Measuring Homelessness and Housing Exclusion in Poland: The BIWM Data Collection Standard

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› **Abstract**_ *Data collection on homelessness in Poland has come a long way since the first national review of statistics on homelessness was undertaken for the Fourth Review of Statistics in Europe. The need for national data on homelessness has been recognized by the authorities. National homeless counts were conducted by the Ministry of Labour and Social Policy from 2010 to 2013 leading to a planned national count in January 2015. A dedicated survey was conducted during the 2011 Housing and Population Census. Regional homeless counts, including the pioneering Pomeranian Survey, produce data on a regular basis (Dębski, 2011). Both the BIWM Data Collection Standard on Homelessness and Housing Exclusion and the methodology for aggregating service providers' data on service users were created and pilot-tested in Warsaw and the Mazovia Voivodship to support these goals. BIWM is an acronym that comes from the Polish for 'homelessness and housing exclusion': bezdomność i wykluczenie mieszkaniowe. The BIWM standard is based on core and non-core variables on homelessness that were put forward by the European research project entitled 'Mutual Progress on Homelessness Through Advancing and Strengthening Information Systems' (MPHASIS) and by the ETHOS typology of homelessness and housing exclusion. BIWM tested methodology allows all types of data to be generated, including stock for any given day and flow for different periods of time. The standard and methodology were created within two projects implemented by the Foundation for Social Innovation and Research 'Shipyard' in 2010 and 2011.*

› **Keywords**_ *Data collection, BIWM data collection standard, measuring homelessness, evidence-based policy, ETHOS, MPHASIS, Poland*

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Introduction: National Data Collection Context

A number of factors need to be mentioned in introducing the data collection context in Poland at the time of the creation and testing of the BIWM (*BIWM is an acronym that comes from the Polish for 'homelessness and housing exclusion': bezdomność i wykluczenie mieszkaniowe*) standard and methodology, many of which are still in place today. They include: relatively strict personal data protection regulations (*Ustawa z dnia…* , 1997); dispersed management of homelessness services; a view, taken by some stakeholders, that data-sharing and human dignity are incompatible; and a lack of funding for computer specialists and technical development within NGO homelessness service providers. These factors will be described in more detail below.

Poland has relatively strict data protection regulations that are defined in the Personal Data Protection Act of 1997 and are overseen by the General Personal Data Protection Inspector and very active non-governmental organizations. Any information collected by an institution that allows for the unique identification of a person is considered to be personal data, even if identification would require additional actions. For example, if the dates of stay and the sex of a shelter user are revealed, and the registry book of the shelter is available, it means the data is not protected because it is possible to identify the person using these two sources. Personal data cannot be shared between data administrators unless it is made anonymous in a way that does not allow for identification or the identification would require too much effort and/or cost.

The Act defines rules for data processing (*przetwarzanie*), including on 'providing data' to the person or researcher processing the data, but a 2010 Amendment removing a specific paragraph on data provision means the Act no longer obliges institutions to reveal any information, but states only that under certain conditions there are no restrictions on revealing certain information. Thus, provision of data is at the institution's discretion, and rarely shared. The regulations were made purposely strict to protect valuable information from being used for commercial or political purposes, but they make it very difficult for valuable administrative data to be used for public goals – for example, research for evidence-based policy.

NGOs are independent bodies that shape their activities according to their missions and insights on how things should be done. This universal feature of the third sector is taken very seriously by many Polish NGOs active in the field of homelessness. They face difficulties in finding a balance between independence and cooperation. Even in 2014, after finalizing the implementation of a long-term systemic project called Local Standards for Exiting Homelessness, which was implemented by a partnership of six major service providers and numerous homelessness stakeholders, a lack of cooperation was mentioned as one of the barriers to creating

effective policy on homelessness: “There is lack of cooperation between subjects directly engaged in homelessness. Organizations treat each other as competitors (especially in access to funding) which brings about the tendency rather to rivalry than dialogue and cooperation.” (Browarczyk *et al.*, 2014, p.18)

A negative attitude to data-sharing, understood as revealing client data in an anonymous but client specific format that allows for aggregation of other organization’s data, is just another illustration of the above point. That the vast majority of services for people experiencing homelessness in Poland are provided by NGOs is an important factor shaping the data collection context. In data protection language it means that data on service users is collected by many different ‘data administrators’ who are obliged to fulfil data processing rules. Misunderstandings of independence and dispersed management of homelessness services were, and still are, important factors that have to be taken into account by anyone wishing to research the homelessness phenomenon in Poland in a way that involves more sophisticated indicators than simply stock at one point in time in a two-year period.

