

**GREATER MANCHESTER COMBINED AUTHORITY**

Date : 25 September 2020

Subject: Greater Manchester VCSE Accord – Investment in VCSE sector Leadership and Infrastructure

Report of: Cllr Allen Brett, Portfolio Lead for Community, Co-operatives, Voluntary Sector and Inclusion; and Pam Smith and Andrew Lightfoot, Portfolio Leads for Community, Co-operatives, Voluntary Sector and Inclusion

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**PURPOSE OF REPORT**

In July 2019, GMCA Members agreed to undertake a review of CA investment in the Voluntary, Community and Social Enterprise (VCSE) sector, including the grant funding which goes into VCSE leadership and infrastructure organisations at a GM level. The scope of the review has been expanded to include the GM Health and Social Care Transformation Fund allocation under the Memorandum of Understanding with VCSE Leaders. Following the update provided at the meeting in July 2020, this paper presents an investment proposal for adoption from April 2021, for Members' approval.

**RECOMMENDATIONS:**

The GMCA is asked to:

1. Note the work undertaken to review GMCA investment with VCSE organisations in the light of the evolving GM policy context.
2. Approve the investment proposal contained at section 3 of this report, and delegate approval to the GMCA Treasurer, in consultation with the Community, Co-operatives and Inclusion Portfolio Leader and Chief Executive to award grant agreements, subject to final agreement of GMCA budgets for 2021/22 onwards.

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#### BACKGROUND PAPERS:

- Information about GM VCSE Leadership Group and VCSE Policy Paper – <https://vcseleadershipgm.org.uk/our-work/>

<b>TRACKING/PROCESS</b>		[All sections to be completed]
Does this report relate to a major strategic decision, as set out in the GMCA Constitution		Yes
<b>EXEMPTION FROM CALL IN</b>		
Are there any aspects in this report which means it should be considered to be exempt from call in by the relevant Scrutiny Committee on the grounds of urgency?		No
GM Transport Committee	Overview & Scrutiny Committee	
N/A		

#### Equalities Implications:

The VCSE Accord includes a commitment from the VCSE sector to support a city region where all residents are valued and included. The Policy Paper to which this report refers provides greater detail on the role of the sector in engaging with, representing, supporting and providing services for all communities of identity. As such the work referred to in this report and the grant funding which is proposed, will serve to actively deliver GMCA's duties under the Equalities Act.

#### Climate Change Impact Assessment and Mitigation Measures –

VCSE organizations take an active role in environmental protection and are an active partner in the GMCA Green Strategy work. The Policy Paper to which this report refers provides greater detail on the role of the sector in environmental activities. Grant recipients will be expected to fulfil GMCA requirements for climate change mitigation and carbon neutrality.

**Risk Management** – None

**Legal Considerations** – Section 5 (relating to contractual arrangements with VCSE organisations funded by GMCA)

**Financial Consequences** – Revenue – Section 5 (relating to a review of GMCA investment in the VCSE sector)

## Financial Consequences – Capital – None

Number of attachments included in the report: 0:

Comments and/or recommendation from the relevant Overview & Scrutiny Committee – this paper was discussed by Corporate Issues and Reform Scrutiny on 8<sup>th</sup> September 2020

### 1. BACKGROUND

1.1 The work described in this paper is set within a period of extreme demand and dependence placed on both the public and VCSE sectors. It is also a time of great uncertainty. Local authority and other public budgets are under immense pressure and that budgeting will have a *direct impact* on VCSE organisations in terms of grants and commissioning, but also an *indirect impact* – reductions and pressures in public services often displace need and puts more pressure on charities and communities. Moving forwards and into the ‘Living with Covid’ and recovery planning period, VCSE active involvement will be key if GM is able to bring society and the economy back together and address the emerging priorities of tackling inequalities, building confidence, behaviour change, and co-design of a resilient city region. Put simply, this is about sharing responsibility and risk as public sector and VCSE sector work together to support the same places and communities.

#### VCSE Accord

1.2 The Greater Manchester Strategy (GMS) sets out the ambition to make Greater Manchester one of the best places in the world. It is a strategy for everyone in Greater Manchester – residents, the VCSE sector, businesses, and civic leaders. But the vision it sets out will only be achieved if GM can build on new approaches which are shaped and driven by our communities themselves.

