecting homeless people's access to services to meet basic needs. This will be examined through the perspectives of policymakers and service providers; the levels and dynamics of service provision in each city; and the behaviour of advocacy groups. In order to further unpack this conceptual framework, this chapter reviews the literature on social citizenship and

the related concepts that inform the research question—social and civil rights, basic needs, poverty, and social exclusion—to understand how they relate to homelessness and the provision of services to meet basic needs. It demonstrates a gap in the literature concerning the application of these concepts together in the context of contemporary Western welfare states.

2.2 Social Citizenship

2.2.1 Overview and Historical Concept

T.H. Marshall set forth the concept of social citizenship in order to account for the development of the modern welfare state (1950). Writing from post-World War II Britain, Marshall saw the state as expanding to take on the provision of a much larger body of services, including health, education, and social security, that could be characterised as 'social rights.' In Marshall's chronology, social rights built upon the earlier establishment of civil and political rights. Within this framework, social citizenship therefore describes the relationship of citizens to the welfare state: 'the body of rights and duties—the status—which goes with full membership of a society' (Dahrendorf, 1994, p. 13).

Although social citizenship first 'gained its expression in the modern welfare state as it developed in Western Europe' (van Steenbergen, 1994, p. 2), welfare states have continued to evolve since Marshall's time. Many modern welfare states have developed markedly different approaches to social citizenship (Mann, 1987). The UK has developed a comprehensive system of social rights and protection. By contrast, social citizenship, denoted by the extension of social rights, 'is still marginal' in the US, where the state continues to take a minimal role in the provision of welfare (ibid., p. 343).

The following sections outline key features of social and civil rights that are relevant to this study. Marshall's account of the welfare state also included the incorporation of political rights, among them the right to vote and to participate in the democratic process. In his chronology, political rights emerge after civil rights (which protect individual freedoms) have been established. Social rights, which encompass the welfare state's responsibility for health and well-being, are then incorporated after the

development of civil rights. Political rights, though an important component of citizenship and of the emergence of the modern welfare state, do not constitute an important basis for comparison within this study, and so will not be discussed in greater depth here.

2.2.2 Social Rights

Marshall defined social rights encompass everything from 'the right to a modicum of economic welfare and security to the right to share to the full in the social heritage and to live the life of a civilised being according to the standards prevailing in the society' (1950, p. 74). They have evolved as a more salient concept within the UK than the US (King, 1999; Mann, 1987). Different conceptual categorisations of social rights have been developed in the literature, such as Janoski's enumeration of 'enabling,' 'opportunity, 'redistributive' and 'compensatory' social rights (1998). Particularly in international rights discourses, economic, social, and cultural rights are often grouped together, but each of these can be separately defined (Eide, 1995). In contrast to economic rights, such as the right to work and the right to property, and cultural rights, such as the right to partake in the cultural life of a society and in scientific progress, social rights are focused primarily on the idea that 'at minimum, everyone shall enjoy the necessary subsistence rights—adequate food and nutrition rights, clothing, housing and the necessary conditions of care' (ibid., p. 31). Because social rights map easily on to modern-day social policies, it is also not uncommon within the literature to discuss social rights within the categories of the welfare state programmes under which they fall such as health care, income maintenance, and education. As such, social rights within a welfare state may be evaluated in terms of the comprehensiveness of the risks against which they protect, the extent to which they do so for all citizens, and their effectiveness in insuring against a particular risk.

One key feature of social rights is that they are *distributional*, related to 'the social redistribution of resources' (Dean, 2001, p.1). Within Marshall's framework, social rights were designed to create equality of status among citizens (Marshall, 1950; White, 2000). Consequently, part of the function of social rights is to alleviate poverty, either 'by limiting the extent of social inequality' or 'to relieve poverty after it has

struck' (Dean, 2001, p. 1). Because they are 'designed to give individuals claims on collective social resources,' social rights are bound up with social policy decisions about how states will redistribute resources, at what levels, and to which groups (Marshall, 1963, cited in Rittich, 2007, p. 109). While social rights, like civil and political rights, are universally held, they may—particularly in liberal welfare regimes—be provided for through targeted programmes (Rittich, 2007).

In contrast to civil and political rights, social rights have been characterised as positive rights in the sense that they are 'claims' that directly depend wholly or in large part upon taxes paid by others (Isin and Turner, 2002). For this reason they have also been described as 'crucially resource-dependent,' and accordingly it has been asserted that 'their range and level cannot be guaranteed in the same way as civil or political rights' (Twine, 1994). Plant (1992), however, challenges this assertion by arguing that in practice both social rights and civil rights require resources in order to be upheld. Similarly, in response to critiques that social rights are not 'judiciable' in the same ways as civil or political rights, Ruxton and Karim (2001) argue that social rights 'are no more vague and imprecise than some civil and political rights are' and therefore no less capable of being enforced (p. 13).

This study considers services to meet basic needs as falling under the mantle of social rights. In relation to homeless people, these services mainly take the form of provision available within shelters, hostels, or day centres; 'emergency food' provision such as soup runs; and resources for ensuring personal hygiene and sanitation, primarily public toilets. As will later be discussed, these types of resources as well as other social rights have often been included in discussions about international development, where they are more commonly referred to as 'economic and social rights' (Ruxton and Karim, 2001). However, they can still be understood in Western welfare states as related to the objectives of health and well-being that social rights set out to ensure.

2.2.3 Civil Rights

While social rights have been central to the development of the British welfare state, the US has developed a tradition of social citizenship that places a much greater emphasis on civil rights than is found in the UK (Loury, Modood, and Teles, 2005).

Marshall defines civil rights as 'the rights necessary for individual freedom—liberty of the person, freedom of speech, thought and faith, the right to own property, to make contracts, and the rights to justice' (1950, p. 74). In the US, civil rights were first enshrined in the 'Bill of Rights' in the US constitution, outlining the freedoms of religion, press, and speech, among others. Both the document and the ideology it set forth remain highly salient in American culture (Moran, 1991).

A few key attributes of civil rights are worth highlighting for the purposes of this study. First, civil rights are highly individualistic, placing an emphasis on the liberty of an individual person (Fraser and Gordon, 1998). This is often tied to their appeal in countries such as the US, whose political and economic foundations were built upon strong notions of individualism and influence of which can still be seen in contemporary public opinion and political rhetoric (Fischer, 2008; Friedman, 1990). Additionally, civil rights are often characterised as 'negative' liberties involving freedom *from* infringement (in the practice of speech or religion, for instance), rather than 'positive' rights carrying an entitlement to an action from another party (Fraser and Gordon, 1998). Civil rights are considered to find their expression through the court system (Dean and Melrose, 1999; Turner, 2001). As noted earlier, Plant (1992) argues that the notion that civil rights require fewer social resources to be maintained is rhetorical rather than substantial, and that services such as the judicial system and the police are, in practice, necessary in order to ensure civil rights in a meaningful way: 'the enforcement of the rule of law is something that consumes resources—the police, courts, prisons, and so on,' and so 'exactly the same questions of resource allocations arise' concerning civil rights as social rights (p. 175).

The fact that civil rights retain such a stronghold in the US reflects the philosophical underpinnings of the American political system and has consequences for homeless people and homelessness services. Furthermore, homelessness advocates in the US may have more opportunities to make claims under the mantle of civil, rather than social, rights if notions of individual liberty have greater salience than entitlement to the provisions of social rights. Advocacy groups' ability to leverage civil rights within the spheres of homelessness and services to meet basic needs will be discussed in greater detail in Chapter Five.

2.2.4 Rights and Responsibilities

While discussions of rights point to the benefits and protections individuals receive from the state, under social citizenship individuals are also expected to make contributions *to* the system. Marshall's vision of social citizenship included responsibilities as well as rights, under the notion that 'if citizenship is invoked in the defence of rights, the corresponding duties of citizenship cannot be ignored' (Marshall, 1949, cited in White, 2000, p. 507). In his framework, individuals are expected to contribute to the welfare state through, for example, military service and taxation (Rowe and Baranoski, 2011). This emphasis on contribution and particularly on economic productivity has led some scholars to note the exclusionary effects of the social citizenship relationship on homeless people. In the UK context, Turner (2009) points out that social rights can 'have an exclusionary consequence for individuals who cannot for various reasons—poor health, mental illness, poor education, disability or impairment—make long-term sustained contributions' (p. 71). Whiteford (2010) and Somerville (1998) outline more specifically the effects of this exclusion for experiencing homelessness, as they may be unable to contribute economically to the state, may be perceived as unwilling to do so, or may be characterised as 'irresponsible' and intentionally homeless (Whiteford, 2010, p. 194). Arnold (2004) describes how people experiencing homelessness fall short of the ideal citizen because they are not economically independent and are seen to owe a debt to society. Services for homeless people are designed not only to provide benefits, to advance social rights or to protect individual liberties; they are also designed to help homeless people to become economically productive members of society, or, in Whiteford's words, to 'responsibilise' homeless people (2010). Feldman (2004) points out that this is true of compassionate/humanitarian and 'tough love' approaches to homelessness; in other words, that the tendency to see homeless people as in need of responsibilisation crosses political and ideological boundaries and is therefore a feature of a wide variety of homelessness services.

2.3 Basic Needs

2.3.1 Overview

The function of social rights is to 'guarantee the satisfaction of human need' (Dean, 1996, p. 216). Contemporary Western welfare states have developed services for health, housing, and social participation to ensure the fulfilment of a variety of these needs (Titmuss, 2001 [1955], cited in Dean, 2010). This thesis will focus on those social rights which fulfil 'basic' needs (in particular those for food, water, and sanitation), a concept that will now be explored in greater detail. Basic needs are often seen as those that are necessary for human survival, aligning closely with Doyal and Gough's categorisation (1984) of 'survival/health' needs and the 'basic needs for food and shelter' measured by the Gallup World Poll (Tay and Diener, 2011). They are found at the bottom of Maslow (1954)'s 'pyramid' of human needs, a category that includes physiological needs common to all humans.

In global social policy, services for basic needs have most frequently been discussed within the related fields of international human rights and development economics. In this sphere, social rights are alternately referred to as 'economic and social rights' as part of the broader category of 'human rights' (Eide, 1995). Article 25 of the 1948 Declaration of Human Rights sets forth the 'right to a standard of living adequate for the health and well-being of himself and his family, including food, clothing, housing and medical care and necessary social services' (UN General Assembly). The Declaration was expanded in the 1970s by the Committee on Economic, Social and Cultural Rights to include more elaborated rights to, among other things, water and resources for sanitation. However, discussions about basic needs have largely remained focused on developing countries. Part of the reason for this is that people living in more affluent societies most often fulfil their basic needs for food and sanitation in private residential settings. Homeless people by definition lack access to these residential facilities and may also face difficulty accessing cash or income benefits (Homeless Link, 2014). Many resources to meet basic needs are provided 'in-kind,' in the form of emergency food (such as soup runs), day centre services, and public toilets. There are disadvantages to these types of services as forms of provision. First, services provided in-kind may be less secure or more arbitrary than services provided or contracted by the

state, therefore not proving the same long-term guarantee that needs will be met (Scott, 2007). Thus the tendency for rough sleepers to rely on these kinds of services is potentially problematic.

Although it is less common outside of the study of development, some scholars have addressed the 'needs fulfilment' aspect of social rights within the context of Western welfare states (Plant, 1992; Dean, 1996). Among the most influential of these is Doyal and Gough's (1984) work on human need. Bridging the gap between predominantly international discussions of 'human' or 'economic and social' rights and social policy in contemporary Western welfare states, they conceptualise social rights as 'national embodiments of universal human rights' (Doyal and Gough, 1984, cited in Roche, 2002, p. 71). (Hewitt, 1998) notes that the idea of basic needs suggests both 'the universal rights of individuals to basic welfare provision and the obligation of government to undertake such provision' (p.62). Social citizenship can therefore be thought of as an assurance that basic needs are met, though this is but one of its functions. Similarly, 'the concept of basic needs is central for Raymond Plant's case for social and economic rights, and the topic is present in the whole of his discussion of social rights' (Espada, 1996, p. 102). Bradshaw (1972) sets out a taxonomy of needs and defines 'normative' needs as 'what the expert or professional, administrator, or social scientist defines as need in any given situation,' suggesting that the types of needs that are recognised by administrators, service providers, and policymakers have implications for social policy (p. 640). Here, he echoes Titmuss' claim that 'all collectively provided services are deliberately designed to meet certain socially recognised "needs"' and that this provision 'depends on prevailing notions of what constitutes a "need" and in what circumstances; and to what extent, if at all, such needs, when recognised, should be met in the interests of the individual and/or of society' (Titmuss, 2001 [1955], p. 62, cited in Dean, 2010, p. 3).

This study will move from the conceptual to the practical level by looking at the extent to which the US and UK welfare systems have dealt with the provision of services such as food and toilets in the cities of New York and London. Two aspects of basic needs will be central to this discussion: first, the positioning of basic needs within a *hierarchy* of needs, drawing from concepts in psychology; second, the situation of basic

needs within debates about the absolute and relative nature of poverty more generally.

2.3.2 Maslow's Hierarchy of Needs

The concept of a hierarchical approach to understanding needs was introduced by Maslow (1954), in *A Theory of Human Motivation*. Maslow posited that there were lower-order needs, primarily those for subsistence and survival, which must be fulfilled before higher-order needs can be pursued. Higher-order needs include knowledge, self-expression, love, and self-actualisation. While the fulfilment of lower-order needs is a precondition for the fulfilment of higher-order needs, the latter 'produce more desirable subjective results, i.e. more profound happiness' and 'represent a general health ward trend' (Maslow, 1954, p. 148).

While Maslow's theory has not been uncontested (Korman, Greenhaus, and Badin, 1977), it has nevertheless had 'an enduring influence' on social policy (Dean, 2010, pp. 19-20). Most prominently, Tay and Diener (2011) drew from Maslow's work to design the Gallup World Poll, surveying participants across five years and 123 countries about needs and subjective well-being. Dean (2010) writes as well that 'the assumptions it embodies are reflected in the ways that policy makers tend to prioritise needs' (p. 20); in other words, the availability of policies and services can reflect policymakers' embedded notions of what kinds of needs are most worth addressing. However, it is possible to interpret Maslow's hierarchy in ways that lend themselves to different priorities. The hierarchy emphasises both the desirability of achieving higher-order needs and the universal necessity of achieving lower-order (or basic) needs.

2.3.3 Basic Needs and Absolute/Relative Poverty

Basic needs are often described as 'absolute,' 'universal,' or 'biological' (Dean, 2010, p. xii), echoing discussions about the extent to which poverty more broadly should be considered an 'absolute' or 'relative' phenomenon. Absolute approaches to poverty tend to focus on those needs and resources which are essential to survival, whereas relative approaches focus on what is necessary for participation in the society in which a person lives (Lister, 2004). Sen (1983) connects these two concepts through his theory of capabilities, or the freedom to carry out certain functionings. The capabilities framework

asserts that poverty is a universal phenomenon with respect to capabilities, but relative in terms of the resources required to fulfil those capabilities, as these requirements will vary across societies. The theory was contested by Peter Townsend in 1985, who disagreed with Sen's contention that there is an 'irreducible absolutist core in the idea of poverty' (Sen, 1983, p. 159) and argued instead that needs and deprivation cannot be understood outside of the context in which they occur (Townsend, 1985). This thesis will not engage directly with these debates but will be informed by the ways in which different conceptions of poverty and/or social exclusion affect the understanding of service to meet basic needs. Basic needs are implicated in these discussion in a few ways: first, absolute definitions and measures of poverty have tended to emphasise basic needs, focusing on what is required for subsistence; relative definitions and measures, by contrast, have tended to view this approach as reductionist and failing to capture important elements of human flourishing. Relative approaches to poverty have instead tended to point to culturally specific resources for the fulfilment of needs and to mechanisms to facilitate social participation, whereas from an absolute standpoint the problem of poverty relates more to what is necessary for biological survival.

Looking to the comparative study at hand, the US takes a more absolutist approach to defining and measuring poverty than the UK. Its primary poverty measurement—the 'budget line' developed by Orshansky in 1963 and still used by the Social Security Administration—is based upon food expenditure and is considered to be a 'subsistence' measure (United States Census Bureau, 2014; Lister, 2004). The UK has favoured a more relativist approach, combining understandings of poverty with social exclusion (to be discussed below) to conceptualise poverty in terms of limitations on the ability to participate in society in which one lives. This difference has implications for the types of needs that are prioritised and made into objects of policy in the two countries.

2.4 Social Exclusion

Social exclusion refers to a way of conceptualising deprivation that is focused on dynamic, relational, and participatory aspects of disadvantage. The Centre for Analysis of Social Exclusion at the London School of Economics defines an individual as socially

excluded 'if he or she does not participate in key activities of the society in which he or she lives' (Burchardt, LeGrand, and Piachaud, 2002). In its original conception, social exclusion referred to '*les exclus,*' or those who had fallen through the cracks of the systems of protection within the French welfare state (Silver, 1994, p. 532). It has since evolved into a multifaceted concept that has gained both academic and political attention, particularly in Europe (Daly, 2010). Silver (1994) developed a threefold typology of welfare states' approaches to social exclusion. Within this framework (which shares many features with Esping-Andersen's 1990 typology of welfare states), both the US and the UK are described as belonging to the 'specialisation' paradigm. This is a liberal, individualist paradigm that emphasises personal responsibility; exclusion arises out of discrimination that 'denies individuals full access to or participation in interaction and exchange' (de Haan, 1999, p. 13). The relationship between poverty and social exclusion has been debated extensively in the literature (Lister, 2004); here, they will be treated as distinct but related concepts. A key distinguishing feature is that while poverty is fundamentally concerned with a lack of resources, social exclusion is dynamic, describing a *process* of exclusion and relational, pointing to actors that are part of the process of exclusion (Atkinson and Hills, 1998). It is also relative: people are excluded within the context of a particular society (Atkinson and Hills, 1998). Social exclusion, as a concept, is broader than exclusion from social citizenship. However, the two concepts are related, particularly through social rights; Twine (1992) notes that social rights are 'a central element required for social inclusion and participation' (p. 166).

Homeless people are socially excluded, not only because of their lack of shelter or resources but also through social processes and discrimination that cause them to be 'generally excluded from participation in a wide variety of social interactions, practices and spaces that other citizens take for granted' (Whiteford, 2011, p. 46). As such, a country's approach to social exclusion also affects its approach to services for homeless people, including those to meet basic needs. The conceptual relationship between social exclusion and services to meet basic needs can be imagined in several ways. On the one hand, needs for food, water, and sanitation may be considered so fundamental that the inability to fulfil them is easily recognisable as a form of exclusion, particularly in

developed Western contexts. On the other hand, scholars have suggested that the concept has risen to prominence with poverty 'out of political favour' (Daly, 2010, p. 146), and policymakers have used the concept to shift discussions away from the material aspects of poverty, with the result that 'poverty, the real and nasty poverty, becomes invisible' (Oyen, 1997, p. 64). By placing an emphasis on highly contextual features of exclusion, social exclusion may, alternatively, draw attention away from basic needs.

2.5 Conclusion to Chapter Two

The literature on social citizenship, as it has developed in contemporary Western welfare states, illustrates that these states have developed in order to provide for individual freedoms as well as the health, well-being, and economic security of their citizens. They have also developed different ways of understanding and ameliorating the conditions of groups that are socially excluded, in poverty, or otherwise marginalised. Depending on the characteristics of this group, providing services to people who are in poverty or, in this case, experiencing homelessness may conflict with citizens' obligations to contribute to the welfare state under the social citizenship relationship that emphasises rights and responsibilities.

Additionally, in developed cities, basic needs are most often provided for through individuals' private incomes and consequent abilities to provide for their basic needs in private, residential settings. Within such a system, providing for the basic needs of people experiencing homelessness poses a particular challenge and has not been thoroughly investigated. This study aims to address this gap in the literature by applying the concepts of social and civil rights along with notions of responsibility and social exclusion to an under-theorised area of research—services to meet the basic needs of homeless people. Conceptualising services to meet basic needs as social rights, it examines how these services have been provided under city governments in developed contexts and how different understandings of rights, as well as poverty, social exclusion, and responsibility, have affected this provision. It will also explore how these findings have implications for the delivery of social services and for city governments as they tackle the policy challenges of homelessness. The next chapter outlines the comparative research design and methods employed for addressing these issues.