Another important factor in the overall attitude to collecting information on homelessness is the perceived success of the headcount survey conducted bi-annually since 2001 in the Pomeranian Voivodship by the Pomeranian Forum in Aid of Getting Out of Homelessness. As the Pomeranian Survey was widely known as the only such effort in the country – in 2010 there were no national headcounts conducted by the Ministry of Labour and Social Policy – it dominated thinking about the methodology for assessing the scale of the homeless population. The mimetic isomorphism described by Powell and DiMaggio (1983) may be a good framework to explain this process. Using administrative data, in particular data collected by homelessness service providers, was not considered because other options were on the table. The fear that it would be against data protection regulations seemed to play a supporting role in this. Besides its popularity, in 2010 the Pomeranian region was the only one in which a headcount survey was conducted; Warsaw stakeholders, for example – including both the Municipality and third sector – never seriously considered conducting such research.

When the need for the on-going collection of client data – and the awareness that much of it is collected by service providers – was recognised, some stakeholders proposed the creation of a central database on homeless people. The goal of such a central or local database would be to enable social workers to check quickly the history of a client’s service use. The inability to share such data between service providers has been mentioned as a barrier to social work with homeless clients, many of whom move frequently between different services. The database idea had supporters among NGO service providers and local authorities, who considered it a way of monitoring and evaluating public spending. However, the proposal was

strongly rejected by other stakeholders on the grounds that this knowledge would be used to refuse further support for any person that had 'misused' a service in the past – for example, having had to leave a shelter due to breaking the rules (for example, by being drunk). Prominent activists and service providers saw such a database as a threat to the dignity of people in very vulnerable living situations. Thus, a central database was never created.

The abovementioned features of data collection context played and still play an important role in the capital city of Warsaw, which has the biggest homeless population in the country. Warsaw has a unique local government system, defined in the special Act on the Polity of the Capital City of Warsaw (2002), which disperses responsibility for homelessness across different levels and departments of a three-tiered local government structure. Since 1990, homelessness service provision, involving emergency accommodation, shelters, specialist shelters and food distribution, has been monopolised by NGOs. There is no single service provided directly by the Municipality of Warsaw, although, of course, the Municipality is a major funder. Public Welfare Centres, responsible for granting welfare benefits and subsidies to individuals, are dispersed over eighteen districts and have no power to demand anything from NGO service operators, including data, bed space, etc. As a result, data on the same people is collected by many separate institutions. This is not the case in some local communities where the welfare and shelter systems are managed by the same department and data collection is centralized – for example, smaller towns in the Mazovia Voivodship like Płock, Ostrołęka and Radom. Their data collection systems have been evaluated during Local Seminars of Homelessness Stakeholders organized by the Camilian Mission of Social Assistance.

Last but not least, data collection requires adequate technical means, such as computers, software and database administrators. More sophisticated means are required for keeping personal identification data, including protected servers and an authorization system for specific levels of access. Whilst hardware is widely available – software can be accessed quite easily thanks to initiatives like the Techsoup Nonprofit Technology programme – NGOs experience difficulties in securing funding for professional database administrators, who have to be hired to maintain client databases. Although there is generally quite a lot of funding for the 'informatization' of public institutions, this does not seem to reach NGO service providers.

In 2010, the vast majority of homeless client registration systems were paper-based and consisted of a registration book and some kind of 'inhabitant's card' containing basic socio-demographic details and the notes of social workers (Wygnańska, 2011b). Cards differed between organizations but they had common core variables, and in Warsaw a standardized card had been used by all the services that were receiving funding from the Municipality. Some service providers claimed having an

electronic database, but further inquiry revealed that these were spreadsheet files rather than databases. Still, at least some data was collected electronically and systematically as opposed to being kept in ingeniously systematized binders in solid steel security containers.

This context obviously impacts the availability of proper data on homelessness in the country on all levels: national, regional and local. To date there are neither flow nor prevalence indicators for the population of people experiencing homelessness and housing exclusion over a certain period of time. This is true even for the commonly accepted situations of homelessness, defined by ETHOS as living in emergency accommodation and in accommodation for the homeless (operational categories 2 and 3). The national stock indicator – meaning the number of people who were inhabitants of homeless institutions – is available for 2010 (MPiPS, 2012), 2011 (GUS, 2013) and 2013 (MPiPS, 2013). Specific numbers can be found in the latest EOH comparative study 2014 (Busch-Geertsema *et al*., 2014), but they differ substantially from each other, which is enough to justify questioning their relevance. Regional research is not widely available and the Pomeranian Voivodship still stands as a solitary example.

