

PH4.3. KEY CHARACTERISTICS OF SOCIAL RENTAL HOUSING

Definitions and methodology

This indicator presents information from the OECD Questionnaire on Affordable and Social Housing (QuASH) on the definition and characteristics of social rental housing, and provides details on the different methods used to define rent levels and rent increases, the eligibility of beneficiaries, and the allocation of dwellings. For the purpose of this indicator, social rental housing is defined as: *residential rental accommodation provided at sub-market prices and allocated according to specific rules* (Salvi del Pero, A. et al., 2016).

Key findings

Nearly all OECD and EU countries have some form of social rental housing.

In total, 39 of 43 OECD and EU countries responding to the OECD QuASH report the existence of some form of social rental housing. However, definitions of social rental housing differ across countries (Table PH4.3.1). Further, many countries report having more than one type of rental housing that responds to administrative procedures (as opposed to market mechanisms), with different characteristics in terms of providers, target groups and financing arrangements. In some countries, the complexity of the social housing sector is due in part to its long history, which has seen different phases and different stakeholders involved over time.

There are also a number of regional specificities that affect the size and functioning of the social housing stock across countries. For instance, in most Central and Eastern European countries (Estonia, Hungary, Latvia, Lithuania and the Slovak Republic), the social rental housing stock is quite small (see indicator PH4.2), and there is a much larger share of the population that own their dwellings outright, as a result of widespread housing privatisation since 1990. In Japan and Korea, social rental housing corresponds to publicly provided rental housing, while in Denmark and the Netherlands, social rental housing refers to housing provided by the non-profit sector. Switzerland does not have social housing at national level, but some cities have some co-operative, non-profit and municipal housing.

Four countries report that they do not have social rental housing: Costa Rica, Greece, Mexico, and Sweden. Mexico, for instance, favours affordable housing solutions that facilitate low-cost home ownership. Sweden has a significant public (municipal) rental sector but, strictly speaking, no social rental housing, as rents in municipal housing are in line with those in the private rental sector. In Türkiye, in addition to the subsidised rental dwellings that are often made available to civil servants (described in Table PH4.3.1), social housing generally refers to the sale of housing units below market price by the Housing Development Administration of Türkiye (TOKİ) to low-income households. (See indicators PH4.1 and PH4.2 for detail on public spending on and the stock of social housing across countries).

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The statistical data for Israel are supplied by and under the responsibility of the relevant Israeli authorities. The use of such data by the OECD is without prejudice to the status of the Golan Heights, East Jerusalem and Israeli settlements in the West Bank under the terms of international law.

LAST UPDATED 26/06/2024

Table PH4.3.1: Social rental housing: Definitions and overview

Country	Term(s) used	Definition and summary overview
Australia	Australia has several types of social housing, including public housing, state owned and managed indigenous housing, community housing and Indigenous community housing.	Social housing is subsidised rental housing provided below the market rents, generally between 25% and 30% of a tenant's gross income, by not-for-profit, non-government or government organisations to assist people who are unable to access suitable accommodation in the private rental market.
Austria (1)	"Subsidised housing", for dwelling administered by limited profit housing associations (with funding from the housing subsidy programmes). "Public housing" for dwellings administered by municipalities (predominately in Vienna)	Subsidised housing is defined by income limits, which are relatively high, meaning that subsidised housing is available to low- and middle-income households. The social housing stock is identified according to different types of providers that provide housing at preferential conditions, either regulated by law (Limited-Profit-Housing) or by political decisions of municipalities.
Belgium (Flanders)	Social housing	Property that is rented at reduced prices by the Flemish Social Housing Company (VMSW) or a social housing corporation; the social rental agencies (SRA); or the <i>Vlaams Woningfonds</i> , a municipality or an inter-municipal partnership.
Bulgaria (1)	Social housing is a comprehensive term for affordable homes and public housing in the rental market, which are subsidized by the state, municipalities or housing associations. These dwellings are prioritised for people in need.	Examples include affordable housing for low-income households (dwellings owned and managed by a housing association under the authority of local authorities); public housing (rental dwellings for people with low to medium income or people with special needs, which are at least partially funded by the state and run by a non-profit and/or local authorities); housing for immediate accommodation (for people in immediate need, including women and children, victims of domestic violence); housing with integrated social services (for disabled people and others).
Canada	Public housing, non-profit housing, co-operative housing, and a variety of other specific programmes.	Public housing are units approved between 1950 and 1985 are administered by provinces and territories and, in some cases, by municipalities. The projects are targeted to low-income households who pay rent based on their income. Non-profit housing provides assistance to public or private non-profit organizations who agreed to build or acquire rental housing for low- and moderate-income households. Co-operative housing provides modest, affordable housing to low- and moderate-income households. These projects are jointly owned by their members who co-operate to maintain lower housing charges by contributing to efficiencies through volunteer labour.
Chile	Public housing (<i>Vivienda pública</i>)	Housing that is built, rehabilitated or acquired to be rented under market price through a rent subsidy and under a specific percentage of the income of beneficiary families.
Colombia (1)	(Priority) social interest housing and <i>semillero de propietarios</i>	Social Interest Housing (VIS) ensures habitability and quality standards for units with a maximum value of 135 times the current legal monthly minimum wage. Priority Social Interest Housing (VIP) is social interest housing with a maximum value of 70 times the current legal monthly minimum wages. The <i>Semillero de Proprietarios</i> programme subsidizes rent and seeks to serve households that live in informal rents and in unworthy housing (or rewards savings towards home ownership).
Czechia	Social housing	According to the Civil Code, a social housing apartment is an apartment with a total floor area not exceeding 120 m ² ; a family house for social housing is house (whereby at least half of the floor area is for family housing) with a total floor area not exceeding 350 m ² . According to other legislation, social housing is defined as an apartment owned by a municipality or a voluntary association of municipalities, which has at least basic facilities, which is intended for rent to an eligible household that cannot find satisfactory housing on the market.
Denmark (1)	Social family dwellings, social dwellings for the elderly, and social dwellings for youth	Social housing is constructed and run by not for profit housing associations. The term "social housing" is a collective designation for three different types of housing: social family dwellings, social dwellings for the elderly, and social dwellings for youth.
Estonia	Social housing	There is no official definition of social housing. The provision of a dwelling is considered to be a social service managed by a local authority whose objective is provide access to housing to a person that due to his/her economic situation is unable to access a dwelling that corresponds to his/her her needs or the needs of his/her family.
Finland	Social housing	Social housing in Finland refers to rental apartments and right-of-occupancy apartments built with subsidised loans and grants by government (managed by the Housing Finance and Development Centre of Finland (ARA)). ARA apartments are more affordable for residents than market-priced apartments and they are owned by non-profit ARA communities and municipalities. Moreover, these apartments are subjected to restrictions related to tenant selection, purpose of use and transfer.
France (1)	Social housing or moderate rent housing (<i>Habitation à loyer modéré</i> , or	Social housing is housing built with public aid (tax benefits, public subsidies and loans at preferential rates) to accommodate people with low incomes.