1.3 As part of the delivery of the GMS, in November 2017 and on behalf of the GMCA, an Accord was signed by the Mayor of Greater Manchester with the VCSE sector, which set out new, improved standards of working with VCSE organisations.

1.4 The Accord acts as a framework for the delivery of the vision set out in the GMS and as a result, the VCSE sector is engaged in the development, governance and delivery of the GMS including relevant consultation and co-design.

#### GM VCSE Leadership Group

1.5 VCSE leaders in GM have come together to form the VCSE Devolution Leadership Group<sup>1</sup>, which seeks to promote the role and involvement of the VCSE sector and communities in devolution, and has given a broader group of VCSE leaders with which to work. Co-ordination and administration of the Leadership Group is funded by the GM Health and Social Care Partnership until the end of June 2021.

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<sup>1</sup> <https://vcseleadershipgm.org.uk/>

- 1.6 The GM VCSE Leadership Group has entered into a Memorandum of Understanding with the Health and Social Care Partnership, which has seen £1.2m of Health and Social Care Transformation Funding flow into the VCSE Leadership Group and the wider sector over the last 4 years. However, although this funding is secure until June 2021, there is no agreement beyond that date, and at this point in time it would be difficult to project likely future funding for the Leadership Group and the sector from GM Health and Social Care budgets. It is proposed that this paper be used to support the reciprocal discussion through the Partnership governance to gauge support for a single joint agreement on VCSE infrastructure support.
- 1.7 As part of the delivery of the VCSE Accord, in January 2020, the GM VCSE Leadership Group published a Policy Paper for the future development of the sector, which is entitled '*Voluntary organisations, Community groups and Social Enterprises (VCSE) in Greater Manchester – the next 10 years*'. The paper describes the role of VCSE anchor organisations and local VCSE infrastructure organisations which support and facilitate the operation of the wider sector, as well as that of the specialist groups and organisations which support, represent and champion particular communities of identity or experience. It builds from both the VCSE Accord and the Memorandum of Understanding with the GM Health and Social Care Partnership, bringing these together under one approach.
- 1.8 The Leadership Group, the VCSE Accord, and the Memorandum of Understanding with the GM Health and Social Care Partnership have been recognised as being nationally significant in terms of the progressive collaboration between VCSE organisations and their partners, and the Policy Paper is ground-breaking for the sector in its creation. GM is leading the way in terms of the strength of its VCSE leadership and partnership working.

#### VCSE Activities during the Coronavirus pandemic

- 1.9 The VCSE response to the Covid-19 emergency across GM has been incredible in its strength, its depth and the speed at which it was been mobilised. VCSE organisations of all sizes, as well as community volunteers, have offered and continue to provide their support, and are integrating with emergency support structures at this time. The sector has been quick to adapt at pace and with a huge degree of accuracy and efficacy to meet the needs of GM communities. Early feedback shows that around two thirds of VCSE organisations have changed the way that they work to respond to the current crisis.
- 1.10 However, this response has not been without its challenges, and VCSE leaders have identified a number of risks and issues which are inhibiting their capacity to work effectively as part of the emergency effort. In May 2020, the GM Strategic Coordination Group discussed a number of supportive actions which might improve the resilience of the VCSE sector and its ability to provide sustained and integrated services. These actions included closer working with VCSE leadership across GM and within individual districts, and the creation of a sustainable VCSE 'ecosystem' which outlasts the current emergency. It will be important that GMCA and the Health and Social Care Partnership are able to add

value to the work taking place in the individual districts involving VCSE sector organisations, through its support and investment at a GM level.

