# Global Solutions to Homelessness: Legal Frameworks, Evidence, and Policy Design

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## Abstract

This analytical paper synthesizes academic research, statutory and regulatory frameworks, and programmatic evidence to assess global solutions to homelessness. Drawing on human rights law (e.g., the International Covenant on Economic, Social and Cultural Rights), national statutes (e.g., the United Kingdom's Homelessness Reduction Act 2017 and Canada's National Housing Strategy Act 2019), key court decisions (e.g., City of Grants Pass v. Johnson, 2024; Government of the Republic of South Africa v. Grootboom), and large-scale evaluations of Housing First and prevention systems, it identifies concrete policy designs that reduce homelessness sustainably. The article argues that legal duties of prevention, rights-based housing frameworks, scaled affordable housing, and fidelity-consistent Housing First—integrated with coordinated access and targeted supports for veterans, youth, and families—produce the strongest, most durable results when paired with fair public-space management and non-criminalization approaches.

## Keywords

Homelessness policy, housing first, comparative homelessness policy, affordable housing systems, homelessness prevention, rights-based housing frameworks, social housing policy, coordinated access systems

## Introduction

Homelessness—the condition of lacking a stable, safe, and adequate nighttime residence—remains one of the most visible failures of modern societies. Although

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often dismissed as an individual problem, homelessness is shaped by structural factors such as poverty, inadequate housing supply, mental and physical illness, addiction, domestic violence, and social welfare policies. International comparisons are instructive because countries have adopted different policy frameworks, levels of investment, and service models. This article compares the United States' approach to homelessness with strategies employed in several other countries, including Finland, Canada, the United Kingdom, Japan, Australia, and Germany. It draws on government reports, academic studies, and news coverage to provide an up-to-date overview of policy initiatives and their outcomes. The goal is to identify what works, where policy gaps remain and what lessons the United States might learn from successful models overseas.

Homelessness is not a single programmatic failure but the intersection of housing market dynamics, income poverty, behavioral health needs, discrimination, and administrative fragmentation. Across the OECD and the European Union (EU), at least two million people were recorded as experiencing homelessness in 2024—acknowledged by the OECD as an underestimate due to persistent measurement challenges (OECD, 2024). At the same time, the United Nations' Sustainable Development Goal 11 targets access to adequate, safe, and affordable housing by 2030 (UN, SDG 11). These dual realities—rising ambition and incomplete progress—have spurred countries to test complementary solutions: rights-based frameworks, prevention duties, Housing First, coordinated entry, and targeted interventions for specific subpopulations (OECD, 2024; USICH, 2022; ECFR 24 CFR Part 578).

Homelessness is a persistent global social challenge affecting both high-income and middle-income nations. While commonly associated with poverty or individual vulnerability, contemporary scholarship emphasizes that homelessness is primarily shaped by structural conditions such as housing affordability, labor market instability, welfare state design, and governance capacity (Fitzpatrick et al., 2013). Despite differing legal definitions and measurement practices, homelessness broadly refers to the absence of stable, adequate, and secure housing. Homelessness exists along a continuum of housing exclusion rather than as a single condition.

In Europe, the most influential framework is the European Typology of Homelessness and Housing Exclusion (ETHOS), which classifies homelessness into rooflessness, houselessness, insecure housing, and inadequate housing (FEANTSA, 2017). This typology recognizes that homelessness includes not only rough sleeping but also temporary accommodation, overcrowding, and legal insecurity. Housing exclusion has increased in several EU countries due to post-pandemic inflation, housing shortages, and migration pressures (FEANTSA, 2025). The adoption of ETHOS has improved conceptual consistency, but measurement remains uneven across member states.

In contrast, countries such as the United States and Canada rely on narrower statutory definitions that emphasize the absence of a "fixed, regular, and adequate nighttime residence," focusing primarily on shelter use and unsheltered homelessness (Employment and Social Development Canada, 2022; HUD, 2024). These definitional differences significantly affect both measurement and policy design.

Structural theories identify homelessness as a consequence of housing market failures, income inequality, and welfare retrenchment. Scholars argue that rising housing costs, stagnating wages, and insufficient social housing supply are central drivers of homelessness across advanced economies (Shinn & Khadduri, 2020). Comparative research shows that countries with stronger social housing sectors and income support tend to experience lower rates of chronic homelessness (Stephens et al., 2019).

While structural forces dominate, individual factors such as mental illness, substance use disorders, family breakdown, and exposure to violence also play an important role in pathways into homelessness (Toro et al., 2007). However, research consistently demonstrates that these vulnerabilities become homelessness-producing primarily in contexts where affordable housing and support systems are inadequate (Fitzpatrick et al., 2013).

International human rights law increasingly frames housing as a fundamental right, emphasizing state obligations to prevent homelessness and ensure housing adequacy (United Nations, 2014). The Housing First model, first widely implemented in Finland, reflects this rights-based approach by prioritizing permanent housing without preconditions, followed by supportive services (Pleace, 2016).

This article proceeds in six key parts. First, it frames homelessness as a human-rights and system-design problem. Second, it examines the evidence base for Housing First and integrated behavioral health supports. Third, it compares prevention-forward legal regimes, including England's Homelessness Reduction Act and Scotland's right-to-housing orientation. Fourth, it analyzes coordinated-access models and national strategies in Canada, the United States, New Zealand, Australia, Finland, Portugal, Japan, and Singapore. Fifth, it discusses public-space governance and recent judicial developments in the United States. Finally, it offers a policy blueprint that unifies these approaches under measurable outcomes and durable governance (CESCR; ECFR; National Housing Strategy Act).

## Human Rights Framework for Policy

International human rights law recognizes the right to adequate housing as part of the right to an adequate standard of living (ICESCR, art. 11). The UN Committee on Economic, Social and Cultural Rights' General Comment No. 4 clarifies that adequacy encompasses legal security of tenure, availability of services and infrastructure, affordability, habitability, accessibility, location, and cultural adequacy (CESCR, General Comment No. 4). General Comment No. 7 prohibits forced eviction without due process and appropriate safeguards. These interpretive texts do not mandate a single national model, but they ground a "progressive realization" duty, requiring reasonable measures within available resources to expand access to adequate housing.

Domestic courts and legislatures have operationalized these principles in different ways. In South Africa, the Constitutional Court's decision in Government of the Republic of South Africa v. Grootboom held that the state's housing

program was unreasonable because it failed to provide emergency relief for those in desperate need (Grootboom). Canada's National Housing Strategy Act (2019) expressly recognizes housing as a fundamental human right and creates an institutional architecture—the National Housing Council and Federal Housing Advocate—to promote accountability and systemic remedies (S.C. 2019, c.29, s.313). At the EU level, the 2021 Lisbon Declaration launched the European Platform on Combatting Homelessness, committing member states and stakeholders to work toward ending homelessness by 2030 through shared principles and peer learning (Lisbon Declaration).

Comparative analysis is complicated by divergent definitions and counting methods. The OECD notes large cross-country variation in whether national statistics include rough sleepers only, people in shelters, or households in precarious or temporary housing (OECD, 2024). Country notes (e.g., the United States and Portugal) reveal that some countries use point-in-time counts, while others report administrative flows or stock measures. This heterogeneity affects the interpretation of trends and the evaluation of policy impact; it also argues for investments in consistent data standards and the adoption of integrated homeless management information systems (HMIS) that facilitate coordinated access and outcome tracking (OECD, 2024).

