

Housing policies beyond numbers: a comparative study in Portugal and Italy

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Abstract: The paper analyses how housing is structured in Portugal and Italy, focusing in particular on the recent housing policies. The objectives are: a) discuss the legislative solutions adopted in the last years to solve the housing needs; b) show the epistemological difference for the concept of social housing; c) compare the institutional variations, namely, the relevance of the local, regional and central levels. Despite Portugal and Italy having the same percentage of social housing and common characteristics of Southern Europe countries, we find differences comparing housing policies and how the countries deal with social housing. The methodology is organized into: i) bibliographic review; ii) analysis of the principal statistic data; iii) analysis of the legislation; iv) interviews with public decision-makers. Notwithstanding a wide literature about housing studies in Northern countries and comparing North and South housing policies approaches, few studies focus on the comparison between Southern European countries. For this reason, the research seeks to increase the knowledge about the singularities of the South and thus contributing to the construction of a theoretical approach South-inspired.

Keywords: housing policies, social housing, comparative housing studies, Southern Europe

1. Introduction

The literature about comparative housing studies highlights the existence of a clear difference among Northern and Southern countries in the way they cope with social housing, how is the model of tenure, the welfare regime, the rental system adopted and so on.

The comparison among Northern and Southern European countries is a well-known thread of housing studies, with the intention to display the positive aspects of the Northern model and identify the methodologies that South should follow in order to improve the housing situation in their countries.

Nevertheless, comparative housing studies among Southern European countries are less studied in depth, as seen as “*a semi-peripheral region and not at the fore-front of international interest and discussion*” (Bargelli and Heitkamp, 2017).

Hence the purpose of this research is to increase the scientific debate about Southern European countries and the comparison between them, considering the presence of some relevant examples about the correlation of the fascist-dictatorial regimes with the current neoliberal housing policies (Di Felicianantonio and Aalbers, 2017).

Starting from these reflections, the paper wants to present a study that follows an innovative method to study Southern European countries and which can be resumed in three points:

1. Housing in Southern European countries is examined with a comparative and interdisciplinary approach that does not take in consideration only quantitative aspects but also qualitative ones, combining a mixed methodology among geography, sociology and urban planning;
2. Given the scarcity of international publications about Southern Europe, housing is investigated in-depth in Portugal and Italy instead of comparing with Northern Europe, in order to find out opportunities within for the production of new housing policies;
3. After a deep understanding of housing policies in these countries, we concurred on an approach that we called '*Learning from the South*'¹ which aims to find peculiarities from which started to build innovative approaches for housing in Southern Europe.

According to Kemeny (1992), even if two countries have similar size about housing issues, they could differ from each other for many aspects, detectable if we look deeply inside the country.

In fact, if we only look at the numbers, the countries look very similar because Portugal has 2% and Italy 3% of social housing among all the entire housing stock (Housing Europe, 2017), but if we look beyond the numbers we will find out several differences, and mostly we will understand small emerging characteristics that are not appearing in the big numbers.

Despite the similar numbers of home ownership and social housing, these countries have been following different paths, mostly shaped as a consequence from the socio-historical events and the political decisions. The paper thus discusses how the two countries diverge in the concepts used for housing, the age of housing stock, the topics in discussion nowadays, in order to build a critical and constructive discourse of housing situation in these two countries.

The structure of the paper is organized in:

1. The next section includes the theoretical framework and the methodological issues in housing comparative studies that permit to frame our empirical work in the literature review about Southern Europe and the "schools" of comparative housing studies;

¹ Boaventura de Sousa Santos (2016) used the expression '*learning from the South*' to justify the building of a general theoretical literature which permits to extrapolate patterns recognized within countries in exam and to start from them.

2. The third and fourth chapters are the parts related to the study of the single countries, Italy and Portugal, which explain the concepts used for social housing, a brief summary of housing policies with a focus on the contemporary issues at national level.
3. The last chapter is dedicated to the comparison of the countries especially showing the differences on the two countries, using international and national statistical data, literature review and interviews. Therefore, here we stress the link among political levels to understand the various actors and different forms of access present in both countries.

2. Theoretical framework and methodological issues in housing comparative studies

Housing studies are common linked with welfare studies, because in the industrialized societies the State principally supports (or should support) who is in precarious and disadvantaged conditions. This kind of approach is called Welfare State and it aims to reduce social inequalities and to guarantee social rights and services, such as health care, public education, retirement pensions and housing.