Although the availability of point-in-time stock indicators should not be undervalued, the fact is that in 2014 as well as in 2010 the real scale of homelessness in Poland – measured by the flow and characteristics of the population of people who experienced even the most obvious situations of homelessness (living in the public space or in institutions for the homeless) – was, and remains, unknown. There are hardly any stakeholders who feel the need to generate all the indicators recommended by the European institutions.

Projects on the BIWM Standard: Goals and Implementation

The context of homelessness data collection in Poland, along with European recommendations on measuring homelessness, led to the idea of creating and pilot-testing a methodology for using homelessness service providers' data to generate the flow and prevalence indicators of homelessness, as well as more reliable characteristics of the population experiencing homelessness over a certain time-period. Two half-year projects were undertaken by the Foundation for Social Innovation and Research 'Shipyard' after securing funding from the Mazovian Voivodship Office through a competition for NGO grants. The overall cost of both projects was 70 000 PLN (€15 700), 84 percent of which was provided by the Voivod Office and the rest by 'Shipyard'.

The goals of the projects were as follows:

- To demonstrate that data-sharing between independent NGOs is possible without violating personal data protection rules and the independence of institutions.
- To demonstrate the nature of the *flow* indicator to service providers and other stakeholders (elimination of double-counting of the homeless population over time).
- To demonstrate that generating flow and prevalence indicators is possible.
- To show how this can be done technically through creating and applying methodology and relevant software.
- To test European recommendations on homelessness data collection – in particular the MPHASIS core and non-core variables on homelessness and the ETHOS typology of living situations – by creating the BIWM Data Collection Standard on Homelessness and Housing Exclusion and asking service providers to work with it.

Implementation consisted of a number of stages: the analysis of personal data protection regulations and finding appropriate solutions; engagement of service providers; creation of the BIWM standard; creation and distribution of the BIWM database; data aggregation and statistical analysis; and results. These stages are described in the paragraphs that follow. In order to test proposed methodology against data protection regulations, a feasibility study was commissioned from the Panoptykon Foundation, a rigorous watch-dog of the right to the protection of personal data. They endorsed the methodology but suggested very strict procedures for making the client data anonymous before sharing it with researchers. Their expertise assured service providers and 'data administrators' that participation in the project would respect personal data protection regulations. It was also a starting point for designing the procedures and software for making data anonymous and correctly formatted for aggregation.

The next stage was the engagement of homelessness service providers. The goal of the projects was to demonstrate the nature of the flow indicator: the number of people who experience homelessness over a certain period of time. Experiencing homelessness was defined as being a user of a service 'for homeless people' – e.g., a shelter, night shelter, health clinic, or being a user of the service 'due to homelessness' as defined by the service provider – e.g., in a local welfare centre and municipal hospital. The period covered was three years: from the 1st of July, 2007 to the 30th of June, 2010. As it was a pilot study to test the methodology using administrative data, it was crucial to engage different kinds of institutions: the third and public sectors, social welfare and health, specialist and generalist, long and short term (ambulatory). Luckily, there was one district in Warsaw, namely Wola, on

whose territory all such kinds of institutions existed and these were willing to participate in the project. Although representativeness of the collected data was not crucial for the project and it was not a criterion for choosing institutions, the fact that residential institutions participating in the study provided one third of all the spaces in the municipal system and that their health clinic was the only such service available in the whole town meant that the gathered data was worth considering, as it potentially captured quite a big population of users of homelessness services in the town.

As only standardized data can be aggregated, the third stage of the project was the creation of a common framework, namely the BIWM data collection standard. The BIWM standard is a set of variables describing the situation of users of services for homeless people, those using services due to homelessness and those experiencing homelessness in general. Variables/questions are closed-ended with a limited list of answers. As one of the goals of the projects was to test European recommendations on data collection, namely MPHASIS core and non-core variables on Homelessness (European Commission, 2008) and the ETHOS typology of homelessness and housing exclusion, these were used as the framework for creating the standard.

However, the framework differed from the local data collection tradition and had to be adjusted based on the assumption that the European recommendations are evidence-based, while there are also good reasons behind the local tradition. It also had to be kept in mind that the kind of the information being collected was strictly tied to the process of social work and supporting clients. Altering questions and lists of possible answers might influence some elements of the social work process. As the participating institutions were informed that only the data they had already collected would be needed for the project, the differences couldn't be too overwhelming. As it was impossible to remove all of them, the workers had to deal with them. The way in which the tradition data collection and the European recommendations interplayed is discussed in later sections of the article. The BIWM standard is outlined in Appendix 1.