## The United States: Context and Current Policy

### Scale and Demographics of Homelessness

The United States conducts an annual point-in-time (PIT) count each January to estimate the number of people experiencing homelessness. According to USA Facts (2024–2025), HUD's January 2024 PIT count found that about 771,480 people (23 out of every 10,000 Americans) were homeless, an 18% increase from 2023. Homelessness declined from 2007 to 2022 but rose 12% in 2023 and another 18% in 2024 (usafacts.org). Unsheltered homelessness accounted for roughly 40% of the total population, with significant geographic concentration in large metropolitan areas and West Coast states (HUD, 2024). Structural contributors include severe housing shortages, rising rents, and insufficient behavioral health infrastructure (Shinn & Khadduri, 2020).

The U.S. Interagency Council on Homelessness attributes the rise to inadequate affordable housing, stagnant wages, and inequitable health and economic systems (usafacts.org). Life expectancy for people experiencing homelessness is around 50 years, compared with 77 years for the average American. Black and African-American people constituted 31.6% of the homeless population in 2024 despite being 13.7% of the total population (usafacts.org), illustrating disproportionate impacts.

Housing affordability is widely recognized as the most significant economic determinant of homelessness in the United States. Over the past several decades, housing costs have increased far more rapidly than wages for low-income

households, particularly in metropolitan areas with strong job growth and limited housing supply (Joint Center for Housing Studies [JCHS], 2024). Researchers consistently find that regions with high rents and low vacancy rates experience substantially higher rates of homelessness, even after controlling for individual risk factors (Glynn & Fox, 2021; Quigley & Raphael, 2001).

The shortage of affordable rental housing is acute for extremely low-income renters. National estimates indicate that there are only a fraction of affordable and available units for households earning at or below 30% of the area median income, forcing many households to spend more than half of their income on housing (JCHS, 2024). When even modest income shocks occur, such cost burdens significantly increase the risk of eviction and subsequent homelessness.

## Housing First and Permanent Supportive Housing

The U.S. federal government has not adopted a single strategy equivalent to those in Finland or the Netherlands; instead, it funds a patchwork of programs under the McKinney–Vento Act and the Housing First–based Continuum of Care system. Housing First approaches prioritize immediate placement into permanent housing without preconditions and then provide voluntary services. Critics have blamed the rise in homelessness on Housing First, yet the Urban Institute (2024) notes that these claims ignore decades of evidence (housingmatters.urban.org). Randomized controlled trials in U.S. cities show that permanent supportive housing programs (most of which use Housing First) improve housing and quality-of-life outcomes, reduce use of emergency services and increase access to community-based care (housingmatters.urban.org).

One example is the Denver Supportive Housing Social Impact Bond (SIB). The program provided housing subsidies and intensive services for chronically homeless individuals. During the first year, participants in the treatment group were housed for an average of 172 days compared with 19 days for the control group (housingmatters.urban.org). After three years, 80% of treatment participants had been housed at least once, versus 18% in the control group, and they spent 654 days housed on average compared with 94 days in the control group. A similar four-year trial in Santa Clara County, California, found that 86% of treatment participants were ever housed compared with 36% of controls; participants spent 84% of each year housed, while controls spent 20% (housingmatters.urban.org). These trials demonstrate that Housing First can achieve durable housing outcomes for chronically homeless people.

However, Housing First has not been scaled nationally to meet the magnitude of need. The United States relies on local Continuum of Care networks and state decisions to determine program scale and funding. The limited supply of affordable housing and rising rents restrict the ability to place people into permanent housing, even when vouchers are available. According to USAFacts, by 2024, only one in five eligible households received federal rental assistance, underscoring the gap between demand and supply (usafacts.org).

### Specialized Programs and Veterans

The United States also funds targeted programs. Veteran homelessness has fallen from 73,367 people in 2009 to 32,882 in 2024 (usafacts.org) thanks largely to the HUD-Veterans Affairs Supportive Housing (HUD-VASH) program, which provides housing vouchers and case management. This success shows that sustained federal funding and interagency coordination can reduce homelessness within a specific population. More recently, the federal government announced the "All Inside" initiative, partnering with states to accelerate housing placements, though its implementation remains limited compared with national strategies in other countries.

## Finland: A Housing-First Success Story

### Policy Evolution and Philosophy

Finland is widely regarded as a model for reducing long-term homelessness. Over the past 16 years, the country has shifted from "treatment first" to a progressive Housing First approach. Finland's program, launched in the early 2000s, treats decent, safe housing as a basic human right (pulitzercenter.org). Unlike traditional models that require sobriety or mental-health treatment before housing, Finland provides a permanent home first and then offers supportive services. This philosophy is rooted in the belief that without a stable home, it is almost impossible to improve other areas of life (pulitzercenter.org).

Finland's labor market structure plays a significant role in homelessness prevention. Compared to more liberal market economies, Finland has lower levels of in-work poverty and income volatility (OECD, 2023a). Active labor market policies—including job placement services, retraining programs, and wage subsidies—help reduce long-term unemployment, which is a known risk factor for homelessness (Stephens et al., 2019).

Nevertheless, certain groups remain economically vulnerable. Young adults, migrants, and individuals with limited education or health challenges face higher risks of labor market exclusion, which can increase homelessness risk when combined with urban housing shortages (Y-Foundation, 2022). Even in a strong welfare economy, homelessness persists where labor market participation is constrained by structural or personal barriers.

According to data from the Finnish Ministry of the Environment, homelessness declined dramatically from the 1980s through the 2010s, reaching approximately 3,800 individuals in recent counts (Ministry of the Environment, 2023).

While recent years have seen slight increases due to housing market pressures, Finland remains the only European country with a sustained long-term reduction in homelessness (Pleace, 2016). Most homeless individuals in Finland now reside in temporary accommodation rather than sleeping rough.

## Implementation and Services

Finland's Housing First strategy involves comprehensive policy changes, investment in low-cost housing, and a broad support system. The Finnish government collaborated with municipalities, nongovernmental organizations (NGOs), and private actors to convert hostels into permanent housing and fund new housing units (pulitzercenter.org). The Housing Finance and Development Centre of Finland (ARA) provides grants and low-interest loans for housing projects, while municipalities manage local implementation. Scattered-site housing units allow people with lower support needs to live in regular apartments across the community, reducing stigma and promoting integration (pulitzercenter.org).

Several NGOs play crucial roles. The Y-Foundation (Y-Säätiö) owns around 19,000 apartments and cooperates with municipalities and private actors to provide housing and support. Its services include counseling, job placement assistance, and health-care referrals to help tenants maintain stability (pulitzercenter.org). Another NGO, VVA ry (the Finnish Association for the Homeless), emerged from a movement of homeless people in 1986. It provides emergency shelter, transitional housing, outreach services, and day centers. VVA ry's day centers not only offer shelter but also reduce crime by meeting basic needs, as people have less incentive to steal when provided with food and essentials (pulitzercenter.org).

## Outcomes and Challenges

Despite its success, Finland faces new economic challenges that may affect homelessness trends. Inflation, rising construction costs, and tighter public budgets have constrained the expansion of affordable housing (OECD, 2023b). Additionally, urbanization continues to concentrate economic opportunity in metropolitan areas, increasing demand for rental housing in cities where supply growth is slower.

Finland's Housing First program has produced measurable declines in homelessness. The number of long-term homeless people has fallen steadily since 2008; by 2023, Finland had among the lowest homelessness rates in Europe. The scattered-site model helps integrate formerly homeless people into neighborhoods and reduces stigma. Government support for rent ensures that even people without steady employment can afford their apartments (pulitzercenter.org). Nevertheless, the program faces challenges. Funding has stagnated, and some localities have shifted their focus from ending homelessness to merely reducing long-term homelessness. Former housing minister Jan Vapaavuori expressed skepticism that Helsinki will meet its goal of eradicating homelessness by 2025 because the current administration has not prioritized the issue. Activists worry that cuts to NGO funding could undermine the community-based services central to Housing First (pulitzercenter.org).

