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Housing systems in the Global South: The relevance of the 'social housing' approach in meeting housing needs

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This paper addresses the problem of accessing decent and affordable housing in the Global South, where the housing need is, in general, more problematic than in the Global North. The paper first identifies five distinctive characteristics of housing systems in the Global South as compared to those in the Global North. These include: (a) the diverse facets of global financialization; (b) the role of the developmentalist state; (c) the importance of informality; (d) the decisive role of the family; and (e) the rudimentary welfare systems. Given these features, the paper reflects on the concept and practices of social housing, particularly their appropriateness to deal with the housing problem in the Global South. The paper then addresses the question of whether the social housing approach is relevant for solving the contemporary housing needs in the Global South. It argues that social housing, redefined to better encompass the distinctive characteristics of housing systems in the Global South, is indeed a useful policy approach and can play a decisive role in satisfying unmet housing needs. Such an approach needs to take into account the great role of informality and family support systems and develop appropriate funding instruments and modes of institutionalization protecting housing rights and the quality of life.

Keywords: social housing in the Global South; financialization of housing; developmentalist states, rudimentary welfare systems, informality

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Introduction

In the Global South[1], housing needs are generally much more problematic and intense than those in the Global North, particularly in countries experiencing fast growing urbanization. In contrast to European countries where only a small share of the population is concerned, a vast majority of the population in countries in the Global South is not properly housed. For many households in the Global South, living and housing standards remain very far behind the so-called normal expectations in European societies; access to decent homes is a major concern, particularly for low-income households living in rural or peripheral areas of the southern big cities. As addressed by Mike Davis (2007) and many others (Forrest & Lee, 2003; United Nations Centre for Human Settlements, 2003), for millions of low but also middle income families in the Global South, the basic question of affordable housing remains unanswered.

This paper explains the distinctive characteristics of housing systems in the Global South, having arisen from different social, political and economic contexts to housing systems in the Global North. The paper focuses on how the notion and practices of '*social housing*' in industrialized (north-west) Europe are relevant to the Global South in meeting the housing needs for disadvantaged households.

Accordingly, it addresses the following questions: (1) Why has the notion of social housing not inspired housing policies in the Global South as it did in Europe during the Fordist period (starting after WWII and continuing through the 1970s)? (2) How relevant is a *social housing* approach for addressing contemporary housing needs in Southern countries? [2]

[1] Dados and Connell (2012, p. 12) define the Global South as *'one of a family of terms, including 'Third World' and 'Periphery', that denote regions outside Europe and North America, mostly (though not all) low-income and often politically or culturally marginalized. The use of the phrase Global South marks a shift from a central focus on development or cultural difference toward an emphasis on geopolitical relations of power.'*
In this paper, the distinction between the Global North and South regarding the housing system is virtually identical. The Global North, as we refer, are those countries which have been industrialized since the 19th century and after the WWII established the Keynesian welfare system. The institutionalization of a (social) housing system in these countries are comparatively more advanced. Accordingly, our reference to the Global South is a heuristic device to focus on countries other than North America (USA and Canada), North-West Europe, Australia, New Zealand and Japan. Thus, the Global South is a shorthand to refer to countries in Africa, Latin America, most of Asia, and even many in Southern and Eastern Europe (although some of these countries can be considered as having high-income economics).

[2] By the end of 20th century, Renaud (Renaud, 1999) categorized the housing systems in all countries into six broad types, according to fundamental elements that shape accumulation systems:
(a) Undeveloped housing systems: present at a very early stage of development. In these countries, the informal financial sector dominates due to the absence of necessary professions and as a result of bad public policies.
(b) Lack of housing systems: these had a weak private property right inherited from a past system of state control over land, finance, and construction sectors. Here, private housing finance remains limited, experimental and relegated to high-income groups.
(c) Fragmented and unstable housing systems: these result from high inflation and macroeconomic instability. The size of housing finance is very small in relation to the urban economy.
(d) Segregated but stable housing systems: these systems are mostly under the control of the state, which has adopted complicated financing policies that give emphasis to priority sectors, where and when it is of necessity.
(e) Sound and integrated housing systems: these are found in economies with outward growth that partially integrated well into the global markets. The financial legal, regulatory and supervisory frameworks are comparatively in place.
(f) Advanced housing systems: The advanced housing finance systems can be found in most of the mature economies of Europe.