Next was the creation and distribution of the electronic BIWM database for collecting client information from participating institutions using the BIWM standard. The MS ASSESS database was created and distributed for free among participating institutions. It consisted of four sections: personal data and the situation of the service user at the beginning of using the service; register of services/support provided during the stay or visit to the service; and situation of the service user at the point of leaving the service. The fourth section allowed for the automatic generation of basic statistics, as well as for exporting data in the format necessary to make it anonymous and ready for aggregation. Participating institutions were

instructed on how to receive inexpensive legal software within the TechSoup Non-Profits Technology Program. Service providers were instructed and trained on how to use the database and how to work with the BIWM standard. They were provided with technical and/or financial support to enter retrospective data, which in most cases meant simply paying a worker to enter data from paper forms.

The final stage consisted of data processing (anonymising and aggregation) and statistical analysis. According to data protection expertise (Szymielewicz, 2010), any data allowing for the unique identification of a person had to be made anonymous before leaving the institution in which it had been collected. To meet the goal of the project – i.e., the generation of the flow indicator, which is the number of unique people who used various services over a certain period of time and on a certain territory – the anonymised data still has to uniquely identify each service user. A computer program was designed that exchanged the first name, last name, sex and date of birth of a service user with a unique code. The same code was used for the same set of variables: first name, last name, sex, date of birth – no matter which service provider the data came from, so, for example, Jan Kowalski, as characterized by male sex and a birth date of 1st of January 1970, would be given the same code by any service provider's coded register if he had used the service and was registered as a service user. Participating institutions were provided with the program and they used it to code data exported from the BIWM database, which they passed to project researchers. With the use of a second set of software, tables with anonymised but still uniquely coded client data were aggregated into final tables, where one record/row contained all information that had been collected on any given unique service user in participating institutions. The tables were the basis for the statistical analysis in SPSS. It has to be emphasized that researchers were not able to identify the real names of service users at any stage of the process unless they were asked and authorized by the service providers to support them in entering data from a previous stage. The computer program for aggregation was designed to work one way only.

The five-stage process resulted in the positive verification of the methodology as applicable and useable by various kinds of service providers; it was in compliance with the personal data protection regulations and made it feasible to generate all the basic indicators of homelessness, including stock, flow and prevalence for given dates and periods. Some barriers that were identified included the fact that the registers of most service providers were paper-based and the substantial financial and time cost of the data-entering stage, as well as substantial gaps in data for some variables/questions and some difficulties in using the BIWM standard.

Although it was not the direct goal of the project, interesting and previously unavailable information was obtained on the relatively large population of people who had experienced homelessness in the Municipality of Warsaw over the three year period from the first half of 2007 to the second half of 2010. First of all, 4 380 unique people were identified as users of the homelessness services located in the Wola district. This number was much bigger than the number usually given in response to questions on the scale of homelessness in the town based on the data collection system run by the Municipality since 2005. The Municipal system is based on quarterly reports from service providers. These reports include summarized sets of variables, including the number of people who used the service on the last day of the quarter. Marginal numbers were summarized and treated as the number of homeless people in town. As most of the time all the shelter beds are taken, the number remained stable and mirrored the overall number of shelter beds in the town. As it is totally logical that the point-in-time stock indicators generated from residential services are lower than the *flow* indicators, even if generated from the same services, it is not logical to use just the first one as the only number to describe the scale of the population of service users. And this was demonstrated by the project: the average quarterly *flow* was counted as being twice as big as the average stock at the end of each quarter.

Another fact that could not be obtained from municipal and other data systems but was supported here by hard data, was that only one third of all service users registered in Wola homelessness services were clients of the local welfare centre. It had always been believed that this particular centre was excessively burdened with homelessness cases due to the concentration of services on its territory. Shipyard's data was interpreted as confirming the major role non-governmental service providers play in supporting homeless people in the district and a lessor role for public welfare centres.

The most original information gathered was in relation to chronic homelessness. Over 200 unique service users were identified as having been registered for four or more stays in the Wola shelters over the three-year period – this is consistent with other analyses of shelter use that show that a small minority of shelter users utilise a disproportionate amount of the shelter beds (Kuhn and Culhane, 1998). Some service users stayed in one particular shelter for an excessively long period of over five years. One-hundred and twenty users of the Day Centre declared being homeless for over five years, many of whom declared being homeless for more than ten years.

Apart from the number of unique clients, complete data on the dates of contacts with service providers and periods of stays was gathered, which enabled the analysis and calculation of migration between services, the stock for each day and

the flow for any given period. Data on sex, age, administrative and geographical origin, family status, and declared length of homelessness was also collected. All the gathered data is summarized in the final report (Wygnańska, 2011a).

