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# International Homelessness Policy Review

A report to inform the review of homelessness legislation in Wales

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# International Homelessness Policy Review

## Introduction

As part of this review of the homelessness legislation in Wales, the research team undertook a targeted review of relevant UK and international literature, as well as an in-depth analysis of a selection of other countries with promising approaches that may provide useful lessons for Wales (England, Finland, France, Germany, Ireland, Scotland and US)<sup>1</sup>. The findings of the review are presented under eight key themes:

1. Legal rights;
2. 'Staircase', 'Housing First', and 'normalising' approaches;
3. Access to housing for homeless people;
4. Homeless prevention;
5. Family homelessness, single homelessness and rough sleeping;
6. Governance and the role of NGOs;
7. Policy implementation, evaluation and monitoring; and
8. Costs and benefits

## Key findings

- Enforceable rights to settled housing for homeless people are very unusual outside of the UK, with the recently enacted French 'right to housing' only weakly implemented thus far.
- Scotland has significantly strengthened its statutory safety net for homeless people in the post-devolution period, in a policy widely regarded as highly progressive, but which poses significant challenges with respect to pressures on both temporary accommodation and social housing allocations.
- Access to settled housing for those who are homeless or threatened with homelessness is a significant problem in all of the countries studied, prompting a range of innovative measures to address this.
- There is a strategic shift towards 'Housing First' and 'normalising' approaches to resolving homelessness in many countries, but the practical impact varies greatly.
- To a lesser extent, there is also a growing focus on homelessness prevention, with (outside of the UK) Germany and Finland showing the most promising results, and recent developments in the US also very interesting.
- The vigour of the English approach to homelessness prevention has raised concerns about unlawful gatekeeping, but there is also evidence of positive outcomes and culture change.
- Evidence from a range of countries indicates that family homelessness is caused primarily by housing affordability issues, and can be virtually eliminated if these are addressed effectively.
- Rough sleeping and 'chronic' single homelessness are more complex issues, but have been driven down by effective targeted programmes in a number of countries.
- Policy implementation, governance and monitoring are strong in some countries and weak in others, with profound impacts on policy outcomes and effectiveness.
- Costs analyses from the US demonstrate savings (or at least significant cost offsets) arising from programmes addressing chronic homelessness, but there is little robust costs evidence from elsewhere.

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<sup>1</sup> Detailed country profiles are available on all of the non-UK countries included in this selection at Appendix 1.

## Legal Rights

Outside of the UK, enforceable legal rights are seldom used as a mechanism for meeting the long-term housing needs of homeless people and other marginalised groups (Fitzpatrick & Stephens, 2007). In some countries, such as Ireland, such individualised rights have been explicitly rejected as ‘adversarial’ and inimical to the difficult task of rationing scarce housing resources (O’Sullivan, 2008). In other countries, including Finland, there is a ‘right to housing’ derived from constitutional or other legal sources, but these are unenforceable through the courts, and are best understood as ‘*political markers of concern*’ (Bengtsson, 2001). In France, an enforceable ‘right to housing’ was enacted in 2007, but weak implementation through a highly complex and (partially) decentralised bureaucratic system means that this has had a very limited practical impact on social housing allocations thus far (Loison-Leruste & Quilgars, 2009; Houard, 2011).

There are examples of enforceable rights to emergency shelter amongst the countries studied, but in the case of the US – where this exists only in New York City – this is largely viewed as part of the problem rather than the solution, driving the creation of the largest and most expensive homeless shelter system in the country (Byrne & Culhane, 2011). In Germany, enforceable rights to temporary accommodation for roofless people under police laws have had the more positive impact of prompting municipalities to prioritise homelessness prevention (Busch-Geertsema & Fitzpatrick, 2007), but are not in themselves viewed as central to resolving homelessness.

