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## **DEFINITIONS OF HOMELESSNESS IN DEVELOPING COUNTRIES**

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### **Abstract**

This paper describes work in progress by the authors to explore the extent and characteristics of homelessness in developing countries including an assessment of the viability of and need for a globally acceptable definition of homelessness. Its main aim is to provide an empirical context from developing countries against which the current theoretical concepts of home, and existing typologies on homelessness, may be examined. This is important because it is becoming evident that a single definition may be inappropriate and that a range of definitions may be needed to underpin interventions and policy development.

### **Introduction**

The number of homeless people worldwide is estimated to be between 100 million and one billion (UNCHS 1996). The gap between the low and high estimate is very large, however, because the true number depends on the definition used. This paper explores the diverse definitions of homelessness in 10 developing countries and how those definitions have developed. Definition is important because "... most

researchers agree on one fact: who we define as homeless determines how we count them" (Peressini et al. 1995).

### **Theoretical concepts of home and homelessness**

Home is a very rich concept. It embodies many ideas such as comfort, belonging, identity and security. Somerville (1992: 532-4) attempts to tease out the multi-dimensional nature of the meaning of home and its converse, homelessness. He presents seven key signifiers of home – “shelter, hearth, heart, privacy, roots, abode and paradise”. To these, are added the connotations they have for dwellers (warmth, love, etc.), the nature of the security they give (physiological, emotional, etc.), and how these affect them in relation to themselves (relaxation, happiness, etc.) and others (homeliness, stability, etc.). Homelessness is the condition that represents the corollary of these, expressed in connotations of coldness, indifference, etc., presenting stress, misery, alienation, instability, etc.

Thus "home" is a place where a person is able to establish meaningful social relations with others through entertaining them in his/her own space, or where the person is able to withdraw from such relationships. "Home" should be a place where a person is able to define the space as their own, where they are able to control its form and shape. This may be through control of activities and of defining their privacy in terms of access to their space. When this is done, they have made a home with a sense of their identity (Cooper 1995).

Recently, UNCHS (Habitat) - now UN-Habitat – has been revising its definitions of homelessness in the light of existing documentation worldwide rather than just in Europe, North America and Oceania. An early, discussion document, published as Springer (2000), and the compilation that resulted from a review project (UNCHS 2000)<sup>1</sup>, both explored the nature and usefulness of definitions of homelessness.

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<sup>1</sup> Based on a report by Graham Tipple. The following paragraphs are based on the discussion therein. Some of the text has also been used in the Global Report on Human Settlements, 2001 (UNCHS, 2001).

The authors wish to thank two anonymous referees for their very helpful comments on the earlier draft.

The terms homeless, houseless, roofless, shelterless people, and pavement dwellers do not always cover the same people. Indeed, Dupont (1998) deliberately avoids the use of the term 'homeless' because it adds the loss of familial roots to a lack of shelter. But also, she argues that many people living on Indian streets have a house and/or a home somewhere else, most likely in a rural area. Just because the family is spatially scattered, it does not preclude it from providing support and emotional ties or, indeed, imposing duties and obligations.

Other commentators have defined homelessness as featuring a lack of a right of access to secure and minimally adequate housing, variously described as,

"rooflessness (living rough), houselessness (relying on emergency accommodation or long-term institutions), or inadequate housing (including insecure accommodation, intolerable housing conditions or involuntary sharing)" (Edgar et al. 1999: 2).

This is very close to the four-fold quality-oriented definition developed by FEANTSA<sup>2</sup> to both define the condition of homelessness and evaluate its extent:

- rooflessness (i.e. sleeping rough);
- houselessness (i.e. living in institutions or short-term 'guest' accommodation);
- insecure accommodation; and
- inferior or substandard housing (Daly 1994).

Springer (2000) points out that the two last classes are overlapping as an accommodation might be both insecure and substandard. She also refers to the Austrian<sup>3</sup> quality-oriented criteria for assessing homelessness. These are the minimum standard of the housing unit, the infrastructure, including schools, shopping opportunities and transport, psychological and health criteria, and the juridical security of the housing situation.

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<sup>2</sup> Fédération Européenne D'Associations Nationales Travaillant avec les Sans-Abri (Federation of European National Associations working with the Homeless).