To contribute to recent debates on housing in the Global South and the South-North convergence in urban contexts and trajectories, this paper draws from specific bodies of theory including: (a) Weberian and Marxian models of analyzing housing systems used to explain the trajectory of contemporary social housing development in the Global North (Harloe, 1995; Cameron, 2006; Scanlon *et al.*, 2008), (b) State-failure theory, to evaluate the achievements of state (housing) development programs in developing countries (Khan, 2004), and (c) Post-colonial development theories, to show that cities in the Global South constitute a distinctive 'type' of human settlement and follow a different paradigm of urbanism (Roy, 2017; Schindler, 2017).

Starting with the idea that the notion of social housing originated and developed in the industrialized North-West Europe, this paper discloses ontological dissimilarities in the north(s) and south(s). Though it avoids considering the social housing practices in the Global North as a reference, it recognizes the general validity of some features of social housing, yet acknowledges the wide variety of social housing practices across countries.

The paper consists of four sections. In the next section, the paper concisely defines 'social housing' and describes its significant related concepts. Subsequently, it identifies the distinctive characteristics of housing systems in countries of the Global South that make the notion and practice of social housing different from that found in (north/western) Europe. Then, in next section, the paper offers a more embedded definition of social housing in these countries. And the final section looks at recent trends in housing systems in the Global South.

A tentative definition of social housing 'made in the Global North'

Social housing—also called council, public or affordable housing in various contexts—was envisaged and developed in industrialized northwest-European cities, especially during the Fordist era, to satisfy the *housing need* of societies and communities in a *decent way* (Un-Habitat, 2009; Lund, 2011).

As Robinson (1979, pp. 56–57) states 'Housing need [is] defined as the quantity of housing that is required to provide accommodation of an agreed minimum standard and above for a population given its size, household composition, age distribution etc., without taking into account the individual household's ability to pay for the housing assigned to it.'

In turn, M. Oxley (2000) underscores the 'agreed minimum standard' in this definition and argues that housing above this standard (called 'decent housing') would provide adequate shelter to households and produce no negative externalities. That is, it would impose no

Years after the Renaud categorization, much has changed in housing systems and regulatory frameworks, particularly in the Global South. Firstly, the structure of the regimes and the form of governing in many countries in the Global South have been changed. There are now many more democratic and elected governments in the world. Consequently, some social-political concerns, such as social exclusion and informality, have been noticed in a rather more open, accountable, and generally stable, if sometimes volatile, policy environment. Secondly, most of the developing economies now have more sophisticated and diversified financial and accumulation systems and regulatory frameworks - mostly - spinning off from the international financial system that affects the housing system. Thirdly, and perhaps most importantly, after the fall of the Soviet Union and the adoption of market-oriented economic policy in Asia, South America, and Africa during the 1990s, the neo-liberal discourse has discharged welfare policies not only in European countries, but also all around the world (Pugh, 1997; Aalbers & Christophers, 2014). It seems that for all these reasons -and maybe others as well- such kind of housing system categorization, or even other kind of categorizations, is accurate no longer. Probably there are few countries - if exist at all - fit into the first two categories and the boundaries between other categories have been gradually faded away. This means that in our distinction between the housing systems, the line between in the Global South and North is very blur.

external costs on the community in terms of, for example, adverse effects on security and health.

The social housing approach rests on the role of the common (collective) good in housing systems. This lens fits the logic of the distribution of wealth for the benefit of the entire society through fighting exclusion, promoting social solidarity, limiting price discrepancies and more. Valuing use-value attributes of housing *versus* exchange value, this approach emphasizes social aspects of housing rather than determining housing as financial asset. In this case, social housing is directly linked to the de-commodification of housing. The de-commodification of housing—keeping housing out of the competitive real estate markets—can provide a safeguard to ensure the provision of a home, at least in an agreed standard, for all[3].

Accordingly, *social housing* can be broadly defined as the manifestation of a greater, non-market force in the housing system: where households or individuals, independently of market forces or regulated market conditions, are provided with the resources to uphold a socially acceptable standard of living in decent homes.

However, as Scanlon and Whitehead (2008) emphasize, there is no definition for social housing that would be ubiquitous across all housing systems. The mechanisms of social housing diverge from country to country, or even within the same country. This diversity relates to the following types of factors: ownership regimes; the type of entities managing construction works; whether or not rents are below market levels; the relevant funding or subsidy stream; the type of tenure; and most importantly, the purpose for which the housing is provided.

Regardless of the diversity of housing provision mechanisms found across different housing systems, any given social housing approach must answer the following four inquiries: (a) Who should provide social housing? (b) Whom should it be provided to? (c) How is it provided, and (d) Why does the provision take place? During the Fordist period in Europe, it was the State, through public funding, that supplied formal off-market housing; it did so inclusively, to the entire society but particularly to families with limited financial resources, through direct intervention in the housing market, and as part of its social welfare policies (Doling 1999; Cameron 2006; Kemeny 1992; Maclennan & More 1997).