This very absence of legally enforceable rights linked to settled housing in the countries studied throws into sharp relief the value of retaining such rights, and the risks apparent when they do not exist or are not enforced. In some continental European countries – including Finland, Germany and France – social landlords routinely exclude low-income and vulnerable households on grounds of ‘social mix’ (similar pressures are apparent in Sweden and the Netherlands, for example, see Stephens *et al*, 2010). Note that the greater ‘income mixing’ in these social housing systems – often regarded as superior to the ‘residualised’ UK system – is achieved, in part, by this explicit filtering out of those most in need (Stephens *et al*, 2002), in a context where there is no legal duty on social landlords to accommodate them. While developments in European law and (some) national governments are placing pressure on European social landlords to focus more closely on addressing the needs of poor and marginalised households (Premius & Gruis, 2011), this has met with powerful resistance from social landlords, many of whom are now relatively autonomous in both financial and legal terms.

This general absence of enforceable rights also means that any lessons in terms of detailed legislative reforms are likely to arise from experiences in England and Scotland, where of course a ‘statutory homelessness system’ was introduced – as it was in Wales – by the Housing (Homeless Persons) Act 1977. While the original Act was incorporated into separate legislation for different parts of the UK in the 1980s, the basic framework remained fairly similar in all four jurisdictions until devolution in 1999. There has since been a ‘radical divergence’ in homelessness policies and legal arrangements across the UK (Pawson & Davidson, 2008), with Scotland in particular significantly strengthening its statutory safety net over the past decade (Fitzpatrick, 2004). This process began with the Housing (Scotland) Act 2001 which, amongst other things, imposed new duties on local authorities to provide temporary accommodation for non-priority homeless households, and new obligations on RSLs to give reasonable preference to homeless households and, through Section 5, to provide accommodation for those households assessed as being unintentionally homeless and in priority need by the relevant local authority<sup>2</sup>. More radical reforms were introduced in the

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<sup>2</sup> RSLs have to meet these Section 5 requests from local authorities unless there are ‘good reasons’ not to. These ‘good reasons’ are limited to two situations: where an RSL is unable to make suitable housing available within six weeks of the request; or the only housing the RSL has available is of a particular nature (for example sheltered housing for older people) and this is not suitable for the applicant. There are no other grounds for a RSL to refuse a Section 5 referral, and RSLs cannot use any terms of their allocation policy for refusing to deal with a Section 5 referral. Effectively, Section 5 has primacy and RSLs are instructed that their allocation policy must reflect this. Councils and RSLs can agree to offset Section 5 referrals against nomination quotas, but they do not have to, and the achievement of a quota is not a ‘good reason’ for refusing a Section 5 referral (Scottish Government, 2010). Despite the strictness of these Section 5 requirements, a recent study noted that the extent to which they are used varies across Scotland and may be less than

Homelessness Etc. (Scotland) Act 2003, culminating in the uniquely ambitious commitment that virtually all homeless people in Scotland will be entitled to settled housing by 2012 (Fitzpatrick *et al*, 2009). This is to be achieved, principally, by the gradual expansion and then abolition of 'priority need' criterion, although the 2003 Act also provided for a significant softening of the impact of the 'intentionality' criterion in Scotland, and made allowance for the Scottish Government to suspend the operation of the 'local connection' referral rules (neither of these latter amendments have been brought into force as yet).

The key impact of the abolition of priority need is to end the traditional 'discrimination' against single people and childless couples within the statutory homelessness system, and single men in particular now constitute a large and growing proportion of households accepted as statutorily homeless in Scotland (36% in 2010/11) (Scottish Government, 2011, Table 6d). While the progressive nature of this extension of the safety net has been acclaimed internationally (Anderson, 2009), pressure on social housing stock makes the Scottish 'universal assistance' approach difficult to deliver in many other parts of the UK. Even in Scotland, growing demand pressures mean that there are serious challenges in delivering this 'rights-based' model in practice, as evidenced by the growing use of temporary accommodation (the number of households in temporary accommodation has risen steadily over the past decade from 4,060 at end March 2001 to 11,019 at end March 2011 (Scottish Government, 2011, Table 11)). Perhaps even more concerning is the rise in the proportion of new local authority lettings absorbed by statutorily homeless households, from around one quarter in 2001/02 to over half (55%) by 2010/11, with one third (34%) of new housing association lettings also now being made to this group (Pawson & Wilcox, forthcoming, Table 103).