## **2. GMCA INVESTMENT IN THE VCSE SECTOR**

- 2.1 In July 2019 GMCA members agreed that a review be undertaken of all investments and grants made by GMCA into VCSE organisations, and that this review considers alignment with the objectives and principles set out in the VCSE Accord. The subsequent publication of the GM VCSE Leadership Group's Policy Paper has allowed a clear blueprint for the delivery of the Accord, and framework for GMCA and the Health and Social Care Partnership to support successful delivery of the sector transformation described in that Paper, in order to arrive at a clear funding strategy which maximizes the benefits realised in terms of delivery of the GMS.
- 2.2 At its meeting in July 2020, in response to a paper deferred from March, GMCA members agreed to work with the GM VCSE Leadership Group to identify ways to maximize the value gained through any funding spent by GMCA, and bring an investment proposal to the GMCA for approval in September 2020. It should be noted that this investment proposal would commence in April 2021, but that approval in September 2020 would allow appropriate notification to existing grant holders of the change to their agreement with the CA.
- 2.3 The CA spends money with the VCSE sector in the following ways:
- *Grants for specific GM-wide services* – notably under the Police and Crime Commissioner Budget and Culture Fund
  - *Grants to VCSE organisations supporting the various equalities advisory and engagement panels* – for example the GM Coalition for Disabled People (Disabled People's Panel) or Youth Focus North West (Youth Combined Authority)
  - *Commissioned services* – GMCA has contracts with a range of VCSE providers where the latter have been awarded contracts through a competitive process, an example would be delivery of the Adult Education Budget.
  - *Repayable 'social investment'* – a facility exists for VCSE organisations to enter into a repayable loan agreement with the CA
- 2.4 The CA Transparency Reports<sup>2</sup>, published on a quarterly basis, include a summary of all grant payments to VCSE organisations.

### Police and Crime Commissioner Budgets

- 2.5 Initial work to create a strategic approach to investment has brought together existing Mayoral funding streams under the Police and Crime budget including the Active Citizens Fund, the Youth Aspiration Fund and the Youth Aspiration Sustainability Fund to provide strategic funding grants of at least three years' duration from April 2018. Furthermore, the Police and Crime Commissioner has been in receipt of an number of Covid emergency funds

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<sup>2</sup> <https://www.greatermanchester-ca.gov.uk/who-we-are/accounts-transparency-and-governance/transparency-reports-voluntary-community-social-enterprise-vcse-grants-awarded/>

over the last 6 months targeting vulnerable people in our society, which have been distributed following Government requirements with local VCSE organisations.

#### Culture and Social Impact Fund

- 2.6 Prior to the establishment of the GMCA, GMCVO and a number of other VCSE organisations had been funded for many years through the Association of Greater Manchester Authorities (AGMA) Section 48 grants. These grants provided support for cultural and specialist VCSE sector activities. However, following the creation of the CA, a decision was taken by all 10 Greater Manchester Authorities to close the s48 grant scheme in favour of a new funding arrangement.
- 2.7 The GMCA Culture and Social Impact Fund was launched in 2017 and began funding from April 2018, building on the success of AGMA's Section 48 scheme. The new portfolio saw GMCA investment of £7m over two years go to 28 organisations, 11 of which had not received GM Cultural Funding previously. This process saw GMCVO being funded at previous Section 48 levels from the GMCA Cultural and Social Impact Fund, under the new VCSE Sector and Cooperatives Portfolio. A new contract was subsequently awarded to GMCVO for 2 years until March 2020 on the basis of the social impact that it undertook to create. Three other organisations (Greater Sport, the Water Adventure Centre and Proud Trust) were also awarded funding on the basis of their 'social impact' rather than cultural outcomes.
- 2.8 In October 2019, upon agreement of the new GM Culture Strategy, GMCA agreed that non-cultural activity should not be part of this Fund going forward, with the same percentage of financial support (13.1%, equalling £460,024 p/a) being ring-fenced from the total budget to support the delivery of GM's VCSE Accord, for delivery of strategic VCSE support for sport, and also LGBTQ+ activity across Greater Manchester.
- 2.9 In early 2020, three organisations (Greater Sport, the Water Adventure Centre and Proud Trust) submitted applications under the new criteria for the Culture Fund. These applications were assessed using slightly amended Culture Fund criteria and all were found to continue to meet the criteria set out for the Culture Strategy as well as delivering the wider strategic support and social impact. All 3 have been awarded grants of 24 months duration, with the funding coming from the ring-fenced amount described at section 2.7 above.
- 2.10 During the Covid lockdown, as the CA was not able to meet, a decision was made by the Chief Financial Officer using his delegated powers to extend the grant agreement held with GMCVO by 6 months until 30<sup>th</sup> September 2020, with all current terms and conditions rolled forward. This interim agreement was further extended by the CA at its meeting in July 2020, until 31<sup>st</sup> March 2021. The required £228,400 will come from the ring-fenced amount described at section 2.7 above set aside to deliver the VCSE Accord.