# Canada: Reaching Home Strategy and Mixed Results

Canada's federal homelessness policy is framed by Reaching Home, a community-based program launched in 2019 as part of the National Housing Strategy. According to the Parliamentary Budget Officer (2023), planned spending on homelessness programs at Infrastructure Canada averages C$561 million per year from 2018–2019 to 2027–2028 (pbo-dpb.ca). This funding flows almost entirely through Reaching Home and supports tens of thousands of people annually. The funding provided placements into stable housing for 17,849 people per year, emergency housing for 5,399 people per year, and prevention services for 31,164 people per year between 2019–2020 and 2022–2023 (pbo-dpb.ca).

## Rising Homelessness Despite Investment

Despite increased spending, homelessness has grown. The PIT count published by Infrastructure Canada indicates that the number of homeless people increased by 20% relative to 2018, the chronically homeless population rose 38%, and the number of individuals living unsheltered increased 88% (pbo-dpb.ca).

Canada measures homelessness through coordinated national PIT counts under the federal Reaching Home strategy. The most recent national estimates suggest that approximately 235,000 people experience homelessness at some point during a year, with about 30,000 to 35,000 people homeless on a given night (Employment and Social Development Canada, 2022).

Homelessness in Canada disproportionately affects Indigenous peoples, reflecting historical and structural inequalities related to colonization and housing access (Gaetz et al., 2016). Federal policy emphasizes community-based prevention, supportive housing, and data standardization.

The Parliamentary Budget Officer estimates that current interventions reduce homelessness by about 6,000 individuals (15%) compared to what would occur without them. Achieving the strategy's goal of reducing chronic homelessness by 50% would require an additional C$3.5 billion per year, a seven-fold increase over current funding (pbo-dpb.ca).

## Policy Goals and Critique

Canada's National Housing Strategy initially aimed to reduce chronic homelessness by 50% by fiscal year 2027–2028 and later pledged to eliminate chronic homelessness by 2030. Reaching Home is the central program to achieve this target (pbo-dpb.ca). However, Infrastructure Canada has not formally adopted reductions in chronic homelessness as performance indicators (pbo-dpb.ca). Critics argue that without clear accountability and sufficient funding, Canada's federal plan risks failing to meet its ambitious goals. Additionally, Canada lacks a national Housing First mandate; implementation is decentralized across communities, leading to variation in program fidelity and effectiveness.

## United Kingdom: Rough Sleeping Strategy

The United Kingdom distinguishes between statutory homelessness, temporary accommodation, and rough sleeping; furthermore, it has long grappled with the rise in rough sleeping. In England, 182,540 households were assessed as homeless and owed a prevention or relief duty in 2023–2024 (UK Department for Levelling Up, Housing and Communities, 2024).

The Rough Sleeping Snapshot recorded approximately 4,667 individuals sleeping rough on a single night in England in autumn 2024, representing a year-over-year increase (DLUHC, 2025). Analysts attribute rising homelessness to housing shortages, welfare reforms, and cost-of-living pressures (Bramley & Fitzpatrick, 2018).

In September 2022, the UK government published "Ending rough sleeping for good," a cross-government strategy signed by eight ministers. The strategy organizes interventions under four themes—Prevention, Intervention, Recovery, and a transparent and joined-up system—and defines success as making rough sleeping rare, brief, and non-recurrent (homeless.org.uk). The strategy commits £2 billion over three years to tackle homelessness (homeless.org.uk).

Major components include (homeless.org.uk):

- Rough Sleeping Initiative (£500 million): Funding local authorities to support people sleeping rough.
- Single Homelessness Accommodation Programme (£200 million): Delivery of up to 2,400 homes by March 2025, including supported housing and Housing First accommodation, aimed at adults with multiple disadvantages and young people.
- Single Homelessness Prevention Grant (£316 million): Funding for local authorities to prevent people from becoming homeless.
- Housing First pilots: Extensions of the three government-funded Housing First pilots in Liverpool, Greater Manchester, and the West Midlands until 2025. The government plans to develop a Housing First Fidelity Framework to ensure adherence to the model's principles.
- Support for people leaving prison (£550 million): Expansion of accommodation and support for ex-offenders.
- Drug and Alcohol Treatment Grant (£186 million): Increased funding to expand treatment for people sleeping rough.
- Data-led framework and integrated systems: A new data-led framework will measure rough sleeping and promote integrated health, housing, and social care systems.
- Night Shelter Transformation Fund (£10 million) and Test and Learn Programme (£12 million) to improve night-shelter provision and trial innovative approaches.

The UK's strategy is notable for its comprehensive, cross-departmental approach, and explicit recognition that homelessness must be prevented, not just managed. It invests in both emergency responses and long-term housing

supply, extends Housing First pilots, and emphasizes data integration. However, funding is modest compared with the scale of need and the UK's ambitious goal of eliminating rough sleeping. Many homelessness charities argue that investment in social housing remains insufficient to address systemic shortages, and critics question whether the government will meet its target after previous pledges were missed (homeless.org.uk).

## Japan: Generous Welfare but Significant Cultural Barriers

### *Extensive Public Assistance*

Japan's visible street homelessness is remarkably low relative to other industrialized nations. Official surveys in Tokyo counted 862 people sleeping outside in 2022, but advocacy groups estimate 1,500–2,000 people sleeping rough and note that thousands more are "internet-cafe refugees"—people renting booths in 24-hour cafés (homelessnessimpact.org). Japan's social safety net helps explain the low numbers. Public assistance cases are typically approved within a month and rarely rejected (melbournemicrofinance.com). The Public Assistance Act (seikatsu hogo-hou) includes eight forms of assistance; living assistance cash benefits cover about 75% of the relative poverty line, and people who are homeless receive housing assistance that lifts their benefits to roughly 126% of the poverty line. This generosity makes the gap between minimum wage and assistance smaller than in other OECD countries (melbournemicrofinance.com).

Japan's core national statistic comes from the Ministry of Health, Labour and Welfare (MHLW) National Survey on the Actual Conditions of Homelessness (approximate survey). Local governments conduct visual street enumeration (e.g., parks, riverbanks, roads, stations, and other public facilities) during January and report the number of people meeting the legal definition of "homeless" under Japan's homelessness legislation (MHLW, 2025).

In the most recently published national results, MHLW reported 2,591 homeless people nationwide (January 2025)—2,346 men, 163 women, and 82 individuals whose gender could not be determined—representing an 8.1% decrease compared with the previous year (MHLW, 2025). MHLW also reported that homelessness is highly concentrated in large cities, with Osaka Prefecture (763), Tokyo (565), and Kanagawa (366) among the highest counts, and that Tokyo's 23 wards and designated major cities account for roughly 80% of the national total (MHLW, 2025).

International compilations align with these national figures but also illustrate how definitional differences affect cross-national comparisons. The OECD's homelessness country note for Japan reports a national estimate of 3,065 people (2023)—a PIT count based on Japan's national survey—and notes that the Japanese count primarily corresponds to ETHOS Light "living on the streets, in public spaces," rather than including emergency accommodation or broader

housing exclusion categories (OECD, 2024). Put plainly, Japan's official headline number is best interpreted as an estimate of rough sleeping/visible street homelessness at a single point in time, not a comprehensive estimate of all people lacking stable housing (MHLW, 2025; OECD, 2024).

The national data consistently show a heavily gendered profile, with men representing much of the counted population (MHLW, 2025). The OECD country note similarly reports that approximately 94% of the counted homeless population are men and about 6% are women (OECD, 2024). MHLW's reporting also provides insight into where people are found during the street count. In the 2025 results, the most common locations included urban parks (25.5%), roads (24.1%), river areas (21.6%), stations (5.8%), and other facilities (22.9%), with distributions broadly stable compared with the prior year (MHLW, 2025). This pattern underscores that Japan's official measurement is oriented toward visible public-space residence—precisely the form of homelessness most amenable to visual enumeration.