CHAPTER 3: RESEARCH DESIGN AND METHODOLOGY

3.1 Overview

This study analyses the ways in which the cities of New York and London in the US and UK, respectively, approach the provision of services for the basic needs of people experiencing homelessness. In particular, it seeks to investigate the role that the relative salience of social rights plays in these decisions. Interviews with key informants, as well as the analysis of policy documents and 'grey' literature, will provide evidence for the comparative case study of two cities. What follows is a brief overview of the comparative method and the research design employed in this study; justifications and important focal points within the selected case studies; and a description of the methods used for data collection and analysis.

3.2 The Comparative Method

The overarching framework of this study is a comparative one in which key differences at the macro level will be studied for their effects on outcomes at the micro level (Przeworski and Teune, 1970). In this case, two systems of city governance and welfare provision will be analysed in order to understand the provision of services to meet the basic needs of homeless people, using a theoretical framework drawn from social citizenship. A 'small-n' qualitative case study design is well-suited to the analysis of complex concepts and relationships, allowing the researcher to 'match background understandings of concepts with fine-grained evidence from cases' (Mahoney, 2007, p. 127). This study will not endeavour to establish a strict or exclusive causal relationship between social rights and the provision of services for basic needs for homeless people; instead, it will explore the ways, if any, in which the salience of social rights can be seen to have an effect alongside other factors on how the two selected cities approach the provision of services to meet basic needs. It deals with the connections between complex concepts, including social citizenship, rights, needs, and social exclusion, and therefore benefits from 'the intensive comparative analysis of a few cases' (Lijphart, 1975, p. 685). A qualitative case study approach allows for the unpacking of 'how' and 'why' questions that emerge over the course of the study (Denzin and Lincoln, 2013).

There are a number of different approaches to the comparative method, each designed to facilitate interpretation of and, in some cases, the drawing of causal inference from, observed variations or outcomes of interest. This study's design will approximate Przeworski and Teune's 'most similar systems' design, which is based on Mill's 'method of difference' (Przeworski and Teune, 1970) (Mill, 1843). The most similar systems design is premised upon 'choosing as research sites political systems that are similar (or identical) on as many variables as possible, with the exception of the phenomenon to be examined (whether it is a single variable or a relationship between some traits)' (Frendreis, 1983, p. 260). Ideally, the similar features of the two systems 'will be "held constant" and cannot be adduced as causes of any differences between them' (Przeworski and Teune, 1970, p. 292). In this study, many of these factors will be 'controlled for' by comparing within the liberal welfare regime. The key difference will be the salience of social rights within different countries within that regime. As a design, the most similar systems method is considered to be appropriate 'if there is an *a priori* belief that the dependent variable or relationship does display variation' (Frendreis, 1983, p. 263). In the case of the present study, the literature provides support for the idea that the US and the UK have developed distinct approaches to social rights (King, 1999; Mann, 1987). One drawback of the most similar systems design is thought to be that it 'discover[s] relationships that are limited to the similar systems' (Lijphart, 1971, p. 266). However, rather than generalisability, qualitative research can aim to achieve *transferability*, facilitating further research by providing sufficient detail for other researchers to make connections and assess the implications of its conclusions for other settings (Lincoln and Guba, 1985). By providing a detailed comparative case study, this research aims to provide such a foundation for future inquiry.

The selection of cases has been attended to carefully, in order to ensure that analytically sound conclusions can be drawn from the research (Ragin, 1997). Mill's (1843) and, to a lesser extent, Przeworski and Teune's (1970) prescriptions for the most similar systems design represent an ideal design which, to be strictly adhered to, would require cases to be identical in every respect except for the dependent variable (Goldstone, 1997). Thorough attention has been paid in the selection of cases that will minimise variation on important dimensions. Accordingly, New York and London have

been chosen as similar systems for comparative analysis; the characteristics of each city's national context have also been considered as part of the process of selection. At both the city and the national level, the two cases retain important economic, political, and cultural similarities while differing with respect to the salience of social rights. The following sections will outline in greater detail the basis for this comparison at both the national and the city level.

3.3 Comparing the US and the UK

While the units of analysis in this study are cities, the national welfare state in which each is embedded is a constitutive element of the comparison. The US and the UK are both highly developed liberal market democracies and have historically been dominated by a two-party political system (Alesina and Glaeser, 2004). Importantly for the purposes of this study, social policy scholars have also identified the two countries as taking broadly similar approaches to the provision of welfare. Under Esping-Andersen (1990)'s seminal typology of the welfare state, the US and the UK are both categorised as examples of the 'liberal' welfare regime, characterised by minimal state intervention; low levels of decommodification; and a reliance on means-tested rather than universal welfare programmes. The similarities between the UK have been reiterated by subsequent re-evaluations of welfare state typologies (Korpi and Palme, 1998), and both countries are considered to have 'liberal' rather than 'coordinated' market economies in the varieties of capitalism literature (Hall and Soskice, 2001).

However, as was alluded to in the literature review, the two countries have taken different approaches to social rights, which have achieved greater salience in the UK than in the US. While the two countries retain similarities in their liberal approach to government and the welfare state, social rights are ideologically and institutionally embedded to a greater degree within the UK welfare state (Mann, 1987). Further evidence of this distinction has been provided through comparative studies that examine the greater development of social rights such as health care in the UK as well as greater overall social expenditure (Bambra, 2005; Walker, 2005). The US has instead developed a stronger tradition of civil rights, characterised by a focus on individual freedoms and limiting government interference (Friedman, 1990; Katrougalos, 2008; Loury *et al*.,

2005). These contrasting approaches to rights will serve as the key difference in the comparative design employed. Controlling for factors such as the state's overall approach to welfare provision as well as the relationship between state and market by comparing within the liberal welfare regime allows for the effects of the salience of social and civil rights to be observed more clearly than if these factors differed.

Within the comparative methodology, there is a risk that, in order to justify the comparative design, key similarities and differences may be over-emphasised at the expense of other, potentially confounding, characteristics. In the case of the US and the UK, for instance, Hopkin (2010) points out that comparisons of the two countries have tended to gloss over their often substantial differences: 'parliamentary *versus* presidential government, monarchy *versus* republic, medium-small population *versus* large population, relative ethnic homogeneity *versus* ethnic heterogeneity' (p. 293). Understanding this challenge, this study evaluates the case sites along the dimensions that are important for the development of a robust comparative study while acknowledging potential alternative influences and explanations where relevant.

The decision to compare the US and the UK rather than other countries that have also been classified under the 'liberal' regime type is based on several factors, but on three in particular: First, the two countries share some anomalous macro-economic characteristics, including historically high levels of economic prosperity; leadership roles within the global economy; similar rates of unemployment; and high levels of inequality (as measured by the GINI coefficient) (International Monetary Fund, 2014; The Equality Trust, 2011). In addition to these political and economic factors, the US and the UK share a common language, partake in a shared cultural heritage, and have maintained particularly close international ties (Loury *et al*., 2005). Third, they are home to cities (New York and London) whose size, affluence, and importance as global urban centres is not matched by other cities within the liberal welfare regime. New York and London serve as uniquely well-matched case studies for homelessness and the provision of services at the margin of highly developed urban centres, for reasons that will now be expounded in greater detail.

3.4 Comparing New York and London

The national welfare systems of the US and the UK form the context for the cities that will ultimately serve as the units of analysis, New York and London. In order to adhere to the 'most similar systems' design, it was important to select cases that both retain the key similarities and differences at the national level, and are also sufficiently similar to each other to facilitate comparison.

City governments are, in many ways, products of their national governments, but the extent to which a city represents its national model (Teune, 1997). For the purposes of this comparative study, it was important to find cities that do not deviate from the key similarities the two countries have as liberal welfare regimes, nor from their different approaches to social rights. Both New York and London embody important characteristics of the American and British political and economic systems respectively. Each serves as a cultural and economic centre of its country, and maintains a liberal democratic structure of governance and a market economy with a low level of regulation (Glover, 2014). On the basis of the available evidence, each city embodies its national approach to social rights. Examining the major categories of social rights, both cities operate systems of health, welfare, and education that are directly derived from or consistent with national structures. Both cities have been models of national development or adoption of social programmes, in welfare more broadly as well as homelessness specifically (Youdelman and Getsos, 2005; Department for Communities and Local Government, 2011; Greater London Authority, 2013). Chapter Four will outline in greater detail how each city has reflected or even emblemised national policy responses on welfare and social policy issues.

As cities, New York and London provide robust cases for comparison. With populations of approximately 8 million people, each is the largest city in its country. Each is also the wealthiest major city, with financial services as its leading industry, and is marked by high levels of inequality (Berube, 2014; Centre for Labour and Social Studies, 2012). Both also possess highly developed urban infrastructure, including transport systems and public resources such as parks. This is particularly relevant to homelessness and rough sleeping, because these structures serve not only as public goods for city residents but also as sites where rough sleeping can potentially be

monitored and policed (Feldman, 2004). Finally, and most importantly, each city has had to contend with large-scale homelessness and has developed a comprehensive homelessness 'sector' of public and voluntary providers to respond to the problem. These two sectors are the largest of their kind, and are more similar to each other than to any other within the liberal welfare regime. Other studies have noted that comparing New York and London 'minimizes differences in economic structure, to the extent that these can be minimized in cross-national research' (Model, 1997, p. 542), and several have relied on comparative studies of New York and London to analyse issues related to basic needs and homelessness in the urban environment (Abrams and Christian, 2004; Cohen, 1994; Libman, 2012).

For the research questions being addressed, cities constitute the appropriate level of analysis, as it as this level of governance that the vast majority of policy decisions related to homelessness and the provision of services for basic needs are taken. This is even more the case for services for basic needs than for other policy areas (such as housing); decisions about the provision of emergency food or the construction, maintenance, or closure of public toilets, for instance, fall to the local rather than the national level. Comparative social policy research has tended to focus on countries as the unit of analysis (Teune, 1997). However, Przeworski and Teune (1970) maintain that 'in comparative research, we are concerned with studies in which analysis proceeds at multiple levels' (p. 37), and Teune (1997) adds that the appropriate unit of analysis, or 'macro level,' in a comparative study depends upon the outcomes of interest. Other scholars have noted that the comparative study of sub-national units of analysis has been overlooked despite the fact that to undertake such analysis 'makes it easier to construct controlled comparisons' (Snyder, 2001, p. 95) and to maintain analytical focus (Lijphart, 1975). In the present case, the research calls for attention to policy decisions at the level of city governance, allowing the study to address this methodological gap in the literature.

3.5 Research Methods

The methods used for the collection and analysis of data will now be outlined. The primary data employed in this study consists of semi-structured interviews with

experts in city governance and the homelessness sector. This was complemented by an analysis of policy documents and 'grey' literature related to homelessness and services for basic needs.

3.5.1 Interviews

Sampling: Interviews were sampled purposively in both cities in order to reach respondents whose perspectives could speak most closely to the research question (Bryman, 2008). A breadth of perspectives was sought in order to understand different parts of the policymaking process as well as the interests of different actors. Accordingly, interviews in each city were 'triangulated' among city government officials, service providers, and advocacy groups (Lincoln and Guba, 1985). These categories are permeable, and there was some overlap (for instance, among service providers that also engage in advocacy campaigning, such as Crisis and Thames Reach). In New York, some of these contacts were made through previous work experience with a non-profit organisation in the homelessness sector. Interviewees were also identified through reports or policy documents as actors that had been involved with major homelessness and service provision initiatives in each city. Altogether, twenty-four interviews were carried out: thirteen in New York and eleven in London. In New York, these consisted of representatives from, on the side of city government, the Department of Homeless Services, the Department of Health, the Metropolitan Transportation Authority, and the Center for Innovation through Data Intelligence. In service provision, interviews were carried out with the Bowery Residents Committee, BronxWorks, and Pathways to Housing, and in advocacy, with the Coalition for the Homeless, the Urban Justice Centre, and Picture the Homeless (where a civil rights committee meeting was observed in lieu of an individual interview). Interviews in New York were conducted in September 2013.

Based on the interviews carried out in New York, efforts were made to ensure that a similar range of expertise was consulted in London. Fieldwork in London was carried out primarily in October and November 2013, and consisted of interviews with the following groups: in city government, members of the Greater London Authority and the London Assembly, as well as city councillors from Westminster and Richmond, were

interviewed. Service providers included No Second Night Out, Thames Reach, Crisis, and St. Mungo's. Among advocacy groups, representatives were interviewed from Groundswell, Housing Justice, and the UK Common Rights Project. The result of this was a largely well-balanced sample, with one difference being that most of the government officials interviewed in London were elected officials whereas those interviewed in New York were for the most part appointed department executives. A list of the organisations interviewed is also provided in Appendix Three.

Procedure: Most interviews were carried out in person (face-to-face) and audio-recorded. In two cases, interviews were carried out by phone; in two others, respondents requested that audio recorders not be used. Detailed notes were taken instead in these instances. Interviews lasted approximately one hour and followed semi-structured topic guides (a sample topic guide is included in Appendix One). Topic guides followed slightly modified formats depending on where respondents fell within the triangulated structure of interviewees. All respondents were asked about homelessness in their city and the dynamics and challenges of their work; about policy developments or major changes in the field of homelessness services; and about the city government's role in addressing the problem of homelessness. More individualised questions were directed at respondents' particular experiences. These were largely 'content mapping' questions that attempted to open up the scope of the research and ascertain the key issues at play (Legard, Kegan, and Ward, 2003). More in-depth questions were then directed during the interview towards ideas that emerged from interviewees' responses. Legard *et al.*'s (2003) delineation of 'amplificatory,' 'classificatory,' and 'explanatory' prompts helped to guide efforts to probe for greater detail, conceptual clarity, and the reasoning behind interviewees' views and assertions. This approach was intended to facilitate comparisons across interviews while allowing for exploration of emerging themes more easily than a strictly guided (or 'structured') interview (Eisenhardt, 2002). Consent procedures were followed in accordance with the elite interview protocol laid out by Oxford's Central University Research Ethics Committee (CUREC). Audio recordings of interviews were transcribed with respondents' identifying information removed.

Analysis: Interview data were analysed through a process of qualitative coding. This was carried out manually on printed interview transcripts. This process can

helpfully be described through Spencer, Ritchie, and O'Connor's (2003) account of qualitative data analysis as moving first through a phase of 'data management' on to the creation of 'descriptive accounts' and finally 'explanatory accounts.' The first stage—data management—began with reviewing the themes and concepts that guided the design of the research project; organising the 'raw' findings by assigning codes to data; and, finally, sorting and summarising these codes. The analysis was carried out with an eye for *within-case* and *between-case* comparisons (ibid.). In practice, this involved looking for meaningful differences or similarities both within each city (between service providers, advocacy groups, and city government officials) and also cross-nationally—comparing, for instance, advocacy groups in New York with their London counterparts. Coding was in itself a multi-stage process; codes were first derived both from the research questions and theory and, in later stages, also incorporated ideas that appeared and recurred within the data (Morse and Richards, 2013). The index of codes (some of which were 'in-vivo' codes using respondents' own language) can be found in Appendix Four. Descriptive accounts were formed by refining categories and looking for patterns (for instance, the persistence of discourses about (not) 'enabling' rough sleeping among UK service providers). Finally, explanatory accounts were developed, in this case by linking findings and patterns from the data to the theoretical framework of social citizenship and services to meet basic needs.

3.5.2 Documentary Analysis

Procedure: Evidence was also drawn from the analysis of documents, which consisted of relevant legislation and policy documents as well as 'grey' literature such as organisational reports. This was intended both to support and to cross-check the interview findings, as well as to fill in any gaps in the evidence provided by the interviews. It allowed for a comparison of experts' subjective reflections with 'official' rhetoric and policy developments. A full list of the documents analysed can be found in Appendix Three. 'Overview' documents of organisations such as annual reports were reviewed for their information about organisations' philosophies and approaches to service provision; where multiple documents were available, priority was given to more recent reports. Where organisations had produced a large number of publications (which

was common among UK service provider/advocacy groups such as Crisis, Broadway, Shelter, and St. Mungo's), those documents were selected which were most relevant to the research question at hand (for instance, those that dealt specifically with rights or with services to meet basic needs).

Analysis: As with the analysis of interview data, the documentary analysis in this study was not a linear process but rather was used to inform various phases of inquiry. A large number of the documents in question were read in earlier stages of the study to provide background knowledge as well as possible interview contacts. They were then revisited in a formal, analytical manner after the interview data had been analysed, with the index of interview codes serving as a map to guide a second and more thorough reading of the documents. Areas where there was support for, or conflict with, interview findings were assessed as descriptive and explanatory accounts were developed. The documentary analysis drew from elements of content analysis, discourse analysis, and policy analysis (Spencer *et al*., 2003), seeking to identify the key factors in decision-making related to the provision of services for basic needs. Evidence of the influence of social rights on the provision of services to meet basic needs was assessed through several factors. These included references to welfare state involvement in the provision, regulation, or funding of these services; the expansion or restriction of entitlement to services; responsibilities and conditionality; and the importance assigned to services to meet basic needs. The classification of formal approaches to documentary analysis has been debated, with Tesch (1990) distinguishing between those preoccupied primarily with the use of language and those concerned primarily with interpretative approaches to the data. The focus of this study falls primarily in the latter camps, with an emphasis on the analysis of the policy documents in order to understand embedded notions related to rights and social citizenship.

This study was at times limited by the quality, availability, and comparability of data on services to meet basic needs. This was primarily a result of the fact that services for basic needs do not constitute a substantial area of policy analysis or deliberation for most city governments, and as such the amount of straightforward 'policy' literature in these areas was limited. Where comprehensive documentary evidence was available (such as the comprehensive 2006 and 2011 reports on public toilets produced in

London), this evidence was not necessarily matched in the comparison case site. For this study, information could be gathered about the selected cities' approaches to services for basic needs from the way this issue was addressed in other types of reports, such as those advising on strategies for dealing with rough sleepers. However, there is a need for future research and data collection that documents the availability of services for food, water, and sanitation, as well as their accessibility to homeless people. This would be a valuable resource both for researchers investigating services to meet basic needs and policymakers and service providers looking to improve homeless people's access to these services.

3.6 Conclusion to Chapter Three

The research design was selected intentionally to facilitate early-stage theory development in an under-explored area of research, an endeavour which is 'grounded in certain methodological techniques' including 'the use of highly contextualised comparisons' (Mahoney, 2007, p. 126). In light of the fact that services to meet basic needs have not been studied in great depth within the literature on homelessness, social rights, and city governance, the interpretive account offered is intended to contribute to the body of knowledge and theory-building in this emerging area. This study will provide theoretical contributions in the areas of civil and social rights, basic needs, and the operation of the welfare state at the city level. It will also assist in the development of practical applications to service delivery and city governments' approaches to the basic needs of people experiencing homelessness. There are numerous ways in which the issues explored in this thesis lend themselves to consideration by other researchers. These directions for further research will be discussed in the study's conclusion in Chapter Seven.

CHAPTER 4: LANDSCAPES OF SERVICES AND POLICIES

4.1 Overview

The following chapter presents background information that will serve as a foundation for the study's findings, beginning with a historical analysis of policy developments in homelessness in each city. It then sets out a description of the framework of services within each city's homelessness sector. The final section of the chapter introduces the study's preliminary findings, outlining the extensiveness and availability of services to meet basic needs in each city. This will serve as a basis for the discussion of the role of social rights and civil rights in this provision in Chapter Five. The temporal horizons of this study are not strictly defined but begin in the mid-to-late 1990s, when political developments were taking new directions in both countries following the radically conservative legacies of Thatcher in the UK and Reagan in the US, and conclude in early 2014. The coming to office of New Labour in 1997 and, in the US, the election of Bill Clinton in 1996 both represented relatively new approaches to the provision of welfare, emphasising, respectively, 'active citizenship' and personal responsibility (King and Wickham-Jones, 1999). Examining policy developments within the last fifteen to twenty years serves as a window that is wide enough to provide historical context but narrow enough to fit within the practical limitations of the study. There are minor differences in the historical accounts provided for each city; first, the discussion of homelessness policies in New York goes back slightly earlier to account for the development of major institutions and case law, primarily the Department of Homeless Services in 1993 as well as the litigated 'right to shelter' in 1981 (Institute for Children, Poverty and Homelessness, 2014). Additionally, because homelessness has been a greater policy priority at the national level in the UK than in the US, the overview of policies affecting homelessness in London includes more discussions of national politics than that in New York. In both cases, greater emphasis will be placed on more recent policy developments that have had a more immediate effect on homelessness services.