Country	Term(s) used	Definition and summary overview
	HLM)	
Germany	Subsidised housing or social housing promotion	Housing that is publicly subsidised in order to support households that cannot adequately obtain housing on the market and need assistance. (Cf. Act on Housing Promotion (<i>Wohnraumförderungsgesetz</i>)).
Hungary (1,2)	No national definition of social rental housing	Social rental housing mainly consists of municipal housing. Since 2014, it is also understood to include dwellings let within the National Asset Management Programme (NAMP) to former owners who were no longer able to pay the mortgage.
Iceland (1)	Social housing	Social housing is for families and individuals who are not otherwise able to provide stable housing due to low income, heavy support needs, or other social difficulties.
Ireland	Social housing	Social housing is defined as housing provided by a local authority or a housing association to households who are unable to provide accommodation from their own resources. Social housing support can be provided in a number of ways: i) a rented tenancy in a property owned and managed by the local authority; ii) a rented tenancy in a property leased for 10-20 years by the local authority or approved housing body; iii) Housing Assistance Payment (HAP) where a local authority will make a monthly payment to a private landlord, subject to terms and conditions including rent limits, on a HAP tenant's behalf; iv) Rental Accommodation Scheme (RAS) tenancy where the local authority arranges leases with private landlords for homes; v) a rented tenancy in homes owned and managed by an approved housing body; vi) specific accommodation for homeless people, older people and Travellers; vii) adapting existing local authority homes to meet specific household needs; viii) grants to increase accessibility in private homes for people with disabilities and special needs.
Israel (1)	Public housing	The most important providers of below-market price housing are government agencies. Public housing apartments are owned, maintained and preserved by the state through two government companies that operate throughout the country. These companies own 92% of the public-housing units: Amidar (72%) and Amigour (20%).
Italy (1)	Social rental housing	In Italy, there are three types of social rental housing: i) public social housing (<i>edilizia sovvenzionata</i>), directed to the poorest households; costs are almost entirely covered by public entities and rents are based on tenants' income; ii) subsidised housing (<i>edilizia agevolata</i>), sponsored by regional and local authorities, directed to low- and medium-income households; public subsidies vary between 20 and 60% of rental costs (which in any case cannot be higher than market prices); home purchases by tenants are incentivised; iii) private social housing (<i>edilizia convenzionata</i>), realised by private operators in agreement with local authorities, which establish sale prices or rent levels.
Japan	Public housing	Public housing is provided at low rents to low-income population groups through the cooperation between the national government and local governments (based on the Public Housing Law).
Korea (1,2)	Public rental housing	Public rental housing refers to rental housing constructed i) with funding from the state or local governments, or ii) with funding from the national housing fund according to the Article 60 of the Housing Law, or iii) on a housing site that is developed by public projects after obtaining approval according to the Article 16 of the Housing Law. It is mainly provided by the Korea Land and Housing Corporation (LH), local governments and local public corporations, with involvement from the private sector.
Latvia	Social houses and social apartments	A social apartment is owned or rented by a local government, which is then rented to a household that is entitled to public support. A social house is a building in which all apartments are rented to households that are entitled to public support. A social dwelling may also be a building owned by an association or foundation tailored for people with disabilities.
Lithuania	Municipal housing	Social housing is a dwelling owned by the municipality. It is included in the list of municipal social housing fund approved by the municipal council, and is a part of the municipal housing fund list.
Luxembourg (1)	No official definition of social rental housing, but the law of 25th February 1979 regarding housing allowance refers specifically to dwellings belonging to public developers (<i>Fonds du Logement</i> and <i>Société Nationale des Habitations à Bon Marché</i> , as well as municipalities)	Rental dwellings owned by public developers, where rents are defined according to the composition of the household and its taxable income. Also, dwellings rented through social real estate agencies (<i>Agences Immobilières Sociales</i>) are considered social rental housing.
Malta (1,2)	State-owned rental dwellings	More detailed information is not available.
The Netherlands	Social housing	A dwelling is considered 'social' when it is rented below a specific rent level. This level is EUR 879,66 in 2024. In that case, regulation is applicable including a cap on the maximum yearly allowed rent increase.