Employment plays a central role in Japan's homelessness dynamics. Studies indicate that many people experiencing homelessness in Japan have prior work histories and enter homelessness following labor market exclusion rather than long-term unemployment alone (Okamoto, 2007). The rise of non-regular employment has increased income volatility and weakened the traditional link between work and housing security.

During economic downturns, such as the global financial crisis and the COVID-19 pandemic, individuals dependent on daily wages or short-term contracts were particularly vulnerable to sudden income loss (Fujita, 2020). While emergency government measures mitigated some effects, these episodes revealed how segments of the Japanese economy produce homelessness risk despite low aggregate unemployment.

## Invisible Homelessness and Help-avoidance

Although welfare provisions are generous, Japan's definition of homelessness is narrow (focused on rough sleeping), and a culture of not asking for help discourages some people from applying for assistance. Homelessness in Japan increasingly manifests as "invisible homelessness," with younger people rotating between friends' homes, internet cafés, fast-food restaurants, and occasional nights on the street (homelessnessimpact.org). Advocacy groups note that the number of people seeking emergency housing assistance jumped 34-fold during the COVID-19 pandemic, rising from under 4,000 to nearly 135,000 approved cases. When internet cafés closed during the state of emergency, the Tokyo government secured thousands of hotel rooms to house people temporarily. Tokyo has no night-only shelters; instead, the city operates about 150 longer-term dormitory-style shelters housing around 4,000 people, though these facilities have poor reputations due to crowding and restrictions. Authorities aim to move people directly into permanent housing rather than maintain shelters (homelessnessimpact.org).

## Policy Implications

Japan's experience shows that robust welfare systems can minimize visible homelessness, but cultural attitudes and bureaucratic definitions may leave hidden homelessness unaddressed. Policies focusing solely on rough sleepers risk ignoring the thousands of people living in precarious situations. A more inclusive definition and proactive outreach may be needed, along with the destigmatization of seeking help.

# Australia: Toward a National Strategy

## National Housing and Homelessness Plan

Australia relies primarily on census-based estimates. The 2021 Australian Census identified approximately 122,494 people experiencing homelessness, a 5.2% increase from 2016 (Australian Bureau of Statistics, 2022).

Homelessness rates are significantly higher among Indigenous Australians, who experience homelessness at nearly ten times the rate of non-Indigenous Australians (Australian Bureau of Statistics, 2022). Policy responses emphasize early intervention, social housing investment, and specialist homelessness services.

Australia is developing a National Housing and Homelessness Plan as part of a broader housing reform agenda. The Department of Social Services stresses that safe and affordable housing is central to the security and dignity of Australians, and the plan aims to unite efforts to improve housing and reduce homelessness (dss.gov.au). The plan complements several major investments:

- A 10% increase to the maximum Commonwealth Rent Assistance (building on a 15% increase in September 2023).
- A A$10 billion Housing Australia Future Fund to support 30,000 new social and affordable homes over five years.
- A National Housing Accord to build 1.2 million new, well-located homes over five years from July 2024, with an additional A$350 million to support 10,000 affordable homes.
- Tax incentives and increased lending capacity to support build-to-rent developments and loans to community housing providers.
- A A$2 billion Social Housing Accelerator payment to deliver around 4,000 new and refurbished homes.
- A commitment to A Better Deal for Renters, including limits on rent increases, minimum rental standards and requirements for genuine grounds for eviction.

## National Inquiries and the Role of Housing First

Australia has yet to institutionalize a nationwide Housing First program. However, a 2021 federal parliamentary inquiry identified three key reforms: prevention and

early intervention, a Housing First approach, and reducing the shortfall in social and affordable housing. A Victorian parliamentary inquiry recommended strengthening early intervention and providing more long-term housing (unsw. edu.au). The Productivity Commission's In Need of Repair review found that the existing national agreement had not improved homelessness outcomes and urged governments to establish a separate funding pool for prevention and early intervention programs targeting people leaving institutional settings, Indigenous Australians, young people and others at risk (unsw.edu.au).

These inquiries underscore that prevention and early intervention, alongside expanding social housing supply, must complement Housing First–style programs. Australia's emerging national plan emphasizes supply-side measures and renter protections but has not yet committed to a dedicated Housing First program. Advocates argue that without a shift from crisis-driven responses to long-term solutions, homelessness will remain a "forever problem" (unsw.edu.au).

## Germany: National Action Plan to End Homelessness by 2030

### Rising Homelessness and Policy Response

Germany maintains one of Europe's largest homeless populations, largely due to broad definitions that include temporary accommodation. The Bundesarbeitsgemeinschaft Wohnungslosenhilfe (BAG W, 2025) estimated that over 1,029,000 people experienced homelessness in 2024, including approximately 56,000 unsheltered individuals (BAG W, 2025).

Germany's social welfare system provides extensive emergency accommodation, resulting in relatively low levels of street homelessness compared to total homelessness figures (Busch-Geertsema, 2010).

Germany has experienced rising homelessness amid a severe shortage of affordable housing. Estimates vary: the German government calculates around 375,000 homeless people, whereas the Federal Working Group on Assistance for the Homeless puts the number closer to 600,000, including about 50,000 people living on the streets. German authorities provide emergency shelters, but many people avoid them because they lack privacy and safety (dw.com).

In May 2024, the federal government released its first National Action Plan to eliminate homelessness by 2030 (Deutsche Welle, 2024). The 31-point plan includes measures such as providing funds to state governments to build social housing, combating discrimination in the housing market, helping people obtain health insurance, and making counseling services more accessible. Housing Minister Klara Geywitz emphasized that affordable housing is at the heart of the fight against homelessness. The plan calls for €18.15 billion for social housing construction between 2022 and 2027 (dw.com).

### Critique and Housing First Initiatives

Homelessness charities welcomed the government's attention but criticized the plan as vague and lacking binding commitments. Critics noted that many measures

had already been announced and that the social housing fund falls far short of the target of 100,000 new units per year—only 22,545 new units were delivered in 2022 (dw.com). Advocates argued that local authorities should reserve quotas for homeless people in social housing, and the federal government should require that a proportion of funds be used for Housing First placements (dw.com). Without stronger mandates and dedicated funding, the plan may remain a statement of intent rather than a transformative strategy.

Some German cities have pioneered Housing First projects, notably Berlin's Housing First program, which provides unconditional permanent housing coupled with intensive support. The program reports high housing retention rates and improved well-being for participants, demonstrating the model's potential. However, scale remains small, and national adoption would require significant shifts in social-housing policy and funding.

## Evidence on Solutions

A robust literature finds that Housing First—permanent housing with voluntary services and without preconditions of treatment compliance or sobriety— dramatically improves housing stability for people experiencing chronic homelessness and serious behavioral health needs. Tsemberis et al.'s (2024) pathbreaking studies demonstrated high housing retention and improved consumer choice. The Canadian multicity At Home/Chez Soi randomized trial found Housing First with Intensive Case Management or Assertive Community Treatment cost-effective, with strong gains in days stably housed and net service cost offsets (Latimer et al., 2013; Aubry et al., 2015). Early cost studies in New York City similarly showed large reductions in public service use among supportive housing tenants (Culhane et al., 2002).

Finland's national strategy operationalizes Housing First at scale: converting shelters into apartments, building new supply, and aligning social support services. Long-term homelessness has fallen sharply, and Finland is widely cited as the most successful national application of Housing First (Shinn & Khadduri, 2020; Y-Foundation materials). Portugal's "Casas Primeiro" (Lisbon) has shown fidelity to Housing First principles and high retention, adding to a growing European evidence base (Duarte et al., 2018). In the United States, federal policy endorses Housing First as a best practice through Continuum of Care (CoC) standards and program notices (24 CFR Part 578; HUD Exchange).