BIWM Standard Mainstreaming in Poland

Broad mainstreaming of the BIWM standard was not a direct goal of Shipyard's project. The goal in 2010 was to create, test and demonstrate the effectiveness of this innovative methodology. The goal for 2011 was to inform Mazovian stakeholders about the BIWM standard and implement it in five institutions. These goals were met: ten institutions received relevant software and training and officially declared using the BIWM standard. By the end of 2014, five of them were still using it, despite not receiving any stable funding for this activity. Based on the collected data, a number of reports were prepared providing evidence on the known but neglected issues of chronic homelessness and service avoiders in Warsaw. This data was used as justification for the 'Housing First – Evidence-based Advocacy' project, which aims at gathering evidence on the necessity of programmes based on the Housing First idea in Poland. Research is an important part of this project and it is planned to use the methodology created and tested by Shipyard.

The BIWM standard and methodology for the aggregation of service provider's data has been offered to the Municipality of Warsaw as a framework for improving the local data collection system in order to produce necessary indicators for policy planning. The standard has been mentioned in the CMSA position on Measuring Homelessness and Housing Exclusion in Poland (KMPS, 2013a) as an example of a framework for the national data collection standard for service providers. Recently, this position was given full support by the Polish National Federation for Solving the Problem of Homelessness in its appeal to the Ministry of Labour and Social Policy on measuring homelessness, published in December 2014.

Unfortunately, no recommendation for a data collection standard on homelessness was given by the project on 'Local Standards for Exiting Homelessness', implemented by lead NGO service providers and the Ministry of Labour and Social Policy between 2008 and 2014 (Browarczyk *et al.*, 2014). It is unclear what the position is of the major service providers – in particular the biggest networks – on using methodology for the aggregation of service providers' data to assess the scale and major characteristics of the homelessness phenomenon in the country. The National Federation supported the CMSA's Position (KMPS, 2013a) in its appeal to the Ministry of Labour and Social Policy to improve the national data collection on homelessness by using the BIWM standard and methodology, but in fact it is up to its members to simply exchange data using the methodology established in

Shipyard's projects. Even exchanging uniquely anonymised data on a few variables like sex, age, dates of visits and stays and type of service (e.g., emergency, shelter, day centre) would bring tremendous added value to what is already known, especially in assessing the scale of long-term homelessness and the proportion of service users experiencing it, the remaining types of homelessness as defined by Kuhn and Culhane (1998), age and sex distribution among different types of homeless people geographical migration and the patterns of service use.

Due to the methodology currently used, the picture of homelessness in Poland is based on the characteristics of a model homelessness service user – someone who is seen most often by service providers and is most easily caught by point-in-time research. The following picture was given in the Manual for the LSEH Model (Browarczyk *et al.*, 2014) based on expert evaluation of fragmentary data from national, regional and local research: homeless people are male in 80 percent of cases; the biggest number fall into the age group of 40-60 years; 80 percent are single in terms of marital status; the average period of homelessness is seven years for men and five years for women; the majority of homeless people have vocational or primary education; usually homeless people are unemployed/inactive and, if working, are not usually on long-term contracts; welfare benefits are a major source of income; 60 percent of homeless people live in institutions and most are in metropolises and big cities.

Groups that were excluded or not adequately included due to the methodology used and whose features are, therefore, not likely to have influenced the above picture to the extent they should have include: people experiencing homelessness in the short term; young people who usually sofa-surf or squat; families, as there are no institutions for homeless families unless they are single mothers; newly-homeless people with social capital and good social networks; women using the support of their families; and people who are experiencing homelessness but for various reasons are not present in institutions 'for the homeless' but in other institutions – e.g., for drug addicted refugees. The aforementioned are good reasons to support a claim that the real picture of Polish homelessness is substantially different to the one based on current point-in-time research. As is known from established research conducted in other national contexts (Kuhn and Culhane, 1998), in the traditional support system for homeless people, namely the staircase system, the most frequent service users may represent as little as 10 percent of the overall service user population.

BIWM Standard Evaluation

As the BIWM standard was based on European recommendations 'married' to the local tradition, service providers had to adjust to the new framework. The way they did this was evaluated firstly in the 2010 project in its fourth stage of entering existing data to the BIWM database, and secondly through observations on how the data was entered by service providers who decided to continue using the Standard up to the 2011 project and later. Some of these produced reports based on data collected using the BIWM standard, including the Camillian Mission for Social Assistance (Wygnańska and Cieplak, 2012; KMPS, 2013b) and the Day Centre run by the DOM Foundation (Wygnańska, 2012). Additional information has been obtained by the author at the Caritas AW shelter 'Haven' and the Specialist Health Clinic for homeless people run by the Doctors of Hope Association.