<sup>3</sup> BAWO Projekt Büro, Österreich, Grundsatzprogramm, retrieved January 1999 from <http://www.bawo.at>.

Beavis et al (1997) describe the use of the time component in their study of homelessness among Australian aborigines. They distinguish among situational or temporary, episodic and chronic forms of homelessness.

Cooper (1995) discusses the ideas of relative and absolute homelessness. Absolute homelessness occurs when there is neither access to shelter nor the elements of home. A person may be in relative homelessness; that is, they may have a shelter but not have a home.

In western writing, social exclusion is a major component of the concept of homelessness. It implies a lack of social ties and relations revealing social exclusion or marginalisation (Edgar et al. 1999). Somerville (1992) posits that homelessness is likely to have rather different meanings for women and men. Men would be expected to feel deprived of property rights, whereas women would miss exclusive possession, users' rights and the implications that has for the day-to-day discharge of domestic responsibilities.

“Thus, although homelessness means lack of privacy and dispossession for both men and women, for men it seems more likely to take the form of propertylessness, whereas for women it is more likely to mean the disruption of everyday routines. Again, this could mean that homelessness is more serious for women than for men” (Somerville 1992: 535).

Glasser (1994: 3) quotes a definition of homelessness as suggested by (Caplow et al. 1968: 494):

“Homelessness is a condition of detachment from society characterised by the absence or attenuation of the affiliative bonds that link settled persons to a network of interconnected social structures”.

However, it is intuitively evident that, while this social exclusion and detachment may apply to men sleeping rough in the United States and Europe, it may not apply to pavement-dwelling families and is unlikely to apply to the many millions of people living in squatter settlements throughout the world (Glasser 1994).

Springer (2000: 479) concludes that

“there are as many classifications and definitions of homelessness as there are different point of views. A definition of homelessness might refer to a special

housing situation, to a special minimum standard, to the duration and the frequency of a stay without shelter, to lifestyle questions, to the use of the welfare system and to the being part of a certain group of the population, to the risk of becoming houseless and to the possibility to move or not if desired.”

There is a body of literature that argues for a continuum approach; either a homelessness continuum or a home-to-homelessness continuum (Watson and Austerberry 1986). At one end of the latter, more all encompassing, continuum lie satisfactory and secure forms of housing and at the other lies sleeping rough. Neale (1997) sees homelessness as a highly ambiguous and intangible phenomenon which lies at one end of housing need/experience. She argues that, as it is integral to the housing system and inseparable from other aspects of housing need, theories of homelessness and policies to tackle it cannot be separated from other aspects of ‘housing’.

### **Definitions of homelessness referred to in the literature**

In the UN System, used for example in the “Compendium of Human Settlement Statistics”, the expression “Homeless household” refers to

“... households without a shelter that would fall within the scope of living quarters. They carry their few possessions with them sleeping in the streets, in door ways or on piers, or in any other space, on a more or less random basis.” (UN 1998: 50).”

This definition, suggesting visibly dishevelled figures tramping city streets and carrying their possessions to random sleeping places, is universally recognised and simple. However, such "accommodation oriented" definitions have been criticised because they have restricted the issue of homelessness to not having a house - "houselessness". They do not do justice to the complexity of homelessness nor are they sufficient to describe the different realities of homelessness in every country, Cooper (1995).

Other countries have widened the definition to include people sleeping in institutions meant for those without any form of shelter. This is the case for definitions used in

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the USA, India and France. For example, in the USA, the Stewart B. McKinney Homeless Assistance Act of 1987, defined “homeless” to mean:

“(1) An individual who lacks a fixed, regular, and adequate night-time residence; and

(2) An individual who has a primary night-time residence that is:

A supervised publicly or privately operated shelter designed to provide temporary living accommodations (including welfare hotels, congregate shelter, and transitional housing for the mentally ill);

An institution that provides a temporary residence for individuals intended to be institutionalized; or

A public or private place not designed for, or ordinarily used as, regular sleeping accommodations for human beings.

(3) This term does not include any individual imprisoned or otherwise detained under an Act of Congress or state law.” (USA 1994: 22).

