

**Table 1.121 Main characteristics of housing assistance, housing allowance schemes, housing subsidies, and social housing provision**

Country	Social Assistance	Tenure	Households	Subsidies for social housing	Social housing sector rents
Australia	Rent addition. Differential rents.	Private tenants. Social tenants. No state scheme for home owners.		Decline with reduction new build from 14,000 in 1989/90 to 4,000 in 1995/96.	Rents set at 20/25% of incomes or at market levels for higher income households. Average rents less than one third of the cost of ownership.
Canada	Shelter addition. Differential rents.	Private tenants and owners. Social tenants.	Some provincial allowance schemes, mainly for elderly households.	Decline with sharp cut in new build from 9,630 in 1989 to 1,370 in 1999. Subsidies on existing commitments capped at 1995/96 levels.	Rents set as 20/25% of incomes. For higher income households rents set at 'net cost' of 'low end of the market' levels.
France	Separate housing allowance schemes.	Three schemes, one for qualifying dwellings, and two for various household types.	Two schemes, one for younger and one for older households.	Switch from bricks and mortar to personal subsidy from 1977. Reduced new build programme.	Rents in Paris some half market levels. In other areas rent often similar to those for poor quality private housing.
Germany	Rent addition. Separate housing allowance scheme.	Tenant households only. Home owners and tenants not on social assistance.		Federal government withdrew from funding in 1985 --sharp decline in new build. New federal programme from 1989 to meet identified shortfall in both west and east of reunified country.	Rents are scheme specific. No cross subsidy or cross sector rent policy. Usually below market levels.
Ireland	Housing cost addition. Differential rents.	Home owners and private tenants. Social tenants.		Decline in new build reversed in last few years.	Income based rents range from 6-10% of incomes. Maximum rents less than half market levels.

Netherlands	Social assistance covers minimum costs. Housing allowance for costs over minimum.	Social assistance for all tenures. Housing allowance for social and private sector tenants only.		Switch away from bricks & mortar subsidies in 1990's. 1995 settlement	Rents some 80/90% of cost of ownership. Relatively flat rent structure.
New Zealand	Separate housing allowance scheme.	All tenures. Differential rent scheme for social tenants due to be re-introduced.		Radical switch to market rents and complete reliance on housing allowances. Now being reversed following change of government.	'Housing New Zealand' switched to market rents. Now reverting to income related rents. Small council sector still has lower rents.
Sweden	Separate housing allowance for main part of costs.	All tenures, but capital as well as income conditions for home buyers.	Households without children aged 29-65 ineligible.	Decline in new build and cut backs in subsidy formula.	Housing company rents some 45% of ownership costs for single people and some 60% for couples with children.
USA	Differential rents. Social assistance expected to cover some housing costs.	Social tenants & voucher holders.	Cash limited budget for vouchers.	Subsidies reduced since c1980.	Rents at 30% of incomes, or market levels.

UK	Separate housing allowance scheme for all housing costs.	Covers all rented tenures. Home owners mortgage help as part of social assistance.		Decline in new build and cut backs in subsidy, as rents increased relative to earnings during early/mid 1990's. More recently there has been a small reversal of the decline in new build.	Rents some half to two thirds market levels. Housing association rents generally higher than council rents. Marked regional and sector variations.
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Source: Ditch, J., Lewis, A. and Wilcox, S. (2001) Social Housing, Tenure and Housing Allowances: An International Review, DWP Research Report Series, London.