### Prevention and Legal Duties

Downstream emergency responses cannot substitute for the upstream prevention of homelessness. England's Homelessness Reduction Act 2017 (HRA) reshaped statutory duties: local authorities must provide advisory services, assess all eligible applicants, and take reasonable steps to prevent or relieve homelessness regardless of priority need (HRA, 2017, ss 1–6). The act extends the period during

which a household is "threatened with homelessness" and emphasizes personalized housing plans, data reporting, and cooperation duties (UK LGA overview). Scotland went further, abolishing "priority need" and introducing nationally enforceable standards for temporary accommodation—the Unsuitable Accommodation Order—which now applies to all households and limits time in unsuitable placements (Homelessness etc. (Scotland) Act 2003; UAO 2014 as amended 2020).

Prevention duties are similarly embedded in North American frameworks. Canada's Reaching Home strategy funds community-led systems with coordinated access, by-name lists, and explicit prevention and diversion interventions (Infrastructure Canada, 2025; Homelessness Learning Hub). In the United States, the HEARTH Act strengthened community planning through the CoC program, standardized definitions, and incentivized rapid rehousing and prevention (HEARTH; 24 CFR Part 578). Specialized statutes protect subpopulations: the McKinney–Vento Act guarantees immediate school enrollment and transportation for homeless children and youth, minimizing harmful educational disruption (U.S. Code; NCHE). Veterans' programs—HUD-VASH and Supportive Services for Veteran Families (SSVF)—pair housing subsidies with intensive case management and time-limited financial assistance, contributing to steep declines in veteran homelessness in many communities (HUD, 2024; VA, 2025; 38 CFR Part 62).

## Coordinated Access and System Design

Modern responses to homelessness require integrated governance. Coordinated access (or 'coordinated entry') creates a single, transparent front door for services; standardizes assessment; prioritizes the most vulnerable; and routes households to the right intervention—prevention, rapid rehousing, permanent supportive housing, or other supports. The United States codified system planning through CoCs (24 CFR Part 578). Canada requires coordinated access in Reaching Home communities, supported by national guidance (Infrastructure Canada, 2025; Homelessness Learning Hub). The USICH's federal strategic plan ("All In") sets a national reduction goal and emphasizes multisector alignment—health, human services, justice, and housing—recognizing that homelessness is a cross-systems outcome (USICH, 2022).

## Public-space Governance, Criminalization, and Recent U.S. Jurisprudence

Public-space policy sits at the contentious intersection of community safety, individual rights, and scarcity of shelter and housing. In the Ninth Circuit, Martin v. City of Boise held that punishing people for sleeping outdoors when no shelter is available violates the Eighth Amendment's prohibition on cruel and unusual punishment. In 2024, however, the U.S. Supreme Court in City of Grants Pass

v. Johnson held that generally applicable anti-camping ordinances regulate conduct rather than status, limiting the reach of Martin and expanding municipal authority to enforce camping bans (City of Grants Pass v. Johnson, 2024; Martin v. Boise). These developments heighten the importance of coupling fair time-place-manner rules with real, immediately accessible alternatives—low-barrier shelter, sanctioned sleeping sites, safe parking, and rapid pathways to housing—so that enforcement does not devolve into displacement without solution.

Comparative experience suggests that durable reductions in unsheltered homelessness arise not from punitive measures but from scaling exits to permanent housing, reducing entry through prevention, and aligning health and social care with outreach. Jurisdictions with legal rights to shelter (e.g., New York City's Callahan consent decree) illustrate one approach, though rights without sufficient affordable housing supply can strain temporary systems (Callahan v. Carey materials). By contrast, Finland demonstrates how sustained investment in small, self-contained units aligned with support teams can close mass shelters almost entirely (Shinn & Khadduri, 2020; Y-Foundation, 2022).

## Country Cases and Comparative Lessons

Finland: The long-term national strategy replaced overnight shelters with permanent flats, combining scattered-site and congregate models, and financed acquisitions and conversions. Between the late 2000s and late 2010s, Finland reduced emergency beds dramatically and expanded independent apartments for formerly homeless tenants; the Y-Foundation became one of the largest social landlords (Shinn & Khadduri, 2020; Y-Foundation, 2022; HUD User). Key levers included national targets, capital subsidies, municipal–NGO partnerships, and fidelity to Housing First principles.

United Kingdom & Scotland: England's HRA 2017 created universal prevention and relief duties, backed by monitoring and practice guidance (HRA, 2017; UK LGA). Scotland's abolition of priority need, strong temporary accommodation standards (UAO), and a policy commitment that anyone becoming homeless through no fault of their own is entitled to settled accommodation by local authorities, represents a rights-forward model (Homelessness etc. (Scotland) Act; gov. scot guidance).

Canada: The National Housing Strategy Act enshrines a right-to-housing approach and creates accountability institutions, while Reaching Home funds coordinated access, prevention, and Housing First across communities (National Housing Strategy Act; Infrastructure Canada, Reaching Home, 2025). Economic evaluations of Housing First from Canadian trials demonstrate cost-effectiveness and improved outcomes at scale (Aubry et al., 2015; Latimer et al., 2013).

United States: The HEARTH Act consolidated and modernized homelessness programs, prioritizing rapid rehousing and permanent supportive housing through the CoC program (24 CFR Part 578). The McKinney–Vento Act protects educational continuity for homeless children and youth, while HUD-VASH and SSVF have been central to reductions in veteran homelessness (U.S. Code; HUD,

2024; VA, 2025; 38 CFR Part 62). The USICH's All In plan calls for a 25% reduction by 2025 and emphasizes upstream prevention, cross-system coordination, and a Housing First orientation (USICH, 2022).

New Zealand: The Aotearoa New Zealand Homelessness Action Plan (2020–2023) defines actions across prevention, supply, support, and system enablers, complemented by Māori-led housing strategies (HUD NZ). Evaluations of case management and navigator initiatives align with the plan's goals of making homelessness rare, brief, and non-recurring (MSD NZ; HUD NZ progress reports).

Australia: Intergovernmental agreements (formerly the NHHA, now the National Agreement on Social Housing and Homelessness) structure shared Commonwealth–state responsibilities for social housing funding and specialist homelessness services (DSS, 2023–2024; AIHW technical materials). Recent updates aim to strengthen supply and service delivery while improving performance accountability.

Portugal: The ENIPSSA strategy (2017–2023) and municipal initiatives (e.g., Lisbon's Casas Primeiro) advanced a housing-led response and demonstrated high retention and improved quality of life among participants (Duarte et al., 2018; ENIPSSA, 2017; OECD, 2024).

Japan and Singapore: Japan's 2002 Act on Special Measures concerning Assistance in Self-Support of Homeless People and subsequent basic policies emphasized self-reliance supports and local action plans; national counts indicate a long-term decline in street homelessness (IPSS; JIL; Homelessness Impact). Singapore's coordinated PEERS Network, Safe Sound Sleeping Places (S3Ps), and regular street counts reflect a prevention-plus-stabilization approach tailored to a city–state context with extensive public housing (MSF, 2022; Tan et al., 2024).

Brazil: The 2001 City Statute (Lei 10.257) operationalized the Constitution's urban policy provisions, offering legal tools—such as social function of property and participatory planning—that support regularization and affordable housing strategies linked to homelessness prevention (City Statute; COHRE).