If on one hand housing should be identified by welfare state, on the other hand it is a mechanism affected by unstable market rules making it the “*fourth wobbly pillar of welfare*” (Torgesen, 1987). As opposed to other areas of welfare (education, health, work, retirement pensions), social housing is not supposed on the universalistic system of public provision but is addressed for a minority and after selection controls, determining his shaky role in public policies (Kemeny, 1992).

Before displaying our empirical work about the comparison of the two countries, it is necessary to frame the topic in the political studies as well as in housing studies.

According to Landman (2003), comparing many countries would lead to a high level of abstraction for focusing on general dimension of macro-social variations. On the contrary, single-country studies permit to distinguish characteristics in depth rather than an analytic relation among the variables. In fact, what we expect from this study is more than a mere reading of graphs and tables, but a profound understanding of the principal features and the current housing situation in the two countries.

According to Kemeny and Lowe (1998), different approaches of comparative housing studies have become relevant from the last decades of twentieth century and still remaining applicable: the first one is the universalistic approach that sees countries submitted to global imperatives of the neo-liberal transformation of cities such as capitalistic logics, market failures, structural privatization and so on; the second one is the particularistic approach that sees each country as unique one, giving thus more strength to the empirically evidence in exchange of a theoretical part less developed; the last one is part of middle range theory that identifies a middle way between particular and universal ones and it

seems the most reasonable to understand all the factors that influence both countries, placing them in the European housing studies as well as finding peculiarities of the single country.²

According to Allen *et al.* (2004) the principal traits of the Southern European countries that allow them to be combined in a cluster are:

- High levels of home ownership and low percentage of social housing;
- High levels of second homes and holiday homes;
- The important role of the '*extended family*' for the supply of housing for the relatives;
- Largeness of self-promotion and self-production as crucial factors of home ownership.

The concepts of the 'extended family' (also defined with the Italian term *parentela*) is expressed in preserving the property at all costs and in providing autonomously housing to its members through the self-promotion or self-construction. This expresses how strong is the role of the family in these countries, not as a passive beneficiary of welfare policies but with an active role for the well-being of the households, representing one of the providers for the access to housing.

The State tends to take advantage of this configuration, encouraging policies of tax reliefs for the access to home ownership and supporting a model of '*public action*' (less state intervention on social housing sector, large private rented sector, weakness on land use control systems and so on).

The southern welfare system is influenced by others factors, as the link between formal and informal labour market, in which the over-protected workers have plenty of benefits (the virtually impossibility of losing their jobs, good retirement pensions, etc.), being able to easily access to home loans and the under-protected are precarious workers with very small or no social guarantees at all.

On this line, other studies explain the relation between residential property and the social security system, called as a '*real big trade*' (Castles and Ferrera, 1996), because homeowners prefer to guarantee their safety in old age buying a house since low pensions do not propitiate the payment of renting.

Nevertheless, nowadays the Mediterranean model is gradually moving in other direction due to the consequences of crisis (job precariousness, geographical mobility, the scarcity of public resources and so on). Each country is developing different approaches to cope with these issues, sometimes displaying successful results on small and local experiments. However, the general root seems to offer

² The idea of Southern Europe or Mediterranean countries gathers the cluster including Portugal, Spain, Italy and Greece, or else the countries analysed in the literature about comparative housing studies in Southern Countries.

resources to families instead of providing a product, to enlarge the public-private partnerships of public assets or public functions and strengthen the privatization of public housing stock.

The analysis of the literature review helped to build a ‘South-inspired’ theoretical approach, additionally supported by the bibliographic review about the study in-depth of the two countries. The methodology used also adds the analysis of the principal statistic data (e.g. dimension and age of the public housing stock, owner occupied houses and unoccupied houses etc.) and the recent legislation as well as interviews with public decision-makers.³

About the methodological issues on housing studies, it is also important to stress the possible ‘*conceptual and methodological traps*’. According to Baptista (2001), the analysis of housing policies is dependent on data produced by public bodies, which can create propagandistic interpretations to legitimize the options taken. Critical analysis, multidisciplinary, cross-referencing and multiple validation of data could help to support adequately any work about it.

