# Tower Hamlets Community Fund Report on Findings From The Consultation Survey

Final Report 3rd November 2015

# **Summary of Key Findings**

# 1. Purpose of and Approach to Survey

A consultation survey with local Voluntary and Community Sector Organisations (VCSOs) was carried out during a four week period from late September to late October 2015. Its purpose was to capture their views on the scope, purpose and award criteria related to the proposed Tower Hamlets Community Fund (THCF). This was based on an electronic questionnaire survey process that was announced through the web sites of the Council and Tower Hamlets Council for Voluntary Services and through announcements in the local press and social media. A total of forty three responses were received from which the following insights have been gleaned.

# 2. Demand for THCF Funding

There is likely to be strong demand for the Tower Hamlets Community Fund. Two thirds of the organisations who responded to the survey expected to be applying to it for funding a wide range of community-related projects. Whilst a diverse range of applications for funding is envisaged, the most prominent requirements will be for quality assurance accreditations, training of management and staff and furniture, IT and other equipment.

# 3. Views on the Proposed Scope of the Fund

Most organisations agree with the scope of activities, services and functions that were suggested to be funded through the scheme. It is seen by some as important in filling the gap in provision not available from mainstream grant funding. Several organisations advocate an open minded approach to funding, based on the merits of individual projects particularly those that are already achieving valuable community benefits but need funding for such activities to be continued.

The majority of organisations also consider the proposed list of what is unlikely to be funded to be appropriate. However, some organisations have expressed views that charging for funded events should be possible and that, providing that this is not excessive, should be allowed as it represents good value for money. Some other organisations have suggested that some funding should be allocated to staff costs and as a contribution to overheads (this has not typically been council policy).

#### 4. Identified Priorities

There are mixed views as to whether any particular activities should be prioritised for funding. However, building board and management capacity, quality assurance accreditations and measures to make organisations more effective are seen as priorities by a number of organisations. These are seen as important in achieving self-sufficiency and the quality of what is delivered to communities. Just over half (54%) believe these services should be offered via the THCVS, under separate funding arrangements.

Promotion of social cohesion and related activities where individual community members take the lead are seen as priorities by various organisations. As regards other possible priorities, naturally, individual views are likely to be influenced by the aims of the organisations people work for.

# 5. Views on Funding Allocations

The majority of organisations believe that no specific rules should be set as to how funds are distributed and that it should depend on who bids in for what, rather than for example favouring less projects with larger funding awards or smaller awards to a wide range of organisations. Just over half believe with the suggestion that a cap of £5,000 should be placed on funding for events.

# 6. Views on Eligibility Criteria

The proposed eligibility criteria are agreed by most organisations, except for one aspect – the stipulation that at least 4 trustees of organisations must live in the borough. Less than a quarter of organisations consider this either important or very important. Views have been expressed that valuable expertise and experience on the boards of community organisations from those living outside the borough should be welcomed and not be excluded.

However the inclusion of one or more local residents, particularly those who are representative of the relevant beneficiary communities, is seen as useful in feeding in knowledge and understanding of relevant community needs and issues.

Other eligibility criteria that have been suggested are that the activity must take place within Tower Hamlets and that organisations to be funded should have a suitable track record and references. The point has also been made that some outcomes may not be immediate and that related impacts may be long term.

## 7. Views on Assessment Criteria

As regards the proposed assessment criteria, these appear to be agreed by the vast majority of respondents.

# 8. Other Suggestions Put Forward

Amongst other suggestions of a more general nature that have been fed in are to keep funding existing projects that are working well rather than just inventing and/or encouraging new schemes, keeping it easy to apply for funds for projects, and more emphasis on collaborative work. As one organisation has commented, funds should be allocated fairly, equally, and justly based on full knowledge of the organisation applying.

#### 1. Introduction

## 1.1 Purpose of the Survey

The Tower Hamlets Community Fund (THCF) is a small grants programme aimed at providing a source of funding to local Voluntary & Community Sector organisations. This is a new integrated fund which seeks to ensure that supported activities make effective contributions to the Tower Hamlets Community Plan and that local voluntary & community sector bodies are able to take forward improvements to the way they are set up and operated in order to maximise the impacts and benefits they bring about to the communities they purport to serve.