As with measures of the homeless population, it is difficult to compare expenditure on homelessness services across the two cities. The New York City

Department of Homeless Services had a budget of $801.8 million in 2013, representing most, but not all, of what might be considered homelessness expenditures in New York (The Council of the City of New York, 2013). Due to the decentralisation of administration of services in London, aggregate measures of expenditure on homelessness are difficult to calculate; in addition to centralised funding, local authorities spend money on temporary accommodation, prevention, and administration of homelessness services (Department for Communities and Local Government, 2012). This study will therefore focus on outcomes beyond expenditure totals in order to illustrate the extent of service provision. Homelessness services are situated within the 'mixed economy of welfare,' in which the state not only provides some services directly but also functions as a funding and/or regulating body with respect to services from non-state providers (Powell, 2007). Both of the selected cities have developed comprehensive systems of public, private and voluntary sector provision in response to the problem of large-scale homelessness, though this has taken slightly different forms in each city.

In order to contextualise the provision of services to meet basic needs, this section begins with a historical analysis of policies related to homelessness in each of the two selected cities, including political developments, preventative measures, and relevant legislation and case law. This is followed by a discussion of the structure of the broader homelessness sector in each city. Each of these contributes background information that sheds light on the ways that the selected welfare states have approached the problem of homelessness, which has implications for their approaches to services to meet basic needs. The last part of the chapter begins to introduce the study's findings through an overview of services to meet basic needs for homeless people in each city. The empirical findings will be continued in greater depth in Chapter Five, where they will move from a descriptive account of services provided to discuss the evidence of social rights and civil rights' influence on this provision.

4.2 Homelessness Services and Policies in London

4.2.1 Historical Analysis (London)

There is overall a stronger social assistance safety net designed to prevent and respond to homelessness in London than in New York (Stephens and Fitzpatrick, 2007).

This includes greater availability of social housing, provision of housing advice services for people at risk of homelessness, and a legislative right to temporary accommodation for homeless people who are deemed to be unintentionally homeless and in priority need. The UK has historically had comparatively strong provision for housing. Social housing accounts for approximately 20% of the rental sector (compared to 1%-3% in the US), and the government also provides rental subsidies and other assistance (such as tax reductions or assistance with heating costs) in the form of the Housing Benefit and similar programmes. Local authorities also have an obligation to provide assistance and advice to all people facing homelessness, through Housing Possession Court Duty Schemes or similar services (ibid.).

The UK's statutory right to housing is unique even within Europe (Minnery and Greenhalgh, 2007). The Housing Act 1996 (Part 7) creates a statutory obligation on local authorities in England and Wales to provide advice and assistance to homeless people, with a further obligation to provide housing for those who are deemed to be in priority need. This status is determined by several factors, including a person's eligibility for benefits, level of vulnerability, and whether they are determined to have become homeless voluntarily or involuntarily (Housing Act, 1996). Priority need is automatically granted to young people; people who are pregnant or have dependent children; and people who have lost their homes through natural disasters (Crisis, 2014). This legislation was amended in 2002 to expand the obligation on local authorities. In addition to the obligation to re-house statutorily homeless people in priority need under the Homelessness Act 2002, under the Homelessness (Priority Need for Accommodation) (England) Order 2002, local authorities were required to develop a 'homelessness strategy,' including both preventative and ameliorative homelessness services. The 2002 amendments also extended the priority need categories (Johnsen and Fitzpatrick, 2008).

These are 'complex and qualified rights' (Dean, 1996) and, in practice, do not provide sufficiently comprehensive protection to prevent homelessness from occurring altogether nor to immediately respond to and ameliorate its effects. Respondents from the London homelessness sector described the homelessness legislation as 'pretty weak' with regards to protection for single adults, and the housing advice services offered as

'tokenistic' and 'done badly, too often.' Research has pointed to the fact that the UK system can have exclusionary effects for those who choose not to present themselves to the local authority or do not fall within categories of priority need (Minnery and Greenhalgh, 2007). Furthermore, recent reforms of the welfare system, including cuts to Housing Benefit, are seen by some to mark a turn away from the government's commitment to housing, and agencies within the homelessness sector have predicted that such structural changes will result in increases in homelessness if government action is not taken to remedy the consequences (Fitzpatrick *et al.*, 2013; Homeless Link, 2010).

In addition to these preventative and legislative structures, there have been numerous government initiatives to address homelessness and rough sleeping. Rough sleeping in particular 'has been a policy priority in England since 1990' (Johnsen and Fitzpatrick, 2008, p. 193). After being elected in 1997, the New Labour government established its Social Exclusion Unit (SEU) in order to develop 'joined-up solutions' to interconnected problems of poverty and social exclusion. Rough sleeping was an early priority for the unit, and in 1999 a Rough Sleepers Unit (RSU) was formed within the SEU. The RSU set out a national strategy for dealing with rough sleeping through the publication of a report entitled *Coming in From the Cold* (Department for Communities and Local Government, 1999). Louise Casey, who had previously served as the director of the homelessness charity Shelter, was appointed as the head of the unit and set a target of reducing the number of rough sleepers in England by two-thirds before April 2002, which was reached by November 2001 (Randall and Brown, 2002).

New Labour's approach to rough sleeping was characterised not only by attention to social exclusion but also an emphasis on 'active citizenship' and personal responsibility (Taylor-Gooby, 2009). Policies were thus designed to assist rough sleepers while rehabilitating them back into productivity and social engagement. Casey in particular was vocally critical of charities that could be seen as 'perpetuating' homelessness by providing services such as food and water without conditions and/or connections to other services (BBC News, 1999a). In 2000 a public awareness campaign called 'Change a Life' was launched to encourage the public to donate money to homelessness organisations rather than giving to individuals on the street. Through the Home Office's Anti-Social Behaviour Unit, the New Labour government also began to

address problems of ‘street culture’ in tandem with efforts to end rough sleeping, most controversially through the publication of a green paper on ‘Respect and Responsibility: Taking a Stand Against Anti-Social Behaviour' (Home Office, 2003). In 2008 a new strategy—*No One Left Out: Communities Ending Rough Sleeping*—was developed that maintained political priority for rough sleeping while emphasising new trends towards flexibility, personalisation, and localisation of services (Department for Communities and Local Government, 2008).

Although the Coalition government came to office in 2010 under more austere economic circumstances and with different ideological objectives, many features of homelessness policies have remained constant across administrations. Rough sleeping has remained a political priority both nationally and in London. The most significant policy advancement since 2010 has been the nationwide implementation of the No Second Night Out programme developed under Boris Johnson, who campaigned to be Mayor of London on a platform of ending homelessness and since being elected has taken a more active interest in the issue than his New Labour predecessor, Ken Livingstone. No Second Night Out is an outreach and assessment programme that targets early rough sleepers (ideally on their first night sleeping out or soon after) through rapid intervention. Johnson was also instrumental in the development of the London Delivery Board, which joins together voluntary and public sector representatives to develop strategies to end rough sleeping. In 2009 Johnson agreed to—and later failed to meet—a target proposed by leaders in the homelessness sector of eliminating rough sleeping in London by 2012 (Copley, 2012; Homeless Link, 2009).

Overall it can be seen that initiatives to address homelessness in general, and rough sleeping in particular, have received broad-based political support from national administrations in the UK dating back to New Labour (Randall and Brown, 2006). This support is reflected in legislative initiatives; verbal and rhetorical assertions of the importance of tackling rough sleeping and affirmations of the efforts of service providers; and financial and programmatic resources devoted to addressing homelessness. A report from St. Mungo’s in 2011 reflects confidence that the government is attentive to and ‘understands’ the problem of homelessness:

> We know that this Government is acting to prevent anyone from spending a second night on the streets and this approach seems to be having results. Progress made by the Ministerial Working Group on Homelessness…demonstrates that the Government understands that there is no one solution to the crisis of homelessness. (St. Mungo's, 2011, p. 5)

While reports such as the above are written with an eye to their audience, this view was also reflected in respondents' (primarily service providers') reflections upon the role of government in interview settings. In discussing their relationships with the government officials, they described a 'very direct commitment' from both the national and local government, and officials who 'work closely' with service providers to address homelessness (London service providers). The study will now move to a discussion of the major actors in London homelessness sector in greater depth in order to provide a broader layout of homelessness services before honing in on services to meet basic needs more specifically.

4.2.2 London Homelessness Sector

The political climate has given rise to a large homelessness sector in London that is dedicated to tackling rough sleeping with a strong culture of 'ending, rather than enabling' the problem. Within the London homelessness sector, the majority of services are provided by large commissioned organisations, including Crisis, Shelter, Thames Reach, St. Mungo's, and Broadway (the last two of which have over the course of this thesis merged to become St. Mungo's Broadway). Most of these organisations were represented in the interviews carried out for this thesis. Respondents reported that, in spite of competition for government contracts and funding, there was a general spirit of collaboration between organisations and a sense of working towards the common goal of ending homelessness in London. Services are commissioned by local authorities, and the London Delivery Board, which consists of key stakeholders from the government and voluntary sectors and is chaired by the Mayor's Housing Advisor, serves as a central body for planning and oversight of homelessness policies and services (London Assembly Health and Public Services Committee, 2011).

The major service providers differ in some respects, including the primary populations they serve (such as single homeless people at Crisis and homeless families at

Shelter) and the types of accommodation and/or services provided. Nevertheless, they share many significant common features and adopt broadly similar notions of what constitutes quality service provision. Common themes include the desirability of prevention and early intervention for rough sleepers; the 'joining-up' of treatment and accommodation services; the 'personalisation' of treatment plans; efforts to engage with and incorporate feedback from service users; high-quality physical environments; and individualised, multi-dimensional conceptualisations of client progress. One example of the latter is the St. Mungo's 'outcomes star,' which assess progress in a variety of areas including managing mental health, relationships, addictive behaviour, and identity and self-esteem (Sitra, 2013). As mentioned above, the most recent and widely-adopted anti-homelessness initiative—currently operating across all London boroughs—is the outreach programme No Second Night Out (NSNO). NSNO targets early rough sleepers in particular and emphasises early and aggressive outreach with rapid assessment through 'hubs' that are open 24 hours a day, 7 days per week.

There are also a number of advocacy groups working in London to represent and advance the concerns of homeless people (including, but not exclusively, rough sleepers); these include Groundswell, Housing Justice, the Pavement, the Simon Community, and others. Many advocacy groups also engage in some form of service provision, whether for food and laundry (the Simon Community); mentoring and befriending (Housing Justice); or peer health services (Groundswell). Some, such as Groundswell, were founded by homeless people themselves and many are coalitions of homeless and formerly homeless people as well as other staff.

Compared with New York, fewer advocacy groups adopt 'rights-based' platforms, instead focusing their efforts on the quality, accessibility, and availability of services. The reasons for this difference have much to do with each city's unique approach to rights and social citizenship, and will be explained in greater depth in Chapter Five. Groundswell's mission statement, for instance, is 'to enable homeless and vulnerable people to take more control of their lives, have a greater influence on services and to play a fuller role in our community' (Groundswell, 2014). A few examples of rights-based advocacy efforts have emerged from collaboration between groups such as Housing Justice, the Simon Community, the Pavement, and the human rights

organisation Liberty. Together these organisations produced the Rights Guide for Rough Sleepers, a pamphlet for distribution to rough sleepers concerning their rights when faced with law enforcement. Several of these groups were also involved in the launch of the UK Common Rights Project in December 2013, bringing together stakeholders in the UK to campaign for the rights to shelter, food, water, and sanitation under the International Covenant on Economic and Social Rights and the Universal Declaration of Human Rights.

For the most part, the landscape of homelessness services in London is dominated by large, professionalised service providers and early-intervention outreach services against rough sleeping. Stand-alone services to meet basic needs have been de-emphasised in favour of those that join up this provision with services for housing, employment, education, and other needs as well as food and sanitation. The reasons behind and consequences of this adversarial relationship will be discussed in greater depth in Chapter Five. Before delving into this analytical material, however, the next section will review homelessness services and policies in New York.

4.3 Homelessness Services and Policies in New York

4.3.1 Historical Analysis (New York)

New York operates a larger system of public housing than any other US city (New York City Housing Authority, 2014), though this level of provision is still lower than in London (Stephens and Fitzpatrick, 2007). In keeping with the overall nature of the US welfare state, New York's anti-poverty programmes are largely limited and means-tested. Health insurance for low-income people is available through Medicaid, though studies have documented the difficulties faced by homeless people in accessing health insurance and their over-use of emergency care (Kushel, Perry, and Moss, 2002). The federal government provides some funding for homelessness shelter programmes under the 1987 McKinney-Vento Homeless Assistance Act, and the federal Department of Housing and Urban Development plays a role in developing housing policy and funding implementation at state and local levels (Cohen, 1994; United States Department of Housing and Urban Development, 1987). Overall, with respect to housing, health and social security, the safety net is weaker in New York than in London, and homeless

people have fewer entitlements from the state (Stephens and Fitzpatrick, 2007; Cohen, 1994). However, key policy developments in New York have ensured that homelessness has nevertheless been the object of considerable attention and resources since the 1980s.

New York operates under a 'strong mayor' system under which the mayor wields a large amount of policy power (Black and Burstein, 2013). Also within the centralised structure are the City Council representing 51 community districts and citywide departments (including the Department of Homeless Services). Although the city is divided into five boroughs, the elected Borough Presidents exercise relatively little political power. Local community districts function mostly to advise the City Council (Libman, 2012). The mayor of New York therefore plays the largest role of any elected official in shaping homelessness policies in the city, and shifts in ideological and pragmatic approaches to homelessness can be examined most easily across mayoral administrations. This is in contrast to London's decentralised model of city governance, in which the borough councils of the thirty-two London boroughs are the primary local authorities in the delivery of services and the central Greater London Authority (GLA) is charged primarily with planning and oversight.

The city's unique homelessness policy trajectory began under Ed Koch, who served as mayor from 1978 to 1989. In the 1980s, homelessness in New York increased dramatically, a crisis the Koch administration addressed through opening 'welfare hotels' (or temporary accommodation for homeless families) and large-scale congregate shelters in which multiple people share a room. These forms of accommodation quickly became known for their poor condition, an issue that was ultimately taken up by homelessness advocates in the courts. In particular, the situation of homelessness services in New York has been dramatically shaped by a series of litigations beginning in 1981 with a case brought by the Coalition for the Homeless entitled *Callahan v. Carey*. The case was settled through a consent decree in which the city was ordered to provide space in a shelter for every homeless man. The right to shelter was extended under a subsequent case, *McCain v. Koch*, which was first brought in 1983 and appealed in 1986, and a preliminary injunction filed by the Legal Aid Society in 1984, the right to shelter was expanded. The new litigation expanded the right to shelter include all homeless people and also stipulated that shelters must meet 'minimal standards of

cleanliness, warmth, space, and rudimentary conveniences' (*McCain v. Koch*, 1986, n.p.). Under these settlements, which remain in place in 2014, the city is obliged to provide a shelter bed for every person who presents as eligible by demonstrating that they lack other available accommodation. This criterion is less stringent than the UK requirements of 'involuntarily' homeless or in priority need; however, the British legislation places rather more obligations on the local authority to re-house eligible homeless people as well as limitations on the amount of time that families may spend in temporary accommodation (Wilson, 2014). The result of this is that shelters in New York play a larger role in housing homeless people, with fewer alternatives such as council housing.

Koch's approach to homelessness and, in particular, his reliance on shelter accommodation was criticised by then-Manhattan Borough President David Dinkins, who in 1987 released a report in conjunction with a task force on homeless families entitled *A Shelter is Not a Home* (Manhattan Borough President's Task Force on Housing for Homeless Families, 1987). Dinkins was elected mayor in 1989 and created a task force to investigate policy responses to homelessness. Ultimately the result of the commission was the New York City Department of Homeless Services in 1993, which would serve as a specialised and centralised government agency to oversee homelessness strategies and operate the city's shelter system.

The mid-1990s ushered in an era of welfare reform at both the local and national levels. President Bill Clinton was elected in 1992 in part on a promise to 'end welfare as we know it' (Institute for Children Poverty and Homelessness, 2014, n.p.) In 1996 the US Congress passed the Personal Responsibility and Work Opportunity Reconciliation Act, introducing more stringent work requirements for benefit receipt. The Act replaced the Aid to Families with Dependent Children (a joint federal-state programme) with Temporary Assistance for Needy Families (a block grant to states)—characterised by a five-year lifetime limit on benefit receipt, work requirements, and sanctions for those who did not comply with work requirements. The New York City welfare system was 'hailed as a national model' for the implementation of these reforms (Youdelman and Getsos, 2005, p. 1) under Rudy Giuliani, who served as mayor from 1993-2001 and had, like Clinton, been elected on a platform of decreasing social expenditures and reducing

welfare dependency by moving welfare recipients into the workforce. Another hallmark of the Giuliani administration was the introduction of the 'Broken Windows' policing strategy developed by Giuliani and Police Commissioner Ray Kelly. The policy was intended to discourage crime and deviant behaviour by cracking down on visible signs of disorder, resulting in a significantly increased police presence in public spaces. Homeless people were affected in particular through police measures against begging as well as loitering in public spaces (Arnold, 2004).

Many features of this policy—such as the enforcement of 'quality-of-life' ordinances—remained in place throughout Michael Bloomberg administration (2001-2013) (Nagourney, 2001). Other key features of the Bloomberg administration included an intensely data-driven approach to policymaking and poverty reduction (Flowers, 2013). While 'maintaining the basic structure of welfare provision put in place under Giuliani,' Bloomberg also 'used the city as a laboratory for experiments aimed at relieving or reducing poverty' (Institute for Children, Poverty, and Homelessness, 2014, n.p.). In 2004, Bloomberg pledged to cut homelessness by two-thirds in five years, largely through preventative strategies designed to enable low-income people to stay in their homes. Within homelessness, this experimental approach resulted in the piloting 'housing first' programmes that bypass the shelter system and the creation of 'Safe Haven' shelters in 2007, which would operate as part of the city's shelter system but with lower barriers to entry and fewer restrictions on clients' behaviour, designed to facilitate entry for people who would otherwise be reluctant to enter the system (New York City Office of the Mayor, 2007). The administration also piloted two programmes of short-term rental assistance subsidies— Housing Stability Plus (2004), replaced in 2007 by Advantage, which would run until 2012 (ibid.). In 2004 the DHS implemented a system of local prevention services called Homebase to provide households at risk of homelessness with job training and rental assistance. These measures represented a significant investment of research, funding, and evaluation in potential solutions for homelessness. However, the administration's failure to implement a lasting and effective system of housing subsidies for families leaving the shelter system as well as, among other things, the economic effects of the Great Recession, resulted in increases in homelessness in the 2000s (ibid.).

In sum, as in London, homelessness in New York has been the object of significant policy attention, albeit primarily at the local rather than national level. Furthermore, in spite of efforts by both policymakers and homelessness advocates to reduce the size of the shelter system, it has expanded considerably as a result of the right to shelter, which requires the number of shelter beds to increase with the homeless population. This led government officials and service providers to criticise the litigation as a constraint on effective policymaking, while advocacy groups in turn criticised the failure of government policies to reduce homelessness figures—a debate the *Wall Street Journal* termed the 'homeless blame game' (Saul, 2013, n.p.). The next section will briefly outline the landscape of the New York homelessness sector, including major service providers and the role of advocacy groups.

4.3.3 New York Homelessness Sector

The largest actor in the New York homelessness sector is the city's Department of Homeless Services (DHS). The DHS is a central agency with a commissioner appointed by the mayor. With 2,000 employees and an annual operating budget of $800 million, the DHS has as its priorities the prevention of homelessness; the reduction of street homelessness; the provision and maintenance of emergency shelters; and the transition for people experiencing homelessness from shelters to permanent housing. Non-profit organisations run most of its shelters under contract. In these cases, the city acts in both a regulating and financing capacity. The DHS also publishes a daily 'shelter census' and the annual point-in-time Homeless Outreach Population Estimate (HOPE) count of unsheltered homeless people (New York City Department of Homeless Services, 2014b).

As in London, the largest service providers in New York are those with city contracts. These include the Bowery Residents' Committee (BRC), the supportive housing organisation Common Ground, and BronxWorks. Contracts cover the operation of shelters and housing as well as street outreach to homeless people. The BRC, for instance, works under contract with the Metropolitan Transportation Authority (MTA) to provide homelessness outreach services in the city's transport centres and subway systems. Many of the city's larger shelters bear a strong resemblance to their London

counterparts, with an emphasis on progress through a plan of treatments towards specified outcomes including those relating to employment, housing stability, and mental health. The Callahan consent decree set forth requirements for shelters, including the size and cleanliness of the facilities to be provided, although these are minimal and include conditions such as 'Each resident shall receive a bed of a minimum of 30 inches in width' (*Callahan v. Carey*, 1981, n.p.). Beyond these minimum standards there remains inconsistency in the quality of individual shelters. In 2013, the *New York Times* profiled the conditions in a DHS-operated Brooklyn shelter raising controversy over the safety and sanitary conditions of the shelter system (Elliott, 2013).