This rather narrow definition of homelessness equates to the two groups in Europe who would be sleeping rough or in a public shelter. The use of the term ‘adequate’ does, however, leave room to extend the focus to those whose housing can be deemed to be inadequate. Their situation, which for the most part corresponds to a narrow or literal definition of homelessness, also implies the absence of community and family ties, privacy, security, and the lack of shelter against the elements (FEANTSA 1999). However, writing on behalf of FEANTSA, (Avramov 1996) prefers a wider definition which also includes the value-laden term “adequate”:

“Homelessness is the absence of a personal, permanent, adequate dwelling. Homeless people are those who are unable to access a personal, permanent, adequate dwelling or to maintain such a dwelling due to financial constraints and other social barriers...” (Avramov 1996:71, in FEANTSA 1999: 10).

Adequate housing is now defined by the United Nations Committee on Economic, Social and Cultural Rights in the following terms:

“As both the Commission on Human Settlements and the Global Strategy for Shelter to the Year 2000 have stated: ‘Adequate shelter means... adequate privacy, adequate space, adequate security, adequate lighting and ventilation,

adequate basic infrastructure and adequate location with regard to work and basic facilities – all at reasonable cost.” Article 11 (1) (UNCESCR 1991).

The lack of data on homelessness in developing countries means that much of the current debate lacks an empirical foundation, without which the suitability of Western definitions and typologies cannot be assessed. We have difficulty, for example, in accepting that all who are not “adequately housed”, in accordance with the above, could be regarded as homeless in developing country contexts. Just because a household is crowded by some definition does not automatically and universally render it homeless. For example, we found in previous work that 73 per cent of all households in Kumasi, Ghana, live in single rooms and there is a city-wide mean occupancy rate of 3.3 persons per room (Tipple and Willis, 1991). Although most at or near the mean might regard their housing as inadequate, residents of Kumasi would not generally regard themselves, nor would they be regarded, as homeless because of the crowding.

### **Criteria for homelessness from our survey**

We have recently conducted a review of homelessness in nine countries; PR China, India, Indonesia and Bangladesh in Asia, Egypt, Ghana, South Africa and Zimbabwe in Africa, and Peru in Latin America; sponsored by DFID.<sup>4</sup> Because there seems to be a broad margin of housing inadequacy that cannot easily be assumed to constitute homelessness, we asked the question of all our collaborators, “What is homelessness in your country context?” The following is a discussion of what these definitions tell us about attitudes to homelessness in the different countries represented in our study. It is essentially work in progress being one step forward, we feel, from our recent categorisation by tenure, shelter, suitability and quality, permanence, in our project leaflet (Tipple and Speak, 2003). The paper ends with brief ideas on how definitions may affect policies that may be adopted to combat homelessness.

### **Criteria in official definitions**

Official or government definitions vary widely among the countries in our study. They range from non-existent to virtually all-encompassing. Despite using the term

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<sup>4</sup> Homelessness in developing countries, DFID Research Project No. ESA343, 2001-2003.

'homeless' widely in policy, a number of countries, including Peru, Ghana and China, have no single 'official' governmental definition of homelessness.

The way in which the term is used in housing development policy and in censuses gives an indication of some governments' informal definitions. However, the increase in the number of people living on the streets is forcing many countries into defining homelessness the criteria of lifestyles, location, permanence of occupation or security of tenure, welfare entitlement, and quality.

### ***Lifestyles***

The most straightforward means of defining someone as homeless is through their lifestyle: if someone lives on the streets or other open spaces and does not regularly sleep within a recognised dwelling, they are defined as homeless. These are in FEANTSA's state of 'rooflessness' (FEANTSA, 1999), Cooper's absolute homelessness (Cooper, 1995), at the extreme end of both homelessness and home-to-homelessness continuums (Watson and Austerberry, 1986), and within the UN's (1998) definition of 'homeless households'.

In Peru, one of the two groups defined as homeless are those living on the streets. This group is branded variously as alcoholics, addicts, vagrants, criminals and mentally ill. Even the street children are called 'piranitas' after the piranha fish. Each of these conform to 'being part of a certain group of the population' (Springer, 2000). Being so far outside any formalised community, this group will not be granted land title.