This funding initiative builds on the success of the former Mayor's Community Chest and the Mayor's Community Events initiatives which made up the Council's previous small grants programmes. The Tower Hamlets Community Fund is considered a particularly important source of support for those organisations that are not traditionally supported through the Council's major grant regimes such as the Main Stream Grants Programme.

Against this background, this survey was conducted in order to capture the views of local organisations about the types of activity the fund should cover, how it should be structured and operated and what factors should determine the eligibility of applicants for receiving funding.

#### 1.2 Approach and Method

The survey was conducted by way of an on-line survey. This was launched on 25<sup>th</sup> September 2015 by way of announcements on the web sites of the Tower Hamlets Council for Voluntary Services and the London Borough of Tower Hamlets followed by announcements issued by the LBTH Communications Team through social media, East End Life, the East London Advertiser and local BME media, inviting local third sector organisations to respond to the survey. Respondents were given four weeks to submit their answers, with the survey closing on Friday 23rd October.

Key aspects on which the survey sought to capture views were:

- Prospects of VCS organisations applying for funding from this programme over the next 2-3 years and for what types of activities.
- Views on the range of activities that should be eligible for THCF funding given the needs of local third sector organisations and whether any particular activities should be prioritised.
- Views on the size of funding awards.
- Likely demand for support in the training, advice and guidance of board members and trustees and the preparation of plans and strategies and how the funding for this should be approached.
- Views on the eligibility criteria that should be adopted to assure a fair and equitable approach to grant funding.
- Views on proposed assessment criteria to be adopted for the fund.

 Any other views, comments or suggestions as to how the Tower Hamlets Community Fund should be applied.

A full list of questions covered in the survey is set out in Appendix 1.

# 2. Acknowledgements

The contributions of the following bodies are acknowledged.

- Tower Hamlets Council for Voluntary Services for their advice on the survey design and support in publicising the consultation survey.
- The Communications Team of the London Borough of Tower Hamlets for their assistance in formulation of the electronic survey questionnaire and their efforts in publicising the survey.
- The forty three local VCS organisations who participated in the survey.

# Findings from the survey are set out below.

## 3. Likely Demand for the Tower Hamlets Community Fund

Of the 43 Respondents, 26 (67%) stated that they expected to apply for funds under the THCF scheme over the next 2-3 years. A further 14 (33%) stated that they were not sure. No organisation stated that they had no intention at all to apply for the funding.

Will your organisation apply for funding from this programme over the next 2-3 years?	No. of Responses	%
Yes	26	67%
Unsure	14	33%

Respondents were asked to indicate the types of activities and services for which respondents expect to apply for THCF funding. The profile of responses is set out below.

## Activities and Services for Which Respondents Expect to Apply for Funding

Activities and Services	No. of
	Responses
Quality assurance and other accreditations	12
Arts, cultural and creative activities	10
Furniture, IT & other equipment	10
Community cohesion, inter-organisational and inter-cultural activities	9
Training of management and staff	8
Employment and skills development	8
Organisational development and business planning	6
Building refurbishment, repairs and DDA	6

Activities and Services	No. of
	Responses
Events and festivals	6
Youth activities	6
Sports and recreation activities (various)	6
Study support and raising education attainment	5
Help with core costs and overheads	5
Health and wellbeing activities	5
Volunteering opportunities and training	4
Children's and nursery activities	4
Activities and support for the disabled	3
Innovative projects and events	3
Digital inclusion	2
SEN related activities	2
Activities related to mental health	2
ESOL and languages	2
Support in diversifying services offered	1
Women's activities and empowerment	1
Conferences	1
Family support	1
Leadership training for young people	1
Drug rehabilitation	1
Citizen's rights awareness	1
Fundraising support	1

#### 4. Views What Should be Funded

#### 4.1 Views on Activities to be Funded

In the course of the survey it was explained that The Tower Hamlets Community Fund is able to support a wide range of activities, services and functions which can clearly demonstrate a need and demand, including:

- Activities designed to improve an organisation's infrastructure, including: staff training; quality assurance accreditation; essential improvements to an organisation's management systems; and training for board members; staff and volunteers.
- Small capital works or equipment purchases, which may also be used as a contribution toward a larger proposal including building improvements to meet DDA requirements, improved access or security or repair or replacement of fixed equipment.
- Purchase of furniture, equipment or specialist software essential for the effective delivery of the organisation's contracted or designated activities/services for which the organisation is either contracted to deliver or which is clearly part of the organisation's stated objects/priorities.