Social Housing applied to the Global South

Social housing has a long history in most Western European countries; though diverse, these housing systems share similar roots, draw upon a common philosophy and boast a variety of experiences[4]. As highlighted by Malpass (2008a), social housing did not simply entail, from the onset, the provision of housing to deprived households; it was also an efficient tool to address specific economic, social and integrative concerns of modern society.

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[3] Agreed standards may vary from society to society. However, the agreed minimum standard, as Oxley (2000) mentions, refers to being in situations such as: (1) not suffering from the lack of proper facilities, such as sanitation, (b) not living in a derelict building or shanty, (c) not being too crowded, (e) not being located in remote area, (f) not having tenure security; (g) not being vulnerable to hazards.

[4] The history of social housing in Europe can be summarized into five periods (Reinprecht, Levy-Vroelant and Wassenberg, 2008; Aalbers, 2015): (1) The origin (late 19th century): social housing was mainly based on philanthropy and non-state religious foundations. (2) The period of municipal commitment (early 20th century): public authorities and other societal and political actors played a more important role in housing. (3) The Great Depression (between two World Wars): due to the massive destruction of WWI, governments adopted more interventionist policies in housing. (4) Towards housing for all (three decades after WWII): in this period, heavily subsidized rental housings were built for the masses. Housing was a crucial part of welfare policies. (5) Individualization and fragmentation (at the turn of the 21st century): from the 1980s onward, state-related actors have gradually withdrawn from the housing market.

Contrary to northern Europe where social housing has been a practice since the late 19th century—much more collectively after WWI and reaching its heights after WWII (Fordism)—in the Global South, social housing is a more contemporary phenomenon. As stated by Forrest & Lee (2003) and Nasr and Volait (Nasr and Volait, 2003), it has been limited to the implementation of occasional and restricted programs.

Since the late Fordist period, the notion of social housing was gradually adopted in the housing systems of countries in the Global South. But to what extent do housing systems in the Global South reveal differences in social housing production, provision and consumption as compared to the Global North? And do the basic theories of (social) housing that have sprung and evolved in European contexts shed light on what is going in the Global South?[5]

Distinctive characteristics of housing systems in the Global South

Although it seems that contemporary housing systems all around the world are gradually converging and their differences are fading under the influence of neo-liberal accumulation regimes, a careful look at housing systems in the Global South tells us that there are differences in comparison to housing systems in the Global North, not least with respect to the 'social housing' approach that flourished during the Fordist period in Europe. These differences are enumerated in this section as five key factors that, we propose, determine the manner in which social housing has developed in the Global South. In analyzing these factors, we draw from the following key scholars and their theories: S. Schindler's (2017) study of the distinctive types of human settlements in the Global South[6]; Abramo's (2016, 2019, 2020) concept of urban informality; A. Roy's (2017) epistemological approach to urban informality; and J. Robinson's (2006) concept of ordinary cities in the Global South.

(a) The diverse facets of global financialization

Recent trends of global financialization have significantly affected housing systems. Financialization has transformed real-estate markets and housing systems (Harvey 2014; Moulaert *et al.* 2004). State-led trends such as the re-commodification of social housing, the promotion of policies on (mortgaged) homeownership and the deregulation of investment in private housing (bringing about expansion of especially higher priced housing markets), have become increasingly similar across countries in the Global South (Aalbers, 2017). The financialization of housing policies is not limited to post-industrial economies but has briskly spread through the Global North and South. During the post-Fordist era, a neo-liberal housing policy and discourse, which emphasizes privatization, deregulation and marketization, has gathered momentum around the world. This has resulted in the privileging of housing provision through the market (Kemeny, 1981; Ronald, 2007; Rolnik, 2013).

Post-Fordist globalization has not had a uniform impact around the world. Housing systems in the Global South have not followed exactly the same privatization and financialization schemes that have taken place in the Global North. Aalbers (2015, p. 35) states: 'Many places in the Global South now have a housing system that has one foot in the pre-modern period and one foot in the post-Fordist period, some of them entirely skipping the modern or Fordist period in housing' (Aalbers, 2015; Aalbers and Christophers, 2016). In many countries in the Global South, several aspects of housing systems are not in line with the recent globalization trends. For instance, given the lack of institutions promoting financialization, such as

[5] e.g. Cameron (2006) explores the relationship between theories and practices concerning (social) housing from the mid-19th century.