#### Grants for Equalities panels

- 2.11 The coronavirus pandemic has brought equalities issues into sharp focus, highlighting inequalities which existed in our society, and exposing new inequalities. The GM equalities

panels and advisory functions have been providing a regular flow of information and experience to inform community impacts arising from the coronavirus outbreak, and those effective mechanisms to ensure views are being gathered are informing and influencing the recovery and future responses. At the current time, a total of £130,000 p/a is paid to three VCSE organisations to convene the Disabled People's and LGBTQ+ Panels, and also the Youth Combined Authority. In June 2020, the CA approved a £50,000 budget for the new Women and Girls' Panel, and a further item on this agenda seeks approval for a budget of £50,000 to be set aside each year to support the proposed GM Race Equality Panel.

#### Commissioning from VCSE organisations

- 2.12 GMCA has contracts with a range of VCSE providers where the latter have been awarded contracts through a competitive process, an example would be delivery of the Adult Education Budget. However, at the current time, directly commissioned services only equate to a small percentage of CA expenditure.
- 2.13 In 2019, in order to explore ways that community based / VCSE-led services across Health and Care could be better commissioned, two VCSE Leaders were seconded into the GM Commissioning Hub. The output of this work was a VCSE Commissioning Framework which was co-produced by commissioning leads and VCSE organizations, and was approved by the Joint Commissioning Board in February 2020. The Commissioning Framework is intended as guidance for commissioning of services provided by VCSE organisations, and talks about the importance of co-production, embedding VCSE into commissioning strategies, the importance of VCSE 'infrastructure' to support a more resilient and extensive sector, and the strategic use of grants alongside commissioning and repayable 'social' investment.

#### Social investment

- 2.14 In January 2020, GMCA Members approved a Social Enterprise Investment Framework<sup>3</sup> to be utilised during consideration of applications for funding from Social Enterprises from the GM Investment Fund. This Framework was developed in discussion with key VCSE leaders, including GMCVO. The loan criteria consider the principles of Greater Manchester's Good Employment Charter and applications are considered through the normal Investment Fund process. The Framework sets out the key principles to be applied to investments sought by entities that operate within the Social Enterprise sector and identifies some of the common challenges Social Enterprises face when seeking funding, typical operational differences between the Social Enterprise sector and private business and, in light of those factors, criteria for assessing the applications from the sector. It also sets out the underlying rationale for lending to the sector.
- 2.15 In July 2020, approval was given by the CA to a loan of £1.5m for the GM Social Enterprise Emergency Relief Fund in conjunction with GMCVO as managing agent and the Access Foundation for Social Investment, which will provide patient capital to the scheme. This proposal has now progressed to due diligence.

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<sup>3</sup> <https://democracy.greatermanchester-ca.gov.uk/ieListDocuments.aspx?CId=136&MId=2838&Ver=4>

### **3. VCSE INVESTMENT PROPOSAL – VCSE LEADERSHIP AND INFRASTRUCTURE**

- 3.1 The current situation provides an opportunity not only to clarify GMCA investment in the leadership and infrastructure of the GM VCSE sector, but also to align this with that from the Health and Social Care Partnership. It would be advantageous to have a single, jointly-funded agreement put in place for the GMCA and the GM Health and Social Care Partnership with the GM VCSE Leadership Group. This would offer security and continuity for the VCSE sector leaders, and would allow a single conversation with them in relation to all aspects of the GMS and its partner strategies. Given the uncertainty around any future Health and Social Care Transformation Fund, this approach would also help manage the potential risks to the Leadership Group and delivery of their Policy Paper.
- 3.2 There is also an opportunity to reflect on the existing GM VCSE Accord and to extend its scope to include health and social care, including for example, the next stages of work on commissioning for inclusion and tackling inequalities, as well as some specifics on social prescribing and mental health.
- 3.3 It is proposed therefore that from April 2021, a new VCSE Accord and financial agreement with the GM VCSE Leadership Group be co-produced and put in place. GMCA and the GM Health and Social Care Partnership will provide funding to the VCSE Leadership Group to deliver all the elements listed in the following proposal (and specifically the functions listed in the table at section 3.9). The Leadership Group will be accountable for the outcomes agreed with the CA and the Health and Social Care Partnership through the new VCSE Accord. The VCSE Leadership Group will ensure delivery by commissioning discrete elements from individual VCSE organisations. The financial agreement would include the budget set aside by the CA to deliver the VCSE Accord (£228,400), together with the remaining Health and Social Care Transformation Fund allocation for April – June 2021 (£91,455). Any further Health and Social Care allocation would be added into the agreement, once budgets are confirmed.
- 3.4 The following investment proposal has been co-produced with the GM VCSE Leadership Group and is presented to the CA with their full endorsement. It will support leadership and infrastructure within the sector and enable it to sustain and grow the functioning ecosystem needed in our communities. The proposal is aligned with the recommendations of the VCSE Commissioning Framework described at section 2.13 above.