- Organisational and inter-organisation development, including plans, strategies, partnership initiatives and network development.
- Properly managed and supervised events or open days involving the local community for the purposes of: celebration; awareness raising; improving the health, wellbeing and enjoyment of local residents; and improving community cohesion.
- Innovative projects and other initiatives consistent with the purpose of the fund.

Respondents were asked whether they thought the range of activities listed above is adequate, given the needs of the local Voluntary and Community Sector.

27 (67%) of organisations stated that they believed this range of activities would be adequate, with 7 (18%) indicating that they did not think it was and 6 (15%) indicating that they were unsure.

Do you think the range of activities listed above is adequate, given the needs of local Third Sector Organisations?		%
Yes	27	67%
No	7	18%
Don't Know	6	15%

# 4.2 Suggestions as to Other Activities to be Funded

Respondents also highlighted a number of other activities that should be considered for funding. Most organisations submitted comments on this question.

- Of these, four stated that they thought the proposed list of activities services and functions activities eligible for funding was wide ranging and sufficiently broad and gave any organisation applying for funds good scope to choose from.
- Two organisations indicated that the fund would be useful in filling gaps, given that programmes like MSG are more strategic and that smaller projects need a source of Council funding to apply to. For example, money for development and training is very hard to find elsewhere.
- Two organisations alluded to the need to be open minded about maintaining activities through funding that have already worked well and need to remain open. Of these, one questioned the need for projects to be innovative; questioning the requirement to be re-inventing the wheel.
- A number of additional items for funding were suggested such as funds to assist small local groups that meet regularly and the work of many small to medium community groups who provide services right across the board and often over weekends when large organisations do not operate.
- A few organisations suggested that the fund should contribute to overheads such as rent or the fixed costs of staff setting up projects.

#### 4.3 Views on Prioritisation of Activities to be Funded

17 (45%) of organisations believed that some activities should be prioritised, whereas 12 (32%) believed that no priority should be applied, with 9 (24%) being unsure.

Do you think there should be any activities that should receive more priority for funding from the programme than others? If so, what should these be?		%
Yes	17	45%
No	12	32%
Don't Know/Unsure	9	24%

As regards specific activities that respondents considered should be prioritised, views expressed included the following.

- Several organisations mentioned capacity building support and quality assurance accreditations for various reasons, such as enabling groups to become more self-sufficient long-term and things that have lasting effect like training that leads to new ways of working and can improve the quality of services to beneficiaries. Quality accreditation can assist with levering other funding into the borough.
- A number favoured prioritising activities hard to fund from elsewhere, particularly
  for needs for which it is very hard to secure funding particularly where they are
  unfashionable. One such example cited was recovery from addiction, which is
  considered to have more social stigma than other activities. (It should be noted
  that this activity does already receive funding from the Council through
  contracted provision).
- Several others highlighted promotion of social cohesion, such as building intergenerational and inter-cultural relationships, social inclusion or interfaith activities. On a related note, others highlighted community focused, local initiatives with local community members taking a lead role in the development and delivery of projects.
- Community education such as language support, homework clubs, parent empowerment, BME school governor recruitment, youth services and community cultural activities.
- Disability should be highlighted as children with disabilities are often made to "fit in" with other activities.
- Funding programmes to tackle the endless cycle of child poverty, given that Tower Hamlets has the highest child poverty rate in the UK.
- Activities that are shown to work, but can't be funded because it has happened before.
- Emergency funds- for example short term help for any organisation facing crisis because of funding cuts.

 A number of more miscellaneous activities such as sustainable arts activities, well-being, IT for more people of all ages, support for elderly carers, more advice centres and more provision for SEN were mentioned.

As one organisation commented, this is a difficult question to answer as people's priority will be the aims and purpose of their own organisation and the needs of the people they work with. All voluntary organisations are striving in hard times to achieve the best for people and communities and each application should be taken on an individual basis.

## 5. Demand for Training and Advice and Guidance for Board Members

With regard to strategic development and the training of board members, organisations were asked what types of support in the form of training or tailored advice and guidance they expected would be needed over the next 2-3 years. As can be seen from the responses below, capacity building for delivery, strategic development and business planning and fundraising were the most frequently mentioned requirements.