[6] This study identifies three tendencies: (a) 'cities in the South tend to exhibit a persistent disconnect between capital and labor', (b) 'their metabolic configurations are discontinuous', and, (c) 'political economy is always already co-constituted with the materiality of Southern cities'.

investment pools, collective investment, managed funds, or investment funds, mortgages and securitization systems are still so restricted that they limit massive and advanced investment in housing to promote ownership. Because of the instability of property rights and the distortion of markets due to state-created rents, as well as the presence of rent-seeking and corruption, the institutional capacities that promote financialization tools have not developed at the same rate as seen in North America or North-West Europe (Vaziri Zadeh, 2016). In other words, in most of the countries in the Global South, few aspects of the housing systems can be considered post-Fordist; a considerable part of the policies have not synchronized with the post-Fordist developments as they occurred in the North.

Housing systems in the Global South are generally characterized by high inflation and macroeconomic instability. This creates an environment where informal markets thrive, where private housing financing is limited to better-off households, and where the state has a strong control of the housing market. And although some financialization tools (such as secondary mortgage system) can be found, the majority (such as securitization systems) are, to a great extent, absent[7].

It should also be observed that while the social housing approach in the Global North has been decidedly restricted during the last decades[8], some countries in the Global South, particularly those with a flourishing economy (for example in India and China) pursue massive implementation of social housing schemes to promote the formal housing market (UN-Habitat, 2011).

(b) The developmentalist state

Developmentalist states constitute a form of capitalism, mostly in developing countries in the Global South with relatively higher incomes, in which political legitimacy, social solidarity and the production and consumption of goods are structured around the primary goal of economic growth and coordinated by a powerful national state (Ronald & Lee, 2012; Ronald & Kyung, 2013).

As many states in the Global South emerged from a (neo)-colonial system, their political regimes (comparatively non-democratic and non-bureaucratic) have focused on achieving fast-growing development. They have justified the approach of '*growth at all costs*' through urbanization and industrialization. Ronald and Lee (2012, p. 115) believe that in developmentalist countries, in the logic of '*productivism*', social policy is based on the necessity of *'intensive economic growth*'.

Holliday (2000) argues that developmentalist regimes follow the logic of '*productivism*'[9], meaning that social policy is either sacrificed in favor of the needs of economic growth or that social policies are developed to serve economic objectives. Thus, in these contexts, certain types of public goods (such as housing) may be pushed to the background (see also Ronald, 2007)[10].

[7] For instance, Heeg, Ibarra García and Salinas Arreortua (2020) describe how financialization took hold in Mexico, in what Reyes (2020) calls 'Mexico's Housing Paradox'. Migozzi (2020), analyzes the problem of the financialization of housing in South African cities. There are numerous cases showing the paradox of financialization in the Global South. See for example Jorge (2020) on Mozambique; Fauveaud (2020) on Cambodia; Ergüven (2020) on Turkey.

[8] Scanlon, Whitehead, & Arrigoitia (2008) in their research provide different examples of this in post-industrial European countries.

[9] Zhou and Ronald (2017) consider 'productivism' the fourth type of welfare regime in Esping-Andersen's (1999) categorization, which fits well with the developmentalist states in the Global South, i.e. social rights links to productive activity (Ronald and Doling, 2010).

[10] T. Goodfellow (2018) looks at three Eastern African cities (Kampala, Kigali and Addis Ababa), arguing that transformations of urban built environments in situations of late development reflects the political settlement and

Housing plays a particular role in the economic and, on occasion, welfare trajectories of developmentalist regimes. Housing construction has been an important driver of industrial expansion and a stimulus for economic growth. Urban housing construction has provided considerable legitimacy to the 'growth-first' ethos of the developmentalist state. Moreover, housing can also provide economic security for the elites that improves the legitimacy of the state (Leftwich, 2007).

Housing, for developmentalist states, is an interest domain in which they can assert authority through control of land allocation and influence on urban development. David Harvey, based on Marx's theory of 'primitive accumulation', proposed the theory of 'accumulation by dispossession' considering the ways dispossession takes place in different forms of contemporary capitalism '…to transfer [existing] assets and channel wealth and income either from the mass of the population toward the upper classes or from vulnerable to richer countries' (Harvey, 2006, p. 153). Thus, housing for developmentalist states can be abused as a tool to demonstrate their authority. Modern urban housing landscapes and the expansion of the so called middle-class lifestyle gives flesh to the idea that developmentalist states are catching up with the West (Ronald & Lee, 2012).

However, as Khan (2004) argues, developmentalist states, on many occasions, fail to achieve the goals of their ambitious developmental (housing) programs, i.e. promoting the housing sector as an engine of economic growth. In his view, the interactions and synchronization of certain conditions such as market distortions by the state, instability in property rights, (incentives for) rent seeking, corruption and the absence of democracy, lead to a failure of developmentalist ambitions (Vaziri Zadeh, 2016)[11].