The Bangladesh Bureau of Statistics (BBS) suggests an official definition of homelessness, which it uses for census purposes, as:

“[The] floating population are the mobile and vagrant category of rootless people who have no permanent dwelling units whatever” (BBS 1999: 3)

This definition was refined from an earlier one which included the term 'transient population', when it was agreed that much of the transient population may have homes elsewhere, which they had temporarily abandoned. Central to the change in BBS's definition is a notion of 'rootlessness' (implying separation from family and familiar places) and of homeless people being landless, or of having lost their original homestead.

## **Location**

The means of definition by lifestyle (transience, vagrancy) is very closely linked with location as it tends to define homelessness by where they are; ‘on the streets or other open spaces’ or ‘mobile’. Many countries define homelessness as not living in recognised dwellings - as in Springer’s (2000) housing situation or minimum standard - and then go on to stipulate the sort of places homeless people are found; their location. Thus, those living on the streets (a location as well as a lifestyle) are usually included. The more contentious issue of location is whom to include or exclude on the margins.

In Bangladesh, the definition includes locations where the homeless people:

“are found on the census night ... in the rail station, launch *ghat* (terminal), bus station, *hat-bazaar* (market), *mazar* (shrine), staircase of public/government buildings, open space, etc.” (BBS 1999: 3).

There is a great similarity between expressions of homelessness based on the adequacy of housing and those based on location. In South Africa, officials of the Gauteng Provincial Housing Department and the Greater Johannesburg Metropolitan Council base their definition on quality<sup>5</sup> but tend to express it locationally as they consider homelessness to be:

“...People without (i) adequate shelter, (ii) secure tenure, (iii) living in squatter settlements, (iv) living in backrooms in townships and elsewhere,<sup>6</sup> (v) living in slum conditions. It is evident in the inner city, since it consists of both third and first world elements, a cardboard house under the bridge, occupation of metropolitan open spaces, parks, vacant land, a couple of dirt-stained blankets on the corners of high rise building, occupation of unused buildings”.

“...The definition of homelessness includes the unavailability of adequate shelter, land and security of tenure. It is a result of unfavourable financial conditions and other conditions beyond the control of the homeless people...”

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<sup>5</sup> With a measure of security thrown in for completeness!

<sup>6</sup> These include the backyard shacks that are almost ubiquitous in the former ‘Black Townships’.

(Interviews at the Gauteng Provincial Housing Department and the Greater Johannesburg Metropolitan Council by Dr O. Olufemi)

In the above, the backrooms in townships are structures of timber or masonry built to the rear of formal (former 'Black') township housing plots. The tenants usually share the services of the plot with the other occupants. However, there is no differentiation in this between renters in flimsy wooden sheds sharing bathing and sanitation facilities with twenty or more occupants of the plot and married children of the plot holder occupying permanent rooms with self contained bathroom and toilet.

Even though adequacy appears to be important in the definition, no distinction is made amongst shack dwellers, squatters, and homeless pavement dwellers. The result is that shack dwellers and squatters, arguably somewhat better off than pavement dwellers, benefit most from the various housing delivery policies and programmes such as subsidies and informal settlement upgrading programmes. Indeed, squatter settlements are often used purposely as a stepping-stone into a formally serviced area where residents are eligible to receive the government grant with which to buy or build a minimum dwelling.

### ***Permanence of occupation, security of tenure***

Permanence of occupation, or the level of security of tenure, is another criterion often used in definitions. It appears in the Johannesburg definition, above, and is adopted by many countries in their definitions of homelessness. They can range from people who are rootless, moving from one rough-sleeping location to another, to those in dwellings that may be of varying quality but share a lack of secure tenure - reflecting FEANTSA's (1999) 'insecure accommodation, part of Cooper's (1995) criteria of relative homelessness, and Springer's (2000) risk of becoming homeless. In our samples, it is the most frequently used criterion.

In Peru, the second group regarded as homeless are those without legal title to land. Unlike occupants of poor-quality buildings, they are included in the land registration programme which focuses on formalising land title for squatters without a registered plot or property, being below the poverty level, and claiming a plot from the government.