Difficulties or discrepancies between the local tradition and the standard observed include: the classification of alcohol dependency as 'support need' versus 'reason for homelessness', the assessment and classification of mental health problems, the necessity of collecting information on the administrative origin, and the application of ETHOS in the definition of homelessness. These problems are described in more detail in the paragraphs below.

Social workers usually marked alcohol dependency as the 'reason for homelessness' not as a 'support need' as defined in MPHASIS (European Commission, 2008) and the BIWM standard. This may be the consequence of the fact that local tradition doesn't include collecting systematized data on support needs but it is common to research causes of homelessness on both the individual (inhabitant cards) and the population level (Census 2011, National Count 2013). Users of the BIWM standard frequently registered a client's declaration of being an alcoholic as a 'reason for homelessness' under 'personal reasons', for example in the qualitative report of the Saint Lazarus Boarding House (KMPS, 2013b). When asked about this, one of the social workers answered that the clients themselves declare alcohol dependency as a cause and it therefore has to be registered as such. In some cases it was unclear to social workers whether they should register information as declared by the client or as evaluated by themselves. For example, what should be marked if the client was obviously alcohol dependent (e.g., "it was written on his face", as was noted in one of the inhabitant cards) but declared not being dependent at all – just having one beer because it was hot outside?

Differentiating between various 'strange' or unwanted behaviours and suspected or diagnosed mental health problems was reported as problematic. It seemed to be difficult to correctly distinguish symptoms of mental health problems from the actual decisions and choices of the service user; for example, the fact of refusing to cooperate with a case-worker was frequently interpreted as a choice. There was

one question/variable, which is neither part of MPHASIS nor ETHOS but which was very important to service providers testing the BIWM standard: 'administrative origin'. 'Administrative origin' is defined as the full registration address for permanent stay, its status being marked either 'current' or 'last'. For many service users, their administrative origin is different to the actual place of stay, but as the former is crucial for obtaining important public services and benefits, it has to be collected. It was reported to be very important to founders of services – in the case of Warsaw, the Municipality – because it demonstrated how many of those supported were the 'responsibility' of other local governments.

The BIWM standard uses the ETHOS typology to define the fact of being homeless. According to ETHOS, which is an operational typology, there are thirteen living or housing situations in which one is defined as homeless or housing excluded. So, if a person lives on the street or in a homeless shelter, both ETHOS categories, she/he is automatically considered homeless. In the Polish tradition, the subject of the definition of homelessness is a 'person', as stated in The Act on Social Welfare of 2004 and in the most recent Manual for the Model on Local Standards for Exiting Homelessness, put together by major NGO service providers in cooperation with the national government (Browarczyk *et al*., 2014). The Model recommends using three definitions at the same time: the descriptive one (see below), the administrative one as outlined in the Act on Social Welfare (2004), and the operational one based on ETHOS; however, it is not clear how they interplay. The descriptive definition of homelessness is as follows: "A homeless person is a person who due to various reasons, using her own capabilities and entitlements, temporarily or permanently is not able to provide herself with a shelter that meets minimal conditions for naming it a living/housing quarter/unit (…)" (Browarczyk *et al.*, 2014, p. 23)

Based on this definition, one should evaluate a person's homelessness as being her/his fault or not, and as something that can be resolved by her/his own actions. By this definition, it is not obvious that every inhabitant of a homeless shelter is really homeless; for example, some of them might be workers living far from the town who do not want to commute on work days, and who sleep over in shelters while at weekends they go back to their family homes. According to ETHOS they are homeless and according to the descriptive definition they are not. Another example that was given during one of the discussions on the BIWM standard is of a person who has a home but is in a conflict with members of the household, where if there were no conflict (which is considered something she could resolve) she would not be homeless. The consequence for the BIWM standard was that the ETHOS type was treated as an additional question/variable that does not necessarily confirm the homelessness status of the service user.

In addition, there were questions over some of the options listed in the BIWM standard for the living situations of homelessness or housing exclusion, as service providers considered them situations where there was a stable and real home. One such option was that of 'being accommodated in a social apartment', which is a very small studio apartment of a very basic standard (some amenities are shared between a number of tenants) that is provided to a person by the local government for a certain amount of time and at a very low rent. Only people with low incomes are eligible, and once their income grows they have to leave the place. In terms of the social, physical and legal domains of FEANTSA's conceptual definition of homelessness, living in such an apartment equates to a very unstable situation, but some BIWM standard testers saw it differently.