A striking difference between New York and London is the number and nature of advocacy groups in the two cities. The homelessness sector in New York contains a large body of rights-based (and, in particular, civil rights) advocacy that is without a strong parallel in London. This is comprised of organisations such as the Coalition for the Homeless, Picture the Homeless (a grassroots advocacy group founded by homeless people), and the Urban Justice Center—as well as the American Civil Liberties Union, the Legal Aid Society, the New York Coalition Against Hunger, all of which have been involved with advocacy work concerning homelessness and/or homelessness services. National groups such as the National Law Center on Homelessness and Poverty and the National Coalition for the Homeless (different from the New York-based Coalition for the Homeless) also contribute to advocacy efforts on the local level. These groups are often vocal opponents of city government policies. Codified rights, civil liberties, and individual freedoms figure prominently as themes in their activities, which include campaigning, political action, and legal representation and litigation on behalf of homeless people. As will be discussed in greater depth, the nature of this advocacy work is reflected of the broader US approach to rights and citizenship.

Having set out the policy initiatives and services affecting homelessness more broadly, the discussion will now focus on the preliminary findings from the study, looking at how services to meet basic needs fit within this landscape and how this provision varies across London and New York. This will serve as a foundation for the subsequent chapter's findings, which explore the roles of social and civil rights in explaining the provision of these services.

4.4 Preliminary Findings: Services to Meet Basic Needs in London

In spite of the comprehensiveness of the London homelessness sector, services to meet basic needs are provided in a rather patchwork fashion in London. Homeless people who are engaged as clients of one of the large, commissioned service providers receive access to services to meet basic needs as part of a larger package of treatment services. While the commissioned service providers account for the majority of homelessness services, there is nevertheless also a network of smaller voluntary sector providers operating soup runs and day centres, which will be discussed in more detail below. Soup runs and day centres assume much of the provision of basic needs services for people who are sleeping rough or otherwise homeless and not engaged with a comprehensive service plan (or, in one case, for homeless people whose shelters or accommodation do not provide three meals a day). Johnsen, Cloke, and May (2005) note that along with soup runs, 'day centres are often the only accessible means of clothing, bathing facilities, daytime shelter and essential nutrition available to rough sleepers' (p. 794).

To give an approximation of the number of services available, as of April 2014 the Pavement's website lists approximately 75 soup runs and just over 60 day centres (with some, but minimal, overlap between the organisations listed in each category) (The Pavement, 2014). Most soup runs are staffed by volunteers, with day centres more commonly having a mix of volunteers and professional staff (Lane and Power, 2009). In contrast to the major service providers, those that organise soup runs and day centres are more likely to be religiously affiliated. While a large number of these services operate in London, issues have been raised about the unsystematic nature of this provision, including geographic disparities; uncoordinated opening hours; and the difficulty of obtaining information about the location and hours of such services (Shelter, 2005; UK Common Rights Project, n.d.). As was discussed earlier, soup runs and day centres have come under opposition both from government officials and from the larger, 'building-based' or commissioned service providers (Shelter, 2005). In its most extreme manifestations, this opposition has taken the form of city councils, such as Westminster, attempting to ban soup runs from operating within their boundaries (Lane and Power, 2009). The proposed ban was supported by several of the major homelessness service

providers, including St. Mungo's and Thames Reach, on the grounds that such services may ultimately be responsible for enabling rough sleeping in the long term.

With regards to sanitation, London borough councils are in charge of the maintenance and provision of public toilets (with the exception of those in bus and train stations, which are dealt with by transport providers). The 1936 Public Health Act gives local authorities 'permissive, not mandatory' powers to provide public toilets (Greed, 2006). The Mayor does not have a specific statutory duty to provide public toilets in London but can promote the provision of public toilets through the use of planning powers; additionally, Transport for London, which the Mayor controls, provides public toilets directly in bus and railway stations. A citywide scheme called Open London, launched in 2009, aimed to encourage the opening of toilets in commercial and public buildings to the general public but was met with limited take-up and did not result in a significant increase in the number of available toilets (London Assembly Health and Public Services Committee, 2011).

Public toilets have been the object of policy attention in London since the early 2000s. The London Assembly's Health and Public Services Committee conducted an evaluation of the state of public toilets in London in 2006, and followed up on its findings in 2011, citing general declines in the number of toilets available, noting best practice by boroughs in provision and the dissemination of information and urging the city to take action to expand both the provision and accessibility of toilets (London Assembly Health and Public Services Committee, 2006 and 2011). Some local authorities' strategies were subsequently replicated in other boroughs or scaled-up, such as the Community Toilet Scheme developed by the Borough of Richmond, which provides financial incentives to local businesses to make their toilets available to non-customers.

Nevertheless, the availability of public toilets remains somewhat inconsistent. By some measures, 40% of London public toilets have closed since 1990 (Stanwell-Smith, 2010). Significantly, the issue of homelessness has largely been absent from policy discussions concerning the accessibility and availability of toilets, in spite of the fact that homeless people (and particularly rough sleepers) are disproportionately affected by not being able to access toilets in public. It is significant that the comprehensive 2006 and

2011 Health and Public Services reports on the availability of public toilets in London have no mention of the word 'homelessness,' focusing instead on other affected groups including tourists, elderly people, and pregnant women. Furthermore, many of the solutions that have been developed to create or maintain access to toilets have exclusionary consequences for homeless people, who face obstacles such as difficulty in paying for pay toilets (UK Common Rights Project, 2013). The trend towards partnering with private businesses is also problematic with respect to homelessness, as homeless people are likely to face discrimination when accessing toilets in commercial spaces. Until the launch of the Common Rights Project in December 2013, the issue of access to toilets had not figured prominently (if at all) on the agendas of advocacy groups or service providers in the homelessness sector. This thesis will later explore the puzzle of how services for food, water, and sanitation have received relatively little attention within homelessness services in London, where social rights such as housing, health, and other treatment and accommodation services are provided for extensively.

4.5 Preliminary Findings: Services to Meet Basic Needs in New York

As in London, services for basic needs in New York are provided through a number of public, private, and voluntary channels. Particularly for these services, there is a strong emphasis on charitable provision. Soup runs (known in the US as soup kitchens) are more common than day centres. There may be some definitional boundary issues in comparing groups of services, since a 'soup kitchen' can describe a service that, by virtue of being larger and held indoors with seating, may more readily be classified as a day centre than a soup run in the British context; a day centre tends to refer to a service that is indoors and may offer services beyond food, such as laundry and showers. A recent survey by the Food Bank for New York City included responses from 138 soup kitchens, while the number of day centres seems to range between 10 and 15, totalling more soup kitchens and many fewer day centres than London (75 and 60, respectively) (Food Bank for New York City, 2014; New York City Innovations in Mental Health, 2014). Compared with London, New York's relatively concentrated geography may also mean that a smaller number of day centres are able to serve a greater number of people. While some respondents spoke in general terms about not wanting to support services

that make living on the street 'comfortable,' the relationship between soup kitchens and other service providers has not been as adversarial as it is in London. These dynamics will be discussed in greater depth in Chapter Five. The only notable source of conflict arose in 2012, when Mayor Bloomberg banned private donations of food to homeless shelters on the grounds of food safety, a decision that was met with a backlash from advocacy groups (CBS New York, 2012). Otherwise, the city has by and large refrained from interfering with the activities of soup kitchens.

The provision of public toilets falls largely to citywide departments, primarily the Department of Parks and Recreation and, to a lesser extent, the Metropolitan Transportation Authority. A large proportion of toilets in both transport centres and city parks have been found to be closed or otherwise inaccessible due to unsanitary conditions, leading some to describe Starbucks coffee shops as 'the city's bathroom' (Molotch and Noren, 2010, p. 3). For people experiencing homelessness, troubles accessing restrooms are further exacerbated by the fact that higher-quality bathrooms are likely either to be found in commercialised spaces or to be staffed by attendants (Molotch and Noren, 2010). Both of these situations create opportunities for the discretionary exclusion of people who present as homeless (Legal Action Center for the Homeless, 1990). In an interesting contrast to the situation in London, public toilets in New York have been raised explicitly as a homelessness issue *rather than* through the lens of public health, disability rights, or tourism, although these efforts have not yet resulted in substantive policy change. In 1990 the Legal Action Center for the Homeless attempted to bring a case against the city, arguing that the lack of public toilets provided in New York constituted a 'public health crisis' in which homeless people suffered special harm because of their reliance on public toilets (p. 26). The court ruled that homeless people did not have the legal standing to bring the case, and the city has not contracted with another provider to build more public toilets (interview, New York advocate).

4.6 Conclusion to Chapter Four

Homelessness as a general issue has had greater political priority in London and in the UK at the national level, where there is also a more extensive system of services in

place to prevent homelessness from occurring. However, New York has invested considerable government resources and administrative efforts in addressing homelessness, particularly through the Department of Homeless Services. Reforms in both the UK and the US in the 1990s introduced ideas of active citizenship and responsibility, which have influenced both welfare more broadly and homelessness services in particular.

The preliminary findings outlining the resources available for homeless people to meet their basic needs in each city have shown that while a variety of different kinds of services exists to meet this provision, homeless people in both cities may have trouble regularly accessing services to meet their basic needs. Homeless shelters, soup runs, and day centres all engage in the provision of food. The provision of services for sanitation is dependent (particularly for homeless people who do not access services through large shelters) on a mix of charitable provision and public provision through uncoordinated city departments, primarily those charged with operating parks and transport services. Public resources for sanitation in particular are scarce, although this has been the object of more recent policy attention in London. The charitable provision of services to meet basic needs is perceived more favourably and less controversially in New York than in London, where there is conflict between larger, commissioned service providers and soup runs/day centres over the role of this provision. This dynamic will be explored in greater depth in the following chapter. In both cities, the provision of services to meet basic needs is fragmented rather than systematic, and involves a variety of actors from government, voluntary, and private sectors with different interests. The next chapter continues with the study's findings, moving to the conceptual level to discuss how this provision relates to the relative salience of social and civil rights in the selected cities.

CHAPTER 5: THE INFLUENCE OF SOCIAL AND CIVIL RIGHTS

5.1 Overview

This chapter presents and analyses the substantial empirical findings related to the study's research question, which deals with the influence of social and civil rights on services to meet the basic needs of people experiencing homelessness in London and New York. It builds on the discussion in Chapter Four, which introduced contextual information as well as preliminary findings outlining the availability of services to meet basic needs in each city.

Findings will be presented in the following format: First, evidence of dominant discourses from interviews and documentary analysis is discussed. Then, the research examines how the dynamics of service provision in each city—particularly the interactions between service providers, city governments, and advocacy groups—affect services to meet basic needs. The tension between basic needs service providers and commissioned service providers/city government officials in London, and between advocacy groups and a coalition of service providers and city government officials in New York, will serve as a framework for the presentation of these findings. The last body of empirical evidence to be considered is the behaviour of advocacy groups in each city, and the ways in which advocacy groups' activities can illustrate the salience of different rights-based approaches to homelessness in a given welfare state.

5.2 Findings from London

5.2.1 'Enabling' discourses

A review of the evidence from both interview and documentary data suggests that London's approach to homelessness includes a strong commitment to social rights. However, these levels of priority, attentiveness, and welfare state support were not found to extend to services to meet basic needs. Instead, providers and city governments used largely critical discourses about 'enabling' and 'sustaining' rough sleeping in relation to the provision of services for basic needs. The evidence does not suggest that conceptions of social rights are absent from decisions about the provision of services for basic needs

in London; rather, the argument contends that they are influential, but that they also shape providers' notions about what fully realised social rights should entail. The influence of social rights (as well as the related concepts of social exclusion and social citizenship) manifests itself as a commitment to helping homeless people to progress past the fulfilment of their basic needs into the realisation of their higher-order needs.

These ideas emerged from consistent evidence across both interview and documentary data within the UK in which service providers and policymakers voiced their concerns about services for basic needs as factors that 'enabled' or 'sustained' life on the streets. One leading service provider described their organisation's approach to rough sleeping as 'to try and make sure that it's not a pleasant experience—that it's not easy to sustain.' Findings from the documentary analysis suggest that this trend dates back at least as far as New Labour and the establishment of the Rough Sleepers Unit. Access to food, water, and services for sanitation was seen as having almost dangerous effects that enabled survival in the short term with deleterious consequences for individuals' long-term health and well-being. One respondent—a service provider—offered a particularly stark view of services for basic needs, saying 'the streets shouldn't be places where you can get fed, watered and be looked after.' Other studies have found that the views of policymakers in London 'suggest that unrestricted support offered by soup runs and other voluntary bodies can have a detrimental impact on service users' (Lane and Power, 2009). Providing such services outdoors, with few or no preconditions, was seen as disincentivising engagement with providers of programmes that would enable homeless people to move on from rough sleeping—that 'taking basic services to the streets helps keep people there' (St. Mungo's, 2011b, p. 1). While acknowledging that the providers of services to meet basic needs were well-intended, many respondents reflected the view that these services were 'unknowingly sustaining people's lifestyles' (London service provider).

Among respondents, rough sleeping was characterised as dangerous, damaging to long-term health, and psychologically harmful both in its immediate effects and through the more pernicious processes of 'acclimatising' rough sleepers to conditions on the street (London service provider). Services to meet basic needs—when not joined up with more comprehensive housing, social, or educational/employment programmes—were

described as short-sighted and as adhering to a limited understanding of what it means to help someone on the street. This last point is critical, as it is indicative of the larger system of values at play among the major service providers. Respondents contrasted life on the streets with what they viewed as the objectives of progressing through a treatment plan: stable housing, educational attainment and employment, and reintegration.

In sum, the data collected from key informants in London suggests that many service providers and city government officials did not necessarily see extending service provision to meet basic needs as an imperative or ideal function of the welfare state. Rather, this provision was discussed as being in conflict with the higher-order, aspirational functions of the welfare state, such as enabling homeless people to obtain housing and employment and achieve health, well-being, and social integration. The discussion will now progress to explore how these ideas play out 'on the ground' through the dynamics of service provision in London.

5.2.2 Dynamics of service provision

Examining the data suggested that, rather than being promoted as social rights, services to meet basic needs were seen as enabling rough sleepers to live on the streets. This section explores these findings further by showing how they have also played out in the dynamics of service provision in London. Respondents spoke of a clash of goals and values between large-scale commissioned service providers and smaller, basic needs services such as soup runs and day centres. Analysis of this conflict will corroborate the evidence from the previous section. While commissioned service providers distance themselves from the provision of services to meet basic needs, day centres and soup runs view this provision as integral to their mission. For instance, the Passage, a day centre located in Westminster, advertises itself simply by saying, 'We meet basic needs,' including meals, laundry, and services for hygiene. Perhaps the most controversial episode in this conflict was the drafting of a bylaw in 2011 by Westminster City Council to ban soup runs from operating within the borough. The Council stated that it was 'of the view that providing food on the streets can and does sustain a rough sleeping lifestyle,' which in turn 'shortens life expectancy and leads to premature death'

(Westminster City Council, 2011), once again employing discourses of 'enabling' rough sleeping.

While the soup run ban attracted media attention as a singular and provocative incident, it was not, in fact, discordant with the perspectives of providers in the homelessness sector, nor with the earlier scepticism towards soup runs first articulated by Louise Casey at the Rough Sleepers Unit. After the proposed Westminster ban, many commissioned providers weighed in with qualified but overall supportive statements affirming limitations on the activities of soup runs. The following remarks by Charles Fraser, then the CEO of St. Mungo's, reflect a perspective similar to that voiced by other providers:

> While we recognise the compassion involved in providing food to vulnerable people, those in distress and rough sleeping need services that will support them off the streets for good, and give them the opportunity for longer-term better housing, health and work as they move on with their lives. (Tran, 2011)

Thames Reach and No Second Night Out have been even more vocal in this debate. Both organisations emphasise early intervention to prevent acclimation to life on the street and have made public awareness efforts to address not only soup runs but also individual donations to people begging for money. Evidence of this can be seen in two organisations' joint 'Killing With Kindness' campaign, which was designed to promote public awareness about the potentially harmful consequences of giving money to individuals on the street.

What can be drawn from this is that the major service providers in London reflect a particular interpretation of Maslow's hierarchy of needs that affects their approach to service provision. This interpretation places a high value on the fulfilment of 'higher-order' needs such as education, employment, and social engagement—reflecting Maslow's own view that these needs are more valuable to human flourishing, having 'desirable civic and social consequences' (Maslow, 1954, p. 149). However, this interpretation also holds that the effects of rough sleeping are such that the fulfilment of lower-order needs will not be sufficient to enable homeless people to move on to pursue higher-order needs. Instead, respondents expected that the fulfilment of lower-order needs would, on its own, perpetuate rough sleeping. The solution, therefore, is to join

services to meet basic needs with those to fulfil higher-order needs, so that people experiencing homelessness can be moved out of the cycle of rough sleeping and directed towards self-actualisation.

In describing the relationship between homelessness and needs fulfilment, providers described rough sleeping as prohibitive to the pursuit of higher-order needs, forcing homeless people to focus on survival rather than flourishing. A 2011 report from the Joseph Rowntree Foundation reflects this view, noting that 'On becoming homeless, many initially prioritise street survival needs—safety, food, personal hygiene—above securing accommodation or seeking help with other problems,' and homeless people's priorities may 'evolve' (McDonagh, 2011, p. 10). Providers' perspectives reiterated the idea that health and overall well-being 'may not be a priority for homeless people themselves—basic survival needs such as food, drink, and warmth may concern them more than the possibility of future illness' (Power *et al.*, 1999, p. 591).

This perspective has implications for the delivery of services, which are reflected in the design of services from larger, commissioned service providers in London. As noted in Chapter Four, these organisations tend to provide food, water, and sanitation in 'building-based' settings where they are joined up with engagement with providers and services for education, skill-building and social participation. The high value placed on higher-order needs was evidenced through respondents' perspectives on success and the goals of homelessness services: 'getting a job, getting into training, getting into education, health outcomes, other tangible things- that's a sign that we're doing a better job, when those indicators around health, work, housing are going in the right direction' (London service provider). Two London service centres—a hostel at St. Mungo's and a large day centre at Connection-at-St.-Martin's—even reproduce Maslow's hierarchy of needs as part of their design, with food, laundry, and showers on the lower floors, progressing to job training, educational courses, and social activities on the upper floors. While the focus on higher-order needs has been led by larger, commissioned service providers, these groups have been influential in moving services in London towards a model that facilitates the pursuit of higher-order needs. Lane and Power (2009) note that in London 'many day centres have moved away from offering only basic services for the

homeless such as showers and food, and instead have become outcome focused and professionalised with an aim of moving people on' (p. 9).

5.2.3 Behaviour of advocacy groups

Advocacy groups in London are engaged, among other activities, in the work of making claims (rights-based or otherwise) on behalf of homeless people. The ways that advocacy groups position themselves and frame their agendas and the arenas in which they advance their positions (such as courts, legislative bodies, or appeals to public opinion), are reflective of the types of claims that are seen as legitimate and the salience of different notions of rights in the context in which they operate. It was found that advocacy groups tend to advance agendas of social rather than civil rights and also, though not without exception, to have views that were consistent with those of service providers.