Notably, the Scottish Government has now started to promote prevention measures, to some extent along the lines of the English 'housing options' model (see below), far more strenuously than hitherto in an effort to reduce 'statutory demand' and assist with meeting the demands of the 2012 commitment (Shelter Scotland, 2011). At the same time, it has introduced legislative amendments which allow for discharge of the permanent accommodation duty into fixed-term 'short assured tenancies' in the private rented sector, with the consent of the applicant (though these provisions seem only rarely to have been used thus far (SCSH & Crisis, 2011), and there appear to be no plans for 'compulsory' discharge of duty into fixed-term tenancies as contained in the Localism Act 2011).

The political momentum in Scotland seems sufficient to ensure that the 2012 undertaking to abolish priority need will be met (though the implications will be more difficult to manage in some local authorities than in others). There is, however, less certainty that the remaining Homelessness Task Force recommendations – including on intentionality and local connection – will be fully implemented (Anderson, 2009).

### **'Staircase', 'Housing First' and 'Normalising' Approaches**

One of the most striking things to emerge from this review was the extent to which countries claimed to have adopted a 'Housing First' approach to resolving homelessness. In some cases – France and Ireland – this was very recent, whereas in Finland it was claimed that a Housing First approach used before the concept was wide recognised in Europe. While what precisely is meant by Housing First varies widely – and often bears little relation to the original New York 'Pathways' model (Tsemberis, 2004) - there is something of a recognizable underlying philosophy in a move away from an emphasis on 'transitional' or 'staircase' models of provision for homeless people, towards a 'normalising' approach focused on rapid access to mainstream rented housing or other 'permanent' solutions (Johnsen & Teixeira, 2010).

In France and Ireland it is not at all clear what national strategic commitments to Housing First mean, beyond a vague acknowledgement that homeless people should be moved on to settled housing as quickly as possible. The content of Finland's commitment to Housing First is, on the other hand, rather clearly

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had originally been anticipated, with a level of confusion apparent regarding their purpose and scope (Britain *et al*, 2009).

defined as requiring rapid access not to 'regular' housing, but rather to housing let on a 'permanent' tenancy (Busch-Geertsema, 2010). This has permitted a growing emphasis on congregate models of 'Housing First' provision in Finland, including the conversion of former institutional shelters into supported housing with permanent tenancies. While these remodeled supported accommodation units are doubtless a vast improvement on the dormitory hostels they are replacing, it is questionable whether the secure tenancy of what is essentially a (high quality) hostel space is an attractive model for Wales or other parts of the UK to emulate.

Interestingly, the Housing First model has been slower to take off in both the UK and Germany than elsewhere in Europe, possibly reflecting the more longstanding 'housing-led' approach to tackling at least some aspects of homelessness in these two countries, which perhaps means that Housing First does not capture the imagination as an innovative 'paradigm shift' to the same extent that it does elsewhere (Johnsen & Teixeira, forthcoming). However, while a housing-led focus on homelessness prevention and 'normalising' of homeless people's conditions as soon as possible is well established in Germany, the specific idea of taking people straight from the streets or shelters and placing them into mainstream housing (with support) is not. In the UK, too, Housing First has garnered interest mainly as a possible addition to the 'menu' of options available - aimed particularly at those for whom shared or transitional models have not worked - rather than being interpreted as a radical rejection of the 'housing readiness' philosophy underpinning staircase approaches.

## **Access to Housing for Homeless People**

Access to housing for homeless people, those threatened with homelessness and other vulnerable groups is a major concern in all of the countries studied, prompting the development of a number of innovative attempted 'solutions'.

Specialist segments within social housing have been developed in several countries specifically to accommodate the low-income and marginalised groups whom mainstream social landlords are reluctant to house. In France, 'very social housing' is a widely used term denoting two relevant (though not necessarily linked) concepts. First, social housing is sometimes sub-let via social workers or NGOs to homeless people or others viewed as having difficulties with social integration. These sub-tenants often have lesser security of tenure than ordinary tenants, and a similar arrangement in Sweden (called the 'secondary housing market') has been heavily criticized for segregating vulnerable groups in an inferior sub-sector (Sahlin, 2005). Second, and perhaps more promisingly, a special type of more affordable social housing with a lower maximum income threshold has been developed which now comprises 20% of all social housing in France. Importantly, this form of 'very social housing' is let on normal tenancy terms and mixed with other social housing.