Country	Term(s) used	Definition and summary overview
New Zealand	Public housing; Community Housing	Social housing refers to properties for tenants who are eligible for subsidised rent through income related rent.
Norway (1)	The municipalities provide housing for the most vulnerable groups.	The housing provided by the municipalities is allocated according to specific rules rather than market mechanisms. The municipalities are encouraged to take market rent in their rental housing, but housing allowances (from the state and some municipalities), are used to cover the extra cost for those who need it.
Peru	Subsidised social housing	Subsidised social housing is housing that is built or acquired through public programmes and policies aimed at facilitating access to decent and adequate housing for individuals and families in vulnerable situations or with low incomes.
Poland	No legal definition of social rental housing, but it can be understood as referring to municipal housing let according to social criteria, as well as social housing companies (TBS) and social housing initiatives (SIM). No legal definition of social rental housing, but it can be understood as referring primarily to municipal housing let according to social criteria and housing stock owned by social housing companies (TBS) and social housing initiatives (SIM), in addition to the State Treasury, other companies and entities.	According to definition provided by the Act of 20 July on <i>Krajowy Zasób Nieruchomości</i> , social rental housing must meet the following conditions: i) access to dwellings is provided on non-market basis, based on criteria defined by public authorities; ii) at the stage of construction, reconstruction or use of buildings, entities carrying out investments use support from <i>Krajowy Zasób Nieruchomości</i> or public funds; and iii) dwellings are provided by entities whose main purpose is not to gain a profit.
Portugal	Social housing	Social housing refers to cost-controlled housing for sale or rent that targets low-income households.
Romania (1)	Social housing	Social housing is defined as publicly-owned dwellings with a subsidised rent, which are allocated to households whose economic situation does not allow them to access a dwelling in the property or to rent a dwelling under market conditions.
Slovak Republic	Social housing	Social housing is housing acquired with the use of public funds, addressed for adequate and humanly decent housing of individuals who are not able to ensure housing with their own effort.
Slovenia	Non-profit housing	Social housing is officially defined as "non-profit rented dwelling" and it targets middle and low-income households. Non-profit rents cannot exceed prescribed limits, expressed as the percentage of the value of housing unit. Furthermore, upon entering the sector, new tenants have to pay a participation fee unless their income is particularly low. For service users below certain income thresholds the rent is split between the tenant and the municipal housing department or the national government. Priority is given to families with children, households with unemployed members, young people, and people with disabilities.
South Africa	Social housing	Social Housing is a rental or co-operative housing that requires institutionalised management and is provided by accredited social housing institutions (SHIs) or in accredited social housing projects in designated restructuring zones.
Spain (1,2)	Publicly protected housing (<i>Vivienda de protección pública</i> or VPO) is the general term for subsidised housing. It includes mainly subsidies for home ownership but also rent with an option to buy and public rental housing. Only the latter is to be considered as social rental housing.	Dwellings let at low rent to low- to middle-income households. They are mainly provided by local authorities, public bodies and publicly owned companies, although funding is virtually open also to NGOs and not for profit companies. There are different schemes in place targeting different income levels, but the overall size of public rental housing is very small.
Switzerland (1,2)	No national definition of social rental housing, different definitions apply at the communal, cantonal and federal level	Non-profit housing is provided mainly by cooperatives, which are independent from the state but statutorily obliged to create affordable housing and to consider the needs of vulnerable people/groups. Municipalities also own and let a limited stock of dwellings to households in need.
Türkiye	Social subsidised rental housing	In terms of social subsidised rental housing, public houses provided for civil servants are an example. Several Ministries provide affordable rental housing to their employees, especially those who work in remote areas with limited access to the decent housing.
United Kingdom: England (1)	Social housing is defined in law (the Housing and Regeneration Act 2008) as "low-cost rental accommodation" and "low-cost home ownership	Low-cost rental accommodation is made available for rent below the market rate, with rules to ensure it serves people whose needs are not adequately met in the commercial housing market. Low-cost home ownership accommodation is made available in accordance with shared

Country	Term(s) used	Definition and summary overview
	accommodation”.	ownership arrangements, equity percentage arrangements or shared ownership trusts, with rules to ensure it serves people whose needs are not adequately met in the commercial housing market. <i>[These units are not included in the social housing data reported in indicator PH4.2, which reports solely subsidised rental dwellings]</i>
United States	Subsidised housing; Project-based rental assistance	Subsidised housing programmes provide public funds for the construction, maintenance, provision, and allocation of affordable rental housing to eligible low-income tenants. Subsidised housing includes public housing and project-based rental assistance. Public housing is owned and operated by local Public Housing Authorities (PHAs). These local housing authorities receive allocations of federal funding to build, operate or make improvements to the housing stock. Project-based rental assistance describes a collection of programmes that provides rental housing owned by private landlords who enter into contracts with the US Department of Housing and Urban Development in order to receive housing subsidies. The subsidies pay the difference between tenant rent and total rental costs. There are also some project-based rental assistance programs administered by other federal agencies.

Notes: Social rental housing is not available per the OECD definition in Costa Rica, Greece, Mexico, or Sweden. 1. Information is based on country responses to the 2021 OECD QuASH. 2. Some information is based on previous editions of the OECD QuASH. Source: OECD Questionnaire on Social and Affordable Housing (QuASH), 2023.

Setting the rent

The rent in social housing is set in different ways, with most countries taking a blend of factors into account to determine rent levels:

- **Income-based:** 20 countries establish rent levels at least in part based on household income levels: Australia, Bulgaria, Canada, Colombia, Czechia, France, Germany, Ireland, Italy, Japan, Latvia, Luxembourg, Malta, the Netherlands, New Zealand, Peru, Portugal, South Africa, the United Kingdom (England) and the United States.
- **Market-based:** 17 countries set the rent levels in social housing – at least in part – with reference to market rent levels for similar properties: Canada, Colombia, Czechia, Germany, Iceland, Israel, Italy, Japan, Latvia, Malta, the Netherlands, New Zealand, Norway, Peru, South Africa, the United Kingdom (England), and the United States.
- **Cost-based:** in 16 countries the rent in social rental housing is cost-based, so as to allow long-term recovery of the cost of building/acquiring the dwelling: Austria, Czechia, Denmark, Estonia, Finland, France, Iceland, Japan, Latvia, Malta, the Netherlands, Peru, the Slovak Republic, Slovenia, South Africa and the United States.
- **Utility-based:** in 15 countries, the rent level is defined at least in part by considering the dwelling characteristics (including size, amenities, and/or location): Czechia, Estonia, Iceland, Israel, Italy, Japan, Latvia, Lithuania, Luxembourg, Malta, the Netherlands, Peru, Slovenia, South Africa, and the United Kingdom (England).

In several countries, municipalities are primarily responsible for setting the rent and/or managing the social housing stock, in which cases practices and rules vary widely across jurisdictions within countries. Hence, no detailed information is available at national level in Poland. Similarly, rent setting in social housing in Germany varies across *Länder*: in Nordrhein-Westfalen for instance, a combination of utility- and income-based system is used, while in Schleswig-Holstein, social rents are set based on the rent levels in the region.

In terms of increases to rent levels in social housing, there are regular adjustments to rent levels in 19 countries, most commonly (but not systemically) on an annual basis. Adjustments to the rent level may be made in line with increases to the Consumer Price Index (or other relevant index) (Colombia, Czechia, France, Israel, Norway, and Slovenia); when a tenant’s income increases (Ireland, Italy, Luxembourg and New Zealand); or when costs increase (Finland). Meanwhile, there is no general rule about regular increases in rent levels in 8 countries: Bulgaria, Estonia, Iceland, Japan, Peru, Poland,

Portugal, and the Slovak Republic. In six countries, conditions relating to rent level increases vary across jurisdictions: Australia, Canada, Estonia, Germany, Latvia and Lithuania.