In London, homelessness advocacy groups emphasise the need for mental health treatment; housing; access to health care through the NHS; and access to income (through both employment and social security). Respondents also listed lobbying the city government as high among their primary activities, adding 'we make sure [homelessness] is high on their political agenda' (London advocate). Furthermore, these claims are often directed as claims on the government and focus on service delivery, access, quality, and increased funding. In recent years there has been an increasing emphasis on peer support and on user involvement in services—in other words, involving homeless people themselves in the design of services, granting homeless people the 'right to participate actively in shaping social care provision and public knowledge in new, progressive and exciting ways' (Whiteford, 2011, p. 50). In both interview and documentary evidence, these claims are evidenced more often than claims to individual liberties or freedom from state interference. In one example, Crisis (a group that engages in both advocacy and service provision) set forth the following response to proposals that the city government in London might start to use legal enforcement against begging:

> Put in place the necessary and appropriate support and services to enable people who beg to overcome the problems that they face: access to accommodation, detox services and primary health care, to name three. (Crisis, 2003a, p. 5)

As will be later addressed in greater depth, the responses of US advocacy groups to police involvement with homeless people is to assert individuals' rights to freedom from police action; Crisis's suggestion is framed in the language of social, rather than civil, rights. Advocacy groups thus stake out claims that can largely be characterised as claims for the extension or realisation of social rights and, furthermore, these claims share much in common with the objectives of service providers. Additionally, the claims of advocacy groups in London tend to focus on higher-order needs such as mental health, housing, and engagement; services to meet basic needs are relatively absent from discussions. This lack of emphasis on services to meet basic needs was evidenced in interview and documentary data; it can be seen, for instance, the Homeless People's Commission's Policy Report, a series of policy recommendations produced through Groundswell by a group of former rough sleepers. The recommendations focus on expanding access to benefits and the NHS; increasing opportunities for employment; and improving the quality and accessibility of low-cost housing within the private rented sector (Groundswell, 2011). Housing Justice has conducted a substantial amount of work on soup runs, focusing on improving coordination and raising awareness among homeless people about the availability of services as well as publishing a 'Soup Run Best Practice Guide' for service providers advising on best practice for soup run operating environments, client engagement, and health and hygiene (Housing Justice, 2012).

Homelessness advocacy groups in London differ from their New York counterparts not only in the types of rights-based claims that are made but also in the language they use about advocacy generally. Several respondents reported that the language of 'rights' is less popular in the UK than in the US: 'rights in the UK, politically has *sort* of got a slightly dirty word about it' (London advocate). Another reported 'we've never - I've never heard anybody talking about their rights' (London advocate). Nevertheless, a rhetorical aversion to discourses of rights does not mean that advocacy efforts are in fact outside the purview of civil or social rights. An examination of what is being demanded is needed: a claim for better access to NHS services, for instance, can be seen as a claim to a social right but may also be framed in the language of justice, equality, fairness, or even simply 'access' rather than of right. However, it is

significant in some senses that the language of rights is less popular because it is seen to connote legal or legislative action rather than substantive outcomes - rights in theory, rather than rights in practice.

Advocacy groups' activities in London reaffirm the salience of social rights in the UK context. Additionally, while advocacy groups in New York will be shown to take a largely oppositional stance against governments and many service providers, thus providing a 'check' on the extent to which such groups can assert their agendas, London-based advocacy groups play less of a dissenting role and share many views with service providers about the desirable outcomes of homelessness services. Thus the goals of commissioned service providers and policymakers, which place a high value on connecting services to meet basic needs to resources for the fulfilment of higher-order needs, can be implemented without significant interference**.**

5.2.4 Summary

This section has established that discourses about services to meet basic needs as enabling or encouraging rough sleeping, alongside other evidence gathered from the interview data, suggest that rather than being actively promoted in a setting of strong social rights, services to meet basic needs are seen as harmful or ineffective. This approach to services for basic needs is reflective of the particular hierarchical approach to needs espoused by service providers in London, which emphasises the need to couple services for lower-order needs with resources for the fulfilment of higher-order needs. Examining the activities of advocacy groups then provided further evidence that these findings are reflective of a context in London in which social rights are highly salient (in practice, if not in the language of 'rights') and 'higher-order' needs are valued.

5.3 Findings from New York

5.3.1 Overview

The previous sections have already discussed how, with respect to historical traditions of social citizenship and approaches to the provision of welfare, the US presents a contrasting case to the UK's system of social rights. This section will explore the idea that the US has developed a contrasting system of strong *civil* rather than social

rights, characterised by an emphasis on individual freedoms and minimal state interference, the securing of rights through the court system, and individuals as rights-bearers, and will discuss the implications of these findings for homelessness and the provision of services for basic needs.

5.3.2 Civil rights discourses

The strongest theme to emerge from the UK interview data was the idea of services for basic needs as 'enabling' homeless people to continue living on the streets. These ideas were not found to be as present in the analysis of interviews and documents from the US. Instead, the ideas that repeated themselves most often concerned 'rights' (substantively, referring most often to civil rights and individual freedoms). As will be discussed later in greater depth, advocacy groups saw much of their work as securing and protecting homeless people's rights. Both the Coalition for the Homeless and Picture the Homeless describe raising awareness of rights as part of their mission and distribute 'Know Your Rights' guides for situations ranging from intake to the city shelters to interactions with the police. By contrast, in the UK, despite the strong tradition of social rights, the discourse of 'rights' in the abstract has not been as popular, and so advocacy groups frame their agendas in these terms less frequently (Ruxton and Karim, 2001).

Additionally, it was not only advocacy groups that emphasised individual rights in their mission statements and activities. Service providers and policymakers also made use of rights-based discourses. One example is the DHS' Statement of Client Rights and Code of Conduct, which outlines the rights of individuals living in the city's shelter system. The first of these is 'the right to exercise your civil rights and religious freedoms' (New York City Department of Homeless Services, n.d.). Another service provider noted that New York was unique in having 'so many different laws to protect rights,' while others referred to homeless people as having rights in a more abstract sense: 'it's not against the law to be homeless. They have a right to self-determination' (New York service provider). These were not seen as absolute, and providers described instances of using the city's 'Code Red' and 'Code Blue' ordinances to remove homeless people from the streets during periods of dangerously hot or cold weather, respectively. Nevertheless, these situations still contained repeated mentions of individual rights. One

service provider in particular noted that when interviewing prospective employees for social work positions, 'I ask them - you know, are they going to be comfortable taking someone's rights away' in a situation where city ordinances condoned involuntary removal (New York service provider).

Most often, policymakers and providers referred to rights as limitations—whether as natural limits establishing boundaries that service providers could not and should not cross (e.g. 'they have a right to self-determination') or, in other cases, as a threat of litigation) serving as a constraint on their ability to create services or policies. In practice, this results in very different environments of service provision in London and New York. For instance, one respondent, who worked as a director of one of New York's largest outreach and shelter providers, expressed reservations about enabling homeless people to sleep on the streets, but suggested that the rights of homeless people limited his ability to interfere:

> I am a firm believer that no person should be sleeping or eating outside. And anything we do to enable that - is wrong. With that said, I mean, civil rights and basic human rights are the cornerstone of what we also believe in, right? (New York service provider).

By contrast, most London providers did not qualify their statements about sustaining life on the streets with notions of individual rights.

5.3.3 Dynamics of service provision

While the New York homelessness sector shares many features with its London counterpart (such as the centrality of a few major service providers who contract extensively with the city), it is not marked by the same contentious relationship between larger non-profit organisations and smaller, charitable providers. Indeed, the city's soup kitchen providers and other charities are largely seen as playing a small but admirable role in addressing the homelessness crisis (see, for instance, *New York Daily News*, 26 November 2010). While some of the commissioned service providers interviewed spoke of being opposed to measures to make life more 'comfortable' for people living on the streets, this opposition has not manifested itself in the same concentrated effort to replace or reform the small-scale delivery of services to meet basic needs. New York

service providers did not emphasise the same reservations about providing stand-alone services to meet basic needs.

The coexistence of charitable services alongside those that are run by the government or through government contracts is in keeping with the broader US welfare system. This dynamic reflects the high valuation of charitable giving in the American context, particularly alongside scepticism about government provision (Alesina and Glaeser, 2004). By contrast, while charity is valued in the British context as well, charitable provision may also be seen as a shortcoming of the state. A 2012 article in *The Guardian*, for instance, discussing the charitable provision of emergency food described the reliance on charitable provision as troubling: 'Whereas previously this was a service that the state would have provided, now feeding large numbers of people who are not able to feed themselves is being subcontracted out to charities' (Gentleman, 2012). Respondents in London also described the drawbacks of charitable provision as being less constant and less regulated than state-commissioned services.

In the US context, interference with charitable provision is seen as an over-extension of government power, and may even leave the state open to litigation. This is, in many ways, the crux of the dynamics of homelessness services in New York: the courts loom large, and the threat of litigation serves as a constraint on government power and a way for advocacy groups to stake out territory. One respondent described the role of advocacy groups by saying, 'They are constantly suing the city' (New York service provider). City government officials echoed the sentiment that the Coalition for the Homeless and other advocates are 'very adversarial' (New York City government official). Other respondents described the threat of litigation concerning that might arise from different aspects of service provision, from hospital discharge to involuntary removals from the street or subway system. Advocacy groups were aware of the possibility of litigation as a power resource: one respondent phrased this by saying that 'the government skimps as much as possible, and when they do that, it can create an opportunity for a lawsuit,' indicating that this power may be wielded not only as protection against interference but also when government failed to fulfil its perceived or legal responsibility.

The dynamics of service provision thus stand in sharp contrast to those in London: instead of being regarded as potentially harmful, providers of services for basic needs are seen as charities and are left largely to their own devices. Instead, the major conflict in New York arises between those groups that would assert and those that seek to limit government power. The ways in which advocacy groups' activities have shaped homelessness service provision in New York will now be discussed in greater detail.

5.3.4 Behaviour of advocacy groups

This study will now turn to a discussion of the behaviour of advocacy groups, which, as in London, is indicative of the city's political climate as well as the types of claims that are seen to be legitimate within it. First, advocacy groups have a far more established presence in New York than in London, a fact that is itself an indication of the salience of rights-based advocacy in the New York context. The relationship between advocacy groups and the city government, as well as its major commissioned providers, is largely adversarial. Finally, as was noted earlier, advocacy groups use both notions of individual rights and the enforcement of these rights through the courts to stake out territory and to limit the activities of the city government.

Advocacy groups in New York have tended to frame their agendas and issues as rights-based claims to a much greater extent than their London counterparts. Aspects of this advocacy not seen in London include protests about the criminalisation of homelessness as a violation of rights and the litigation of issues through the courts. A 2009 report by the National Law Centre on Homelessness and Poverty (NLHCP) and the National Coalition for the Homeless chronicles over 100 court cases at the state or federal level in the US which have dealt with the rights of homeless people (see 'Homes Not Handcuffs,' 2009). Many lawsuits have targeted intrusive or coercive government policies, public sleeping bans, and what are perceived as street-clearing efforts aimed at gentrification. Most recently, Picture the Homeless, the New York Civil Liberties Union, and other advocacy groups were successful in preventing an MTA planned action to remove homeless people sleeping in the subway system. This is a continuation of the efforts of Picture the Homeless to combat the 'systemic violations of the civil rights of homeless New Yorkers by the NYPD' (Picture the Homeless, 2002).

Efforts to combat police or government interference can be seen as manifestations of the US civil rights tradition, as they frame the problem as one of both protection from impermissible intrusion by the state and the freedom of individuals to carry out activities. More complex are advocacy efforts involving services for basic needs. New York homelessness advocates have, at different times, engaged in advocacy related to food and sanitation. Investigating instances in which these issues have been taken up shows that, in the New York context, services for basic needs are handled in a way that reflects an emphasis on individual freedoms rather than social rights. It suggests that basic needs occupy contested territory, particularly in affluent developed contexts, where their provision is undertaken in a patchwork rather than systematic fashion, due to the assumption that most citizens will access these services privately. Services to meet basic needs can be seen to interact with civil rights through advocacy groups' protests about 'food-sharing bans,' or restrictions placed on charitable food sharing and tend to take the form of either bans on outdoor soup runs or, in the case of New York, restrictions on private donations to soup runs (National Law Center on Homelessness and Poverty and National Coalition for the Homeless, 2010). Opposition to these bans differs from the parallel debate over soup runs in London in a few ways. First, food-sharing bans do not emerge from the concerns of, and are not driven or overwhelmingly endorsed by, larger service providers. Second, advocacy groups, including the National Law Center on Homelessness and Poverty and the National Coalition for the Homeless, have immediately and vehemently opposed the bans. Finally, and most importantly, those groups that oppose the ban do so in large part through the language and procedures of civil rights claims: by arguing that the bans are unconstitutional, 'violate the obligation of respecting the right to food,' constitute a criminalisation of homelessness, and violate the freedoms of both providers and recipients; and by attempting to remove restrictions by taking city governments to court (ibid., p. 18). In this framework, accessing services for food becomes not so much a social right to which homeless people are entitled as an activity in which they cannot legally be restricted from partaking.

Advocacy groups have more recently begun to engage with issues of hygiene and sanitation. On its website, the National Law Center on Homelessness and Poverty poses the following question:

> **What is one "life-sustaining" act that we do each day, but rarely think about, let alone discuss in public?**
>
> Going to the bathroom. Yet, when you're homeless or poor, an act that most people take for granted, such as going to the bathroom, can be a huge challenge or even a life-altering decision. Forces beyond homeless persons' control, such as a lack of affordable housing and emergency shelter, compel them to live and take care of their basic human needs in public. When performed inside, these acts are unquestionably legal. However, criminalization policies in many cities punish homeless persons who are forced to perform life-sustaining actions in public spaces. (National Law Center on Homelessness and Poverty, 2014, n.p.)

Here, the ability to access a bathroom is framed as an essential individual freedom. This issue had been raised in New York even before rising to the level of the national agenda of homelessness advocacy. In 1990, the Legal Action Center for the Homeless brought a court case against New York City for failing to provide sufficient public toilets to meet the needs of vulnerable groups, a category that included taxi drivers and pregnant women but was focused primarily on homeless people. The attorneys for the case criticised the city's 'glaring inability to address this most basic of its citizens' and visitors' needs' (1990, p. 3). The case, which was accompanied by a comprehensive proposal for the construction of Automated Public Conveniences across the city, was ultimately dismissed on the grounds that homeless people did not have the standing to bring it to court. Two features of the case are particularly interesting: first, that it was settled through the courts, which less commonly serve as an arena for the claims to social rights (Dean and Melrose, 1999); and second, that it framed the issue of fulfilling the basic need of sanitation as one of discrimination, in which homeless people's ability to carry out this activity was unjustly curtailed.

In London, *overall* levels of provision of public toilets are higher than in New York, as is information about the availability and accessibility of these resources. In a sense, toilets have received even more substantial 'political priority' in London than in New York. However, they have not been connected to the problem of homelessness. By contrast, in New York, this case for the provision of toilets was taken up by a rights-based legal advocacy group—showing that this service to meet the basic need of

sanitation is again a contested one without a clear 'arena' in which to address it, having been taken up by government health officials in London and by homelessness advocates in New York. The involvement of New York advocacy groups in lobbying for services to meet basic needs demonstrates that claims to these services can be made outside of the domain of social rights, and that in fact these advocacy groups have in several instances advanced claims for services to meet basic needs within the framework of civil rights.

5.4 Conclusion to Chapter Five

It is illustrative to pose the question of what advocacy groups conceptualise people experiencing homelessness as *needing*. On this issue, there is consensus between London and New York: homeless people need access to health care, and they need stable, affordable housing. There is also, however, some divergence: the positioning of New York-based advocacy groups suggest that as a group homeless people need freedom from interference (including police harassment and criminalisation); legal advocacy and representation (hence, the involvement of groups such as the Urban Justice Center and the American Civil Liberties Union); and recognition of their status as rights-bearing individuals (exemplified by the identity politics of grassroots groups such as Picture the Homeless, with the slogan 'Don't talk about us. Talk *with* us.'). From the activities of advocacy groups in London, an observer can gather the view that homeless people need social participation, peer support, engagement with knowledgeable providers, rehabilitation, and access to high-quality services. These views are harmonious with those of service providers that value facilitating the fulfilment of higher-order needs.

The findings from New York show that there are ways in which basic needs can be situated in the purview of civil as well as social rights. Providers and policymakers expressed an obligation not to interfere with the provision of services to meet basic needs, rather than, necessarily, an obligation to provide these services as a social right. Furthermore, advocacy groups advance claims for services to meet basic needs in ways traditionally associated with civil rights, by bringing claims to the court system through the lenses of discrimination or unjust interference. The study will now proceed to an analysis of the empirical findings in relation to social exclusion and social citizenship,

showing how these concepts can explain the ideological underpinnings of each city's approach.

CHAPTER 6: ANALYSIS

6.1 Overview

The findings presented have shown that, in the UK, the strength of social rights does not result in a correspondingly high level of attention to the provision of services for basic needs; rather, the provision of services reflects a prioritisation of higher-order needs. Two factors can help to account for this phenomenon, as well as the contrasting situation in the US, which has low levels of provision but some recourse to these services through the courts and the protection of civil rights. The following section will outline some of the conceptual dimensions of these findings, including normative ideas that have shaped and continue to shape the provision of homelessness services. These are, first, the relative importance of social exclusion, and, second, the social citizenship relationship between individuals and the welfare state.

In the UK, the incorporation of social exclusion into social policies results in an approach to poverty that is relative and multidimensional, and leads policymakers to prioritise the achievement of goals that are specific to participation in 21st-century Britain. Furthermore, social citizenship in the British context positions the individual citizen as someone who contributes as well as receives, thereby emphasising homelessness strategies that reintegrate people into society economically as well as socially. The US takes a more individualistic and absolutist approach to poverty, and has not adopted the same ideas about social exclusion. Its notions of citizenship emphasise independence and equality of opportunity rather than reciprocity. These distinctions serve as the basis for the analysis to follow and nuance the homogenisation of the US and the UK under the liberal welfare regime label.

6.2 Social Exclusion

Much has been written about the fact that while social exclusion has emerged as a key concept in both EU and UK approaches to poverty, it has failed to achieve the same stronghold in the US (Micklewright, 2002). As discussed earlier, social exclusion refers to the processes through which individuals become excluded from key social and economic areas of life. It is tied to a multidimensional conceptualisation of poverty,

while the US has tended to conceive of poverty more in terms of income and subsistence (Lister, 2004; Walker, 2005). This section argues that the salience of social exclusion in the UK context can help to explain the empirical findings related to the provision of services for basic needs as well as how the findings from the US, where social exclusion is not as prominent, can be understood.

6.2.1 Social Exclusion in the UK

The findings from this study—including London respondents' emphasis on helping homeless people to 're-join society,' as well as the design of services towards assisting and rehabilitating rough sleepers with the goal of social participation—suggest that an understanding of social exclusion plays a role in the way that both the problem of homelessness and services for basic needs have been addressed in London. Social exclusion rose to prominence under New Labour, with the establishment of the national Social Exclusion Unit and accompanying policy priorities, including tackling rough sleeping (Johnsen and Fitzpatrick, 2008). The national government's dedication to tackling social exclusion has been reiterated at the level of city governance in London, with commitments from both Ken Livingstone and Boris Johnson to address the issue from the Office of the Mayor (Clark *et al.*, 2005; Greater London Authority, 2013).

In this setting, rough sleeping is seen to be 'at the sharp end of social exclusion' (Department for Communities and Local Government, 1999, p. 18). The government's 2002 Guidance for Local Authorities on tackling homelessness and rough sleeping emphasised not only that homelessness 'can have a profound impact on health, education and employment prospects' but also that 'at a social level, homelessness can impact on social cohesion and economic participation' (Department for Communities and Local Government, 2006, p. 30). Service providers similarly understand homeless people as 'a typically vulnerable, chaotic, socially excluded group' (St. Mungo's, 2009, p. 21), who are 'first and foremost victims of social exclusion' (Crisis, 2003b). The housing services provider Single Homeless Project has as its slogan, for instance, 'Preventing homelessness. Promoting social inclusion.' (This can be contrasted with the New York-based Urban Justice Centre's tagline, 'Individual rights. Social change.') Service providers have also promoted an understanding of rough sleeping through the lens of

social exclusion rather than anti-social behaviour or deviance (Crisis, 2003a). A survey of homelessness services in London found that they emphasised 'both welfare and social functions' (Abrams and Christian, 2004, p. 180).

To understand the relationship between social exclusion and the provision of services for basic needs, a more thorough unpacking of the concept is needed. Social exclusion is 'relational' and dynamic (Room, 1995) and draws from a conceptualisation of poverty as multi-dimensional (consisting of deprivations beyond income poverty) and relative (specific to the setting in which it takes place). Its focus is on the ability to participate in a given society, and so is highly related to the activities and resources considered to be standard within a particular society (Burchardt *et al.*, 2002). In the present case, social exclusion points to the objective of being able to participate in the life of 21st-century London—an undertaking which requires a much more extensive set of resources and activities than those involved in the fulfilment of basic needs. One respondent reported that providers in the homelessness sector are 'trying to get away from the language of needs' towards conversations 'about skills and resources' (London service provider). Several others—service providers in particular— described rough sleeping as 'a failure of society'; No Second Night Out couches its mission statement by saying, 'We believe that sleeping rough is a concern for us all and there should be no need for it in the capital in the 21st century' (No Second Night Out, 2014).