The very small size of the social rented sector in Germany, together with the routine exclusion of those in highest housing need, prompted the establishment from the 1980s onwards of NGO-run 'social rental agencies' (SRAs) which rent properties from the private rental market and sub-let them to households with support needs (see De Decker (2009) for an account of the more developed network of SRAs in Belgium). Importantly, this housing is let using normal rental contracts (and so is unlike the inferior tenancy terms used in, for example, the secondary housing market in Sweden). However, these developments are small-scale and new provision has slowed since the 1990s. Bear in mind, too, that Germany has a much larger private rental sector than the UK (54% of stock) and almost all private tenants have security of tenure, making the SRA model probably more attractive and feasible in the German context than in Wales or the rest of UK, though it may be useful for targeted purposes.

The Y-Foundation in Finland provides a very interesting model, drawn from a tenure context much closer to that of the UK (74% home ownership). This is a nationwide, multi-sectoral partnership which buys small apartments dispersed in the owner-occupied stock and lets them to local authority social service departments, which in turn re-let them to (mostly) single homeless people, usually with regular (secure) rental agreements. It owns 4,500 of these scatter flats across Finland. Y-Foundation flats are not properly

viewed as part of a 'Housing First' approach, but rather more akin to the 'last step' on a staircase model, accommodating people who have been through transitional housing and judged able to cope in an independent tenancy. While recently the Y-Foundation has become involved in developing larger congregate provision, their original model is particularly interesting in providing affordable housing for (selected) homeless people spread throughout the regular owner-occupied stock, thus helping to avoid stigma and social segregation.

Echoing similar developments in the UK (Fitzpatrick *et al*, 2011), the (expanding) private rented sector in Ireland has been argued to be a positive option for meeting the needs of single and young homeless people in particular. However, it is worth noting that the Irish private rental sector now offers a greater level of regulation and security than is the case in Wales or elsewhere in the UK (O'Sullivan & De Decker, 2007).

## **Homelessness Prevention**

There is at least lip service paid to the idea of homelessness prevention in all of the countries studied, but, outside of the UK, the most serious and long-term commitment is evident in Germany, where concerted efforts to drive down rent arrears-related evictions (the predominant cause of homelessness in Germany) have clearly paid dividends, particularly with respect to family homelessness (Busch-Geertsema & Fitzpatrick, 2008). In Finland, too, 'primary' prevention via expanded access to housing, as well as a very rigorous response to family homelessness whenever it threatens, has virtually eliminated it as a phenomenon.

There have been very interesting recent developments in the US in this area where, partly in response to the recession, policy has shifted in a much more preventative, 'housing-led' direction, with a new Federal programme providing funds for short-term rental subsidies, financial assistance for moving costs, deposit payments, utility payments, and housing relocation and stabilization services (Culhane *et al*, 2011). There is a particular issue in the US that, in the absence of a robust mainstream welfare safety net, homelessness assistance programmes in many areas have tended to evolve to create a 'parallel' or 'proxy' welfare system, which have had the effect of isolating homeless people (including those with few support needs) from mainstream services and ordinary housing. However, Federal and other policy-makers are said now to be persuaded of the merits of a prevention-orientated focus on stable housing and community-based mainstream services, with an apparent 'paradigm shift' taking root over the past couple of years.

Within the UK, it is in England that prevention activity has been most vigorously pursued, mainly focused on those who would otherwise be likely to be accepted as statutorily homeless. Between 2003 and 2010 there was an extraordinarily sharp decline in statutory homeless acceptances by English local authorities (Fitzpatrick *et al*, 2011), associated with the mainstreaming of the 'housing options' approach whereby homeless or at risk households approaching local authorities for assistance were given a formal interview on all of the potential means by which their housing problems could be addressed (Pawson, 2007). Assisted access to the private rented sector has been by far the most commonly used preventative measure within this housing options framework, although other interventions such as family mediation (to enable young people to stay in the parental home), 'sanctuary schemes' (for those at risk of domestic violence), and tenancy support for vulnerable groups have also been employed (Pawson *et al*, 2007).