Other methodological issue that comes up in housing studies is the definition of social housing, which it becomes crucially especially when we are comparing two or more countries. According to Hansson and Lundgren (2018), the term social housing is a “*a term with no agreed-upon meaning*” and “*the lack of a definition leads to misunderstandings, rather than constructive dialogue on the advantages and disadvantages of such a system*”. In order to achieve a general definition of social housing, the authors established a set of criteria. The first key criterion analyses to whom is social housing addressed (i.e. a target group), identified in “*low-income households*” or “*households with difficulties in finding housing*” with limited financial resources and/or a fragile position. The second criterion mentions the form of tenure of social housing, which it is mostly the rental systems, even if sometimes appears the accession to ownership. The type of providers embodies the third criterion, which is commonly the State but sometimes we find other actors (non-profit and private for-profit), publicly subsidized on three forms: regulation, subsidies and direct provision.

Even though the text gives a clarification of what social housing is, the lack of defining a unique term of social housing across Europe remains. Each country makes own definition referring to funding arrangement, providers and beneficiaries, as well as the housing regime adopted and the political and cultural circumstances (Braga and Palvarini, 2013; Housing Europe, 2017).

³ All translations of documents, texts and interviews from Italian or Portuguese to English are ours.

Therefore, given the absence of a single, uniformed and standardized definition of ‘social housing’, it becomes necessary to create a convenient sort of ‘vocabulary for housing’, focused on the two analysed countries, which will be presented at the beginning of each chapter about the country.

3. Social housing in Portugal

In Portugal it is common to use the concept of ‘social housing’ (*habitação social*) to refer to housing built with the support of the public administration. This situation stems from the conceptual legitimacy given by the legislation in 1983 when we find the definition of social housing⁴:

"Social housing shall be deemed to be the controlled cost housings (habitações de custos controlados) promoted by the City Councils, housing cooperatives, Private Institutions of Social Solidarity (Instituições Particulares de Solidariedade Social) and private initiative with the support of the State and intended for sale or rent under the conditions established in this diploma".

Until 1983, in Portugal there was no legal definition of ‘social housing’, since up to this date social housing assumed various designations, such as “casas económicas”, “casas de renda económica”, “casas de renda limitada”, among others. In addition to this, up to the beginning of the 1980s, public bodies with responsibilities in the construction of social housing did not always have consensual understandings about the cost, dimension and the quality of this kind of houses.

In 1988,⁵ the concept of ‘social housing’ (*habitação social*) was replaced in the legislation by the concept of ‘controlled cost housing’ (*habitação de custos controlados*), a decision that was maintained later in 1997⁶ and also recently in 2019⁷. Several factors contributed to this alteration, including the creation of a housing program designated ‘controlled cost housing’, destined to private companies and housing cooperative (*i.e.* non-profit and private for-profit). Additionally, it contributed to overcoming the stigmatization that the concept of ‘social housing’ had gained within the Portuguese society as usually associated with disqualified urban spaces. At the same time, the change from ‘social housing’ to ‘controlled cost housing’ was intended to disassociate the idea of social

⁴ Ordinance (*Portaria*) n. 580/83 of 17 May.

⁵ Ordinance n. 828/88 of 29 December.

⁶ Ordinance n. 500/97 of 21 July.

⁷ Ordinance n. 65/2019 of 2 February.

housing from only public ownership and to approach other concepts such as affordable housing, in line with the European common trend.⁸

Nowadays, the term ‘social housing’ is usually used in the scientific, political and popular discourse to refer to the only public housing, and the term ‘controlled cost housings’ to refer to housing built with public support from private companies, private institutions of social solidarity and housing cooperatives (*i.e.* non-profit and private for-profit).

The first social housing policy in Portugal dates back to 1918. The development of social housing policies in Portugal was recently studied, namely by Antunes (2018), which analyses the policies of social housing, rent and urban rehabilitation since 1820, and Agarez (2018), which analyzes social housing policies published since 1918. Based on the Antunes (1918) study, the *history of housing policies* in Portugal is briefly established:

- *1910-1926*: period of the First Portuguese Republic, in which the first social housing policies were created. The housing policies created at 1918⁹ and 1919¹⁰ were extremely unsuccessful and did nothing to alleviate the problem of housing.
- *1926-1974*: period of the Portuguese dictatorship (*Estado Novo*), in which a coherent housing strategy was created. It was in this period that was created the first social housing policy with impact in urban spaces (*casas económicas*, at 1933¹¹ – ownership model), and also the first housing policies related simultaneously with housing and urban planning (*casas de renda económica*, at 1945¹², and *casas de renda limitada*, at 1947¹³ – rent model).

Despite many housing policies enacted by *Estado Novo*, the housing construction with public support was always insufficient and answered particularly to the social segment that the corporatist regime intended to satisfy. In general, the housing policies were marked by the traditionalist view of the dictatorship, especially in the first half of the regime, so social housing policies served to support the dictatorship itself.