## Program Design: What Works in Combination

Comparative evidence highlights a consistent pattern. First, permanent housing—subsidized, supportive, or rapidly rehousing—must be available at the scale of need. Without permanent housing, shelters overflow and encampments proliferate. Second, fidelity matters: Housing First succeeds when paired with appropriate support intensity (ACT or ICM), consumer choice, harm reduction, and landlord engagement strategies (Aubry et al., 2015; Tsemberis et al., 2024). Third, prevention must be a legal duty, not merely an aspiration; front-door triage, eviction prevention, and mediation can stop inflow. Fourth, coordinated access aligns scarce resources with the highest needs and improves transparency and fairness across providers (24 CFR 578; Reaching Home). Fifth, targeted subpopulation programs (veterans, youth and families, survivors of violence) address distinct pathways into homelessness and produce outsized returns when well-implemented (McKinney–Vento; HUD-VASH; SSVF).

Finally, rights frameworks and fair public-space management must connect. Where courts recognize justiciable housing rights, governments still need credible delivery systems and capital financing to avoid rights without remedies. Where municipalities enforce camping ordinances, they should do so with alternatives in place and pathways to housing to avoid carceral churn and legal exposure (City of Grants Pass v. Johnson, 2024; Martin v. Boise; Callahan line).

## Implementation Challenges and Trade-offs

Scaling supply requires overcoming zoning constraints, construction capacity, and neighborhood opposition. Acquisition and conversion of existing buildings (hotels and office-to-residential), modular construction, and public land disposition can accelerate timelines. Sustainable financing blends capital subsidies (tax credits and social housing bonds), operating subsidies (vouchers), and service funding (health and human services), ideally under multi-year compacts. Data infrastructure needs sustained investment to maintain by-name lists, HMIS quality, and outcome dashboards while respecting privacy. Workforce pipelines for case managers, peer specialists, and housing navigators are critical; burnout and turnover weaken fidelity and outcomes.

Different legal environments also matter. Prevention duties without sufficient private rental access may stall; Housing First without adequate clinical capacity risks attrition; and rights to shelter without parallel housing production can create costly bottlenecks. These are design problems, not evidence failures: jurisdictions that align legal duties, capital pipelines, and case-rate service funding see durable gains (Finland; Canada trials; UK/Scotland statutory duties).

# Comparative Analysis of Approaches

## Philosophical Foundations and Goals

A key distinction among countries is whether they treat housing as a basic human right. Finland's Housing First program explicitly frames housing as a prerequisite for addressing other problems (pulitzercenter.org). Japan's generous public assistance implicitly acknowledges the right to a minimum standard of living, but cultural attitudes and narrow definitions limit its reach. Canada and the United Kingdom seek to prevent and reduce homelessness, but do not constitutionally guarantee housing. Germany's new plan aspires to eliminate homelessness but has yet to commit to rights-based legislation. The United States has no national recognition of housing as a right; homelessness policies are largely reactive and targeted at subpopulations (e.g., veterans).

## Scale of Investment and Housing Supply

Homelessness cannot be solved without addressing housing supply. Finland invested heavily in social housing and converted shelters into permanent homes

(pulitzercenter.org). By contrast, the United States and Canada continue to face severe shortages of affordable housing. USAFacts notes that only one in five eligible U.S. households receives federal rental assistance (usafacts.org). Canada's Reaching Home funding averages C$561 million per year (pbo-dpb.ca), but the Parliamentary Budget Office estimates that achieving the 50% reduction goal would require an additional C$3.5 billion annually (pbo-dpb.ca). The UK strategy's £2 billion over three years funds both emergency responses and housing supply (homeless.org.uk) but is modest relative to the country's housing deficit. Germany's plan includes €18.15 billion for social housing construction over five years (dw.com), yet this sum was already committed and has delivered far fewer units than planned.dw.com. Australia's plan offers significant new funding, including A$10 billion for a housing future fund and a commitment to build 1.2 million homes (dss.gov.au).

## Prevention Versus Response

Countries vary in emphasis on prevention and early intervention versus reactive approaches. Finland's integrated system invests in prevention, outreach, and scattered-site housing. Canada's Reaching Home funds prevention services, but rising homelessness suggests that investments are insufficient. The UK strategy explicitly organizes interventions around Prevention, Intervention, and Recovery and allocates £316 million for a Single Homelessness Prevention Grant (homeless. org.uk). Australia's parliamentary inquiries stress early intervention and propose separate funding for prevention (unsw.edu.au). Germany's plan mentions counseling and health-insurance access but lacks detailed preventive mechanisms. The United States invests relatively little in prevention; most funding goes toward emergency shelters and short-term assistance.

## Housing First Fidelity and Program Scale

Finland's model demonstrates high program fidelity—housing without preconditions, scattered-site units and integrated services. The United Kingdom is still piloting Housing First and developing a fidelity framework (homeless. org.uk). Canada and Australia lack national mandates, leading to varied fidelity. Germany's plan references Housing First but does not guarantee scaling. In the United States, Housing First is implemented through specific programs such as permanent supportive housing; trials like the Denver SIB show high effectiveness (housingmatters.urban.org). However, limited funding and local discretion lead to inconsistent fidelity and insufficient coverage.

## Cultural and Definitional Factors

Japan illustrates how cultural norms and official definitions influence homelessness. Despite generous welfare, a help-avoidance culture, and a narrow definition of homelessness mean many precariously housed individuals are not

counted (melbournemicrofinance.comhomelessnessimpact.org). This invisibility reduces political urgency. The United States counts sheltered and unsheltered people, but misses those doubled up with friends or family. Accurate enumeration is critical for policy design; undercounting can lead to underinvestment.

Japan's relatively low levels of visible homelessness are closely linked to its economic structure, housing supply, and social policy framework. Stable aggregate employment, modest housing price inflation, and public assistance programs have limited large-scale street homelessness.

At the same time, labor market dualism, wage stagnation, and barriers to rental housing have produced significant forms of hidden homelessness that are less visible in official statistics. Japan's experience demonstrates that economic stability alone does not eliminate homelessness; rather, the quality of employment, access to housing, and inclusiveness of welfare systems shape how homelessness manifests. Understanding homelessness in Japan, therefore, requires attention not only to headline economic indicators but also to the distributional and institutional features of the economy.

## Strength of Nongovernmental Actors

NGOs play vital roles everywhere. Finland's Y-Foundation and VVA ry provide housing and services (pulitzercenter.org). Canadian communities implement Reaching Home funding through local service providers. UK charities like Homeless Link (2022) help shape policy and deliver services. Japan's advocacy groups highlight hidden homelessness, and many workers at day centers were once homeless themselves (pulitzercenter.org). In the United States, NGOs and faith-based organizations operate shelters and supportive housing. Sustained funding and collaboration with the government are critical for these organizations to succeed.

# A Policy Blueprint for Ending Homelessness

## Basic Framework

Based on the comparative analysis of the various nations, the following framework is suggested:

- Codify prevention duties. Require early identification and reasonable steps to prevent or relieve homelessness for all eligible households, with enforceable timelines and personalized plans (HRA, 2017).
- Scale Housing First with fidelity. Fund ACT/ICM teams, landlord incentives, and tenancy supports tied to quality metrics; prioritize chronic and high-acuity cohorts (Tsemberis et al., 2024).
- Expand affordable housing supply. Acquire and convert shelters/hotels to apartments; produce deeply affordable units with predictable operating subsidies; leverage public land and expedited approvals (Finland; City Statute).