(c) Informality

The fundamental change in the geography of poverty is the most prominent contemporary phenomenon in cities in the Global South. Nowadays in Mexico, Brazil, India and other fast developing countries, most poor people settle in urban areas. In many of these countries, poverty is much higher in urban areas than in rural ones; it is not surprising that because prices in formal housing markets are unaffordable for most deprived households, informal urban development keeps growing (Buckley & Kalarickal, 2005; Davis, 2007). Although there are some forms of informality in the Global North (Durst & Wegmann, 2017), in the Global South informal markets have pervaded the allocation of land and housing to deprived families (Broeck *et al.*, 2020).

In most of the fast growing cities in the Global South, only the formal housing markets which serve a limited portion of the urban population, have become subject to regulatory frameworks (Payne & Majale, 2004). The Global South is marked with a long history of insufficient urban housing and lack of access for low-income families to formal social structures. For example, approximately twenty per cent of households in urban areas of South Africa live in some kind of informal settlement (Lemanski, 2009). In some Southern cities this percentage is much higher (Groenewald *et al.*, 2013)[12].

In Asia, according to UN-Habitat (2011, p.vi) reports, almost a sixth of households live in informal settlements due to the lack of affordable housing alternatives. Consequently, as Drakakis-Smith (Drakakis-Smith, 1981), Keivani and Werna, (2001), Groenewald *et al.*, (2013), Abramo, (2019) and others observe in their studies on different modes of housing

its broader development implications.

[11] T. Goodfellow (2013) provides us with two good cases through his comparison of urban development in Uganda and Rwanda.

[12] They study informality in five sub-Saharan cities: Luanda, Maputo, Cape Town, Ekurhuleni and Johannesburg.

provision in countries in the Global South, the informal mode of housing provision is an essential part of urban development for the majority of deprived households that cannot afford a decent house in the formal sector.

Most of the housing in informal settlements is developed without appropriate formal permission. This form of settlement is usually associated with insufficient urban infrastructure and issues related to land release and property rights (Keivani & Mattingly 2007; Keivani and Werna 2001). Informality is an essential part of the housing provision process in the Global South. Informality is a counter-hegemonic process with rules and values quite different to formal planning prescriptions (Miraftab, 2009; Midheme & Moulaert, 2013; Prathiwi & Moulaert 2017; Leontidou, 2014).

Abramo (2020) finds that there are established institutions in informal markets that might be considered subordinate to formal institutions but which (re)produce some (informal) commercial practices of buying, selling or renting. These institutions facilitate transactions and guarantee the robustness of inter-temporal and inter-generational contracts.

The main reason for the spread of *informal* modes of provision in the Global South is the inability of the conventional market to meet the housing needs of low-income households. When formal markets cannot respond appropriately to issues such as fast urban expansion and increasing poverty, due to the lack of sufficient investment in affordable housing, high inflation and high interest rates, the housing needs of the majority of urban dwellers are met through informal provision (Desai & Loftus 2013).

Some of the characteristics of housing systems in the Global South (and perhaps the Latin rim) that underpin and hold up informality are the parcellation of land purchased from farmers or even land-grabbing with self-building (Delladetsima, 2006). The weak public control over land development encourages self-building that customarily leads to informality[13]. Self-built, inherited from rural and pre-modern traditions, plays an important role in informality.

The necessity of self-building in housing arises from the shortcoming of a financial market that only supports people with secured formal jobs and/or higher incomes. The lack of formal financial support to people with no secured positions in the formal market is one of the main drivers of informal practices and institutions.

(d) The decisive role of the family

In many countries in the Global South, reciprocity plays a crucial role in the socio-economic integration of low-income families in obtaining resources through mutual exchange and networks. The most common networks are family, extended family, clan and even neighbors or ethnic communities (Kesteloot, 1998).

The role of the family in the provision of housing is decisive in the Global South. Due to social structures different to those in the Global North, the family is a principal social institution, it can coordinate the provision of housing to its members, mostly through organizing self-building, inter-sharing of properties among generations, improving the purchase power of young households and managing the patrimony of the family.

Home ownership is linked to particular family-related traditions in many societies in the Global South (and particularly so in informal settlements, through informal market relations). The social meaning of land/home ownership is profoundly rooted in the concept of family patrimony. The low standard, limited amenities, owner-occupied and self-built low-cost houses provide a sort of security to deprived families, particularly when income from irregular and low-

[13] Payne and Majale (2004) highlight the relationship between the accessibility to proper land and security of tenure, the promotion of informal markets and the affordability of housing.

paid jobs is insecure. Therefore, although the ownership might take place through informal institutional relations, the rate of home ownership is comparatively high among low-income households[14].