- *1974-present*: period of democracy characterised by several phases. The first period (1974-1976) happened during the process of post-revolution¹⁴, where the Provisional Governments

⁸ Remember that Portugal joined the European Economic Community at 1986.

⁹ Decree n. 4137, of 25 April 1918.

¹⁰ Decree n. 5397 and Decree n. 5397 of April 1919.

¹¹ Decree-Law n. 23052, of 23 September 1933.

¹² Law n. 2007, of 7 May 1945.

¹³ Decree-Law n. 36 212, of 7 April 1947.

¹⁴ The dictatorship ended with the *Carnation Revolution* on 25th of April 1974.

chose progressive and left-wing policies, usually associated with direct and participatory democracy, as the case of *Serviço de Apoio Ambulatório Local* (mainly know as SAAL)¹⁵.

In the following decades (1976-2000), the Portuguese Governments improved the initiative of private companies, housing cooperatives and public housing under a joint of housing policies promulgated without strategy, continuity and systematization. On one hand the housing cooperatives and the private companies (programme called ‘*habitação de custos controlados*’) were only successful during the 1980s and 1990s, especially aimed to the middle class. On the other hand, the public promotion was only visible at 1990s, after the creation of the Special Programme for Rehousing (*Programa Especial de Realojamento* [PER]) in 1993, that has built about 35.000 public housing dwellings in Lisbon and Porto metropolitan areas to rehousing the population who lived in slums.

Table 1 shows how much the Portuguese State spent for all the housing programs between 1987 and 2011. As we can see, the social housing programs only used 22,4% of the total amount, namely 22,1% to public housing programs and 0,3% to controlled cost housings program (supporting housing cooperatives and private companies – non-profit and private for-profit). Furthermore, we can stress the most important housing policy as the ‘mortgage interest rate subsidy’, which allowed the acquisition of home ownership by the middle class. That means that in this period the State preferred support directly the Portuguese families than invest in social housing.

Programs	Budgeted		Used	
	(€)	%	(€)	%
Mortgage interest rate subsidy	6.672.508.894	65,9	7.046.685.145	73,3
Special Programme for Rehousing ^{1,3}	1.814.981.359	17,9	1.353.426.012	14,1
Rent programs	739.632.917	7,3	803.874.566	8,4
Urban Rehabilitation	392.242.730	3,9	166.594.609	1,7
Social Security	37.558.163	0,4	29.223.491	0,3
Other rehousing programs ^{1,3}	426.216.498	4,2	193.944.373	2
Controlled cost housing ^{2,3}	35.205.155	0,3	13.868.736	0,1
TOTAL	10.118.345.719		9.607.616.934	

¹ Support to public / municipal housing.

² Support to housing cooperatives, private companies, etc.

³ Social housing.

Table 1 – National budget to housing policies between 1987-2011. IHRU (2015), Resolution of the Council of Ministers n. 48/2015.

It’s also important to stress that a substantial part of the social housing stock was sold right after the construction, mainly in the 1980s and 1990s by the housing cooperatives and private companies that

¹⁵ Created in August 1974.

built social housing with financial / public support. In Portugal there are almost no housing cooperatives using the renting model and that means they sold the houses right after the construction, embracing in this way the ownership model.

Today almost the entire stock of social housing in Portugal is public housing and the public bodies own approximately 120.000 dwellings, most of them localized in Lisbon and Porto metropolitan areas. This situation displays why in Portugal ‘social housing’ (*habitação social*), ‘controlled cost housing’ (*habitações de custos controlados*) and public housing (*habitação pública*) cause so many misunderstandings and can be treated in practise almost as synonymous.

Nowadays, housing in Portugal is under pressure, especially in urban areas, such as Lisbon and Porto. On this line, the central housing institution (*Instituto da Habitação e da Reabilitação Urbana* [IHRU]), conducted a national study presented in 2018, which identified 25.000 families urgently needing new housing. In order to cope with this situation, the current Government has recently prepared a housing programs reform package, usually referred to as the New Generation of Housing Policies (*Nova Geração de Política de Habitação*), which is currently taking the first steps.