- Institutionalize coordinated access. Maintain by-name lists, triage tools, and transparent prioritization; integrate domestic violence, youth, and veteran systems while protecting safety and privacy (Reaching Home; 24 CFR 578).
- Protect children and youth. Enforce immediate enrollment, transportation, and stability supports under McKinney–Vento; develop family rapid rehousing with child-centered services (U.S. Code; NCHE).
- Support veterans. Pair HUD-VASH vouchers with case management and SSVF-funded prevention/rapid rehousing; formalize collaborative case management (HUD; VA; 38 CFR Part 62).
- Adopt rights-based accountability. Establish independent housing advocates/councils to monitor systemic barriers and recommend remedies (National Housing Strategy Act).
- Ensure fair public-space rules. Use time-place-manner limits only alongside low-barrier alternatives and lawful, trauma-informed outreach and encampment resolution protocols (City of Grants Pass v. Johnson, 2024; Martin).
- Invest in health integration. Co-locate primary care, behavioral health, harm reduction, and benefits navigation within housing programs; pursue Medicaid/health payer partnerships where applicable.
- Measure what matters. Track inflow, active homelessness, exits to permanent housing, and returns; publish dashboards; fund continuous improvement capacity at provider and system levels (OECD, 2024; USICH, 2022).

## Policy Recommendations

Scale up Housing First with fidelity: Evidence from Finland and U.S. trials shows that Housing First combined with supportive services dramatically improves housing stability (housingmatters.urban.org). Governments should ensure program fidelity—permanent housing without preconditions, voluntary services, and harm-reduction approaches—and scale up funding to meet demand. A U.S. national Housing First strategy could replicate Finland's model while adapting to local contexts.

Expand affordable housing supply: A shortage of social and affordable housing undermines all homelessness strategies. Finland's progress relied on converting shelters and building new units (pulitzercenter.org). Germany, Canada, and the United States must invest far more in constructing and preserving affordable housing. Australia's housing future fund and housing accord provide a model for large-scale investment (dss.gov.au).

Invest in prevention and early intervention: Homelessness is easier and cheaper to prevent than to resolve. This requires targeted support for people exiting foster care, hospitals, prisons, domestic violence shelters, and other institutions. The UK's prevention grants (homeless.org.uk) and Australia's recommended prevention funding (unsw.edu.au) offer useful models. The United States should dedicate a portion of homeless-assistance budgets to prevention programs.

Integrate health, social services, and housing: Homelessness often co-occurs with mental illness, substance use and chronic disease. Integrated service delivery—combining housing with health care, employment and case management—improves outcomes. Finland's model and U.S. permanent supportive housing provide effective examples. Germany's plan to facilitate health-insurance access (dw.com) could be broadened to include full health–housing integration.

Address structural determinants: Policies must tackle the root causes of homelessness: low wages, high rents, racial inequities and inadequate health care. This includes raising minimum wages, expanding rental assistance, enforcing fair-housing laws, and providing universal health coverage. USAFacts notes that many homeless individuals are employed but cannot afford housing (usafacts. org); bridging this gap requires systemic reforms.

Adopt rights-based approaches: Recognizing housing as a human right can galvanize political will and accountability. Finland frames housing as a right (pulitzercenter.org), and Germany's plan emphasizes a nationwide guideline (dw. com). Codifying such rights in the United States and other countries could shift policies from managing homelessness to ending it.

Improve data and definitions: Accurate counts and inclusive definitions are essential. The U.S. PIT count misses people in precarious living arrangements; Japan's definition excludes many hidden homeless (homelessnessimpact.org). Governments should invest in year-round data collection and expand definitions to include those doubled up, in informal settlements or transient arrangements.

## Conclusion

Ending homelessness is achievable with the right mix of law, resources, and implementation. The comparative record is clear: jurisdictions that treat housing as the platform—through rights, duties, and scaled investment—and that organize systems around prevention, Housing First, and targeted supports, make sustained progress. Global commitments like the Lisbon Declaration and SDG 11 set the horizon; national strategies and local delivery systems translate ambition into outcomes. The decisive task for the next decade is not discovering what works but doing what works—at the scale of need and with fidelity to people's rights and dignity.

Homelessness persists across high-income countries despite wealth and resources. International comparisons reveal that Housing First, when implemented with fidelity and supported by adequate housing supply and services, is an effective strategy to reduce chronic homelessness. Finland's experience demonstrates the power of treating housing as a right and investing in permanent homes. The United States has evidence of Housing First's effectiveness, but lacks national coordination and sufficient affordable housing. Canada's Reaching Home program illustrates the limits of incremental funding without structural reforms. The UK's cross-government strategy and Australia's emerging plan signal growing emphasis on prevention and supply but require sustained investment and

fidelity to Housing First principles. Germany's national action plan shows awareness but needs clearer commitments. Japan illustrates how generous welfare can minimize rough sleeping, yet cultural barriers and narrow definitions conceal a larger problem.

Ending homelessness will require integrated, rights-based strategies that prioritize housing, expand social housing supply, invest in prevention, and address structural drivers of poverty and exclusion. By learning from the successes and failures of different approaches, policymakers in the United States and elsewhere can craft more effective and humane responses to homelessness.

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## References

Aubry, T., Nelson, G., & Tsemberis, S. (2015). Housing first for people with severe mental illness who are homeless: A review of the research and findings from the at home–chez soi demonstration project. *The Canadian Journal of Psychiatry*, *60*(11), 467–474. https://pmc.ncbi.nlm.nih.gov/articles/PMC4679127/

Australian Bureau of Statistics. (2022). *Estimating homelessness: Census of population and housing 2021*.

Bramley, G., & Fitzpatrick, S. (2018). Homelessness in the UK: Who is most at risk? *Housing Studies*, *33*(1), 96–116.

Bundesarbeitsgemeinschaft Wohnungslosenhilfe (BAG W). (2025). *Homelessness in Germany: Annual report*.

Busch-Geertsema, V. (2010). Defining and measuring homelessness. In E. O'Sullivan, V. Busch-Geertsema, D. Quilgars, & N. Pleace (Eds), *Homelessness research in Europe* (pp. 19–39). FEANTSA.

Centre for Homelessness Impact. (2022). *Lessons from other countries: Japan*.

CESCR United Nations (2014). Office of the High Commissioner for Human Rights. United Nations Committee on Economic, Social and Cultural Rights (CESCR). "General Comment No. 4: The right to adequate housing (Art. 11(1) of the Covenant)." 13 Dec. 1991. https://www.refworld.org/legal/general/cescr/1991/ en/53157

City of Grants Pass v. Johnson. 599 U.S. ___ (2024). Supreme Court of the United States, 28 June 2024. https://www.supremecourt.gov/opinions/23pdf/23-175_19m2.pdf

Culhane, D. P., Metraux, S., & Hadley, T. (2002). Public service reductions associated with placement of homeless persons with severe mental illness in supportive housing. *Housing Policy Debate*, 13(1), 107–163. https://shnny.org/uploads/The_Culhane_Report.pdf

Department for Levelling Up, Housing and Communities (DLUHC). (2025, July 15). Rough sleeping snapshot in England: Autumn 2024 [Official statistics]. UK Government.

https://www.gov.uk/government/statistics/rough-sleeping-snapshot-in-england-autumn-2024

Department of Social Services (DSS). (2023–2024). National Housing and Homelessness Plan: Consultation Summary. Australian Government. https://www.dss.gov.au/

Deutsche Welle (DW). (2024). *Germany's plan to end homelessness by 2030.*

Duarte, T., Costa, P., & Ornelas, J. (2018). Implementation of housing first in Lisboa, Portugal: A fidelity study of the casas Primeiro programme. *European Journal of Homelessness*, *12*(3), 199–227. https://www.feantsa.org/download/12-3_ejh_2018_duarte5123425204035460814.pdf

Employment and Social Development Canada. (2022). *Everyone counts 2020–2022: Coordinated point-in-time counts.*

EFCR United States. 24 CFR Part 573 - Continuum of Care Program. https://www.ecfr.gov/current/title-24/subtitle-B/chapter-V/subchapter-C/part-578

ENIPSSA (Portugal). (2017). *Implementing the new Portuguese homelessness strategy (2017–2023).* https://www.enipssa.pt/ (selected docs).