#### Investment criteria

- 3.5 The following broad investment criteria have been used to guide the development of this proposal:
- Enabling the VCSE sector to maximize its role in the delivery of the key priorities of the GMS
  - Compliance with and implementation of VCSE Accord (subject to joint review of the Accord)
  - Implementation of the VCSE Policy Paper published in January 2020
  - Alignment with the VCSE Commissioning Framework

- Responding to Covid related priorities and issues for the sector, including building overall sector resilience
- Adding value to publicly funded VCSE activity and infrastructure in the 10 districts of GM
- Enabling an effective ‘ecosystem’ of VCSE infrastructure across GM and supporting the operation of the GM VCSE Leadership Group

### VCSE Leadership and Investment proposal

3.6 The GM VCSE Leadership Group has expressed the need for some underlying principles to their future operation and VCSE Accord or funding agreement:

- That VCSE Leaders and their staff teams positively advocate for and champion GMCVO, 10GM, the Leadership Group and the leadership of those organisations in open and closed discussions with all partners local, city region, and beyond.
- That any investment aligned to the VCSE policy paper, or the Accord, or the MoU, or any replacement document, is accountable to and shaped by the Leadership Group. That investment supports the effective executive role of the Leadership Group structures.
- That collectively the members of the VCSE Leadership Group champion for each borough to have access to an effective Local VCSE infrastructure service that (a) meets the NAVCA Performance Standards and Quality Award<sup>4</sup> and (b) meets the requirements of that standard for each borough.

3.7 Following discussions with members of the VCSE Leadership Group over the last few months, the following model of the functions needed to support the VCSE sector ecosystem in GM over the coming years is now proposed. While the Policy Paper is still applicable, there is a need to consider what has changed since it was written: GM is clearly anticipating wide scale economic recession creating increased hardship and exacerbating inequality with ongoing phases of contain measures and public restrictions to Covid19. There is a cumulative effect of challenges and uncertainty which threaten the resilience of many local VCSE organisations which still have a role to play in local communities and emerging new forms of social action. So the approach to the sector’s ecosystem over the next 5 years has to face these specific challenges. This has to be about ‘Living with Covid’ and ‘Recovery’ – and tie explicitly to GM plans. It has to be the model we need for 2020-2025, more than generic infrastructure functionality. Essentially we need to increase the resilience of and ‘future-proof’ the VCSE sector in GM.

3.8 The proposal also has to enable the key functions of engagement with GMCA and GMHSCP developed over the last few years, working across ten localities as well as at GM level. It has focused on what a reframed ecosystem could look like, with defined priority areas, within the current funding level from GMCA and GMHSCP (at 2020/21). All the functions are highly interconnected (which critical mass enables added value by, for example, ability to convene

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<sup>4</sup> <https://na2vca.org.uk/navca-quality-award#:~:text=The%20NAVCA%20Performance%20Standards%20and,and%20direction%20for%20their%20work.>

and lead in a crisis) but the priority areas will change over time. We anticipate a programme of priorities over a number of years.