It is not difficult to see, therefore, how a focus on social exclusion—particularly in the context of contemporary London—encourages policymakers and service providers to focus on 'higher-order' goals and needs. Indeed, when relative poverty measurements were developed, they were seen as a positive step away from 'subsistence' measures of poverty towards broader conceptualisations that captured more of the dimensions that mattered in people's lives (Townsend, 1979). Part of the reason for the unpopularity of services for basic needs alone may therefore be that, in the British context, an emphasis on these needs harks back to an idea of poverty from which advocates have fought to move away, one in which the problems of poor people—and therefore the remedies as well—are thought of merely in terms of the fulfilment of such needs.

In this sense, the notion—especially prevalent among London providers and policymakers—of homelessness as a moral failure, described by Tony Blair as a

'scandal' in a 'modern and civilised society' (BBC News, 1999b) both helps and hinders where homelessness and the provision of services for basic needs are concerned. On the one hand, it creates an impetus to act against homelessness and puts pressure on both the public and the voluntary sectors to address the problem. Apart from the potentially stigmatising language of homelessness as a 'failure,' it directs some of the blame for the problem to structural and societal processes rather than homeless people themselves. Simultaneously, however, it contributes to a sense that providers should and could be doing more than providing for basic needs, as if providing these services in and of itself sets the standard below what could be achieved in a modern and affluent society. The result of this is that services to meet basic needs are de-emphasised in favour of those that facilitate the achievement of higher-order needs. By placing contemporary and highly developed norms at the heart of what it means to achieve social inclusion, the UK response to homelessness assigns lesser value to needs and services that may be seen as using a minimum rather than optimum standard.

6.2.2 Social Exclusion in the US

In the US, by contrast, social exclusion has not gained nearly the same traction as either a political concept or an object of policy. Absolute and material definitions of poverty have retained a good deal of salience, with the most well-known being the Orshansky budget line still used by the Social Security Administration (United States Census Bureau, 2014). Providing services to meet basic needs does not conflict as much with the conceptualisation of poverty in this policy context, as the problem itself (a lack of material resources) is framed as having a great deal to do with the inability to fulfil these basic needs. In New York, homelessness is seen as the most extreme manifestation of poverty, rather than social exclusion. Restoration to economic independence—or, put simply, more resources—is sooner seen as a solution to the problem of poverty and by extension homelessness.

Furthermore, in the American context, individuals are held to account for their own well-being; society is not at fault for their exclusion (Micklewright, 2002). This is part of a larger system of values in the US in which citizens and government 'firmly believe in the value of individual rights and individual freedom' (Friedman, 1990, p. 2).

Abrams and Christian (2004) have noted that this individualistic perspective has influenced the design of homelessness services in New York, which are 'designed primarily to enable welfare provision to individuals,' with less emphasis on the social dimension (p. 172). This has two consequences in particular for homelessness services. First, it reinforces the conceptualisation of needs fulfilment as primarily an individual rather than a social activity. In New York, consequently, homeless people have less access to collective resources for the fulfilment of basic needs and greater scope to characterise their limited access to these resources as a violation of their rights to carry out certain activities. Secondly, the salience of individualism and personal choice means that homelessness service providers (a group that, as discussed earlier, is highly conscious of individuals' freedom from certain kinds of interference) are more hesitant to be proscriptive about what solutions work best for any given homeless person.

As with social rights, the relationship between social exclusion and services for basic needs is interesting because it is, in practice, somewhat paradoxical. Although lacking access to resources for the fulfilment of basic needs can undoubtedly be conceived of as a form of social exclusion (in contemporary London, it places a person well outside the prevailing social and economic norms, and is certainly prohibitive to full participation), adopting a policy strategy centred on social exclusion does not ensure that the provision of such services will be prioritised or even implemented. The US, by contrast, continues to employ a definition of poverty that is more absolute and centred on the lack of material resources, in which basic needs constitute a greater part of the concept of what it means to be poor. While there has been less vocal opposition to services to fulfil basic needs in New York, in the context of the minimal approach to the provision of welfare *overall* in the US this has produced a situation of non-interference, rather than extensive provision.

6.3 Responsibilities and Social Citizenship

This section discusses the idea that social citizenship in both the US and the UK emphasises the importance of economic productivity and that this is therefore a contributing factor in shaping the design of homelessness services towards education and employment. However, the way in which economic productivity is viewed (and the

reasons why it is such a desirable end goal) are somewhat distinct in each setting: the UK emphasises the relationship between the citizen and the welfare state, therefore encouraging contribution and reciprocity; in the US, greater value is placed on independence and, in particular, independence from government assistance.

In the UK welfare system, rights are not only entitlements but are also part of a reciprocal system in which individuals contribute as well as receive. Marshall articulated an early vision of this idea that remains highly relevant, starting particularly with New Labour, whose agenda 'sought to emphasise individual and mutual rights' (Dwyer, 2010). Services for homeless people set out, in part, to reinstate the status of citizenship through, on the one hand, connecting homeless people to the benefits to which they are entitled and, on the other, helping them to contribute to the welfare state. The US also places considerable emphasis on employment and productivity as the end of the process of homelessness services or treatment. However, this is framed as a move towards independence rather than reciprocity.

The notions of what comprises the bundle of citizenship rights, as well as the responsibilities it entails, are specific to the welfare states to which they pertain. This section will discuss how the design of services in each place, both emphasising economic productivity as a desired end goal, reflects its particular citizenship trajectory. As throughout this thesis, the word 'citizenship' is used in the Marshallian sense as it relates to the welfare state and participation in political, civil, and social rights, rather than alternative definitions of citizenship as, for instance, national membership or civic virtue.

6.3.1 The UK: Contribution and Reciprocity

Perhaps unsurprisingly, given that the development of the modern British welfare state provided much of the evidence behind 'Citizenship and Social Class' social citizenship in the UK shares many features with the model set forth by T.H. Marshall (1950). Social citizenship in this framework 'concerns the rights and duties associated with the provision of benefits' (Taylor-Gooby, 2009, p. 4-5). While some have argued that the recent curtailment of social rights is indicative of a trend towards liberalism and away from state protection (Taylor-Gooby, 2013), the British welfare state retains

(particularly relative to the US) many institutionalised social rights. However, echoes of Marshall's call for the 'corresponding duties of citizenship' can be heard in the prevailing notion of 'responsible citizenship' that 'seemingly spans the New Labour and New Tory political divide' (Marshall, 1949, cited in White, 2000; Whiteford, 2010, p. 193). A 2001 report from Oxfam notes that 'during the past decade, the view that citizens have "too many rights and not enough responsibilities" gained currency' (Ruxton and Karim, 2001, p. 18). The British citizenship relationship places a high value on reciprocity (Taylor-Gooby, 2009; Whiteford, 2010). This emphasis on contribution as an important aspect of participation in the welfare state can help to explain UK service providers' preoccupations with 'higher-order' goals such as employment and education.

While there are instances in which citizens can be released, whether temporarily or permanently, from their obligation to contribute to the welfare state (as with elderly people or those who are sick), homeless people do not constitute one of these groups, though in many cases their behavioural, psychological, and in some cases physiological ailments are indeed seen as prohibitive to their being able to contribute. Instead, rough sleeping is a status that is seen to prohibit contribution temporarily—though in many cases not as deservingly as illness, disability, or other statuses prohibiting contribution (Feldman, 2004). This is in part because it is seen as self-inflicted (for instance, in the language of 'voluntary' and 'involuntary' homelessness in the UK) and in part because of the possibility of future contribution, emphasised in service providers' focus on education and employment programmes. Thus, the service providers charged with 'rehabilitating' homeless people are engaged in bringing them back to the status of 'contributing members of society' (Homeless Link, 2012, p. 1). Dean (2010) describes these processes as 'seeking to engage the excluded as economically productive members of society' (p. 80). Accordingly, both government and service sector responses have emphasised helping rough sleepers 'to become active members of the community' (Department for Communities and Local Government, 1999, p. 4). The 'norm of reciprocity' (Whiteford, 2010, p. 193) is built into the design of support, advice, and training that enables homeless people to '[contribute] to society through their work' (Hough, 2012, p. 15). In keeping with the aforementioned focus on social exclusion in

the UK context, many of these services situate employment as a link between individuals and the broader society.

Within such a framework, the prioritisation of education, employment, and re-integration can be seen not only as the promotion of entitlement to social rights but also as direction towards employment and ultimately contribution to the welfare state. On the surface, these discourses around social citizenship may not seem to speak to basic needs. However, once again, homeless people who are dependent upon public or charitable provision for the fulfilment of their basic needs are greatly affected by the level of welfare state involvement in this provision. Accordingly, if part of the work of homelessness services is 'moving people on' (Lane and Power, 2009, p. 9) to a more socially and economically productive life, whereas services to meet basic needs can instead be seen as sustaining a non-contributing lifestyle, homelessness service providers are faced with conflicting objectives.

6.3.2 The US: Emphasising Self-Sufficiency

The US system places a high value on economic productivity as well, although this takes on a slightly different form that once more is bound up with American notions of citizenship. Whereas in the UK economic productivity is valued because it enables participation in the reciprocal relationship of the welfare state, in the US its value derives from the promotion of economic independence. While the relationship between state and citizen is also meant to be a reciprocal one, less is expected on each side, and, as such, there is less of an incentive on both sides to foster this relationship. This social citizenship relationship also helps to explain why, in comparison to the UK, the US has tended to be more receptive to charity and less so to taxation (Alesina and Glaeser, 2004). In the UK, the government assumes more responsibility for citizens' overall welfare—most notably for their health, but also, as previously discussed, for helping them to retain their housing and even for facilitating their social inclusion. In the US, by contrast, this study's findings indicate that while provision for homelessness services is extensive—particularly in New York—these services do not attempt the project of 'self-actualisation' and social re-integration of homeless people to quite the same extent as in

the UK. This is also in keeping with US values of respecting individual rights and limiting government intervention.

Much of the US approach to poverty has arisen out of concerns about a dependent 'underclass' (Morris, 1994; Wilson, 1987). In this framework, poverty is often viewed as the outcome of individual moral or behavioural failure (Piven and Cloward, 1971), and employment is viewed as a way of breaking the cycle of dependency. The notion of a social and economic underclass has not achieved the same salience in the UK (Walker and Howard, 2000). A key difference between the two countries can be illustrated through a statement from the UK government's first national rough sleeping strategy, *Coming In From the Cold* (1999). The report argues that 'it is crucial that we make it as simple as possible for rough sleepers, who often have chaotic lifestyles, to access the benefits system' (p. 14). The reconnection of poor people to government benefits is seen as part of the process of inclusion. In the US, accessing benefits sets up the individual as an outsider (Piven and Cloward, 1971). As such, the importance of employment is not to connect someone back into a system but, ideally, to render them independent from that system altogether. This has led to the development of 'a policy logic of *self-reliance*' in the US (Lain, 2011, p. 493, emphasis original). The ideal of independence is not only reflected in government policies towards poor people but is also so deeply embedded as to be seen in the missions of homelessness advocacy groups and service providers: 'to restore hope and dignity by offering opportunities for health and self-sufficiency' (Bowery Residents Committee, 2010, p. 16); to provide workforce-development initiatives for clients 'who seek economic self-sufficiency to move out of poverty' (Urban Justice Center, 2009, p. 4); and 'to ensure economic and food self-sufficiency for all Americans' (New York City Coalition Against Hunger, 2014). The Department of Homeless Services states that 'Employment is a cornerstone of DHS' effort to help its clients move back to independence' (Department of City Planning, City of New York, 2012, p. II-3).

Homelessness service providers in both cities can therefore be seen to be actively engaged in the work of helping homeless people to become active citizens according to the values of the welfare state in which they operate: in the UK, to participate in social citizenship by contributing as well as receiving; in the US, by becoming independent

bearers of individual freedoms. In the US, the promotion of employment or educational initiatives is driven more by the objective of instilling self-sufficiency rather than reciprocity or furthering social inclusion. In this framework, services to meet basic needs—although not interfered with, if they are provided through charity—can be seen as fostering dependence, leading the government not to engage extensively in their provision. Focusing on social citizenship also helps to understand welfare states' objectives more fully. In the UK, this helps to illustrate why service providers and governmental agencies pursue objectives beyond simply extending provision (including the provision of services for basic needs): a welfare state with strong social rights is interested not only in the promotion of entitlements to those rights but also in the development of reciprocal social citizenship relationships.

6.4 Alternative Explanations

It is important to give weight to 'rival explanations,' particularly in theory-building (Yin, 2003). Furthermore, different explanations may not be mutually exclusive and multiple factors may be involved in producing outcomes. Although comparing within the liberal regime type and across two cities with similar economic and cultural circumstances helps to 'control' for many factors related to the provision of welfare, it has not been possible to compare two cases that are strictly identical in every respect except for the variable under consideration (Goldstone, 1997). This means that the influence of other explanatory variables cannot be categorically eliminated. Decisions about homelessness services in both cities are also influenced by factors such as cost-benefit analysis and efficiency. In New York in particular the Bloomberg administration has been preoccupied with developing data systems to predict patterns of service use and minimise costs (Center for Innovation through Data Intelligence, 2014). It can also be argued, however, that welfare state expenditure is influenced by notions of the state's obligations to its citizens' social rights and so is not completely removed from discussions of social citizenship. In the US, efforts to minimise state expenditures are also bound up with ideological preferences for 'small government' and understandings of the American social citizenship relationship. Lastly, explanations related to cost would not be sufficient to explain the behaviour of advocacy groups in each city.

It is also possible, in a comparative study, to over-emphasise the differences between the two cases. The most similar systems approach suggests by design that the two cases are likely to be largely similar in most respects. There is some evidence that suggests convergence across the two cities' approaches to homelessness; for instance, Johnsen *et al*. (2005) have pointed to the increasing use of legal enforcement or 'criminalisation' strategies in the UK. Convergence may be even more likely in the future as the two countries increasingly engage in policy learning and transfer with respect to homelessness (London Housing Foundation, 2012), and as the economic climate puts pressure on the UK welfare state. However, there remain some striking differences between the two cases, such as the level of political priority given to rough sleeping in London and the strong and vocal civil rights advocacy found in New York, neither of which finds an analogue in the contrasting case site. This study has aimed to provide a sufficiently broad base of evidence, cutting across both political administrations and, within each city, groups of actors that are likely to have different perspectives (advocacy groups, service providers, and city government officials), to argue that its findings are plausible and grounded in the data.

6.5 Conclusion to Chapter Six

This study furthers the literature and expands on existing theories of social citizenship and the provision of services for poor or marginalised groups. Neither social exclusion nor social citizenship presents a complete or a rival explanation of a city's approach to the provision of services to meet the basic needs of homeless people. However, each contributes to the explanation of why certain strategies are pursued and helps to account for the outcomes and illustrate the ideas and objectives that guide service provision for homelessness within a given welfare state. Welfare providers' behaviour is influenced by their conceptualisations of the nature and causes of poverty, the relevance of social exclusion, and their notions of who is a citizen and what 'citizenship' entails. This study has explored some of the ways in which these factors interact with rather than preclude one another and in doing so has set forth new understandings of these relationships. The findings also introduce complexity to previous understandings of the US and the UK as broadly similar welfare states, showing that in

fact they proceed from different understandings of poverty and social exclusion as well as the relationship between the welfare state and its citizens.

CHAPTER 7: CONCLUSION

This thesis set out as a comparative study to investigate the provision of services to meet the basic needs of homeless people in New York and London. It examined whether, since services to meet basic needs can be conceptualised as social rights, the relative salience of social rights in a country (and hence a city within it) would affect the provision of these services, as well as the effects of civil rights.

The perspectives of advocacy groups, service providers, and city government officials demonstrated complex relationships between different kinds of rights and services to meet basic needs. In London, the salience of social rights was indeed evidenced through stronger programmes for the prevention of homelessness and more entitlements for homeless people. While there was also considerable attention to providing services for rough sleepers, this did not result in corresponding support for the provision of services to meet basic needs. Instead, it was found that providers prioritised services that facilitated progress towards 'higher-order' needs for self-actualisation, and designed programmes to join services to meet basic needs with those for education, employment, and social participation. Services to meet basic needs alone were seen by policymakers and larger service providers as prohibitive to this progress.

By contrast, New York emerged as a case in which civil rights both framed the claims made by advocacy groups and served as a constraint on intervention by the state. The landscape of benefits and service provision in many ways reflected the US tradition of minimal government involvement and a substantial role for charitable provision, particularly for services to meet basic needs. However, it was shown that advocates were able to advance claims for services to meet basic needs through the structures provided by a strong system of civil rights.

Neither of these approaches is categorically positive or negative with respect to the welfare of people experiencing homelessness. The approach taken in New York advances a broader rights-based agenda and asserts homeless people as rights-bearers; however, policymakers are frustrated by what they see as roadblocks that prevent them from making better policy, and such a system creates opposition rather than collaboration between groups that speak for, or as, homeless people and those that

deliver or design services. In London, by contrast, the 'higher-order' needs of people experiencing homelessness are well-attended to but at the expense of attention to services to meet the fundamental needs for food and sanitation which remain in many ways inaccessible to homeless people.

Furthermore, this thesis served to uncover the ways in which homelessness services are engaged in the work of restoring homeless people to economic productivity and restoring the balance of the social citizenship relationship. They do so in ways that reflect the approaches to social citizenship, social exclusion, and poverty within their welfare state. In London, service provision is carried out with the idea of bringing excluded people back into a position to engage with and, ultimately, contribute to society. Evidence from New York suggests a greater emphasis on poverty reduction with the ultimate goal of economic self-sufficiency.

The research presented here has shown that, particularly for services such as those to meet basic needs, where it can be difficult to assess levels of provision, it is important to examine the ways in which cities and providers approach provision and the motivations and decision-making processes at work. This type of analysis helps to account for how, for instance, public toilets in transport centres are part of a larger system involving its own multimillion dollar homelessness outreach contract and police force, and how services that ostensibly are not for homeless people are still intricately bound up with the problem of homelessness. People sleeping rough navigate a variety of channels to fulfil their basic needs, and close analysis is required to produce an understanding of these. Several factors have illuminated the situations in New York and London, including conflicts between service providers with different approaches to human need and the role of advocacy groups in revealing what types of claims and strategies are most effective in a particular context.

This has been an exploratory investigation, and further research will help to solidify both its empirical and theoretical findings. One key opportunity for further research is to explore how cities other than the two selected here have approached the provision of services to meet basic needs. This research could also look beyond the liberal welfare regime to examine how cities in social democratic or conservative regimes have managed this provision and, going further, draw comparisons across

regimes. Finally, as addressed earlier, there is considerable need for data collection on the extensiveness and accessibility of services to meet basic needs in light of the fragmented nature of this provision. This type of data could serve as a foundation for future comparative research, enabling quantitative as well as qualitative investigations, and would also be invaluable as a resource to service providers and advocates concerned with homeless people's ability to access services for basic needs.

The complex and methodical theoretical work that has already uncovered a great deal about the citizenship status of homeless people and their relationship to state power and policies (among them Feldman, 2004; Arnold, 2004; Dean, 2010 and others) can be extended and applied to the delivery of services 'on the ground.' In particular, there is a need for research to address the gap in attention to services to meet basic needs in developed and affluent contexts. On these and other issues within homelessness, there is a great deal of potential for trans-Atlantic learning about rights-based strategies; intergroup dialogue and partnership; and innovation in service provision. In particular, the development of solutions should seek to explore the ways in which services for basic needs can be compatible with longer-term progress on the problem of homelessness, and on ways to build political priority for services to meet basic needs, which otherwise fall between the cracks of the welfare state.

As it stands, the precarious positioning of homeless people within the welfare state has resulted in a situation in which services to meet basic needs are not straightforwardly accessible. Instead, they are obtained through different, often circuitous channels that reflect the different values embedded in the British and American welfare states. Homeless people in London are encouraged by service providers to access services to meet basic needs through enrolment in comprehensive programmes of treatment, engagement, and reintegration. In New York, by contrast, the research has shown that for homeless people, services to meet basic needs have in several cases raised as part of the freedom to carry out certain activities rather than, necessarily, rights granted in kind as resources. Greater attention to the accessibility and availability of these resources has the potential to bring about a significant improvement in the quality of life of homeless people.

REFERENCES

Abrams, D., and Christian, J. (2004). A tale of two cities: predicting homeless people's uptake of outreach programs in London and New York. *Basic and Applied Social Psychology*, 26(2/3), 169–182.