FEANTSA. (2017). *ETHOS: European typology of homelessness and housing exclusion.*

FEANTSA. (2025). *Tenth overview of housing exclusion in Europe.*

Finland Y-Foundation. (2020). How Finland ended homelessness. *Cityscape*, *22*(2), 167–184. https://www.huduser.gov/portal/periodicals/cityscpe/vol22num2/ch4.pdf

Fitzpatrick, S., Bramley, G., & Johnsen, S. (2013). Pathways into multiple exclusion homelessness. *European Journal of Homelessness*, *7*(1), 9–39.

Fujita, M. (2020). 'Staying at home' to tackle COVID-19 pandemic: The role of homelessness services in Japan. *International Journal of Environmental Research and Public Health*, *17*(19), 1–13.

Gaetz, S., Dej, E., Richter, T., & Redman, M. (2016). *The state of homelessness in Canada*. Canadian Observatory on Homelessness Press.

Glynn, C., & Fox, E. B. (2021). Dynamics of homelessness in urban America. *Annals of Applied Statistics*, *15*(3), 1385–1405.

Government of Canada. (2019). *National Housing Strategy Act*, S.C. 2019, c. 29, s. 313. https://laws-lois.justice.gc.ca/eng/acts/N-11.2/

Government of the Republic of South Africa and Others v. Grootboom and Others, 2000 (11) BCLR 1169 (CC). SAFLII. https://www.saflii.org/za/cases/ZACC/2000/19.html

Homeless Link. (2022). *Ending rough sleeping for good: A cross-government strategy.* https://www.homeless.org.uk

HUD. (2024). *The 2024 annual homeless assessment report to Congress*. U.S. Department of Housing and Urban Development. HUD Exchange. HEARTH Act. U.S. Department of Housing and Urban Development. https://www.hudexchange.info/homelessness-assistance/hearth-act/

HUD and VA. "HUD-VASH Program Overview." U.S. Department of Housing and Urban Development, https://www.hud.gov/helping-americans/housing-choice-vouchers-homeless-veterans

Infrastructure Canada. (2025). *Reaching home: Canada's homelessness strategy.* https://housing-infrastructure.canada.ca/homelessness-sans-abri/index-eng.html

IPSS. *Act on special measures concerning assistance in self-support of homeless people.* Summaries in English. https://www.ipss.go.jp/s-info/e/irrj/swsw/swsw02_7.html; JIL, https://www.jil.go.jp/english/JLR/documents/2008/JLR20_sekine.pdf

Joint Center for Housing Studies of Harvard University. (JCHS). (2024). *The state of the nation's housing 2024.*

Latimer, E., Rabouin, D., Cao, Z., & Ly, A. (2013). *Costs of services for homeless people with mental illness in 5 Canadian cities: A large prospective follow-up study*. Mental Health Commission of Canada.

Melbourne Microfinance Initiative. (n.d.). Centre for Homelessness Impact and Melbourne Microfinance Initiative – Japan. melbournemicrofinance.com

Melbourne Microfinance Initiative. (2020). *Internet-cafe refugees and homelessness in Japan.*

Ministry of Health, Labour and Welfare (Japan). (MHLW). (2025, April 30). ホームレスの実態に関する全国調査（概数調査）結果について [National survey on the actual conditions of homelessness (approximate survey): Results].

Ministry of the Environment (Finland). (2023). *Homelessness in Finland 2023*.

Ministry of Housing and Urban Development (New Zealand). (2020–2025). *Aotearoa New Zealand homelessness action plan 2020–2023.* https://www.hud.govt.nz/our-work/aotearoa-new-zealand-homelessness-action-plan-2020-2023

Organisation for Economic Co-operation and Development (OECD). (2023a). *OECD economic surveys: Finland 2023*.

OECD. (2023b). *Housing affordability in OECD countries*. OECD Publishing.

OECD. (2024). *Country note: Data on homelessness in Japan*.

Okamoto, I. (2007). Homelessness in Japan. *Journal of Social Distress and the Homeless*, *16*(3), 211–226.

Parliamentary Budget Officer (Canada). (2023). *Evaluation of the national housing strategy and Reaching Home.*

Pleace, N. (2016). *Housing First guide Europe*. European Observatory on Homelessness.

Quigley, J. M., & Raphael, S. (2001). The economics of homelessness: The evidence from North America. *European Journal of Housing Policy*, *1*(3), 323–336.

Scottish Government. (2021). *Guidance on the homeless persons (Unsuitable Accommodation) (Scotland) Order 2014*. https://www.gov.scot/publications/guidance-homeless-persons-unsuitable-accommodation-scotland-order/

Scottish Parliament. (2003). *Homelessness etc. (Scotland) Act 2003*. https://www.legislation.gov.uk/asp/2003/10/contents. Local Government Association (UK). Get in on the Act: Homelessness Reduction Act 2017. 2016, https://www.local.gov.uk/sites/default/files/documents/9.33%20Get%20in%20on%20the%20Act%20-%20Homelessness%20Reduction%20Act_v04_Web.pdf

Shinn, M., & Khadduri, J. (2020). *In the midst of plenty: Homelessness and what to do about it.* Wiley-Blackwell.

Singapore Ministry of Social and Family Development (MSF). (2022). *Report on street count of rough sleepers 2022.* https://www.msf.gov.sg/docs/default-source/research-data/report-on-street-count-of-rough-sleepers-2022.pdf

Stephens, M., Fitzpatrick, S., & Stephens, D. (2019). Housing policy, poverty, and inequality. *Journal of Social Policy*, *48*(3), 539–560. https://doi.org/10.1017/S0047279418000841

Tan, J. Y. (2024). *Gaps and recommendations from youth experiencing homelessness: Implications for service provision*. Youth & Society. https://doi.org/10.1177/0044118X231183729

Toro, P. A., Tompsett, C. J., Lombardo, S., Philippot, P., Nachtergael, H., Galand, B., Schlienz, N., Stammel, N., Yabar, Y., Blume, M., MacKay, L., & Harvey, K. (2007). Homelessness in Europe and the United States: A comparison of prevalence and public opinion. *Journal of Community Psychology*, *35*(4), 505–524. https://doi.org/10.1002/jcop.20154

Tsemberis, S. et al. (2024). Housing First, consumer choice, and harm reduction for homeless individuals with a dual diagnosis. *American Journal of Public Health*, *94*(40), 651–656. https://ajph.aphapublications.org/doi/10.2105/AJPH.94.4.651

UK Department for Levelling Up, Housing and Communities. (2024). *Statutory homelessness in England 2023–24.*

United Kingdom. (2017). *Homelessness Reduction Act 2017, c. 13*. https://www.legislation. gov.uk/ukpga/2017/13/contents

United States. McKinney–Vento Homeless Assistance Act, 42 U.S.C. § 11431 et seq. U.S. Code, https://uscode.house.gov/view.xhtml?edition=prelim&path=%2Fprelim%40titl e42%2Fchapter119%2Fsubchapter6%2FpartB

United States Interagency Council on Homelessness (USICH). (2022). ALL IN: The federal strategic plan to prevent and end homelessness. https://www.usich.gov/sites/ default/files/document/All_In.pdf

Urban Institute (Housing Matters). (2024). *Housing First isn't to blame for rising homelessness*.

USAFacts. (2024–2025). *How many homeless people are in the United States?*

VA. (2025). *Supportive services for Veteran Families (SSVF) program guide.* https://www. va.gov/HOMELESS/ssvf/docs/SSVF_Program_Guide.pdf

VA. 38 CFR Part 62 — Supportive services for veteran families. eCFR, https://www.ecfr. gov/current/title-38/chapter-I/part-62

Y-Foundation. (2022). *Housing First in Finland: From evidence to system-wide change.* Helsinki.