The difference between actual rents paid in social housing and market rents can be significant, but comparable data on rent levels between social and market rents are hard to come by. Typically, social rents can be much lower than market rents in high-demand locations, such as big cities and capitals, while the difference may be smaller in less dynamic areas. Based on national averages, mainly based on capital cities, the gap between social rents and market rents varies widely across countries. The biggest differences are reported in Estonia (Tallin) and Poland (Warsaw), where social rents are equivalent to approximately 15% and 16%, respectively, of market rents; and the Slovak Republic (Bratislava) and Slovenia (Ljubljana), where social rents are 25% and 31%, respectively, of market rents. The difference is smaller, though still significant, in Austria (Vienna), Denmark (Copenhagen), Finland (Helsinki) and New Zealand (Wellington), where social rents are between 44% and 72% of market rents.

Right-to-buy policies, whereby sitting tenants can acquire the dwelling in which they live at a discounted price, exist in some countries. Ireland, and Malta provide sitting tenants in social housing with the right to buy. In eleven countries, sitting tenants may only purchase certain types of social dwellings, or may only be able to purchase social dwellings under certain conditions; this is the case in Australia, Austria, Colombia, Italy, Lithuania, the Netherlands, New Zealand, Poland, Portugal, and the United Kingdom (England), and the United States.

Further detail on rents in social rental housing is provided in Table PH4.3.2 below.

Table PH4.3.2: Rents in social rental housing

Factors affecting the setting of rents and rent increases in the social housing sector

	Market-based	Rent-setting system:			Rent increase system:		Social rent as percentage of market rent	Sitting tenant right to buy
		Cost-based	Income-based	Utility-based	Regularly increased	Not regularly increased		
Australia (1)			Income-based		Depending on regulation at level of States and Territories			Depending on regulation at level of States and Territories.
Austria (2)		Cost-based			Yes, but rent regimes vary depending on the type of housing		72% (Vienna) (2022)	From limited-profit housing associations under certain conditions.
Bulgaria (3)			Income-based			Not regularly increased	Not available	No
Canada (3)	Market-based		Income-based		Varies		Not available	No
Colombia (3)	Market-based (primarily)		Income-based		Yearly, by no more than retail price index		Not available	Yes, but only applies to new dwellings at beginning of rental contract.
Czechia	Market-based	Cost-based (primarily)	Income-based	Utility-based	Yes, in accordance with inflation		50% (Prague) (2022)	No
Denmark		Cost-based				No, the rent for social housing is fixed on the grounds of a balance principle that seeks an equilibrium between rent and income.	57% (Copenhagen) (2020)	No
Estonia (1)		Cost-based (primarily)		Utility-based	The rent of the social housing (and it's increase) is decided by the local government, it is not regulated by the government.		15% (Tallinn) (2020)	No
Finland		Cost-based			Yes, depending on utility charges and maintenance costs		67% (Helsinki) (2023)	No
France (1,3)		Cost-based	Income-based (primarily)		Annually, increase limited to the reference rent index (<i>indice de référence des loyers</i>).		Not available	No
Germany	Market-based (primarily)		Income-based		Yes, conditions depend on state subsidy programs for		Not available	No

	Rent-setting system:				Rent increase system:		Social rent as percentage of market rent	Sitting tenant right to buy
	Market-based	Cost-based	Income-based	Utility-based	Regularly increased	Not regularly increased		
					social housing; increases every 1-2 years and capped at % increase.			
Iceland	Market-based (primarily)	Cost-based		Utility-based	Yes, but no details provided		Not available	No
Ireland (4)			Income-based		Yes, rent increases with tenant income.		Not available	Yes
Israel (1,5,7)	Market-based			Utility-based	Yes, in accordance with consumer price index.		Not available	No
Italy (3)	Market-based		Income-based (primarily)	Utility-based (primarily)	Yes, rent changes with income and household composition.		Not available	Yes, but under specific conditions and only for a percentage of the social housing stock owned by public entities.
Japan (5)	Market-based	Cost-based	Income-based (primarily)	Utility-based		Not regularly increased	Not available	No
Latvia (1)	Market-based	Cost-based (primarily)	Income-based	Utility-based	Varies across municipalities		Not available	No
Lithuania				Utility-based	Varies across municipalities; can be recalculated once a year.		Not available	No, but a tenant who has lived for five years in a social dwelling is eligible to apply for housing purchase if the municipal council decides to rent that dwelling as municipal housing at market prices.
Luxembourg (6)			Income-based (see note)	Utility-based	Yes, depending on household income and composition.		Not available	No
Malta	Market-based	Cost-based	Income based (primarily)	Utility-based	Yes, every 2 years		Not available	Yes
The Netherlands (1,5)	Market-based	Cost-based	Income-based	Utility-based (primarily)	Max % increase is set by the government.		Not applicable (about 90% of the rental sector applies regulated rents)	Yes, if the housing corporation decides to sell.
New Zealand (1)	Market-based		Income-based (primarily)		Yes, in line with tenant income and changes in household circumstances, for		44% (Wellington) (2020)	Only in some circumstances, but not in areas where the demand for public housing is high.

	Rent-setting system:				Rent increase system:		Social rent as percentage of market rent	Sitting tenant right to buy
	Market-based	Cost-based	Income-based	Utility-based	Regularly increased	Not regularly increased		
					instance, the number of people living in the property.			
Norway (3)	Market-based				Yes, annually with CPI.		Not available	No
Peru	Market-based (primarily)	Cost-based (primarily)	Income-based	Utility-based		Not regularly increased	Not available	No
Poland (7)	Set by the municipality taking into account characteristics of the dwelling and location, within the limits set by regional authorities (the annual rent should not exceed 3% of the replacement value of the dwelling). Rent levels are also set by social housing companies (TBS) and initiatives (SIM), within the statutory limit of 4% of the replacement value.					Not regularly increased	16% (Warsaw) (2022)	Only if landlord intends to sell dwelling. In the case of municipal housing, when the municipality decides to sell. In the case of TBS, when TBS agrees to sell.
Portugal (7)			Income-based			Not regularly increased	Not available	Yes, but there is no formal law regulating this right.
Slovak Republic		Cost-based				Not regularly increased	25% (Bratislava) (2022)	No
Slovenia		Cost-based		Utility-based (primarily)	Adjusted once a year in line with the consumer price index.		31% (Ljubljana) (2022)	No
South Africa (5)	Market-based	Cost-based (primarily)	Income-based	Utility-based	Yes, yearly		Not available	No
United Kingdom: England (3,8)	Market-based		Income-based	Utility-based	Yes, see note		Not available	Some are eligible to buy at discounted price.
United States (1,5)	Market-based	Cost-based	Income-based (primarily)		Yes, in accordance with HUD Fair Market Rents		Not available	No. However, there are some small programmes which permit this, such as the Section 5(h) Homeownership Program.