It is clear that some organisations have requirements for fundamental capabilities such as financial management, understanding of the governance responsibilities of their boards and for acquiring expertise in partnership development.

Some also mentioned a need for better understanding of how the Council can support them and for access to expert advisors as and when needed.

One organisation highlighted the fact that training for the staff, board members & trustees of the organisations can definitely develop and strengthen the organisations which helps local communities in different ways. Organisational and interorganisational development can help organisational partnership and community cohesion by taking projects for the local communities in partnership and multi-cultural events help promote community cohesion.

With regard to strategic development and the training of board members, what types of support in the form of	No. Respondents
training or tailored advice and guidance do expect your	Stating
organisation will require over the next 2-3 years?	J
Management capacity for implementation and delivery of	6
projects or new types of work	
Vision Building, strategic development & business planning	4
Fundraising & funding proposals	4
Financial management	3
Governance, trustee roles and responsibilities	3
Charitable and/or company law	2
Understanding help available from the council	2
Partnership development	2
Ad-hoc links to knowledgeable advisers	2
Presentation support	1
Monitoring systems	1
Re-branding	1
Prevention training, British values and safeguarding	1
Change management	1

With regard to strategic development and the training of	
board members, what types of support in the form of	Respondents
training or tailored advice and guidance do expect your	Stating
organisation will require over the next 2-3 years?	
Don't yet know	4
None	6

With regard to funding for training of board members and trustees and the preparation of plans and strategies, respondents were asked to comment on the two options in the table below. Of the 39 organisations who responded to this question. 21 (54%) believed that these services should be offered by the THCVS under separate funding arrangements with just 33% believing that organisations should have to apply to the THCF specifically for these activities.

With regard to funding for training of board members and trustees and the preparation of plans and strategies,		%
which approach do you consider most appropriate?	responses	
Organisations should have to apply specifically for funding for	13	33%
these activities through the Tower Hamlets Community Fund		
These services should be offered via the THCVS, under	21	54%
separate funding arrangements		
Don't Know	5	13%

# 6. How Funding Should be Allocated

# 6.1 Views on Options for Distribution of Funding

Respondents were asked to give views on three alternative options for the allocation of THCF funding.

- a) Make grant awards to fewer organisations and for larger amounts (e.g. £5-10,000)?
- b) Distribute grants to a wider range of organisations and initiatives, but of a smaller amounts (e.g. £1-5000)?
- c) No specific mix just see who bids in for what?

In allocating funds from the programme, which of the following approaches do you consider most appropriate for the council to take?	Respondents Preferring this Option	%
Make grant awards to fewer organisations and for larger amounts (e.g. £5-10,000)	4	11%
Distribute grants to a wider range of organisations and initiatives, but of a smaller amounts (e.g. £1-5000)	11	30%
No specific mix – just see who bids in for what	22	59%

As can be seen, the majority of respondents (59%) do not favour any rigid policy about the size of grants and believe the fund should respond to what organisations bid for. However, a sizable proportion of respondents (30%) indicated a preference for distributing the fund widely with smaller amounts of funding, with only 11% favouring fewer grants but for larger amounts.

## 6.2 Views on Funding Cap According to Income Levels

Respondents were asked if they think there should be a cap applied on the fund to organisations above a certain annual income level and if so, what do you think this income level should be.

Do you think there should be a cap applied on the fund to organisations above a certain annual income level?	Responses	%
Yes	13	35%
No	17	46%
Unsure/Don't Know	7	19%

Views on this issue were mixed, with 46% of the 37 organisations responding considering that there should be no cap, 35% of the view that there should be a cap and 19% unsure.

# 6.3 Views on Funding for Events

As regards funding for events, respondents were asked whether this should be capped at £5,000 per event.

58% believed that this should be the case, with 25% being unsure and 18% not in agreement to this proposal.