There have been concerns that some of the apparent success in reducing statutory homelessness in England is attributable to increased local authority 'gatekeeping' which denies people their legal rights (Pawson, 2007), and this fuelled anxieties in Scotland about taking a similar path, with local authorities very concerned about attracting criticism from the Scottish Housing Regulator (SHR) if they were to engage in pro-active preventative work with households to whom they may owe a statutory duty under the homelessness legislation. However, the SHR has now indicated support for the prevention efforts being pursued via five regional 'Scottish Housing Options Hubs' established in summer 2010, and Scotland is moving somewhat closer to the English model of extra-statutory intervention (though some may question how far this rather delayed emphasis on prevention will be able to assist in the meeting of the now imminent 2012 commitment (see Shelter Scotland, 2011)).

Notwithstanding the above mentioned gatekeeping concerns, a national evaluation has indicated that at least some of the decline in statutory homelessness in England has been the result of ‘genuine’ homelessness prevention (Pawson *et al*, 2007), and there is also local case study evidence of a positive post-2002 ‘culture change’ towards a more pro-active, flexible and problem-solving style of intervention on homelessness (for example, see Fitzpatrick *et al*, 2011). In a review of the housing and homelessness impacts of devolution conducted to mark the 10-year anniversary in 2009, it was suggested that ‘*the ideal homelessness system*’ would combine the vigour of the English preventative measures (with safeguards against unlawful gatekeeping) with the strong statutory safety net available in Scotland (alongside robust assessment methods to counter concerns about ‘perverse incentives’ for households to have themselves accepted as homeless) (Wilcox *et al*, 2010, p.46). It may be interesting to consider the extent to which Wales could aspire to this sort of combination.

### **Family Homelessness, Single Homelessness and Rough Sleeping**

There is a high level of family homelessness in the US which stands in stark contrast to the situation in countries such as Finland and Germany where this has been virtually eliminated in some areas. It seems likely that the very restricted welfare safety net, together with an acute shortage of affordable rented housing, leaves a large proportion of poor families in the US vulnerable to homelessness (Fitzpatrick & Stephens, 2007). Consistent with this analysis is the strong and sustained evidence from the US that subsidised housing is far more important than support services in the long-term resolution of family homelessness (Shinn *et al*, 1998; Culhane *et al*, 2011). This echoes survey findings from England which indicated that only a minority of statutorily homeless families had complex support needs, with most becoming homeless as a result of the difficulties they faced as low-income households competing in tight housing markets (Fitzpatrick & Pleace, 2011). Also supporting this line of argument is the observation that in Germany a slackening housing market, and in Finland government programmes to increase access to housing, have had particularly beneficial impacts on levels of family homelessness.

Single homelessness and rough sleeping are more complex phenomena, with evidence from across the developed world indicating high levels of support needs amongst many of those affected, particularly with respect to substance misuse and mental health problems (Philipott *et al*, 2007; Toro, 2007). Despite the challenges posed by these complex problems, there is evidence from a number of countries that well-funded and targeted programmes can have very significant positive impacts on rough sleeping in particular. Certainly in the US, targeted homelessness assistance programmes have met with considerable and demonstrable success, with a 30% decrease recorded in ‘chronic homelessness’ between 2005 and 2009 (Byrne & Culhane, 2011). There was also, until recently, a strong downward trend in rough sleeping in Ireland associated with more appropriate and focused interventions, and there is of course evidence of positive outcomes associated with successive Rough Sleepers Initiatives in the various parts of the UK (Fitzpatrick *et al*, 2011).

### **Governance and the Role of NGOs**

The role of NGOs – particularly traditional, often faith-based ones – is very interesting in a number of countries where they are viewed as significant barriers to progress, resisting shifts towards both housing-led and preventative approaches (Fitzpatrick, 2011). In some cases they are perceived to defend traditional shelters and ‘staircase’ models as a means of preserving their own programmes and ‘market share’, with Ireland perhaps the clearest case in point (O’Sullivan, 2008). Given the power of local municipalities as well as NGOs in several of the countries studied, and the tendency of some to resist radical change, there is often a call for a strong steer from central government in order to drive progress forward. This provides an interesting counterpoint to the current UK Government’s portrayal of its ‘Big Society’ and ‘localism’ agendas in housing and homelessness as progressive and inclusive (Fitzpatrick *et al*, 2011).