The last difficulty with ETHOS was an unclear distinction between the operational category of 'living in the public space' (ETHOS 1) and 'living in temporary/non-conventional structures' (ETHOS 11). Some housing situations could fit into both or either, namely 'living in abandoned buildings' ('pustostan') and 'living in gardening allotments' ('działka'). To correctly assess the operational category involved, a deeper interview would be necessary to establish the conditions of the places under discussion. Some abandoned buildings and allotments are inhabited for a long time by the same people, who experience relative stability in terms of a legal domain (for example, through a verbal agreement with the owner) and some privacy in terms of the social domain (for example, they can live in a relationship with a partner). Other such locations might be totally different; for example, they may be screened and cleared by the police on a regular basis, vulnerable to threats from neighbours and passers-by, or inhabited by many people who claim the right to be there. Service users who declare spending the night before staying in the shelter in a 'pustostan' or 'działka' might be coming from substantially different housing situations and the BIWM standard was not helpful in differentiating between them.

The above observations of differences in the European recommendations and local tradition do not represent major clashes, but rather issues that necessitate some education and training with respect to the two exceptions identified: defining homelessness as the living/housing situation versus defining it as the features of a homeless person; and an unclear distinction between the operational category of living in the public space and living in temporary/non-conventional structures. These observations justify the need for debate on the classification of particular ETHOS types to conceptual categories of homelessness and housing exclusion as well as the need to create clearer instructions on how to use the criteria of exclusion in the three domains to assess the nature of ETHOS-defined living situations in a reliable manner.

Relevance for European Stakeholders

Shipyard's projects on the BIWM standard and methodology for aggregating service providers' data were designed to meet specific goals in the local context. However, they also have some relevance for a European audience, firstly with regard to the methodology for aggregating data, and secondly in defining homelessness and housing exclusion. The methodology for aggregating data was tested in order that it should be:

- acceptable in the strict personal data protection context imposed by national legislation;
- functional in a dispersed service provision context, where people who experience homelessness are supported by many different kinds of independently managed institutions: welfare, health, mainstream, specialist, public, non-governmental, ambulatory/residential; and
- inexpensive in the processing stage, although effort was required at the data-entering stage in services with paper-based registers.

It was also intended that it should:

- potentially produce otherwise unavailable data, especially on long-term homelessness, as research on homelessness that is developed tends to concentrate on point-in-time headcounts that are of various quality
- produce the data necessary to assess the effectiveness of the traditional shelter-based homelessness support system by revealing the existence and scale of the population that circulates in the system, never exiting it to a stable and sustainable housing situation.

The last point might be useful for national stakeholders striving to meet European recommendations on housing-led policies and Housing First programmes aimed at chronically homeless people with a dual diagnosis. The methodology allows for finding evidence that among service users are people who need such programmes.

The BIWM standard is based on European recommendations for data collection on homelessness, namely MPHASIS core and non-core variables (European Commission, 2008) and the ETHOS typology. They were created to provide a common framework for research on homelessness and the production of comparable data needed for designing effective evidence-based policies. During its creation, there was broad consultation with many European stakeholders from multiple national and institutional settings. In Shipyard's projects, these recommendations were put to the test by front line social workers employed by homelessness service providers in Poland.

Two aspects of ETHOS were found to be unclear: first, whether there was a contradiction between defining homelessness as being in any one of a number of housing situations and defining it as a set of features/conditions of the homeless person themselves. There were questions around how these two approaches interplay. The second aspect was the distinction between two ETHOS living situations: living in the public space and living in unconventional dwellings, as some living places may match both and can only be differentiated by a deeper analysis of the situation. Such analysis requires a diagnostic interview and cannot be done through merely describing the living place, for example, a gardening allotment as an unconventional dwelling and an abandoned building as part of the public space. A lack of clarity was reported by social workers testing the BIWM standard, but it was also visible in the national counts conducted by The Ministry of Labour and Social Policy and in the 2011 Census, which did not differentiate between the two situations and classified all non-institutional homelessness under 'living in the public space'.