The extended family (clan) network and other informal welfare services facilitate the provision of housing to the younger generation (Putri & Moulaert, 2017). However, this kind of facilitation does not work—at least not in a decent way—for all families, particularly amongst very low-income households whose residential mobility (ability to move) is severely limited. Low mobility also means a high level of attachment to neighborhoods and paternal proximity (Forrest & Lee, 2003).

(e) The rudimentary welfare system

The welfare system in a country is an overarching structure with social housing policies as one of its pillars, be it an often wobbly one (Malpass, 2008b). In comparison with the welfare system(s) in North America and Europe, there are two reasons for which an appropriate welfare system(s), and consequently inclusive social housing policy, has not developed in the Global South.

The first reason relates to rapid urbanization in the Global South. The massive rural-urban migration occurred during the late 19th and early 20th centuries in industrialized European countries whereas in the Global South migration to cities has sped up over the last few decades. Up to the end of the Fordist period in the late 1970s, the majority of the population in those countries resided in rural areas, for example in Rwanda and Sudan (Goodfellow, 2017, 2014).

In 1976 in Iran, less than 35 percent of the population lived in cities; 25 years later, the share of the total urban population bypassed 50 percent. At the end of the 20th century, after the total population had doubled over 25 years and 70 percent of the population was urbanized, housing needs became a severe challenge (Madanipour, 1998, 2006; Khatam, 2004).

In the first half of the 20th century, countries in the Global South did not have to face the issue of housing needs as industrial countries did; rarely was the issue of social housing provision at the forefront of their agendas. Rather, in the second half of the century, many governments in the Global South recognized the importance of the housing problem in their countries; after the 1970s, many gradually established housing development agencies (Un-Habitat, 2011).

The second reason for which appropriate welfare system(s), and social housing policies therein, did not develop fully in the Global South has to do with the evolution of the labor force. Rapid urbanization in countries in the Global South during the second half of the 20th century proliferated in the context of weak industrial development. During this time, many countries in the Global South shifted their economies from being rural, agriculture-based to being urban, service-based. In contrast, there were two shifts that occurred in Europe's labor force: first there was a shift to the manufacturing sector in the early 20th century and later one toward services. In other words, immigrants in most countries in the Global South moved from the agricultural sector to the service-based sector (and not to the manufacturing sector as in the Global North). In this context, the urban labor market offered precarious unskilled jobs, usually in services and construction. Accordingly, most of the labor power that entered the urban labor market was characterized as pre-commodified and supplied outside regulated markets. As such, it was not of vital importance to invest in the reproduction and skilling of the laborers, which were already abundantly available to work in mainly unskilled jobs. This contrasts with

[14] S. Proxenos (2002) reveals that the rate of homeownership in some developing countries (e.g. Mexico, India, and Brazil) are more than in many North-West European countries. Correspondingly, the rate of homeownership between the low-income families is comparatively more.

Industrial Europe, where the Keynesian welfare system played a crucial role in the reproduction of labor power.

According to Barlow and Duncan (1994), in this type of rudimentary welfare system, the state is rarely involved in inclusive housing provision policies. For instance, in some African and Asian countries, policies restrict unemployed people's access to welfare services (including affordable housing) while they strongly support the so-called productive members (mostly civil servants).

Defining social housing in the Global South

This section offers a definition of social housing 'made in the Global South' rather than in the Global North. In order to do so, it first deconstructs the conventional definition of social housing as it was practiced in Europe (mostly during the Fordist era); it then proposes a reformulation of social housing taking into account the distinctive characteristics of housing systems in the Global South (elaborated upon in section 3.1).

The conventional definition of social housing (based on the experience of Europe under Fordism) involves the following elements: (a) it is provided by the state or other distributive agencies (subsidy providers), (b) it includes the construction of housing (direct intervention), (c) it targets the disadvantaged whose needs cannot be met in the private housing market, and (d) it is a (semi) public good. These elements have limited relevance to social housing in a Global South context.

Firstly, the role of the state in the provision of (social) housing in the Global South is rather insignificant. Of central importance, rather, is the 'family' as a key agent/institution in housing provision for low income households. In the Global South, the state has not succeeded in meeting the housing needs of the disadvantaged, whereas the (extended) family and informal housing allocation play key roles in housing provision.