In Indonesia, the closest translation of homelessness in the national language is *tunawisma* (from Old Javanese meaning “no house”). The Indonesian language does not distinguish between house and home (both words translating into *rumah*). This might suggest that Indonesians would have difficulty differentiating between houselessness and homelessness. However, the official definition, as used in the national census of 2000, is based not on houselessness, rooflessness, rootlessness or landlessness, but on permanence.

The Indonesia census of 2000 divides the population into two main categories, those having a permanent place to stay (*mempunyai tempat tinggal tetap*) and those not having a permanent place to stay (*tidak mempunyai tempat tinggal tetap*). Those not having a permanent place to stay included ship’s crewmen, nomadic people and people living in houseboats or floating houses,<sup>7</sup> as well as the more obvious *tunawisma* – houseless.

The importance of tenure, is seen again, in a somewhat extreme form in Zimbabwe. The definition used by the National Housing Taskforce of Zimbabwe is based on the assumption that anyone who does not own their own home in an officially approved residential area is homeless. So embedded is this concept of homelessness being related to ownership, that government housing policy prescribes that 90% of all new housing should be for home ownership and only 10% for rent. Furthermore, all urban local authorities are required to sell their housing to tenants.

However, this is only a precursor to a welfare entitlement qualification in that everyone who does not own a publicly provided dwelling is entitled to register for on the Official Housing Waiting List (OHWL). Government housing is available to all those on the official waiting lists under this definition, on a first come, first served basis. No priority is given on the basis of need.

### **Quality**

Egypt represents people as homeless by the quality of their housing. People living in marginal housing (“*Iskan gawazi*”) and unsuitable housing are regarded as homeless.

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<sup>7</sup> Though living on houseboats may be quite a highly regarded strategy in some countries, both Indonesia and Egypt regard those who dwell on boats to be homeless.

These include residents of shacks, kiosks, staircases, rooftops, public institutions and cemeteries.<sup>8</sup> In addition to its welfare criterion (below), the Census of India defines homeless people as those not living in “census houses”, i.e. a structure with a roof.

In Ghana, the very concept of homelessness is new and it sits uneasily within a context of traditional extended family responsibility. There is, in fact, no word for homelessness in the main Ghanaian languages, reflecting the fact that the phenomenon is relatively recent. In its attempt to rise to the new challenge of homelessness, the Ghana Statistical Service (GSS) uses a standard of accommodation criterion, in its definition of a home, by accepting that anyone who lives in a structure with a roof is not homeless. No other issues of structural quality or suitability are considered. Thus, a home in Ghana includes sales kiosks, abandoned warehouses, offices or shops. In addition, however, for the 2000 population and housing census, the GSS defines homelessness not only in shelter terms but also as ‘people not belonging to a household’. This means that only the most destitute, without any form of shelter or roof, and without kin or friends anywhere nearby to take responsibility for them, are considered as officially homeless.

### ***Welfare entitlement***

In establishing homelessness according to a welfare entitlement, Zimbabwe joins India, Peru and Egypt as countries in our sample to do so. In India, residents of settlements officially recognised as ‘slums’ are entitled to a plot in a regularised area. However, residents of ‘Juggi and Jompri’ clusters (squatter areas) are only entitled to a plot in a regularised area if their housing is cleared. If a household has a plot in a regularised area but only a poor and insubstantial shack on it, it is not regarded as homelessness because of the land holding. Planners charged with providing housing land to deserving cases classify a person as eligible for their housing land allocation programmes if they do not have a roof or land.

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<sup>8</sup> The cemeteries in question consist of dwelling-like structures but without doors or (frequently) roofs. These may be occupied by a caretaker who lives there with his household (and informal lodgers and renters), or by squatters. When the family of the deceased wish to come and remember the dead, the occupants may move out temporarily.

In Peru, the recent (2000) ‘Family Plots Programme’,<sup>9</sup> was launched in the last days of the Fujimori government. People or households without a registered plot or house, living below the poverty line and claiming a government plot or house, qualify to benefit by being allocated a plot. Those whose circumstances fit are put on the list (about 700,000 households) and can be regarded as the nearest thing the Peruvian Government’ has to a count of homeless people.

Egypt regards people living in marginal housing (“*Iskan gawazi*”) and unsuitable housing as homeless and eligible for government-provided housing. These include residents of shacks, kiosks, staircases, rooftops, public institutions and cemeteries.<sup>10</sup> Those living in institutional housing in Egypt are also included as homeless.