Principal actors and distribution of competences of the public housing in Portugal			
	State	Municipality	IHRU (central body)
Assignment	<ul style="list-style-type: none"> - Guarantee the uniformity of the legislation. - Can create social housing policies. 	<ul style="list-style-type: none"> - Can use the social housing policies created by central government. - Can create social housing programs. - Fix rules to public / municipal housing (incomes, priority criteria); - Buildings and public / municipal dwellings maintenance; - Manage the lists to public housing. 	<ul style="list-style-type: none"> - Can use the social housing policies created by central government. - Buildings and public dwellings maintenance;
Rents		<ul style="list-style-type: none"> - Definition criteria to public / municipal housing (standard regulations) 	
Management		<ul style="list-style-type: none"> - Management regulations and rent contracts of public / municipal housing. 	<ul style="list-style-type: none"> - Management regulations and rent contracts of public housing.
Users monitoring		<ul style="list-style-type: none"> - Regular verification of incomes. 	<ul style="list-style-type: none"> - Regular verification of incomes.
Decay and revocation		<ul style="list-style-type: none"> - Verify the housing situation. 	
Sales	<ul style="list-style-type: none"> - Define requirements to sell public housing. 	<ul style="list-style-type: none"> - Can sale public / municipal housing. 	<ul style="list-style-type: none"> - Can sale public housing.

Table 2 – Table of actors and their competences about the social housing in Portugal.

In the Portuguese case, social housing policies have been dominated by the central power. The most important policies were created by the Governments, which later proceeded to the construction of social housing with the collaboration of the local power, housing cooperatives or private initiative (Table 2).

In the absence of autonomous regions in Portugal (with the exception of Madeira and Azores), the political articulation is made directly between the central government and the local authorities (308 municipalities). At the same time, the local authorities have recently begun to create housing programs, especially in Lisbon and Porto municipalities, making use of the municipal budget.

4. Social housing in Italy

In Italy the common and currently used concept is '*edilizia residenziale pubblica*', which can be the translation of '*public housing*'. This represents the largest part of the current social housing stock, owned and managed by the former *Istituti Autonomi per le Case Popolari*¹⁶ (IACP), public bodies that provide housing for low-income families registered in municipal lists.

The term comes from Law n. 865 of 1971, which has supplanted the previous one (*Edilizia Economica e Popolare*) and has determined the State intervention in three areas which are identified by the types of subsidies financed for the provision of housing: subsidized, agreed and assisted.

On the other hand, the term 'social housing' has been recently defined with the Italian concept '*alloggio sociale*'. It appears for the first time in the National Law of 2008¹⁷ which defines:

“Social Housing [Alloggio Sociale] is the real estate unit used for residential use in a permanent lease that carries out the function of general interest, in safeguarding social cohesion, to reduce the housing problems of disadvantaged individuals and households, who are not able to access the rental of housing in the free market”.

The dwellings built under this concept are mainly promoted by private or third sector companies through public contributions¹⁸ with the goal of being rented or sold at affordable prices and achieving a social mix as well as 'financial mix', among promoters, funding, tools and practices.

¹⁶ We indicated 'former' because the Italian public housing agencies, created in 1903 with the name of IACP, have now different nomenclatures based on regional autonomy. This is the result of a long process of decentralization since the 1970s but only concluded with the Constitutional Reform in 2001.

¹⁷ Decree 22 April 2008 of the Ministry of Infrastructure and then Law n. 133/2008.

¹⁸ According to Lungarella (2010), the ERS does not exist without a direct or indirect public contribution.

The target is the ‘gray band’, namely the lower-middle class in economic difficulty for the loss of work, marital separation and so on. In this sense, the provided solutions are set to fight temporary problems under provisional conditions¹⁹. Nevertheless, the examples of this new concept are intended as the unique ‘social housing’ presented in Italy, although it is formally incorrect because we should also consider the public housing examples as part of the entire social housing stock.

According to FEDERCASA²⁰ (2015), the Italian public housing companies own about 750.000 dwellings, distributed differently between North and South, since the majority is owned in the North.

- *1903-1949*: the beginning of social housing can be traced back to the early years of the XX century, when in 1903 was created the IACP²¹ as a public institution to build and manage the public housing stock at a municipal level, even though managed by the central government. During the fascist dictatorship, an important legislative text²² was created about indications for the construction of public or economic houses and for the public actors involved.
- *1949-1980*: after the end of dictatorship and the Second World War, in 1949 a relevant political instrument for housing demand was created (the INA-CASA Plan²³) to respond to massive migratory processes and the strong demand for homes and also the employment growth to revive the economy. The state’s total investment in public housing was considerable while encouraging indirect public intervention to support home ownership²⁴. In 1963 the INA-CASA Plan ended and a new instrument was created (GESCAL fund²⁵) that guaranteed a continuous cash flow to housing, generated by the contributions from both

¹⁹ Some of these, as temporary residences in Turin, are predicted for a time even up 18 months.