Do you agree with the proposal that funding for events should be capped at £5,000?	Responses	%
Yes	27	57.5%
No	3	17.5%
Unsure/Don't Know	10	25%

## 7. Views on Activities unlikely to be Funded

# 7.1 Proposals as to Activities Unlikely to be Funded

Respondents were first informed that it is proposed that the following activities, services and functions would not normally be funded by the Tower Hamlets Community Fund:

a) of a political or religious nature

- b) related to day-to-day running costs of the applicant's organisation, such as utility bills, rent, insurance, or ongoing staff costs related to day-to-day work
- c) duplicating those generally funded through other Council grant programmes and/or already in receipt of grant funding either from LBTH or other funders
- d) for premium priced ICT equipment
- e) for events subject to charging of entry fees
- f) for costs incurred in putting together an application for this fund
- g) for contingency funds to cover unforeseen or upcoming general organisational running costs
- h) work associated with land or building projects where the ownership or lease is not yet in place
- i) costs of fundraising activities for your organisation or others
- j) items to be purchased on behalf of another organisation
- k) repayment of loans/interest or for the payment of fines
- any project or activity that cannot be completed within 12 months of receiving the grant
- m) the purchase of alcohol.

## 7.2 Views on Whether Any Excluded Activities Should be Funded

Respondents were asked if they thought that any of these activities, services or functions should, in fact, be funded.

Do you think there are any activities above that should be funded?	Responses	%
Yes	12	31%
No	23	59%
Unsure/Don't Know	4	10%

59% agreed that these should be considered unlikely to be funded, 31% stated that they believed some of the above activities should be funded, with 10% who did not know.

Of fourteen respondents who commented on this aspect, five believed that overheads and day to day running costs should be funded. One felt that grants should be available to a charity if their work is valuable and is facing closure and this may include running costs. However, another organisation felt the reverse – that funding should be specifically for each individual new project. Other points raised were:

- events that charge fees should not always be excluded from funding, because there may be events where is appropriate to charge as part of income mix for good value.
- fundraising activities should be funded
- reasonable costs related to putting together the application and completing the report should be included
- organisations should be able to apply for an element towards the staff time of existing workers in running the event or preparing a quality accreditation portfolio, otherwise these issues remain barriers to successful achievement.

## 7.3 Views as to Other Activities that Should be Excluded from Funding

When asked if there are other activities or items that should be added to the list of what is unlikely to be funded, 47% said no and 37% said they did not know with 6% indicating that other with items should be added to this list (38 responded).

Are there any other activities or items that should be added to the list of what is unlikely to be funded?	Responses	%
Yes	6	16%
No	18	47%
Unsure/Don't Know	14	37%

#### Such items mentioned were:

- anything premium priced, such as inflated costs for food at networking events
- repairs/alterations to buildings owned by private landlords
- one-off pilot projects
- long-term evaluation of project outcomes, where funding is only within 1 year.

## 8. Views on Eligibility and Assessment Criteria for Grant Awards

## 8.1 Views on Funding Eligibility Criteria

Respondents were asked to give their views on a series of eligibility criteria for funding by ranking them from 1 to 5, where 1 = unimportant and 5 = very important.

39 out of the 43 respondents replied to this question. As can be seen from weighted average of the rankings in the table below, the majority of respondents are broadly in agreement with the eligibility criteria proposed for all criteria, except for the stipulation that an organisation applying for funding should have a management committee or board of trustees with at least 4 of its members living in the borough. This received a weighted average ranking of 2.9, whereas all other criteria scored weighted average raking for between 4.21 and 4.56.

Bearing in mind the need to assure a fair and equitable approach to grant funding, from the eligibility criteria listed below, please rank these on a scale of 1 to 5 where 1 = unimportant and 5 = very important.	Weighted Average
Be a not-for-profit group based-in Tower Hamlets	4.56
Be a properly constituted organisation with a governing document such as a constitution	4.33
Have a track record of delivery in Tower Hamlets	4.21
Have a Management Committee or Board of Trustees with at least 4 of its members living in the borough	2.90
Have an Equal Opportunities Policy that sets out how the organisation and services will be provided and how it will abide by anti-discriminatory legislation	4.38
Have a bank or building society account (in the organisation's name) which has at least 2 signatories from the Management Committee or	4.26

Bearing in mind the need to assure a fair and equitable approach to grant funding, from the eligibility criteria listed below, please rank these on a scale of 1 to 5 where 1 = unimportant and 5 = very important.	•
Board of Trustees, who are not related	
Have current and appropriate insurance that covers its activities, premises & equipment, staff and volunteers as well as service users where relevant	4.36

# 8.2 Views on Importance of Trustees Being Resident in the Borough

The survey went on to probe the question of how important it would be for some trustees of organisations applying for funding to live in the borough in further detail. The responses indicate that just over half of organisation believe that this criterion is either not necessary or not that important, with less than a quarter considering it to be important or very important.