Alesina, A., and Glaeser, E. L. (2004). *Fighting poverty in the US and Europe: A World of Difference*. Oxford: Oxford University Press.

Arnold, K. (2004). *Homelessness, Citizenship, and Identity: The Uncanniness of Late Modernity*. Albany: State University of New York Press.

Atkinson, A. B., and Hills, J. (1998). Exclusion, Employment and Opportunity. London.

Bambra, C. (2005). Cash Versus Services: "Worlds of Welfare" and the Decommodification of Cash Benefits and Health Care Services. *Journal of Social Policy*, 34(2), 195–213.

BBC News. (1999a, November 14). UK Charities "promote homelessness." *BBC Online Network*. Retrieved from http://news.bbc.co.uk/1/hi/uk/519627.stm

BBC News. (1999b, December 15). Drives to cut homelessness. *British Broadcasting Corporation*. Retrieved from http://news.bbc.co.uk/1/hi/uk/563566.stm

Berube, A. (2014). *All Cities Are Not Created Unequal*. Washington, D.C. Retrieved from http://www.brookings.edu/research/papers/2014/02/cities-unequal-berube

Black, A., and Burstein, R. (2013). Local Scale and Local Data. In: B. Goldstein and L. Dyson (Eds.), *Beyond Transparency: Open Data and the Future of Civic Innovation*. San Francisco: Code for America Press.

Bradshaw, J. (1972). The concept of social need. *New Society*, 30 March.

Bryman, A. (2008). *Social Research Methods*. Oxford: Oxford University Press.

Burchardt, T., LeGrand, J., and Piachaud, D. (2002). Degrees of exclusion: developing a dynamic multidimensional measure. In: J. Hills, J. LeGrand, and D. Piachaud (Eds.), *Understanding social exclusion*. Oxford: Oxford University Press.

CBS New York. (2012, March 19). Donations to the Homeless: Has the Mayor Totally Eaten Away at the Public's Desire To Do Good? *Columbia Broadcasting System*. New York, NY. Retrieved from http://newyork.cbslocal.com/2012/03/19/bloomberg-strikes-again-nyc-bans-food-donations-to-the-homeless/

Center for Innovation through Data Intelligence. (2014). Multi-System Service Users. Retrieved April 11, 2014, from http://www.nyc.gov/html/cidi/html/research/multi-system.shtml

Centre for Labour and Social Studies. (2012). *Why Inequality Matters*. London.

CHAIN, and Broadway. (2014). *Street to Home Bulletin 2012/13*. London.

Clark, D., Kinnock, N., Leahy, M., Livingstone, K., Monks, J., and Twigg, S. (2005). *A New Deal for Social Europe*. London.

Coalition for the Homeless. (2004). Undercounting the Homeless: How the Bloomberg Administration's Homeless Survey Undercounts the Street Homeless and Misleads the Public. New York, NY.

Cohen, C. L. (1994). Down and Out in New York and London: A Cross-National Comparison of Homelessness. *Psychiatric Services*, 45, 769–776.

Copley, T. (2012, December 11). Boris Johnson admits he may miss target over rough sleeping in capital. *The Guardian*. London.

Crisis. (2003a). *Compassion not Coercion: Addressing the question of begging*. *Health for the millions* (Vol. 17). London.

Crisis. (2003b). *Living Places: Powers , Rights and Responsibilities--Response to the consultation by the Department of the Environment, Food and Rural Affairs*. London.

Crisis. (2014). Priority Need. Retrieved April 10, 2014, from http://england.shelter.org.uk/professional_resources/working_with_children_and_young_people/advising_young_people/common_issues/priority_need

Dahrendorf, R. (1994). The Changing Quality of Citizenship. In: B. van Steenbergen (Ed.), *The Condition of Citizenship*. London: Sage Publications.

Daly, M. (2010). Assessing the EU Approach to Combating Poverty and Social Exclusion in the Last Decade. In: E. Marlier, D. Natali, and R. Van Dam (Eds.), *Europe 2020: Towards a More Social EU?* (pp. 143–161). Brussels: European Interuniversity Press.

Dean, H. (1996). Welfare, Law, and Citizenship. Hemel Hempstead: Harvester Wheatsheaf.

Dean, H. (2001). Welfare rights and the "workfare state." *Benefits: the Journal of Poverty and Social Justice*, 30, 1–4.

Dean, H. (2010). *Understanding human need: Social issues, policy and practice*. Bristol: The Policy Press.

Dean, H., and Melrose, M. (1999). *Poverty, riches and social citizenship*. Basingstoke: Macmillan Press.

Denzin, N. K., and Lincoln, Y. S. (2013). Introduction: The Discipline and Practice of Qualitative Research. In: N. K. Denzin and Y.S. Lincoln (Eds.), *Collecting and Interpreting Qualitative Materials* (4th ed.). Thousand Oaks: Sage Publications.

Department for Communities and Local Government. (1999). *Coming in from the cold: the Government's strategy on rough sleeping*.

Department for Communities and Local Government. (2006). *Homelessness Code of Guidance for Local Authorities*. London.

Department for Communities and Local Government. (2008). *No One Left Out: Communites Ending Rough Sleeping*. London.

Department for Communities and Local Government. (2012). *Evidence review of the costs of homelessness*. London.

Department of City Planning- City of New York. (2012). *Consolidated Plan: Annual Performance Report 2011, Volume 2* (Vol. 2). New York, NY.

Doyal, L., and Gough, I. (1984). A theory of human needs. *Critical Social Policy*, 4, 6–38.

Dwyer, P. (2010). *Understanding Social Citizenship* (2nd ed.). Bristol: The Policy Press.

Eide, A. (1995). Economic, social, and cultural rights as human rights. In: A. Eide, C. Krause, and A. Rosas (Eds.), *Economic, social, and cultural rights: a textbook*. Boston: M. Nijhoff Publishers.

Eisenhardt, K. M. (2002). Building Theories From Case Study Research. In: M. A. Huberman and M. B. Miles (Eds.), *The Qualitative Researcher's Companion* (pp. 5–27). Thousand Oaks: Sage Publications.

Elliott, A. (2013, December 9). Invisible Child- Girl in the Shadows: Dasani's Homeless Life. *The New York Times*. New York, NY. Retrieved from http://www.nytimes.com/projects/2013/invisible-child/?n=Top/News/U.S./U.S. States, Territories and Possessions/New York?ref=newyork#/?chapt=1

Espada, J. C. (1996). *Social Citizenship Rights*. New York: St. Martin's Press.

Esping-Andersen, G. (1990). *Three Worlds of Welfare Capitalism*. Princeton: Princeton University Press.

Feldman, L. C. (2004). *Citizens Without Shelter: Homelessness, Democracy, and Political Exclusion*. Ithaca: Cornell University Press.

Fischer, C. S. (2008). Paradoxes of American Individualism. *Sociological Forum*, 23(2), 363–372.

Fitzpatrick, S., Pawson, H., Bramley, G., Wilcox, S., and Watts, B. (2013). *The Homelessness Monitor: England 2013*. London.

Flowers, M. (2013). Beyond Open Data: The Data-Driven Cit. In: B. Goldstein, L. Dyson, and A. Nemani (Eds.), *Beyond Transparency: Open Data and the Future of Civic Innovation* (pp. 185–198). San Francisco: Code for America Press.

Food Bank for New York City. (2014). New Data from Food Bank For New York City Reveals Alarming Increase in New Yorkers Turning to Emergency Food Providers Following November 2013 SNAP Cuts. Retrieved May 17, 2014, from http://www.foodbanknyc.org/news/new-data-from-food-bank-for-new-york-city-reveals-alarming-increase-in-new-yorkers-turning-to-emergency-food-providers-following-november-2013-snap-cuts

Fraser, N., and Gordon, L. (1998). Contract versus charity: why is there no social citizenship in the United States? In: G. Shafir (Ed.), *The citizenship debates: a reader*. Minneapolis: University of Minnesota Press.

Frendreis, J. P. (1983). Explanation of Variation and Detection of Covariation: The Purpose and Logic of Comparative Analysis. *Comparative Political Studies*, 16, 255–272.

Friedman, L. M. (1990). *The Republic of Choice: Law, Authority, and Culture*. Cambridge: Harvard University Press.

Gentleman, A. (2012, July 18). Food banks: a life on handouts. *The Guardian*. Retrieved from http://www.theguardian.com/society/2012/jul/18/food-banks-on-hand-outs

Glover, J. (2014, March 17). New York Strips London of Mantle as World's Top Financial Center. *Bloomberg*. Retrieved from http://www.bloomberg.com/news/2014-03-15/new-york-steals-london-s-mantle-as-world-s-top-financial-center.html

Goldstone, J. A. (1997). Methodological issues in Comparative Macrosociology. *Comparative Social Research*, 16, 107–120.

Great Britain. (1996). *Housing Act 1996: Elizabeth II. Chapter 52*. Great Britain. Retrieved from http://www.legislation.gov.uk/ukpga/1996/52/contents

Greater London Authority. (2013). *2020 Vision: The Greatest City on Earth- Ambitions for London*. London.

Greed, C. (2006). The role of the public toilet: pathogen transmitter or health facilitator? *Building Services Engineering Research and Technology*, 27(127-139).

Groundswell. (2011). *The Homeless People's Commission: Full Report*. London.

Groundswell. (2014). Creating inclusive solutions to homelessness. Retrieved January 30, 2014, from http://www.groundswell.org.uk/index.html

De Haan, A. (1999). *Social Exclusion: Towards an holistic understanding of deprivation*. London: Department for International Development.

Hall, P. A., and Soskice, D. (2001). *Varieties of Capitalism: The Institutional Foundations of Comparative Advantage*. Oxford: Oxford University Press.

Hewitt, M. (1998). Social policy and human need. In: N. Ellison and C. Pierson (Eds.), *Developments in British Social Policy*. Macmillan Press.

Home Office. (2003). *Respect and Responsibility – Taking a Stand Against Anti-Social Behaviour*. London.

Homeless Link. (2009). Mayor Takes Action to End Rough Sleeping in London by 2012. Retrieved May 19, 2014, from http://homeless.org.uk/news/london/mayor-takes-action-end-rough-sleeping-in-london-2012#.U479opRdVUw

Homeless Link. (2010). *Homeless Link's Evidence: Social Security Advisory Committee Public Consultation on the Housing Benefit (Amendment) Regulations 2010*. London.

Homeless Link. (2012). *The Value of the Homelessness Sector*. London.

Homeless Link. (2013). *Counts and Estimates- Evaluating the Extent of Rough Sleeping*. London.

Homeless Link. (2014). Welfare Benefits. Retrieved May 9, 2014, from http://homeless.org.uk/welfarebenefits#.U44QLZRdVUw

Hopkin, J. (2010). Comparative Methods. In: D. Marsh and G. Stoker (Eds.), *Theory and methods in political science* (3rd ed., pp. 285–307). Basingstoke: Palgrave Macmillan.

Hough, J. (2012). *Keeping Work: Interm findings from longitudinal qualitative research on homeless people's experiences of starting and staying in work*. London.

Housing Justice. (2012). *Soup Run Best Practice Guide*. London. Retrieved from http://www.housingjustice.org.uk/data/files/Soup_Run_Handbook.pdf

Institute for Children Poverty and Homelessness. (2014). 1977-Today: New Urban Poverty. *History of Poverty & Homelessness in NYC*. Retrieved May 6, 2014, from http://povertyhistory.org/era/today

International Monetary Fund. (2014). *World Economic Outlook April 2014: Recovery Strengthens, Remains Uneven*. Washington, D.C.

Isin, E. F., and Turner, B. S. (2002). Citizenship Studies: An Introduction. In: E. F. Isin and B. S. Turner (Eds.), *Handbook of CItizenship Studies* (pp. 1–11). London: Sage Publications.

Janoski, T. (1998). *Citizenship and Civil Society: A Framework of Rights and Obligations in Liberal, Traditional, and Social Democratic Regimes.* Cambridge: Cambridge University Press.

Johnsen, S., Cloke, P., and May, J. (2005). Day centres for homeless people: spaces of care or fear? *Social & Cultural Geography*, 6(6), 787–811.

Johnsen, S., and Fitzpatrick, S. (2008). The Use of Enforcement to Combat Begging and Street Drinking in England: A High Risk Strategy? *European Journal of Homelessness*, 2, 191–204.

Katrougalos, G. S. (2008). European "Social States" and the USA. *European Constitutional Law Review*, 4, 225–250.

King, D. S. (1999). *In the Name of Liberalism: Illiberal Social Policy in the United States and Britain*. Oxford: Oxford University Press.

King, D. S., and Wickham-Jones, M. (1999). From Clinton to Blair: The Democratic (Party) Origins of Welfare to Work. *The Political Quarterly*, 70(1), 62–74.

Koh, H. H. (2003). On American Exceptionalism. Retrieved from http://digitalcommons.law.yale.edu/fss_papers/1778

Korman, A. K., Greenhaus, J. ., and Badin, I. . (1977). Personnel Attitudes and Motivation. *Annual Review of Psychology*, 28, 175–196.

Korpi, W., and Palme, J. (1998). The Paradox of Redistribution and Strategies of Equality: Welfare State Institutions, Inequality, and Poverty in the Western Countries. *American Sociological Review*, 63(5), 661–687.

Kushel, M. B., Perry, S., and Moss, A. R. (2002). Emergency Department Use Among the Homeless and Marginally Housed: Results From a Community-Based Study. *American Journal of Public Health*, 92(5), 778–784.

Lain, D. (2011). Helping the poorest help themselves? Encouraging employment past 65 in England and the USA. *Journal of Social Policy*, 40(3), 493–512.

Lane, L., and Power, A. (2009). *Soup Runs in Central London: "The right help in the right place at the right time?"* London.

Legal Action Center for the Homeless. (1990). New York City's Public Bathroom Crisis. New York, NY.

Legard, R., Keegan, J., and Ward, K. (2003). In-Depth Interviews. In: J. Ritchie and J. Lewis (Eds.), *Qualitative Research Practice: A Guide for Social Science Students and Researchers* (pp. 138–169). London: Sage Publications.

Libman, K. (2012). *Eating the city: Food environments, inequality, and the everyday journeys of eaters in New York and London*. City University of New York.

Lijphart, A. (1971). Comparative Politics and the Comparative Method. *American Political Science Review*, 65(3), 682–693.

Lijphart, A. (1975). II. The Comparable-Cases Strategy in Comparative Research. *Comparative Political Studies*, 8, 158–177.

Lincoln, Y. S., and Guba, E. G. (1985). *Naturalistic Inquiry*. Newbury Park: Sage Publications.

Lister, R. (2004). *Poverty*. Cambridge: Polity Press.

London Assembly Health and Public Services Committee. (2006). *An urgent need: The state of London's public toilets*. London.

London Assembly Health and Public Services Committee. (2011). *Public toilets in London: Update report*. London.

London Housing Foundation. (2012). London managers sent to USA. Retrieved May 24, 2014, from http://www.lhf.org.uk/content/london-managers-sent-usa

Loury, G. C., Modood, T., and Teles, S. M. (2005). *Ethnicity, social mobility and public policy: comparing the US and UK*. Cambridge: Cambridge University Press.

Lucadamo, K., and Smith, G. B. (2010, November 26). Feasts for all as thousands across the city flock to soup kitchens. *New York Daily News*. New York, NY.

Mahoney, J. (2007). Qualitative Methodology and Comparative Politics. *Comparative Political Studies*, 40(2), 122–144.

Manhattan Borough President's Task Force on Housing for Homeless Families. (1987). *A Shelter is Not a Home*. New York, NY.

Mann, M. (1987). Ruling Class Strategies and Citizenship. *Sociology*, 21(3), 339–354.

Marshall, T. H. (1950). *Citizenship and social class, and other essays*. Cambridge: Cambridge University Press.

Marshall, T. H. (1963). Citizenship and Social Class. In: T. H. Marshall (Ed.), *Sociology at the Crossroads and Other Essays*. London: Heinemann.

Maslow, A. H. (1954). *Motivation and personality*. New York: Harper & Row.

Mcdonagh, T. (2011). Tackling homelessness and exclusion : Understanding complex lives.

Micklewright, J. (2002). Social Exclusion and Children: A European view for a US debate. London.

Mill, J. S. (1843). *A System of Logic, Ratiocinative and Inductive*. London: Longmans Green.

Minnery, J., and Greenhalgh, E. (2007). Approaches to Homelessness Policy in Europe, the United States, and Australia. *Journal of Social Issues*, 63(3), 641–655.

Model, S. (1997). An occupational tale of two cities: minorities in London and New York. *Demography*, 34(4), 539–50. Retrieved from http://www.ncbi.nlm.nih.gov/pubmed/9545630

Molotch, H., and Noren, L. (2010). *Toilet: Public Restrooms and the Politics of Sharing*. New York: New York University Press.

Moran, M. (1991). *Governing the health care state: a comparative study of the United Kingdom, the United States and German*. Manchester: Manchester University Press.

Morris, L. (1994). *Dangerous Classes: The underclass and social citizenship*. London: Routledge.

Morse, J. M., and Richards, L. (2013). *ReadMe First for a user's guide to qualitative methods* (3rd ed.). Thousand Oaks: Sage Publications.

St. Mungo's. (2009). *Happiness Matters: Homeless people's views about breaking the link between homelessness and mental ill health*. London.

St. Mungo's. (2011a). *Battered, broken, bereft: Why people still end up sleeping rough*. London.

St. Mungo's. (2011b). *St. Mungo's Response to Westminster Council's Byelaw Consultation*. London.

Nagourney, A. (2001, December 27). Quality of Life is High Priority for Bloomberg. *The New York Times*. New York, NY. Retrieved from http://www.nytimes.com/2001/12/27/nyregion/quality-of-life-is-high-priority-for-bloomberg.html

National Law Center on Homelessness and Poverty, and National Coalition for the Homeless. (2009). Homes Not Handcuffs : The Criminalization of Homelessness in U.S. Cities, (July).

National Law Center on Homelessness and Poverty, and National Coalition for the Homeless. (2010). *A place at the table: Prohibitions on Sharing Food with People Experiencing Homelessness*.

New York City Coalition Against Hunger. (2014). Mission & History. Retrieved April 15, 2014, from https://nyccah.org/about/mission-history

New York City Department of Homeless Services. (2014a). Daily Report, April 8. New York, NY. Retrieved April 8, 2014, from http://www.nyc.gov/html/dhs/downloads/pdf/dailyreport.pdf

New York City Department of Homeless Services. (2014b). *What We Do*. New York, NY.

New York City Department of Homeless Services. (n.d.). Statement of Client Rights and Client code of Conduct. New York, NY.

New York City Housing Authority. (2014). About NYCHA.

New York City Innovations in Mental Health. (2014). Homeless Drop in Centers. *Network of Care*.

New York City Office of the Mayor. (2007). Mayor's Fund to Advance New York City Announces Success of Safe Haven Pilot Program Addressing Street Homelessness. Retrieved from http://home2.nyc.gov/html/fund/html/news/pr_030708.shtml

No Second Night Out. (2014). About NSNO.

Office of the Deputy Prime Minister. (1998). *The Social Exclusion Unit*. London.

Oyen, E. (1997). The contradictory concepts of social exclusion and social inclusion.

Picture the Homeless. (2002). *Pattern and Practice: Systemic Violations of the Civil Rights of Homeless New Yorkers by the NYPD* (Vol. 10029). New York.

Piven, F. F., and Cloward, R. A. (1971). *Regulating the Poor: The functions of public welfare*. New York: Vintage Press.

Plant, R. (1992). Citizenship, Rights, and Welfare. In: A. Coote (Ed.), *The Welfare of Citizens*. London: River Oram Press.

Powell, M. A. (2007). *Understanding the mixed economy of welfare*. *2007*. Bristol: The Policy Press.

Power, R., French, R., Connelly, J., George, S., Hawes, D., Hinton, T., Klee, H., et al. (1999). Health, health promotion, and homelessness. *BMJ (Clinical research ed.)*, 318, 590–2. Retrieved from http://www.pubmedcentral.nih.gov/articlerender.fcgi?artid=1115032&tool=pmcentrez&rendertype=abstract

Przeworski, A., and Teune, H. (1970). *Logic of Comparative Social Inquiry*. John Wiley & Sons.

Ragin. (1997). *The Comparative Method: Moving Beyond Qualitative and Quantitative Strategies*. Berkeley and Los Angeles: University of California Press.

Randall, G., and Brown, S. (2002). *Helping rough sleepers off the streets: A report to the Homelessness Directorate*. London.