Notes: 1. Social rent as percentage based on responses in previous QuASH rounds. 2. Austria: Tenant's right to purchase a social dwelling is regulated by the Limited-Profit-Housing Act. 3. All information is based on 2021 QuASH responses. 4. Sitting tenant's right to buy based on responses in previous QuASH rounds. 5. Rent increase system based on responses in previous QuASH rounds. 6. Luxembourg: Rent levels depend upon the household income and composition, according to the (modified) Grand-ducal regulation of November 16, 1998 (Article 18). 7. Rent setting system based on responses in previous QuASH rounds. 8. United Kingdom: Information refers to England. Social rent is based on a formula considering condition and location of a property, local earnings and property size. Landlords are permitted to increase rents by up to CPI+1% per year until 2025.

Source: OECD Questionnaire on Social and Affordable Housing (QuASH), 2023.

Eligibility criteria

All countries have criteria to determine who is eligible to live in social rental housing. In many cases, these criteria determine which households can be placed on waiting lists to obtain a social dwelling, to be eligible for selection on the basis of a set of priority criteria. In practice, the combination of eligibility and priority criteria determines which households ultimately obtain social tenancies (see Table PH4.3.3).

Depending on the country, eligibility criteria are more or less restrictive, relating to household income, citizenship/residency status, household size and composition, and a household's current housing situation. The majority of countries impose minimum conditions to be eligible for social housing.

Most commonly, income thresholds exist in 26 countries. Income-tests are usually benchmarked against either average incomes or minimum incomes/minimum wages. Income ceilings can be set at relatively high levels, however, so as to allow mixing of households at different income levels to combat segregation (such as for instance in Austria and France). Assets are typically not included in means-testing (except, for instance, in Finland). Citizenship or permanent residency status is required in 19 countries, but exemptions for some refugees exist for example in Norway. In Germany, for instance, eligible tenants must have legal residency for at least a year. In 9 countries, local residency is also required.

Additional criteria relating to employment are in place in Colombia, and employment can facilitate jumping the queue for social housing in specific social housing associations in Denmark. Further details on criteria defining who is eligible to live in social rental housing are provided in Table PH4.3.3 below.

Table PH4.3.3: Social rental housing eligibility criteria¹

Criteria assessed in selecting eligible households

	All are eligible	Income threshold	Citizenship/ Perm. Residency	Local residency	Employment	Other
Australia	No	Yes	Yes	Yes	No	Eligibility criteria for social housing is determined by state and territory housing authorities and varies between states and territories.
Austria	No	Yes	Yes	Yes (Vienna)		Eligibility criteria differ between type of housing, subsidy scheme, and municipality.
Belgium	No	Yes	Yes	No	No	Applicants must not be in possession of property rights.
Bulgaria (1)	No	Yes	No			
Canada (1,2)	No	Yes	No	Yes	No	Priority allocation varies by specific social housing programme.
Colombia (1)	No	Yes	Yes	No	Yes	Victims of forced displacement, informal sector workers, elderly, members of ethnic communities, people with disabilities, members of the public force and their families when the member of the public forces has died in service.
Czechia	No		No	Yes		Social housing is a competency of municipalities. Such housing targets people with lower incomes, and the assessment of apartment applications should be non-discriminatory. The most common criteria include whether any member of the household owns a residential property.
Denmark	Yes					Everyone is eligible to access social housing; however, in some social housing organisations, individuals meeting certain criteria (for instance, studying or being employed) might be able to skip the waiting list to access social housing.
Estonia	No	Yes	Yes	Yes		
Finland (3)	No	No	Yes	No	No	Household selection is based on suitability and financial needs assessed on the basis of the applicant's housing needs, wealth and income. Priority is given to people experiencing homelessness and other applicants with an urgent need for housing.
France (1,3)	No		Yes			
Germany	No	Yes	Yes	No	No	Legal residency of at least one year.
Hungary (1)	No	Yes	Yes	Yes		Rents and eligibility conditions are regulated by a decree of the municipalities.
Iceland (1,3)	No	Yes	Yes			
Ireland (4)	No	Yes	Yes	Yes	No	Eligibility criteria is based on income, previous rent arrears, and availability of alternative accommodation.
Israel (1)	No	Yes	Yes	No	No	

	All are eligible	Income threshold	Citizenship/ Perm. Residency	Local residency	Employment	Other
Italy (1)	No	Yes	Yes	Yes	No	Criteria are defined at the local level, but there are some general requirements.
Japan	No	Yes	No	No	No	
Latvia	No	Yes	No	Yes	No	See priority cases in PH 4.3.5.
Lithuania	No	Yes	Yes	Yes	No	
Luxembourg (1,3)	Yes	No	No			
Malta (1,3)	No	Yes	Yes			
Netherlands	No	Yes	Yes	No	No	Income thresholds from work, home, dividends and shares, and investments and savings.
New Zealand	No	Yes	Yes	No	No	
Norway	No	Yes	Yes			Housing situation is a criterion as well. In terms of citizenship, there are exceptions for some refugees.
Peru	Yes					
Poland	No	Yes		Yes, or work in the municipality	No	Income thresholds and any additional specific criteria are set by the municipalities.
Portugal	Yes					
Romania (1)	No	Yes				
Slovak Republic (5)	No	Yes	No	No	No	Legally, the only criterion is income level. However, in practice each municipality sets particular criteria (for instance, having permanent residency in the municipality).
Slovenia	No	Yes				
South Africa (1)	No	Yes	Yes			
United Kingdom: England (1)	No	No	No	No	No	Application is open to all British citizens or citizens who have the right to stay in the UK for an unlimited time. Allocation by local authorities according to own criteria.
United States	No	Yes	No	No	No	On top of income, eligibility is assessed on the grounds of family, age (elderly), and disability.