### ***Homeless people deprived of welfare***

In some countries, the state of homelessness, as locally defined, removes people from benefiting from rights that others enjoy and these are, perversely perhaps, some of the people most clearly identified as homeless, those living quite literally on the streets, are the very ones least likely to have their housing needs addressed and the most likely to be considered illegal.

We have seen, above, that Peru denies land to those living on the streets. In the People’s Republic of China, the state has, for decades, prided itself on its strong socialist welfare system with no unemployment and no homelessness. A strong national housing registration system, tight links between employment and housing, and rigid constraints over movement of people, meant that few households would ever be without a dwelling of their own or, at least, one shared with family members,<sup>11</sup> unless they moved illegally away from their place of registration.

The development of a market economy in China and the relaxation of some controls, including control over movement, has meant that China is experiencing a growth in

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<sup>9</sup> *Programa de Lotes Familiares.*

<sup>10</sup> The cemeteries in question consist of dwelling-like structures but without doors or (frequently) roofs. These may be occupied by a caretaker who lives there with his household (and informal lodgers and renters), or by squatters. When the family of the deceased wish to come and remember the dead, the occupants may move out temporarily.

<sup>11</sup> The three generation household is traditional and still very common in China.

the number of people moving away from their place of registration, or *Hukou*, where housing is assured. These people, known as *Mangliu* (blindly floating people) or *Sanwurenyuan* (without registration card) are the closest to being officially defined as homeless people that can be found in China. They are not entitled to (subsidised) housing through the normal channels and, like most households, find themselves unable to afford housing on the open market. They collect in ‘aggregated villages’ of poor quality overcrowded housing; they are dislocated from mainstream society in that they are not locally entitled to school places, welfare payments, etc. This reflects Edgar et al’s (1999) state of social exclusion and marginalisation, and Caplow et al’s (1968) absence or attenuation of affiliative bonds. However, China still has no official definition of homelessness and regards those without housing, especially squatters, as illegal rather than as a category of people to be supported by policy.

In Indonesia, people without a ‘permanent place to stay’ are also, generally, without an identity card (*kartu tanda penduduk* - KTP), issued by the local authority. They are not organised into community and neighbourhood units (*rukun warga* and *rukun tetangga*)<sup>12</sup> in which every household (at least theoretically) should be a member. As a consequence, they do not benefit from development projects and their dwellings, regardless of standard or quality, and cannot be fitted with any electricity or piped water connections.

In the Peruvian official definition, those living in dilapidated *tugurios* (old city-centre houses) which are, in many cases, in such poor condition as to be dangerous and hazardous to health, are not included as homeless with respect to the land registration policy aimed at addressing homelessness. In India, pavement dwellers are usually not entitled to any plot because they are rarely on the voters’ list and do not possess ration cards (UNCHS 2000). Hindu *sadhus* (wandering ascetics), who travel around India carrying few possessions, dressed only in loincloths and giving up all worldly attachments in order to obtain enlightenment, are not included in the category of

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<sup>12</sup> These organisations are a legacy of the Japanese occupation period (1942-1945) when they were used to organise the people in war efforts (Jellinek 1991). In 1969 Ali Sadikin, the governor of Jakarta at that time, revived them to promote community participation in the city’s development. A *rukun tetangga* (RT) consist of around 30 households, while a *rukun warga* (RW) consist of around 10 RTs.

homeless. *Banjaras* (Gypsies) and Loharas (a nomadic tribe involved in the blacksmith trade) have also been excluded.

None of our countries defined those involuntarily sharing accommodation or those living in institutions (except shelters specifically for homeless people) as homeless, except when they qualify for other reasons.

We offer tabular forms of the above discussion in tables 1. and 2.

TABLES 1 AND 2 HERE

### **Working definitions**

The official definitions discussed thus far are those used by governments, predominantly in their land and housing policies and censuses. However, arguably more appropriate, working definitions are adopted by NGOs to prioritise their work. In some cases working definitions are tighter than official ones, in order to focus the NGOs work on those most in need. In other cases, an NGO's definition can be much more all-encompassing, in order to provide for those who would not be considered homeless officially, and for whom government support is not available.