²⁰ FEDERCASA (*Federazione Italiana per le Case Popolari e l’Edilizia Sociale*) is an association that represents the public agencies entitled to manage public dwellings. It was interviewed for this study in the last February 2019.

²¹ IACP is the acronym of *Istituto Autonomo per le Case Popolari*, as explained above.

²² *Testo unico sull’edilizia economica e popolare*, R.D. n.1165, of 28 April 1938

²³ Law n. 43/1949, of 28 February, which takes its name to the Minister of Labor and Social Security (*Amintore Fanfani*).

²⁴ According to Balchin (1996) a total of 800.000 social-rented dwellings were built between 1951 and 1970 and 850.000 dwellings were privatised in the same period.

²⁵ GESCAL was the acronym of *GESione CAse per i Lavoratori* (Management Houses for Workers) and was a fund destined to the construction and the assignment of houses to workers, disciplined by the law n. 60 of 14 February 1963.

workers and employers. In the 70s started the decentralization process from the State to the Regions²⁶.

- *1980-2008*: 1980 marked a turning point (Padovani *apud* Balchin, 1996:198) for the decline, in opposition of the three previous decades, in the number of new houses built; the drop of withdrawals from the housing stocks; the statistical increase of second homes. The 90s was the period of regeneration policies (called Complex Programs or Integrated Programmes) that seek to co-ordinate initiatives and investments, both public and private in urban regeneration projects. In 1993 the law of privatisation of public housing was approved to cope with the deterioration of the public stock. At the beginning of 2000s the IACPs were transformed into public agencies with independent legal status, finally concluding the decentralization process started in the 70s. In 1998 the GESCAL fund was abolished, and rents were liberalized to revitalize the market, even if the reform did not produce specific results, on the contrary, the number of families living in rent reduced.
- *2008-2019*: after years of silence, a revival for housing policies comes out for many reasons: firstly, in this period the disposable incomes of Italian families have never grown so slowly over the last 60 years; secondly, the housing prices have reached levels never seen before (Baldini, 2010:166-167). With a new regulatory package approved in 2008²⁷, new operators (private and non-profit) were added in the social housing scene, along with the creation of an integrated real estate fund, set up for a national fund²⁸ and a network of funds for financing social housing (Integrated Fund System - SIF)²⁹ (Poggio and Boreiko, 2017).

Italy is an example of multi-level housing policies (Bianchi, 2017:74); the competence of ERP is indeed distributed between State, Regions and Municipalities, as shown in Table 3.

²⁶ The law n. 865 of 1971 (*Norme per l'edilizia residenziale pubblica* or *Legge per la casa*) establishes the transfer of many competencies from State to Regions, legislating about the discipline for assignments and the organization of public entities in the sector of public housing. Lately the Decree of President of Republic n. 616 of 1977, especially with the art. 93 comma 3, and law 457/1978 transferring the functions related to IACP from State to Regions. Nevertheless, the transfer will become effective only with the constitution reform, Constitutional law n. 3 of 2001 within the modify of the Title V of the Italian Constitution.

²⁷ Decree-Law 112/2008 – Law 133/2008.

²⁸ The main shareholder is *Cassa Depositi e Prestiti S.p.A. (CDP)* which is an Italian financial institution, controlled about 83% by the Ministry of the Economy and Finance and about 16% by various banking foundations.

²⁹ The SIF is based on public-private funding, with the main shareholder is *Cassa Depositi e Prestiti*, aiming at developing the affordable housing for lower-middle families, resulting from the National Housing Plan of Berlusconi government.

Principal actors and distribution of competences of the public housing in Italy				
	State	Region	Municipality	IACP (or how called locally)
Assignment	Guarantee the uniformity of the assignment criteria	Fix rules with regional law (incomes, priority criteria)	Issue the announcement and manage the lists	Receive of those entitled and priority. Assign the fees
Rents		Regional law (definition criteria)		Apply the fees
Management		Regional law (standard regulations)		Management regulations and rent contracts
Users monitoring		Regional law	Verification at the moment to assign	Biennial verification of incomes
Decay and revocation		Fix criteria (e.g. incomes.)	Provide for the decay/revocation	Report to the municipality the illegal situations. Provide for the evictions if required from municipality
Sales	Define prices and requirements of those entitled (L. 560/1993)	Eventual regional law for sales housing. Approve the sales plans		Draw up the sales plans. Apply the normative. Stipulate the purchase acts

Table 3 – Table of actors and their competences about the public housing in Italy. Source: Federcasa, 2015.