Secondly, the social housing model found in the Global North focuses on the direct implementation of social housing through construction of new dwellings, renovation of existing buildings. This contrasts with housing provision programs in the Global South which mostly have to address the informality of settlements. In these countries, interventions in housing markets consist of indirect policy interventions such as the upgrading of sites and services as well reforms of the housing funding schemes (Keivani & Werna, 2001; Charlton & Meth, 2017; Abramo, 2020).

Thirdly, the people benefitting from housing provision programs in the Global South are different from those targeted by conventional social housing policies as conducted by states in the Global North. Social housing in Europe has often aimed at housing poor working class as a means of labor power reproduction. In the Global South, in contrast, because of the 'dissimilarity of the labor market', the targeted inhabitants benefitting from social housing programs are likely to belong to privileged groups. There is substantial evidence that the 'developmentalist state' allocates social housing to privileged groups—strategic agents sustaining the state system—rather than to those in deep need of housing (Ronald & Lee, 2012).

Fourthly, the (re)distribution system in the Global South works in a rudimentary fashion. In European countries during the Fordist period, housing was a cornerstone of the welfare system. Yet, in the Global South, given the 'rudimentary welfare system' and the 'dissimilarity of the labor market', social housing in many cases has been utilized to accomplish the ambitions of the 'developmentalist state'.

There are also other facts be taken into consideration in studying social housing in the Global

South. These facts disclose the necessity of applying a diversity of social housing measures in Global South countries including massive construction of new homes, revision of funding tools, institutional regulation of informal construction and settlements, etc.

- Evidence from the Global South reveals that social housing has played a limited role in housing provision. Indeed, the share of social (public) housing in the Global South is only around 10 percent, or even lower, of the total housing stock (Keivani & Werna, 2001)[15]. This is not so different from the share of social (public) housing in the Global North. But given the greater housing gap in the Global South, the portion of the social housing sector in a housing system must be considerable if this sector is to play a decisive role. Shrinking the size of social housing to a small segment makes its viability difficult. The size of the social housing sector may differ from country to country, yet it has to be large enough in order to have an impact on market forces, i.e. it must have the ability to de-commodify part of the housing system for the benefit of deprived households.

- So far, in many countries in the Global South, short-sighted policies have dominated social housing provision. These policies in most cases fail to meet the housing needs of hundreds of millions of people who live in severely inadequate housing conditions. There should be a push to replace recent failed short-term policies with more deep-rooted and persisting ones. Social housing development programs should be integrated into a comprehensive regional, urban development plan; long-term and sustainable policies should incorporate the development of social housing.

- There is significant heterogeneity in recent approaches to social housing in Europe. A wide range of actors participate in social housing provision: public and private actors, central governments, local authorities and commoners can all be found as partners in social housing provision. This dynamizes the system and capacitates it to adapt innovatively to changing circumstances (De Decker, 2002; Moulaert *et al*., 2014). Social housing provision may indeed include other forms of (non-government) intervention in housing in the Global South as well; for instance, through policies favoring community land trusts that facilitate low-income housing provision (Midheme & Moulaert, 2013).

- To meet the unmet housing demand in the Global South, other types of housing provision services need to be taken into account alongside and synchronously to social housing provision programs. To improve housing provision for low-income families, more inclusive and pluralistic methods need to be applied. This means that the different modes of provision and their key agents in housing systems have to be identified and coordinated through integrated policies.

- In spite of existing evidence on the failure or inefficiency of the state in the Global South, it can still play a central role in the regulation of housing systems, particularly in social housing. In most parts of the Global South, the state is still the sole and most vigorous entity that can provide ‘law and order’, ‘stability of property rights’, ‘essential public goods’, ‘welfare distribution’, and the ‘correction of market’ (Khan 2004).

In sum, we argue that in order to define social housing in a particular housing system in the Global South, the following elements should be taken into account:

[15] According to Whitehead, Scanlon and Hills (2007), the share of social rental housing in many North-West European countries, despite three decades of re-commodification, is still high. For instance, it is 35% in Netherlands, 25% in Austria, 18% in England, and 17% in France.

(a) Social housing should be an integrated part, if not the main pillar, of inclusive, long-term, comprehensive and innovative redistribution programs (to promote the status and share of social housing in the housing system).
(b) Social housing should involve state-led agency and other non-market societal forces (though the decisive role of the state and its interaction with market-oriented forces is central).

Social housing should include various methods of housing provision. Non-conventional housing provision instruments, such as alternative land division and land allocation measures, assisting self-financing, improving infrastructures and site-upgrading should gain in importance. Moreover, it is essential that these instruments are implemented through collaboration in successive planning stages.