Notes: Empty cells are missing information or QuASH responses stating “uncertain”. 1. All information is based on 2021 QuASH responses. 2. Canada: Eligibility is determined by the First Nation governments when programmes are delivered On-Reserve. A Tenant Selection Criteria, shared with all members, is a requirement of the programme. 3. Responses partially based on replies to previous QuASH rounds. 4. Ireland: Eligibility for social housing is assessed based on the criteria outlined in section 20 of the Housing (Miscellaneous Provisions) Act 2009 and the associated Social Housing Assessment Regulations 2011. 5. Slovak Republic: Act No 443/2010 Coll. on subsidies for housing development and on social housing stipulates the only criterion to access social housing is income level.

Source: OECD Questionnaire on Social and Affordable Housing (QuASH), 2023.

The eligibility of tenants to remain in social housing is typically re-assessed on a regular basis, but this is not the case in all countries (Table PH4.3.4). Seven countries re-assess eligibility of social housing tenants on an annual basis (Australia, Canada, Estonia, Japan, Lithuania, New Zealand and the United States), while five countries usually verify eligibility every two to three years (Belgium, Czechia, Norway, Poland and the Slovak Republic). In Ireland, re-assessment happens on a continuous basis. The frequency of eligibility re-assessments was not specified in a handful of countries. In the case that a sitting tenant no longer fulfils eligibility requirements, eight countries impose rent increases (Canada, France, Hungary, Ireland, Japan, Poland, Slovenia and the United States); eleven countries terminate the lease of the sitting tenant (Belgium, Czechia, Denmark, Estonia, France, Italy, Latvia, Lithuania, Norway, Poland and South Africa).

By contrast, there is no regular re-assessment in 11 countries: Austria, Bulgaria, Colombia, Denmark, Finland, Germany, Luxembourg, Malta, Netherlands, Portugal and the United Kingdom (England).

Table PH4.3.4: Details on eligibility re-assessment for social housing

	Frequency of re-assessment	If sitting tenants no longer fulfil eligibility:		
		Rent increase	Lease termination	Other
Australia	At the end of probationary lease (generally 12 months) or at end of fixed-term lease (generally two, five or ten years), and subject to other reviews on an ad hoc basis or when a tenant's circumstances change.			Depending on regulation at level of States and Territories, tenants may fall under transition policies to support them to exit public housing. Some States also waive eligibility criteria if exiting public housing would negatively affect the tenant.
Austria (1)	No regular reassessment			
Belgium	Bi-annually		Yes	Income eligibility is checked every nine years, and every three years after the first check-up. If the tenant is no longer eligible, the contract is terminated. The contract shall also be terminated if the tenant acquires a property.
Bulgaria (1,2)	No regular reassessment			
Canada (1)	Annually	Yes		
Colombia (1)	No regular reassessment			
Czechia (1)	Bi-annually		Yes	
Denmark (3)	No regular reassessment		Yes	If tenants cannot pay their rent, the social housing department can ask the bailiff to schedule an eviction.
Estonia (4)	Annually or more regularly		Yes	
Finland (1,2)	No regular reassessment			
France (1,2)	Yes	Yes	Yes	A rent increase applies to households whose income increases above the income limits for social housing; some exceptions, depending on household age and composition.
Germany (1)	No regular reassessment			
Hungary (1)	Re-assessment, but no information on timing provided	Yes		
Iceland (1,2)	Eligibility is re-assessed			No information provided
Ireland (5)	Continuous review	Yes		
Israel (1)	Re-assessment, but no information on timing			

	Frequency of re-assessment	If sitting tenants no longer fulfil eligibility:		
		Rent increase	Lease termination	Other
Italy (1)	Depends on local management		Yes	
Japan (1,2)	Annually	Yes		
Latvia	Every 6 months		Yes	
Lithuania	Annually, but potentially earlier if tenant situation changes		Yes	Rental contract is terminated, unless income and asset thresholds do not exceed 35% (or by 50% for specific groups).
Luxembourg (1,2)	No regular reassessment			
Malta (1,2)	No regular reassessment			
Netherlands (1)	No regular reassessment			
New Zealand				Since March 2020, tenancy reviews for public housing tenants have been paused.
Norway (1)	At lease expiration, usually every three years		Yes	
Poland	Municipal housing: No more often than every 2.5 years Social housing: Bi-annually	Yes	Yes (Social housing - TBS)	
Portugal (1)	No regular reassessment			
Slovak Republic	Varies, typically every 3 years			Depends on the situation in the municipality; if a new tenant needs social housing, sitting tenant must move out.
Slovenia	Every 5 years	Yes		
South Africa (1,2)	Eligibility is re-assessed		Yes	Rent subsidy is abolished.
United Kingdom: England (1)	No regular reassessment			
United States	Annually	Yes		

Notes: empty cells are missing information or QuASH responses stating "uncertain". 1. All information is based on 2021 QuASH responses. 2. Responses based on replies to previous QuASH rounds. 3. Frequency of re-assessment is based on 2021 QuASH responses. 4. Lease termination is based on 2021 QuASH responses. 5. Rent increase is based on 2021 QuASH responses.
Source: OECD Questionnaire on Social and Affordable Housing (QuASH), 2023.

Priority criteria

Once registration for social housing is completed, criteria are often used to establish the order of allocation to different registered applicants. In 12 countries, the length of time a household has been registered on a waiting list is driving key means to prioritise the allocation of social housing (Table PH4.3.5). At the same time, additional criteria may in place to ensure that persons in greatest needs are served first. In 21 countries, people with disabilities are given priority allocation. Some countries have also established specific arrangements to identify priority cases; for instance, in Austria, municipalities retain the right to allocate a portion of the social housing stock to households they deem in priority need. This may include, for instance, victims of domestic violence (France and Malta). Other criteria can also grant the elderly or those with adverse housing conditions priority access in many countries. A few countries provide priority access to social housing to asylum seekers (the Netherlands) and ethnic/racial minorities (Australia, New Zealand).