Due to the transfer of jurisdiction from the Central State to the Regions, the boundaries between exclusive and competing competences are subtle and often object of controversy. According to Baldini (2010:162) the Constitutional Court has expressed several times and has articulated public housing on three levels³⁰:

- The State has the responsibility of the determination of the minimum housing offer destined to satisfy the needs of the most disadvantaged classes;
- The competence of planning ERP settlements is belonging to the concurrent matter “territorial government”, which is shared between the State and the Regions;
- The management of the public stock refers to the Regions through the public housing agencies. With the decentralization, the nomenclatures of the agencies have changed: in some Regions they are still called IACP, in others they changed names as non-economic public bodies or economic public bodies with the obligation of balance, and only in few cases they are a sort of joint stock company³¹.

³⁰ With the ruling 94/2007.

³¹ As the General Director of FEDERCASA reported in the interview.

5. Comparative analysis and final reflections

About the vocabulary of housing

As we have seen previously, in Italy the concept of social housing created in 2008 has added new characteristics to the public housing, but has concurrently generated a confusion and different interpretations throughout the country. According to Tosi (2016:92), in addition to '*edilizia residenziale pubblica*', some people use '*alloggio sociale*', others '*social housing*' or '*housing sociale*', few say '*edilizia residenziale sociale*' (ERS) or '*edilizia privata sociale*' (EPS).

However, these terms are part of the Italian social housing scenario that is actually divided into two parts: one older, public and larger, and the other recent, private (profit or non-profit) and residual.

Regarding to the vocabulary of housing, we can stress the shift of the notion from the “negative definition of public housing”³² towards another positive, “*like a catharsis process*” (Lungarella, 2010). This shift could be also understood as an extension of the meaning, an “*extensive social*” as Tosi (2016: 87) states, which broadens the issue to a wider catchment area, while supplying practices and financing models already consolidated in the European context.

On the contrary in Portugal the concept of the ‘social housing’ (*habitação social*) is older (from 1983) and it was changed at 1988 into one similar to the affordable housing (‘controlled cost housing’ [*habitação de custos controlados*]), even if it has generated some misunderstandings – even between the experts.

Although in Portugal ‘social housing’ is formally called ‘controlled cost housing’, the expression ‘social housing’ is still used to refer to housing built with public support by housing cooperatives, private companies and by public bodies as the municipalities. However, the social housing built with public support by the third sector and private companies (profit and non-profit) is usually referred as ‘controlled cost housings’; while public housing is termed as ‘social housing’. At the same time, wide public housing ensembles are usually known as social neighbourhoods (*bairros sociais*), facing issues of stigma and prejudice.

Recently, the New Generation of Housing Policies package proposed several housing policies more closer to the affordable housing. This was especially visible recently in 2019 with the last legal

³² Over the decades, public housing has had a higher stigmatized perception and a prejudiced definition of the targeted model of the inhabitants who use them, leading to phenomena of social as well as territorial segregation.

change to the concept of *habitação de custos controlados*, with a more flexible understanding and action.

To conclude, Portugal seems to be more in step with times considering the use of the concept of affordable housing which instead has not yet entered in the Italian vocabulary of housing. Even though, both Portugal and Italy' concepts of social housing seek to be in line with the European and global trends (flexibility, new governance, access to non-public resources, empowerment of civil society, etc.), there are still misunderstandings about which concept to use in the political, academic and common language.

The Constitution

The inclusion of the 'right to housing' in the Constitution represents a relevant difference among the two countries because Portugal has an article entirely dedicated to "*Housing and urbanism*", as opposed to Italy. In Portugal, the 'right to housing' is enshrined in the Constitution of the Portuguese Republic (1976) in the article 65, referring:

"Everyone has the right for himself and his family to have an adequately sized dwelling that provides hygienic and comfortable conditions and preserves personal and family privacy".

The Portuguese Constitution not only enshrines the 'right to housing' in the Art. 65 as it directly refers to the support to "*housing cooperatives*", "*local communities*", and "*self-construction*", between other ideas. This Constitutional consecration is usually taken as progressive and avant-garde in the political perspective (Farha, 2017), even if several authors bring forward a very critical view of how the right to housing has not been respected by governments.