The future of social housing in the Global South

The contemporary massive rural-urban migration[16] and the rapid rate of urbanization in many cities in the Global South that face a significant unmet housing demand (Davis, 2007), make it very complex to figure out the future of social housing.

Two ways ahead can be considered. One sees the fundamental economic differences between the different housing systems fading in the future. The globalization of the financial system will probably reinforce the financialization of the real estate and housing markets, pushing the commodification of land and housing even further. Within the global neo-liberal regime and the ways, it privileges financialization, housing will remain a less important area of welfare policy. In this scenario, social housing programs will remain limited and will benefit only privileged groups among the population (Goodfellow, 2017). As a result, it is likely that informal settlements will take an even greater place in the future. Informality or unconventional methods of housing provision will be the only option for low-income households to settle in cities or the peripheral areas.

Another scenario considers each of the countries in the Global South as a unique and singular locus of the globalized economy. How far each state will roll back the commodification of housing may vary from country to country, but social housing should be rescued from its residual role. Residualization, in this context, means that social housing then becomes a practice set aside only for the most vulnerable (Ronald & Lee, 2012).

Despite the prevailing global neo-liberal ideology that marginalizes the de-commodified social rented housing to a residual form, social housing can play a universal role[17] (Moulaert, Morlicchio & Cavola, 2007; Tutin, 2008). On that account, during the last decade in countries in the Global South there has been a vigorous interest in social housing in order to meet the growing need for housing deriving mainly from income pressure. Notwithstanding the prevailing neo-liberal policy environment, collaborative and innovative social housing schemes that are based on a well-established housing system and rooted in the indigenous social-political context, can play a decisive role in: fighting exclusion, promoting desegregated residential patterns, increasing affordability, limiting price discrepancies, ... Recent practices of *Community Land Trusts* (CLTs), *cohousing communities*, development trusts and other forms of innovative *community-led housing* (CLH), as well as the institutionalization of informal housing practices (particularly in Latin America and Africa) have divulged the robustness of this approach in the provision of housing for deprived households (Davis, Algoed &

[16] 'In 1950, only 30 per cent of the world's population lived in urban areas, a proportion that grew to 55 per cent by 2018'. United Nations, Department of Economic and Social Affairs (2018).
[17] Evidence reveals, for example in India and China, the success of robust national programs of large-scale affordable housing provision (Un-Habitat, 2011).

Hernández-Torrales, 2020)[18].

Studies focused on the housing sector in the Global South show that there is a revival of interest in the social housing approach. In the contemporary neoliberal context, particularly in the Global South, social housing programs still have the capability of creating social benefits and reducing other external public costs. Social housing is able to assist the restructuring of cities and promote the creation of a more productive workforce, or even to facilitate long-term economic growth (Harloe, 1994; Maclennan & More, 1997; Regan, 1999; Levy-Vroelant, 2009). Davis, Algoed and Hernández-Torrales (2020), for instance, provide us with recent cases of successful practices around the world. How this will take place in future trajectories of social housing will undoubtedly be different from country to country. But, as Scanlon *et al.* (2014) point out, social housing has proved that it can be both innovative and flexible in applying various methods of housing provision (Vaziri Zadeh, 2020).

However, fulfilling this task will likely require 'the recombination of existing agents, transformation of their identities and their associated values, norms, and interests, development of new strategic …orientations, tightening of social interaction among agents' (Moulaert, Jessop & Mehmood, 2016).

Conclusion

In this paper, we argue that housing systems in the Global South show particular features that require taking a fresh look at the conventional approach to social housing seen in European practices.

We argue that in a situation where the traditional patrimony model supports home-ownership (even if institutionalized informally), where ownership constitutes a considerable part of housing demand, but where the financial banking and monetary system cannot support 'homeownership' and the private rental sector is not sufficiently supportive, the proliferation of informal settlements is significant. When the state is not capable of promoting an inclusive supporting welfare system, because reproduction of the labor force is not of vital importance, the family has a crucial role in satisfying the housing needs of younger generations.

Given the dissimilarities between housing systems all around the world, and the fact that the Northern or European social housing approach (as defined during the golden age of Fordism in Europe) is not applicable to other countries and can at most inspire them, this paper offers a redefinition of social housing that is relevant for the Global South. It should be observed that through inclusive, long-term, and comprehensive programs, a new era for social housing is to arise in the Global South.

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[18] Bredenoord, Lindert and Smets (2014) also present successful practices from Asia (India, Pakistan, Indonesia, Sri Lanka, and China), Latin America (Mexico, Brazil, Colombia, Peru, Nicaragua, and Ecuador), and Africa (Egypt, South Africa, Nigeria, Kenya, and Ghana).

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