## Policy Implementation, Evaluation and Monitoring

The effectiveness of policy implementation differed significantly between the countries studied, and the benefits of clear monitoring and evaluation frameworks were evident. Certainly in the US and in Finland successful policy implementation was closely linked with rigorous evaluation and data collection. In the Finnish case, the long-term downward trend in homelessness, particularly family homelessness, can be relied upon because it is based on (reasonably) consistent data collection over a long run of years. In the US case, robust cost analyses have been highly influential in mobilizing political will to leverage significant funding for programmes to 'end chronic homelessness' (Culhane, 2008). It is also notable that the remarkable influence of the US-based 'Housing First' model derives in large part from robust evaluations of the original 'Pathways' programme in New York (Tsemberis *et al*, 2004; Johnsen & Teixeira, 2010). In Scotland, the Scottish Housing Regulator has played a key role in monitoring the practices of local authorities as they endeavour to meet the 2012 target to abolish the priority need criterion. There is widespread agreement about the importance of this monitoring function in ensuring the quality and appropriateness of interventions and some concern about its decreasing role post-2012.

In contrast, data collection and monitoring, as well as policy implementation, appear relatively poor in Ireland and France. Radical strategies have been developed, and ambitious targets set, but with insufficient means to assess achievements or impacts, the incentives for effective policy implementation are severely blunted. In the Irish case, the scepticism noted above about homelessness 'rights' also has to be seen in the context of low levels of transparency and accountability in public policy implementation, whereby effective regulatory and monitoring frameworks may reasonably be viewed as a more immediate priority. On the other hand, however, some might take the view that the introduction of a system of individually enforceable rights may help to foster a climate of improved accountability and transparency.

## Costs and Benefits

It is clear that a significant investment of resources is a necessary, but not sufficient, condition for success in addressing homelessness. Finland and Ireland provide two contrasting case studies. In Finland, there has been a marked and relatively consistent long-term reduction in homelessness since the late 1980s, attributed to high quality and well-funded government programmes, as well as to advantageous structural conditions (notably, strong national economic performance and reduced migration from rural to urban areas). In Ireland, on the other hand, where policy implementation and monitoring is poorer, there are concerns that returns may have been insufficient given the considerable resources invested.

Of course, 'spend to save' arguments are common in the homelessness field, with both preventative and housing-led approaches often argued to be highly 'cost-effective'. While the Finns argue that their Housing First programme has generated overall costs savings, these claims are not altogether convincing, based as they are on robust costs analysis on only one (relatively small) project (Kaakinen, 2010). In the US, on the other hand, there has been rigorous cost analyses undertaken - as well as a large number of informal local 'cost studies' - which indicate net cost savings (or at least substantial cost offsets) associated with Housing First and other interventions targeting the needs of chronically homeless people, particularly those with severe mental illness (Culhane, 2008). However, it is conceded by US evaluators that it is easier to demonstrate cost offsets with this client group - who tend to be heavy users of expensive emergency services when homeless - than with homeless people with less complex needs. It may in some cases simply cost more to do better, with *cost-effectiveness* rather than *cost savings* the most appropriate and feasible objective.

## Conclusion

There are a wide variety of potential policy lessons arising from this international review of legal and policy frameworks on homelessness. The difficulties that low-income households face in accessing mainstream social housing in most of the countries reviewed provides unambiguous support for the maintenance of a strong legislative framework in Wales, imposing clear national minimum entitlements and standards. Detailed learning points with respect to legislative reform are limited to England and Scotland, where it is suggested that the 'ideal' for Wales to consider aiming towards (resources allowing) would combine the

preventative rigour of the former with the broadened safety net of the latter. Outside of the UK, both Finland and Germany appear to have experienced great success in driving down family homelessness in particular, with potential lessons for Wales. There are exciting developments on Housing First-type interventions for homeless people with complex needs across a range of European countries, and we would suggest that the most radical and relevant in the Welsh (and wider UK) context are those which prioritise rapid access to mainstream housing with appropriate support. The 'social letting agencies' found in Germany, and Finland's Y-Foundation, provide innovative models for procuring mainstream housing 'scattered' within the private rented and owner-occupied sectors respectively, that may be worthy of further investigation for their applicability to the Welsh context. A final point to emphasise is the link between effective policy implementation and clear monitoring and evaluation frameworks.

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## **Disclaimer**

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