In Italy the 'right to housing' is not explicitly considered in the Constitution of the Italian Republic (1948³³) but the article 47 refers to the encouragement of the home ownership:

"The Republic promotes the access of the popular savings to the home ownership, to the direct cultivating ownership and to the direct and indirect investment of stock in the great productive complexes of the country".

Therefore, we can see a distinction on the value given to the 'right to housing': while in Portugal the right to the adequate housing for families is defined regardless of the providers, in Italy it would seem the access to housing is only considered within the home ownership as a form promoted by the State.

³³ Promulgated on 27th December of 1947 and became effective on the 1st January of 1948.

Governance and the management

The framework of actors and competencies is truly different among the two countries because in Portugal the governance is between State (Government and central public body - IHRU) and municipalities and in Italy among State, Regions, Municipalities and public agencies.

If in Italy the State has very limited competencies on housing due to the decentralization to Regions, in Portugal the State has the principle role for housing policies while municipalities simply perform. Nevertheless, the multi-level governance in Italy doesn't work since creating inequalities and territorial differences in terms of social performances and answers to the housing problems.

The Italian model does not work for: i) the scarce management, ii) the lack of economic resources, iii) to satisfy a very marginal set of families leaving out lots of people in growing waiting lists. Furthermore, the ex-IACPs are victims of a continuous replacement of directors, put by political bodies, which is not favourable to the long-term growth perspectives of the public bodies. Additionally, they have to maintain and manage an old stock, mostly build 40 or 50 years ago, basically without financial instruments³⁴. Moreover, the reduction of public resources in the 90s and the alienations of the stock led to the paralysis of the offer of social housing.

On the other hand, in Portugal there is 2% of social housing, almost all public. Of these 2%, 1,8% is municipal housing and 0,2% public housing owned by IHRU (central public agency). The management and maintenance of these 120,000 public dwellings faces a diverse scenario, depending on the effort of each municipality. For example, IHRU it's generally not known for making good maintenance of the buildings and the same happens with several municipalities. In the biggest municipalities with more municipal housing, it's common the management be ensured by municipal companies and not by the municipality directly, like happens in Lisbon, Porto, Cascais, etc.

About the dwellings

According to ISTAT (2011) the Italian housing stock was principally built in the decades 1960-1980, in the 90s the percentage of dwellings built was less than half. In Portugal we see a different trend because in the 80s and 90s Portugal had been built more than in other European countries.

³⁴ To explain this situation, the General Director of FEDERCASA reported in the interview: “*we fry the fish with water*”. This is a typical expression that comes from Naples (*friggere il pesce con l'acqua*), which means to get good results even in difficult situations and without proper tools.

	Period of construction			
	Before 1946	1946-1980	1981-2000	2001 onwards
EU-28	22,3	44,1	22,1	9,8
Italy	20,7	51,4	19,8	7,9
Portugal	10,7	37,1	36	16,3

Table 4 – Period of construction – national and EU average.

Another difference concerns the unoccupied dwellings. As happens in many Southern European countries, the presence of second home for tourist reasons is very common along the coast. The unoccupied dwellings in Portugal are considerably higher than Italy, especially because many families living in Porto and Lisbon metropolitan areas keep the home ownership in the countryside to go in the holidays. As the Eurostat data shows³⁵ (2011), the majority of the Portuguese NUTS3 has more than 30% of unoccupied dwellings, while in Italy the average does not exceed the 30%.

After the comparison analysis of some data, we can state that our initial hypothesis is confirmed. Beyond the similar percentage of low social rental housing, high home ownership and the similarities of the Mediterranean model explained in the theoretical chapter, we have demonstrated that an in-dept study of the single countries can show a different scenario. In fact, we have found some visible dissimilarities in the vocabulary of housing, in the framework of actors and competencies, in the value given to the right to housing in the Constitution as well as quantitative data about the age of dwelling, the empty dwellings and the resident home owners.

We are certainly aware that this study represents a first effort to compare social housing policies in Italy and Portugal, that is still in progress in our researches.

Nevertheless, our purpose was to stress the importance of this kind of studies that help to develop a “South-inspired” theoretical approach in opposition to the only “North-inspired” one. This means to look beyond the numbers and discover features that we actually did not expect to find in a general framework and with which it is possible to make a critical discourse on existed housing policies as well as proactive one to propose innovative trajectories or to develop emerging practices.

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³⁵ <https://bit.ly/2QxpYL7>, accessed at 30 May 2019.

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