In South Africa, the government view seems to be widely accepted. NGOs such as the South African Homeless People's Federation regard shack-dwellers and squatters as homeless people. The Federation states that it is a network of organisations that are "rooted in shack settlements, backyard shacks or hostels<sup>13</sup>" (Bolnick 1996). It operates on a wider definition to support those living in conditions which would not otherwise be considered as homelessness in many countries. Furthermore, by including these, the Federation opens its remit to about one-fifth of all residential units in African areas (Crankshaw et al. 2000).

Three distinct groups of homeless street people were identified in the Johannesburg inner city (Olufemi 1997; Olufemi 1998).

- Pavement or street dwellers. For example, those who live on bare floors, pavements, in cardboard boxes, etc.

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<sup>13</sup> Such hostels are not homeless people's hostels but the dormitories built for single male workers by the apartheid regime and now occupied by households.

- Those who live in temporary shelters such as bus or railway stations, open halls, taxi ranks, etc.
- Those who live in city shelters (shelters provided by NGOs or faith-based organisations).

These are based on quality (or adequacy) and location, just as the ones used by officials in local government are.

As we have seen, in Zimbabwe, the government's definition of homelessness is very broadly based and includes everyone '*without a house to his name*'. Even some NGOs, such as Dialogue on Shelter for the Homeless in Zimbabwe (DSHZ) and the Zimbabwe Homeless People's Federation (ZIHOPFE) subscribe to this definition. However, among many relief NGOs, this definition is narrowed to focus on those in greatest need, such as people on the streets, displaced people, and farm workers recently evicted by the government in the land reallocations. Some NGOs such as Bulawayo Shelter, the Scripture Union, and Zimbabwe Red Cross Society include displaced persons in their client group. Even these groups will not, however, support anyone with family willing to take them in: a definition using familial connections comparable with the Ghana definition.

In some countries NGOs operate on a wider definition of homelessness than the government. This is either to draw attention to the poor and unsafe housing conditions in which many people live, or to actively support those people who would not be eligible to receive government help.

In India the National Campaign for Housing Rights uses a broad, holistic, definition of home as a place where one is

“able to live with dignity in social, legal and environmental security and with adequate access to essential housing resources like land, building materials, water, fuel, fodder as well as civic services and finance”.

Also in India, Aashray Adhikar Abhiyan (AAA 2001: xiii) defines a homeless person as

“[one] who has no place to call a home in the city. By home is meant a place which not only provides a shelter but takes care of one's health, social, cultural and economic needs. Home provides a holistic care and security (sic)”.

This tends to emphasise the lack of the components of a broad image of home (as expressed by (Somerville 1992) which makes it a much more inclusive definition than that used by the India Government.

In Bangladesh, where the official definition of homeless equates to rooflessness, the international NGO, CONCERN, takes a more holistic approach to defining homelessness. For example it considers social issues and causes of homelessness and includes brothel workers as homeless.

In some countries it is left to NGOs to take account of issues of quality and condition of shelter. In Ghana, for example, the Westphalia Children's Village, at Oyoko in the Ashanti region, considers children in 'poor living environments' such as a dilapidated dwelling, as homeless. They are not considered so by the government, however, unless they live on the streets and seek shelter at night in abandoned buildings or bus shelters or if they cannot trace their families.

In Peru, where there is no official definition but where the policy emphasis is on land registration, many thousands of people live in dreadful conditions. They live either in inadequate shelters on registered or unregistered plots in squatter settlements or in dilapidated and hugely overcrowded *tugurios*; old inner city tenement properties. Their plight is taken up by NGOs who, thus, widen their definition of homelessness to include poor quality and dangerous conditions, lack of facilities and infestation. For example, CEPROMU, an NGO in Lima, works exclusively with households living in the run down city centre *tugurios*, who it considers homeless due the extremely poor and dangerous conditions in which they live.

## **Conclusions**

The concept of homelessness is one that varies greatly among nations and often reflects the political climate rather than the reality of deprivation. There is little doubt that people living on the streets, under bridges, and in structures not designed for residence are homeless. However, the margin between homeless and inadequately housed is much more vague and can be set very low, excluding squatters, or very high, including all who are not owners or renters of formally approved dwellings. The continuum approach allows some flexibility to blur the threshold of homelessness but, without a threshold, estimating the scale of policy interventions needed is difficult.