Please indicate how important it would be for some trustees of organisations applying for funding to live in the borough?	Responses	%
Not necessary at all	14	36%
Not that important	7	18%
Of some importance	9	23%
Important	4	10%
Very Important	5	13%

Respondents were then asked if they thought there should be a minimum number, and if so to indicate what that number should be.

If you think there should be a minimum number, please indicate what you consider that number should be?	Respondents
None	2
1	2
2	4
3	1
4	1
5-6	1
At least 25%	1
60%	1
70%	1

Comments put forward on this issue by some respondents highlighted the issues that need to be considered with regard to where trustees reside.

 Some felt that this was not relevant because the selection of trustees depends upon on their particular expertise, experience, skills, competence and commitment, as key expertise may not be available locally. As one respondent pointed out, it is really difficult to recruit really good trustees who are not only engaged but have skills and expertise that will really help the organisation; restrictions such as a high resident trustee quota for a small organisation will hinder its development.

- Another commented that if the Council insists on a particular number of trustees living in Tower Hamlets, some organisations will "load" their boards with token residents who will not necessarily be competent or committed to governing an organisation.
- On the other hand, the view was expressed that it would be ideal to have at least one trustee who knows the borough and that organisations should be encouraged to involve service users at governance level.

## 8.3 Suggested Additional Eligibility Criteria

With regard to additional eligibility criteria that should be added in order to ensure fairness, value for money or impact, the following factors were mentioned.

- Length of operation and delivery in the borough
- Insurance should be a condition of the grant rather than eligibility for the grant, as for some small organisations this may be their first piece of funding
- Recognition that impact is not necessarily high numbers and that some charities' work is long term and outcomes are not immediate
- For the committee to include local people that understand the need
- Diversity of the board members and trustees and ensuring that they are representative of the local community rather than to purely living in the Borough
- That the activity takes place in Tower Hamlets specifically
- Charity registration
- A good track record with relevant experience and referees to back it up is sufficient

One respondent highlighted the advantages held by larger organisations who have finance and other staff who are not directly involved in delivering services and therefore have more time to spend on fundraising. These organisations are more likely to be better funded than smaller grass-roots organisations.

#### 8.4 Views on Assessment Criteria for Funding Applications

Within the survey, respondents were informed of the proposal that the assessment of applications will, amongst other things, consider:

- Whether the applicant organisation meets the Eligibility Criteria
- Whether the activities/services for which funding is sought are suitable to be funded under this programme and are consistent with the expressed purpose of the fund
- Whether the application is clear as to what is being asked for
- Whether costings are accurate, appropriate and represent good value for money
- Whether the need and demand for the activity or service has been adequately and accurately demonstrated

- Whether the proposed activity/service will contribute to the aims and aspirations of the Tower Hamlets Community Plan
- The outcome or difference the proposed project/event/activity will make within the context of the targeted beneficiaries and/or the local community as a whole.

Respondents were asked to indicate if they felt these criteria were reasonable. Only 1 respondent said no with 32 (86%) indicating that they thought they were, with 4 (11%) unsure.

Do you think these criteria are reasonable?	Responses	%
Yes	32	86%
No	1	3%
Unsure/Don't Know	4	11%

#### 9. Other Views, Comments and Suggestions Offered

Respondents were invited to put forward any other comments or suggestions they considered appropriate. The following points were put forward.

- One organisation was keen to get the point across that the Council should not try to re-invent the wheel by favouring innovative projects over existing work that has been proven to work well in improving people's quality of life, health and financial position.
- Another highlighted the importance of keeping it easy to apply for projects and sustainable work within the Borough, even though organisation development is vital in improving efficiency.
- Another proposed more emphasis on collaborative work and approaches that build partnerships so that residents' best interests are at heart.
- The application process needs to be accountable but also appropriate to the types of organisations applying. For example a local Church of England does not have a written constitution.
- Funds should be allocated fairly, equally, and justly based on full knowledge of the organisation applying.
- A concern was raised that funding of THCVS by the local authority means it is less likely to serve as a voice to raise concerns about processes by which the community sector is managed and this arrangement could muzzle disparate voices and that mechanisms should be built in to address this problem.