Table PH4.3.5: Social rental housing: Criteria for priority allocation to eligible recipients¹

	Time on waiting list	Income level	Disability	Elderly	Asylum seekers	Ethnic/racial minority	Household composition/size	Current housing conditions	Other
Australia	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Allocated to households in greatest need; criteria vary by State/territory.
Austria	Yes	Yes	Yes	No	No	No	Yes	Yes	There is no consistent system across providers. Limited-profit housing associations are obliged to have a system of social criteria and municipalities have their own criteria.
Belgium	Yes				No	No	No	Yes	
Bulgaria (1,2)	Yes	No	Yes	Yes			No	No	
Canada (1)									Priority allocation varies by specific social housing programme.
Colombia (1)			Yes	Yes			Yes		
Czechia (1)	Yes	Yes	Yes	Yes	No	No	Yes	Yes	Allocation criteria is set by the municipalities.
Denmark	Yes	No	Yes	Yes	No	No	No	Yes	
Estonia (3)	Yes	Yes	Yes	Yes			Yes	Yes	Allocation criteria is set by local governments.
Finland	No	Yes	No	No	No (See "Other")	No	No	Yes	Empty ARA rental apartments (social housing) can be used asylum seekers or those granted temporary protection as a reception center for temporary accommodation of persons or as a regular apartment.
France (1,2)	Yes	No	Yes	No			No	No	People experiencing homelessness; people at risk of eviction; people with temporary accommodation; persons in unhealthy or unfit accommodation; households with children in overcrowded or indecent dwellings; people with disabilities; victims of domestic violence; etc.
Germany	No	Yes	No	No	No	No	No	No	States and municipalities can provide priority housing for certain target groups.
Hungary (1)		Yes					Yes	Yes	
Iceland (1,2)	Yes	Yes	Yes	Yes			Yes	Yes	
Ireland			Yes	Yes			Yes	Yes	Local authorities need to have an allocation scheme determining the order of priority.
Israel (1,2)	No	No	No	No			No	No	Allocated through a lottery.
Italy (1)		Yes	Yes	Yes			Yes	Yes	The criteria for priority allocation in social rental housing depend on the local laws and can include (but are not limited to): situation of severe housing deprivation; family members with physical or mental disabilities; elderly people; young families (below 35 years); families with 3 or more children; single parents; current accommodation in a poor status; overcrowding; refugee status; very low income; eviction notice. Each category is associated with a score on the basis of its

	Time on waiting list	Income level	Disability	Elderly	Asylum seekers	Ethnic/racial minority	Household composition/size	Current housing conditions	Other
									relevance and contributes to a final ranking.
Japan	No	No	No	No	No	No	No	No	
Latvia			Yes	Yes					
Lithuania	Yes	No	Yes	No	No	No	Yes	No	Families with 5 or more children (or with triplets), persons without parental care (group life or independent living).
Luxembourg (1,2)	No	Yes	Yes	Yes			No	Yes	
Malta (1,2)	No	No	Yes				No	Yes	Victims of domestic violence living in shelters, people leaving institutionalised care.
The Netherlands	No	No	Yes	No	Yes	No	No	Yes	About 80% is a waiting list system, and 20% is lottery or a combination of systems. Priority households make up about 20% of all allocations. Reasons for priority allocation include: taking care of family, medical reasons, renovation projects, specific jobs, homelessness, children, or leaving a social institution (recovery, rehab, health care, prison).
New Zealand	No	Yes	Yes	Yes	No	Yes	No	Yes	
Norway	No	Yes	Yes	No			No	Yes	Allocation is determined at municipal level.
Peru	No	No	No	No	No	No	No	No	
Poland									Priority allocation varies by municipality. Priority is usually given to very low income households/households living in poverty, in addition to people experiencing homelessness, the elderly, people with disabilities, youth, etc.
Portugal	No	No	No	No	No	No	No	No	
Slovak Republic (3)	No	No	No	No			No	No	Criteria are set by the municipalities and vary locally.
Slovenia (4)	Yes	Yes	Yes	Yes	No	No	Yes		Position on waiting list based on a number of above-mentioned different criteria.
South Africa (1)	No	Yes	No	No			No	No	
United Kingdom: England (1)	No	No	Yes	No			No	No	Local authorities must give 'reasonable preference' to people who are homeless; people living in overcrowded, unsatisfactory or insanitary accommodation; people who need to move on medical or welfare grounds, including grounds relating to a disability; and people who need to move to avoid hardship to themselves or others. Additional criteria can be set at local level.
United States (4)	Yes	Yes	Yes	Yes	No	No	Yes	Yes	Nationally, eligibility for HUD rental assistance is based on income. State and local housing agencies and providers can adopt additional priorities based on a variety of options and restrictions.

Notes: Empty cells are missing information or QuASH responses stating uncertain. 1. All information except from asylum seekers and ethnic/racial minorities is based on 2021 QuASH responses. 2. Responses based on replies to previous QuASH rounds. 3. Time on waiting list, income level, disability, elderly, household composition/size, and housing conditions based on 2021 QuASH responses. 4. Other based on 2021 Quash responses. Source: OECD Questionnaire on Affordable and Social Housing (QuASH), 2023.

Support measures for social housing introduced in response to the COVID-19 crisis.

Among the countries responding to the QuASH, 12 countries reported having introduced new or extending existing support measures for the social housing sector in response to the COVID-19 pandemic: Australia, Austria, Belgium (Flanders), Hungary, Ireland, Israel, the Netherlands, Poland, Portugal, the Slovak Republic, South Africa, and the United States (Table PH4.3.6). Eight countries developed new support measures, while four adapted or extended existing measures that were in place before the COVID-19 pandemic. At the same time, a number of additional countries have passed measures that span across different tenure forms, such as eviction bans for social and private rental housing. For instance, in Germany, tenants and landlords in the social housing sector benefitted from the general support measures provided to tenants, landlords, households and companies. These are discussed in indicators HC3.3 Evictions and PH.5.1 Rental regulations, and in the OECD Policy Brief [“Building for a better tomorrow: Policies to make housing more affordable”](#).