3.9 The following table outlines the GM-level functions which are required across the VCSE sector.

1	<b>Engagement</b>	Build collaboration within the VCSE sector and with a range of partners in public and private sectors. Priorities: <ul style="list-style-type: none"> <li>• GM BAME Network</li> <li>• Equalities Alliance</li> <li>• Mental Health Alliance</li> <li>• Localities</li> <li>• GM wide organisations</li> </ul>
2	<b>Advocacy</b>	Highlighting the successes, needs and impact of VCSE organisations, the people and communities they support and working collaboratively with universities, businesses, politicians, public sector, etc.
3	<b>VCSE Leadership Group</b>	<ul style="list-style-type: none"> <li>• Support and facilitation</li> <li>• Informed and accountable VCSE voice at important GM boards and forums</li> <li>• A participation budget to support representation</li> <li>• Support and development for VCSE representation</li> <li>• Priority: engagement with Covid19 Response and Recovery structures.</li> </ul>
4	<b>Policy, Intelligence and Insight</b>	<p>Leading work to gather evidence and feedback from the sector – using it to understand challenges and inform local and GM actions by public bodies, locality VCSE infrastructure and wider stakeholders and to capture learning from successful and unsuccessful programmes.</p> <p>Research, evaluation and learning with an investment budget for thematic projects around the following priorities:</p> <ul style="list-style-type: none"> <li>• Population Health and Wellbeing</li> <li>• Inclusive Economy</li> <li>• Poverty</li> <li>• Homelessness</li> <li>• Climate Action</li> <li>• Commissioning Framework</li> <li>• Assets and Wealth in Communities</li> </ul>
5	<b>Resilience</b>	Developing a strategic programme to ensure the resilience of VCSE organisations across GM (supporting existing VSCE organisations and new forms of social action) – delivered by

		collaboration between infrastructure bodies and working with public and private sector stakeholders.
<b>6</b>	<b>Leverage</b>	<ul style="list-style-type: none"> <li>Secure investment from non-statutory sources &amp; non-GM sources to support and stimulate community economies</li> <li>Develop social value approaches and collaboration with business</li> <li>Target funding to make greatest impact</li> </ul>
<b>7</b>	<b>Communications</b>	Keeping the sector connected and informed – delivered through a collaborative approach to information management.

- 3.10 It is proposed that the functions described above be shared across the VCSE Leadership Group, as determined by the form, function and track record of those members. Individual grant agreements will be required relating to the performance of the functions described.
- 3.11 Moving to this model will present challenges for individual organisations so the timescale for investment is equally as significant as the scale. We do not want to destabilise organisations which play an essential role nor to lose the benefit of existing work which has been invested in - so a transition will be needed in order to manage risks effectively. It is proposed that this transition takes place over the coming 9 months.
- 3.12 As stated above, to perform all of the functions described in the table at section 3.9 is anticipated to require an annual budget in the region of £450,000 (being the current total level of investment from GMCA and the Health and Social Care Partnership into GMCVO and the VCSE Leadership Group). However, at this time, the future allocation from the GM Health and Social Care Partnership is uncertain beyond the amount described at section 3.3 above. A parallel discussion will take place through the health governance in order to secure the onward investment required to continue the vital work carried out by the VCSE leaders across GM.
- 3.13 However, should further Health and Social Care Funding not be forthcoming, there will need to be a discussion with VCSE Leaders about the prioritisation of the functions described at section 3.9. It is proposed that GMCA should ensure that there is investment in items 3, 4, and 5 in the list of functions – supporting the functioning of the Leadership Group itself, the GM level policy, intelligence and insight, as well as work to ensure the resilience of the sector as a whole.

#### Other options considered

- 3.11 The proposal described above is considered to deliver against all of the investment criteria described at 3.5 above. However, it should be noted that the following alternative options have also been considered and rejected:
- The budget of £228,400 is divided up and re-allocated directly to the 10 districts. The methodology for doing so would need to be determined, but would result in a relatively

small amount for each district to spend on VCSE infrastructure. It would be extremely difficult to honour the GM VCSE Accord or deliver the VCSE Policy Paper if this approach were taken, and would present significant financial risk to the VCSE Leadership Group.

- The budget forms a new VCSE Infrastructure Fund and competitive bids are invited from across the VCSE sector. This would require work involving all districts to co-design the prospectus for the new Fund using the criteria listed above and would exclude the VCSE sector itself from the process. To do this effectively would take considerable time and resources, and might undermine the existing work of the VCSE Leadership Group. As in the first option, it would be difficult to honour the GM VCSE Accord if this option were selected.
- A portion of the budget is retained by GMCA to cover the administrative costs of the GM VCSE Leadership Group, with the balance being used across districts to co-produce individual solutions in each area. Although this option might enable a number of the proposed investment criteria, it would take a great deal of officer capacity at a GM and district level to bring this option into beneficial fruition. Furthermore, it would only see a small amount invested into each district and not realise any economics of scale.

#### **4. RECOMMENDATIONS**

4.1 Recommendations appear at the front of this report.