The criteria used can be expressed as lifestyle, location, permanence of occupation (or security of tenure), welfare entitlement and housing quality. Each of these is valid but tends to generate different perspectives on homelessness. Better link here needed. See notes on small version

It is likely that criteria used for definition will affect policies towards homeless people. Where particular criteria are seen to be ‘the problem’, there is a temptation to address them and expect the problem to be solved. Where they are not amenable to policy, e.g., lifestyle, authorities may just turn away accepting the *status quo* as inevitable. Where criteria such as secure tenure generate a large percentage of households in homelessness, it is likely that policy makers (out of desperation at the size of the task) will simply regard existing long-term supply policies as the only way to assist households in even the greatest need. At the same time, perversely, they may come to view all housing solutions that fall short of fulfilling their criteria as invalid. Thus, squatter settlements may be cleared in order to build acceptable housing on secured plots without anyone in authority noticing the paradox of clearing one sort of housing to build another sort of housing without making any material inroads into shortfalls (or even increasing them as new formal housing may be less densely developed than the informal settlement that was cleared).

It would seem to be beyond contradiction that poverty is the main underlying cause of homelessness even though, in two equally poor households, one may be housed and the other homeless. Poverty alleviation policies are undoubtedly important in combating homelessness.

In the context of this paper, there seems to be a need for more agreement than already exists especially if policy is to be appropriate and if lessons are to be learned between country experiences. We are not ready to propose a single definition to suit all cases and we suspect that it will not be appropriate to do so. Neither will we be quick to abandon the term homeless in favour for such terms as houseless, shelterless, etc. - as suggested by Springer (2000) and others – though we are moving towards suggesting terms for different circumstances within homelessness. The term homeless has a resonance for lay people, and home has embedded meanings which are absent in ‘house’, ‘shelter’, and other semantic roots. However, the lead given by Springer (2000) in separating homeless and inadequately housed people may be useful if we can work out where the threshold may be. Which is where we came in.....

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Table 1. Criteria for homelessness by country studied

	Lifestyle (Vagrancy, transience)	Location	Permanence of occupation or security of tenure	Housing quality	Welfare entitlement	Others
Bangladesh	Mobile and vagrant, rootless people	In rail station, launch terminal, bus station, market, shrine, staircase of public/ gov't buildings, open space, etc.				
China						Outside their district of registration
Egypt				In marginal and unsuitable housing, including shacks, kiosks, staircases, rooftops, public institutions, open boats and cemeteries	Those in marginal and unsuitable housing, and in public institutions are eligible for government-provided housing	
Ghana				Lacking a roof		Lacking anyone to care for them
India				Not living in "census houses", i.e. a structure with a roof.	In settlements officially recognised as 'slums'	

Table 1 cont'd

	Lifestyle (Vagrancy, transience)	Location	Permanence of occupation or security of tenure	Housing quality	Entitlement to housing	Others
Indonesia			Without a permanent place to stay			
Peru	Living on the streets: alcoholics, addicts, vagrants, criminals and mentally ill.		Without legal title to land		Households registered on the 'Family Plots Programme'	
South Africa		In squatter settlements, in backrooms in townships and elsewhere	Without secure tenure, in squatter settlements, in rented backrooms in townships and elsewhere			
Zimbabwe			In informal residential areas		Any household not owning a publicly provided dwelling is entitled to register on the Official Housing Waiting List (OHWL).	

Table 2. Groups who might be considered homeless but are removed from entitlement

	Categories excluded from rights to housing and other welfare benefits
China	Those known as <i>Mangliu</i> (blindly floating people) or <i>Sanwurenyuan</i> (without registration card)
India	Pavement dwellers, squatters whose settlement has not been recognised as a 'slum', Hindu <i>sadhus</i> (wandering ascetics), <i>Banjaras</i> (Gypsies) and Loharas (nomadic blacksmiths)
Indonesia	Those without a identity card issued by the local authority.
Peru	Those living in dilapidated <i>tugurios</i>