Some of the measures specific to the social housing sector include supports or stimulus packages for landlords and social housing providers that aim to boost maintenance of existing as well as construction and acquisition of new social housing units (Australia, Belgium, Poland, the Slovak Republic and the United States). For example, the CARES Act in the United States provided extended capital for the Public Housing Operating Fund to maintain normal operations during the pandemic. Social rental agencies in Belgium (Flanders) received dedicated funding to hire part-time employees tasked to extend their dwelling stock to release pressure on the social rental market. Other measures directly support tenants, for example by lowering the rent for those whose income has been negatively affected by the COVID-19 pandemic (Ireland, Israel, the Netherlands, Portugal), suspending regular rent increases (Austria, Hungary) or postponing rental payments (Austria) and/or evictions (Austria, Ireland, the United States).

Table PH4.3.6. Social housing measures introduced and/or modified in response to the COVID-19 pandemic.

Country	Measure name	Level of government	New or adapted?	Who receives?	Details
Australia (1)	State and territory government stimulus packages	Regional/state	Adapted/expanded	Landlords & tenants	Housing stimulus packages varying by state and territory government, including funds for the maintenance and construction of social dwellings.
Austria (2)	Multiple measures, including COVID 19-Gesetz-Armut (§5b); Lebenshaltungs- und Wohnkosten-Ausgleichs-Gesetz – LWA-G StF: BGBl. I Nr. 93/2022 Additional measures introduced in the context of the cost-of-living crisis.	National	New	Tenants	Related to the recent pandemic and price increase crisis, certain national measures were introduced: <ul style="list-style-type: none"> - Regarding the pandemic, rent/mortgage payments for a limited period (4-6/2020) could be postponed until 4/2021, and evictions due to rent arrears in this period were suspended until 6/2022. - To prevent a wave of evictions after the end of the that period, a financial aid scheme was introduced: COVID 19-Gesetz-Armut (§5b). Households at risk of eviction could be granted financial aid until the end of the year 2023. - In addition (Lebenshaltungs- und Wohnkosten-Ausgleichs-Gesetz – LWA-G StF: BGBl. I Nr. 93/2022), rent increases for a part of the rental stock were suspended in 2021 and some of the provinces introduced additional financial aid for tenants (with limited income; e.g. Vienna). - In the context of the cost-of-living crisis, households affected by rent increases that put them at risk of eviction are granted financial support either to cover increased costs or to change accommodation from 2024 onward.
Belgium (Flanders) (1)	Subsidy for SRA's to hire a part-time employee to extend building stock (<i>subsidie aan SVK's voor het aanwerven van een halfzijdse prospectiemedewerker</i>)	Regional/state	New	Landlords	Subsidy of EUR 25 000 for social rental agencies to hire a part-time employee to extend the building stock.
Belgium (Flanders) (1)	Lowering the minimum interest rates for social loans (<i>verlaging intrestvoet bijzondere sociale leningen</i>)	Regional/state	New	Landlords	Reduction of interest rate from 2% to 1.6% for new social loans.
Belgium (Flanders) (1)	Payment deferment of social loan (<i>betalingsuitstel sociale lening</i>)	Regional/state	New	Landlords	Option to postpone payment of the mortgage loan in the case of temporary or full unemployment resulting from Covid-related reasons.
Hungary (1)	Prohibition of termination (<i>felmondási tilalom</i>)	National/federal	New	Tenants	The landlord of a municipal or state-owned apartment may not terminate the contract or increase the rent.
Ireland (2)		National/federal	New	Tenants	Local authorities were asked to prioritise downward rent reviews in cases where households had suffered a loss of income due to the impacts of Covid 19. Local authorities were asked to suspend any tenancy terminations while travel restrictions were in place due to Covid 19 except in cases of severe anti-social behaviour.

Country	Measure name	Level of government	New or adapted?	Who receives?	Details
Israel (1)	Discounts (<i>הנחות</i>)	National/federal	Adapted/expanded	Tenants	Tenants of general public housing received an extension of regular discounts.
Netherlands (1,2)	One-time rent reduction for tenants with lower incomes (<i>eenmalige huurverlaging huurders met een lager inkomen</i>)	National/federal	New	Tenants	Mandate for housing associations to decrease the rent of low-income tenants if their rent was deemed too high.
Poland (1)	Government Housing Development Fund (<i>rzadowy fundusz rozwoju mieszkalnictwa</i>)	National/federal	New	Landlords	Fund to help finance municipalities expenditures on acquisition of shares in new or existing social housing initiatives.
Poland (1)	The Act of 10 December 2020 (<i>ustawa z dnia 10 grudnia 2020</i>)	Joint (shared across levels of government)	Adapted/expanded	Landlords & tenants	Variety of financial funds supporting housing development, including some dedicated to development of social housing initiatives or acquisition of shares in social housing initiatives.
Portugal (1)	Law 4-C/2020 of April 6 (<i>lei 4-C/2020, de 6 de abril</i>)	Joint (shared across levels of government)	New	Tenants	Possibility to lower the social housing rent for COVID-related reasons during the state of emergency.
Slovak Republic (1)	Postponement of loan payment (<i>odklad spätok úveru</i>)	National/federal	New	Landlords	Potential postponement of loan payments to the State Housing Development Fund for a maximum of 12 months.
South Africa (2)		National/federal	New	Tenants	R300 000 000 rent relief was allocated to the Social Housing Regulatory Authority (SHRA) in 2020/21 to help ease financial constraints of defaulting tenants.
United States (1,2)	CARES Act (<i>Coronavirus Aid, Relief, and Economic Security Act</i>)	Joint (shared across levels of government)	Adapted/expanded	Landlords & tenants	Funding of USD 12.4 billion for a variety of programmes intended to protect tenants, including extended funding for the Public Housing Operating Fund. In addition, in March 2020, the Centers for Disease Control issued a temporary national moratorium on most evictions for nonpayment of rent to help prevent the spread of coronavirus. The moratorium applied to tenants in rental properties that receive federal funding or have federal government-backed mortgages. The order was extended multiple times and ended in August 2021

Notes: 1. Measure reported in the 2021 OECD Questionnaire on Affordable and Social Housing; 2. Measure reported in the 2023 OECD Questionnaire on Affordable and Social Housing.
Source: OECD Questionnaire on Social and Affordable Housing (QuASH), 2021 and 2023.

Sources and further reading

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