The last observation can be linked to the debate on ETHOS started by Amore *et al.* (2011) in their article for the *European Journal of Homelessness* followed by the response of Edgar (2012). Amore *et al.* challenged the validity of the three-domain conceptual definition of homelessness and housing exclusion in terms of the arbitrary threshold between homelessness and housing exclusion. According to the original conceptual definition, homelessness occurs when the living situation lacks all three domains or lacks two domains, but only if these two are legal and social. Any living situation that is lacking two domains – either legal and physical or social and physical – should be classified as housing exclusion. Such a threshold is questioned by Amore *et al*. as being unclear and lacking 'face validity', as it is not clear why the situation of a person who lives in a homeless shelter (exclusion from three domains) should be classified as homelessness while the situation of a person who moved from the homeless shelter to a makeshift shelter on public land (exclusion from physical and legal domains) would be classified as housing exclusion. Another concern raised by Amore *et al*. regards the unclear application of the criteria of exclusion from the relevant domains with respect to the ETHOS operational categories. They give an example of people living temporarily with family or friends due to the lack of other housing, which is classified as housing exclusion, while it could as well be considered homelessness due to the lack of security of tenure and private space.

In the opinion of the BIWM standard testers, for those people who should be classified as homeless according to ETHOS (living in the public space, using a night shelter) or housing excluded (living in gardening allotments) stability and access to adequate housing was the same, and it was unclear why they should be classified

differently. They complained about the lack of clear instructions on how to assess the housing situations of people living in a 'działka' (gardening allotment), which by generic definition should be classified as a 'non-conventional structure'.

As Edgar (2012) pointed out in his response to Amore *et al.*, the conceptual definition and ETHOS operational typology of homelessness and housing exclusion were created for a specific (European) context. As he writes: "The challenge was to provide a definition of homelessness and housing exclusion that could address the diversity of experience, governance and policy frameworks to allow national governments and the European Commission to monitor progress in this vital social policy arena." (Edgar, 2012, p.220)

As civil sector bodies – namely NGOs – were active stakeholders in the field of homelessness, filling the gaps in provision not covered by public institutions, it was vital to include their voice in the debate on defining homelessness, and this was done through the FEANTSA network. Thus, establishing ETHOS was not purely a research experience conducted for the ultimate purpose of conceptual validity; rather, to a certain extent it was the process of negotiation between a variety of stakeholders with established attitudes to the meaning of homelessness. This challenge has been met, as a growing number of countries (not only European) are currently using ETHOS as a framework for their policies on homelessness. However, the experience with BIMW standard has shown that there are still some clarifications to be made in order to improve the statistical reliability of ETHOS in measuring homelessness and for international comparisons between countries and continents.

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Appendix 1. BIWM Standard – Data Collection Standard on Homelessness and Housing Exclusion

Questions:	**Lists of answers:**
Name and surname	
Date of birth	
Sex	male/female
Town and country of birth	
Address of permanent registration	street and street number; zip code; town; voivodship
Citizenship	Polish/non-Polish/undefined
Marital status	never married/ married/ divorced/ separated/ informal /widowed
Education (highest educational attainment)	primary or lowest obligatory education; vocational; high school or technical high school; unfinished higher education; higher education
Declared length of homelessness	less than 2 months; 2-6 months; 6 months to 1 year; 1-3 years; 3-5 years; over 5 years
Household structure	single; single with children; couple; couple with children; other
Relationships – close people	father; mother; sibling/s; children; partner; wife/husband; none
Kind of service	stay; visit; rejection
Date of beginning of stay	or date of visit
Date of end of stay	
Housing: living situation based on ETHOS operational category and/or living situation: the night before beginning of stay	living rough; in emergency accommodation; in accommodation for homeless people; in women's shelter; in accommodation for immigrants; due to be released from institutions; in temporary/ non-conventional structures; with friends/family due to lack of other housing options; social apartment (communal); unstable accommodation; home – not homeless; other
-after the stay, as declared upon leaving	
Length of stay in ETHOS operational category above before stay	Less than 2 months; 2-6 months; 6 months to 1 year; 1-3 years; 3-5 years; over 5 years
Reasons for most recent episode of homelessness	landlord action; end of tenancy agreement; conflict in a family/ household; violence in a family/household; problems with employment; no success in looking for employment upon migration; personal; financial; discharge from an institution; immigration; force majeure; other
Support needs	disability; long term sickness; other physical health problems; mental health problems; alcohol dependency; other substance dependency (e.g., drugs); gambling; debts; rent arrears; mortgage debts; debts due to unpaid alimonies; lack of occupation/training; experience of domestic abuse; helplessness; other
Main activity: before stay	paid employment; subsidized/supported employment; voluntary work; school or training; unemployment; retired; long term sickness/disability
-after stay, as declared upon leaving	
Source/type of income: before stay	no income; paid employment long term contract; paid employment; short term contract; black market employment; registered business; unregistered 'business' (e.g., collection of recyclables, begging, sex work); pension; regular welfare benefits; unemployment benefits; alimonies; educational grants; family support; other
-after stay, as declared upon leaving	

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