Randall, G., and Brown, S. (2006). *Steps Off the Street: solutions to street homelessness*.

Rittich, K. (2007). Social Rights and Social Policy: Transformations on the International Landscape. In: D. Barak-Erez and A. Gross (Eds.), *Exploring Social Rights: Between Theory and Practice* (pp. 107–135). Oxford and Portland, Oregon: Hart Publishing.

Roche, M. (2002). Social Citizenship: Grounds of Social Change. In: E. F. Isin and B. S. Turner (Eds.), *Handbook of CItizenship Studies* (pp. 69–86). London: Sage Publications.

Room, G. (1995). *Beyond the Threshold: The measurement and analysis of social exclusion*. Bristol: The Policy Press.

Rowe, M., and Baranoski, M. (2011). Citizenship, mental illness, and the criminal justice system. *International Journal of Law and Psychiatry*, 34(4), 303–308.

Ruxton, S., and Karim, R. (2001). *Beyond Civil Rights: Developing Economic, Social, and Cultural Rights in the United Kingdom*. Oxford.

Saul, M. H. (2013, March 5). Homeless Blame Game in New York City. *The Wall Street Journal*. New York, NY.

Scott, D. (2007). The Role of the Voluntary and Community Sectors. In: J. Baldock, N. Manning, and S. VIckerstaff (Eds.), *Social Policy* (3rd ed., pp. 308–344). Oxford: Oxford University Press.

Sen, A. (1983). Poor, relatively speaking. *Oxford Economic Papers*, 35, 153–169.

Shelter. (2005). *Food for thought: soup-runs and soup-kitchens*. London.

Silver, H. (1994). Social exclusion and social solidarity: three paradigms. *International Labour Review*, 133(5-6), 531–578.

Sitra. (2013). *The St. Mungo's approach to Recovery--moving away from traditional power relationships between staff and service users*. London.

Snyder, R. (2001). Scaling down: The subnational comparative method. *Stuides in Comparative International Development*, 36(1), 93–110.

Somerville, P. (1998). Explanations of social exclusion: where does housing fit in? *Housing Studies*, 13(6), 761–780.

Spencer, L., Ritchie, J., and O'Connor, W. (2003). Analysis: Practices, Principles and Processes. In: J. Ritchie and J. Lewis (Eds.), *The Qualitative Researcher's Companion* (pp. 199–218). London: Sage Publications.

Stanwell-Smith, R. (2010). Public toilets down the drain? Why privies are a public health concern. *Public health*, 124(11), 613–6. Elsevier Ltd.

Van Steenbergen, B. (1994). The Condition of Citizenship: An Introduction. In: B. van Steenbergen (Ed.), *The Condition of Citizenship* (pp. 1–10). London: Sage Publications.

Stephens, M., and Fitzpatrick, S. (2007). Welfare Regimes, Housing Systems and Homelessness: How are they linked? *European Journal of Homelessness*, 1(December).

Tay, L., and Diener, E. (2011). Needs and subjective well-being around the world. *Journal of Personality and Social Psychology*, 102(2), 354–365.

Taylor-Gooby, P. (2009). *Reframing Social Citizenship*. Oxford: Oxford University Press.

Taylor-Gooby, P. (2013). *The Double Crisis of the Welfare State and What We Can Do About It*. Basingstoke: Palgrave Macmillan.

Tesch, R. (1990). *Qualitative research: Analysis Types and Software Tools*. New York: Falmer.

Teune, H. (1997). Stories, Observations, Systems, Theories. *Comparative Social Research*, 16, 73–83.

Thames Reach. (2014). Homelessness facts and figures. Retrieved May 21, 2014, from http://www.thamesreach.org.uk/news-and-views/homelessness-facts-and-figures/

The Council of the City of New York. (2013). *Hearing on the Fiscal Year 2014 Executive Budget For the Department of Homeless Services*. New York, NY.

The Equality Trust. (2011). Income inequality: Trends and Measures. London: The Equality Trust.

The Pavement. (2014). Food/Soup Runs. Retrieved May 17, 2014, from http://www.thepavement.org.uk/services.php?facility=&service=13&city=1

Titmuss, R. (2001). Lecture at the University of Birmingham in honour of Eleanor Rathbone [1955]. In: P. Alcock, H. Glennerster, A. Oakley, and A. Sinfield (Eds.), *Welfare and wellbeing: Richard Titmuss' contribution to social policy*. Bristol: The Policy Press.

Townsend, P. (1979). *Poverty in the United Kingdom*. Harmondsworth: Penguin.

Townsend, P. (1985). A sociological approach to the measurement of poverty: a rejoinder to Professor Sen. *Oxford Economic Papers*, 37, 659–668.

Tran, M. (2011, February 28). Westminster council looks to ban soup runs for homeless around cathedral. *The Guardian*. Retrieved from http://www.theguardian.com/society/2011/feb/28/westminster-council-soup-run-ban

Turner, B. S. (2001). The erosion of citizenship. *The British Journal of Sociology*, 52(2), 189–209.

Turner, B. S. (2009). T.H. Marshall, social rights and English national identity. *Citizenship Studies*, 13(1), 65–73.

Twine, F. (1992). Citizenship: opportunities, rights and routes to welfare in old age. *Journal of Social Policy*, 21(2), 165–175.

Twine, F. (1994). *Citizenship and social rights: The interdependence of self and society*. London: Sage Publications.

UK Common Rights Project. (n.d.). Homeless people speak about the lack of those common rights the rest of us take for granted. *2013*. Retrieved January 8, 2014, from http://www.commonrights.org.uk/

UN General Assembly. (1948). *Universal Declaration of Human Rights*. Retrieved from http://www.refworld.org/docid/3ae6b3712c.html

United States Census Bureau. (2014). How the Census Bureau Measures Poverty. Retrieved February 8, 2014, from http://www.census.gov/hhes/www/poverty/about/overview/measure.html

United States Department of Housing and Urban Development. (1987). *McKinney-Vento Homeless Assistance Act of 1987*. United States.

United States Department of Housing and Urban Development. (2008). Questions and Answers About Expanding HUD's Definition of Homelessness.

Urban Justice Center. (2009). *We Want to Work: Challenges to Self-Sufficiency in New York City's Workforce-Development System*. New York, NY.

Waldron, J. (2005). Homelessness and the Issue of Freedom. In: R. E. Goodin and P. Pettit (Eds.), *Contemporary Political Philosophy: An Anthology* (2nd ed., pp. 432–449). Oxford: Wiley-Blackwell.

Walker, R. (2005). *Social Security and Welfare: Concepts and comparisons*. Maidenhead: Open University Press.

Westminster City Council. (2011). *Soup Run & Rough Sleeping Byelaws*. London. Retrieved from http://transact.westminster.gov.uk/docstores/publications_store/Soup Runs Byelaw FAQ.pdf

White, S. (2000). Review Article: Social Rights and the Social Contract – Political Theory and the New Welfare Politics. *British Journal of Political Science*, 30(3), 507–532.

Whiteford, M. (2010). Hot Tea, Dry Toast and the Responsibilisation of Homeless People. *Social Policy and Society*, 9(02), 193.

Whiteford, M. (2011). Square Pegs, Round Holes: Rough Sleeping and Service User Involvement? *Practice: Social Work in Action*, 23(1), 45–58.

Wilson, W. (2014). Homeless households in temporary accommodation (England). London.

Wilson, W. J. (1987). *The Truly Disadvantaged*. Chicago: University of Chicago Press.

Yin, R. K. (2003). *Case Study Research: Design and Methods* (3rd ed.). Thousand Oaks: Sage Publications.

Youdelman, S., and Getsos, P. (2005). *The Revolving Door: Research Findings on NYC's Employment Services and Placement System and Its Effectiveness in Moving People from Welfare to Work*. New York, NY.

APPENDIX 1: SAMPLE INTERVIEW TOPIC GUIDE

Interview Topic Guide: Service Providers

Objectives

- To assess providers' perspectives on the extent and accessibility of services in each city
- To understand the challenges of service provision
- To explore the role of rights and citizenship in service provision, and how this reflects the citizenship status of people experiencing homelessness

Introduction (2 min.)

- *Objective: Cover the basics of the interview process*

Introduction:

- Primary research for MPhil in CSP in Department of Social Policy and Intervention at Oxford University
- Recorded interview about access and provision of services
- Study is confidential and anonymous
- Participant may opt out of answering questions or stop the interview completely if they choose
- Interview is expected to last approximately one hour

Professional History (5-10 min.)

- *Objectives: Set the tone for the interview and get to know respondent*
- *Obtain a general outline of the respondent's professional history*

Ask respondent to cover:

- Current and past positions:
  - Number of years
  - Expertise and responsibilities

Scope and Accessibility of Services for Basic Needs (10-15 min.)

- *Objective: To illustrate the landscape of services for basic needs in each city, and the accessibility of these services to people experiencing homelessness.*

- Ask respondent about homelessness in this city, incl:
  - Scope of problem
  - Unique challenges

- Concerning the respondent's service or advocacy organisation:
  - How are the organisation's services delivered?

    - Who are recipients? How does the organisation interact with them?
    - What are the goals of service provision or advocacy in this area? How is success measured?
    - What are the major challenges, constraints, obstacles to change?
    - Have there been major changes in this area in recent years? If so, what and why?

- More generally, what services are targeted to homeless people for:
    - Food and water
    - Sanitation and hygiene
    - What are roles of other providers, private sector, cash benefits?

- What public or "mainstream" services (such as public toilets) are available to homeless people for the fulfillment of basic needs?
    - Are these services accessible to homeless people, to what extent, and why or why not?

- Limitations to accessibility of each type of service:
    - Temporal
    - Spatial
    - Variations among sub-groups of homeless people

Rights and Citizenship (15-20 min.)

- *Objectives: To ascertain what interviewees think about the role of rights and citizenship in influencing service provision.*
- *To illustrate similarities and differences in conceptions of rights and citizenship across cities.*

- Does respondent see this service as a right?
    - If so, what does that mean to the respondent?
    - Right in theory? Right in practice?
- If not, how should access to this service be determined?
    - Should there be conditions? Are certain groups targeted?

Assess respondent's perspective on homeless people's participation in…

"Social" rights: access to housing, health care, benefits

- Why might homeless people have trouble accessing services?
    - If a homeless person has trouble accessing services, what recourse is available?

"Civil" rights

- To what extent are homeless people prohibited from engaging in activities such as sleeping, sitting, eating in public space in this city?
    - What is the involvement of government/police in regulating these

activities in public space?

- Assess respondent's thoughts on whether/to what extent:
    - Homeless people have right to freedom from government/police regulation when sleeping or sitting in public space: should this be a protected activity?
    - If not, how should it be addressed?
- If a homeless person's civil rights are violated, what recourse is available?
- In what ways are rights-based discourses/approaches helpful/harmful?

Conclusion (5 min.)

- *Objectives: Open the floor to subjects not yet discussed in the interview*
- *Wrap up the interview and leave the respondent feeling comfortable*

Is there anything we haven't talked about that, based on your experience, you think is important to an understanding of this subject?

APPENDIX 2: DOCUMENTARY ANALYSIS

List of Documents Analysed: London			
Category*	**Organisation**	**Year**	**Title of Publication**
Government	Department for Communities and Local Government	2011	*Vision to end rough sleeping: No Second Night Out nationwide*
		2008	*No one left out: Communities ending rough sleeping*
		2006	*Homelessness Code of Guidance for Local Authorities*
		1999	*Coming on from the cold: the Government's strategy on rough sleeping*
	Health and Public Services Committee, London Assembly	2011	*Public toilets in London: update report*
		2006	*An urgent need: The state of London's public toilets*
	Office of the Deputy Prime Minister	1997	*The Social Exclusion Unit*
	Great Britain: Acts of Parliament	2002	*Homelessness Act 2002*
		2002	*Homelessness (Priority Need for Accommodation) (England) Order 2002*
		1996	*Housing Act 1996*
Service Provision	Broadway	2008	*Response to the government's discussion paper: Rough Sleeping 10 Years On: from the streets to independent living and opportunity*
		2007	*Broadway's response to the Mayor of London's Consultation: Towards the Mayor's Housing Strategy*
		2006	*Creating Sustainable Communities: Supporting Independence- a consultation on the strategy for the Supporting People programme*
	Crisis	2006	*Steps off the street: solutions to street homelessness*
		2003	*Living Places: Powers, Rights, and Responsibilities*
		2003	*Compassion not Coercion: Addressing the question of begging*
		1999	*Paved with gold? The reality of homelessness in London*
	No Second Night Out	2011	*Effective Action to End Homelessness: Reconnecting Rough Sleepers*

List of Documents Analysed: London (continued)			
Service Provision	Simon Community	2010	*Consultation Response- 'Proposed changes to guidance on evaluating the extent of rough sleeping'*
	Shelter	2008	*Response - Rough Sleeping 10 Years On*
		2005	*Food for thought: soup-runs and soup-kitchens*
	St. Mungo's	2013	*No More: Homelessness through the eyes of recent rough sleepers*
		2011	*Long Term Rough Sleepers-- Innovation and Recovery*
		2011	*Battered, broken, bereft: Why people still end up sleeping rough*
		2011	*St. Mungo's Response to Westminster Council's Byelaw Consultation*
	Thames Reach	2013	*Breaking Down Barriers: Equipping People to Find Their Own Solutions to Overcome Homelessness and Social Exclusion*
		2003	*Reach Out* ('Killing With Kindness' campaign material)
Advocacy	Groundswell	2014	*Creating inclusive solutions to homelessness*
		2011	*Homeless People's Commission: Full Report*
		2007	*Streets Ahead- Good Practice in Tackling Rough Sleeping*
	Housing Justice	2013	*UK Common Rights Project*
		2012	*Housing Justice Response to the Mayor's Housing Strategy*
		2012	*Busting the Myths: An Alternative Manifesto for Housing*
	Housing Justice, The Pavement, Liberty	2009	*Rights Guide for Rough Sleepers*

*Categories are not strictly defined; some groups, such as Crisis and the Simon Community, can be considered both as 'advocacy groups' and 'service providers.'

List of Documents Analysed: New York			
Category	**Organisation**	**Year**	**Title of Publication**
Government	Manhattan Borough President's Task Force on Housing for Homeless Families	1987	*A Shelter is Not a Home*
	New York City Commission on the Homeless	1992	*The Way Home: A New Direction in Social Policy*
	New York City Department of City Planning	2011	*Consolidated Planning: Annual Performance Report 2011*
	New York City Department of Homeless Services	2014	*Statement of Client Rights and Client Code of Conduct*
		2011	*Critical Activities Report*
		2009	*Housing Placement Guidelines (Revised)*
		2008	*A Progress Report on Uniting for Solutions Beyond Shelter: The Action Plan for New York City*
	New York City Office of the Mayor	2007	*Mayor's Fund to Advance New York City Announces Success of Safe Haven Pilot Program Addressing Street Homelessness*
	New York State Supreme Court	1981	Callahan v. Carey, *consent decree, No. 79-42582*
		1986	McCain v. Koch, *70 NY 2d 109 (Court of Appeals)*
	United States Department of Housing and Urban Development	1987	*McKinney-Vento Homeless Assistance Act of 1987*
Service Provision	Bowery Residents' Committee	2010	*Bowery Residents' Committee Annual Report*
		2005	*Success in Ending Chronic Homelessness: A Case Study at the Bowery Residents' Committee*
	BronxWorks	2012	*2011-2012: A Year of Action*
	CAMBA	2011	*Annual Report*
	Goddard Riverside	2011	*Annual Report: Building Communities and Changing Lives Since 1987*
	Holy Apostles Soup Kitchen	2010	*Annual Report*
	Pathways to Housing	2012	*Annual Report*
		2006	*Housing First Services for People Who are Homeless*

List of Documents Analysed: New York (continued)			
Advocacy	Coalition for the Homeless	2013	*State of the Homeless 2013- 50,000: The Bloomberg Legacy of Record Homelessness*
		2009	*The Bloomberg Administration's New System for Addressing Street Homelessness: Fewer Resources and Reduced Access*
		2000	*Modern Mass Homelessness in New York City: A Brief History and Current Threats to the Right to Shelter*
		1981	*The People's Callahan*
		1981	*Basic Shelter Rights*
	Legal Action Center for the Homeless	1990	*New York City's Public Bathroom Crisis*
	NY Coalition Against Hunger	2013	*Superstorm of Hunger: Lingering Shortfalls Expose a Tale of Two Food Cities*
	National Law Center on Homelessness and Poverty and National Coalition for the Homeless	2010	*A place at the table: Prohibitions on Sharing Food with People Experiencing Homelessness*
		2009	*Homes Not Handcuffs: The Criminalization of Homelessness in U.S. Cities*
		2007	*Feeding Intolerance: Prohibitions on Sharing Food With People Experiencing Homelessness*
	Picture the Homeless	2009	*Time's up: Homeless New Yorkers Demand Alternatives to Bloomberg's Failed Five-Year Plan*
		2002	*Pattern and Practice: Systemic Violations of the Civil Rights of Homeless New Yorkers by the NYPD*
		n.d.	*It is Not Illegal to be Homeless! Know Your Rights*
	Urban Justice Center	2009	*We Want to Work: Challenges to Self-Sufficiency in New York City's Workforce-Development System*

APPENDIX 3: LISTS OF INTERVIEWS

List of Interviews: London	
Category	**Organisation**
Government	Greater London Authority
	London Assembly
	Richmond City Council
	Westminster City Council
Service Provision	Crisis
	No Second Night Out
	St. Mungo's
	Thames Reach
Advocacy	Groundswell
	Housing Justice
	UK Common Rights Project

List of Interviews: New York	
Category	**Organisation**
Government	Center for Innovation Through Data Intelligence
	Department of Health
	Department of Homeless Services
	Metropolitan Transportation Authority
Service Provision	Bowery Residents' Committee
	BronxWorks
	Pathways to Housing
Advocacy	Coalition for the Homeless
	Picture the Homeless
	Urban Justice Center

APPENDIX 4: INDEX OF THEMATIC CODES

1. **The state**
    - 1.1. Welfare state.
        - 1.1.1. Benefits
        - 1.1.2. Citizenship
        - 1.1.3. Entitlement
        - 1.1.4. Universality
        - 1.1.5. Targeting
    - 1.2. Law
        - 1.2.1. 'Sectioning' (involuntary removal from the street)
        - 1.2.2. Anti-Social Behaviour Ordinances (ASBOs)
        - 1.2.3. Legislation
    - 1.3. Role of mayor
    - 1.4. National government
    - 1.5. Politics
        - 1.5.1. Partisanship
    - 1.6. Funding
        - 1.6.1. Taxes
    - 1.7. Public spaces

2. **Rights**
    - 2.1. Social rights
    - 2.2. Civil rights
    - 2.3. Liberties
    - 2.4. Responsibilities
        - 2.4.1. Contribution
        - 2.4.2. Abilities
    - 2.5. Entitlement
    - 2.6. Justice
    - 2.7. Exclusion from rights
        - 2.7.1. Barriers to access
        - 2.7.2. Limitations of rights

3. **Conceptualisations of homelessness**
    - 3.1. Rough sleeping
    - 3.2. Enabling, sustaining
    - 3.3. Public opinion
    - 3.4. Choice
        - 3.4.1. Fault
        - 3.4.2. Incentives
    - 3.5. Causes of homelessness
        - 3.5.1. Structural
        - 3.5.2. Individual
    - 3.6. Psychology of homelessness
    - 3.7. Life on the streets

        3.7.1. Lifestyle
        3.7.2. Acclimatisation
    3.8. Entrenched homelessness
    3.9. Public safety

4. **Basic needs**
    4.1. Food
    4.2. Water
    4.3. Sanitation
    4.4. 'Higher-order' needs
    4.5. 'Lower-order' needs

5. **Service provision**
    5.1. Homelessness sector
    5.2. Outreach
    5.3. Models/principles
        5.3.1. Keyworking/caseworking
        5.3.2. Localism
        5.3.3. Personalisation
        5.3.4. Professionalisation
        5.3.5. Faith-based organisations
        5.3.6. 'Linking up'/'joining up'
        5.3.7. 'Building-based' services
        5.3.8. Housing first
    5.4. Quality
    5.5. Connecting/engaging
    5.6. Challenges
    5.7. Conflict
    5.8. Private sector involvement

Data describing a change (whether in policy, models of service provision, or the scope of the homeless population) were marked with a delta symbol Δ.

Direct references to US/UK or New York/London comparisons were color-coded to facilitate comparative cross-referencing.