**Churches Together in England (CTE)**

**Serious Incident Policy**

## Introduction

The Charity Commission requires charities to report serious incidents. If a serious incident takes place within CT, it is important that there is prompt, full and frank disclosure to the Commission. This includes what happened and, how CYE are dealing with it, even if it has also been reported to the police, donors or another regulator.

## What is a serious incident?

A serious incident is an adverse event, whether actual or alleged, which results in or risks significant:

* harm to your charity’s members , staff, volunteers, or others who come into contact with CTE through its work
* loss of CTE’s money or assets
* damage to CTE’s charity’s property
* harm to CTE’s work or reputation

For the purposes of this policy, “significant” means significant in the context of CTE, taking account of its staff, operations, finances, and/or reputation.

## Who should report?

The responsibility for reporting serious incidents rests with the charity’s trustees. In practice, this may be delegated to someone else within the charity, such as an employee or the charity’s professional advisers. However, all trustees bear ultimate responsibility for ensuring their charity makes a report, and does so in a timely manner.

If CTE decides not to make a report about a serious incident, and the Commission later becomes involved, CTE will need to be able to explain why you decided not to report it at the time.

## Why must incidents be reported to the Commission?

In summary, given the challenging nature of the work undertaken and the difficult context faced by many charities, the Commission understands that serious incidents will happen. When something serious happens, it is the Commission’s role to ensure that trustees comply with their legal duties and that the charity manages the incident responsibly. This means **the Commission will be looking for assurance that the charity has taken steps to limit the immediate impact of the incident and, where possible, prevent it from happening again**.

Most problems can be resolved by trustees themselves, in some cases with timely advice from professional advisers. Sometimes the Commission needs to use its powers to protect a charity. Acting quickly will help protect CTE from further harm. Reporting also means the Commission can identify whether other charities might be affected, and can give better advice to all charities to help them protect themselves.

In more detail, reporting serious incidents to the Commission has three main purposes, which enable it to meet its statutory objectives and functions:

The Commission needs to ensure trustees comply with their duties: **By reporting a serious incident, trustees show that they have identified a risk to the charity that has materialised, and that the trustees are taking appropriate action to deal with it**. This is very important because protecting the charity’s assets, reputation and people who come into contact with it through its work are essential trustee responsibilities. An incident is less likely to damage a charity’s reputation if trustees can show that they handled it well. If the media contact the Commission about an incident and it has been properly reported, they will be able to say that the trustees handled the situation responsibly and this will help protect the charity’s reputation.

The Commission may need to provide regulatory advice or guidance or use its statutory powers: Timely reporting allows the Commission to identify problems in charities at an early stage and, where appropriate, to provide regulatory advice and guidance to trustees. Any regulatory advice and guidance provided will normally be limited to ensuring the trustees meet their legal duties. In the most serious cases the Commission may need to use its statutory powers in order to protect the charity and put it back on track.

The Commission can assess the risk to other charities: Serious incident reporting helps the Commission to measure the volume and impact of incidents within charities, to identify trends and to understand the risks facing the sector as a whole. This insight helps the Commission to warn charities about risks and give trustees the information and tools they need to succeed.

## When to report

The charity should report an actual or alleged incident promptly. This means as soon as is reasonably possible after it happens, or immediately after the charity becomes aware of it.

## Whistleblowing – speaking out if you suspect wrongdoing

The serious incident reporting framework and this guidance is for trustees. If an employee of a charity suspects serious wrongdoing within the organisation, for example criminal offences, malpractice/misconduct or health and safety breaches, they should usually raise this with their employers first, following the charity’s whistleblowing policy. If the charity fails to deal with their concerns appropriately or the employee continues to suspect serious wrongdoing, it can report this to the Commission – including anonymously if so desired. In reporting the employee’s concerns to the Commission, they may be protected under the Public Interest Disclosure Act 1998. See CTE’s Whistleblowing policy.

## What to report

This section identifies the types of incidents the Commission expects to be reported and outlines the different authorities or agencies that may be involved.

An incident should be reported if it results in, or risks, significant:

* harm to people who come into contact with your charity through its work
* loss of your charity’s money or assets
* damage to your charity’s property
* harm to your charity’s work or reputation

The main categories of reportable incident are:

* protecting people and safeguarding incidents – incidents that have resulted in or risk significant harm to beneficiaries and other people who come into contact with the charity through its work
* financial crimes – fraud, theft, cyber-crime and money laundering
* large donations from an unknown or unverifiable source, or suspicious financial activity using the charity’s funds
* other significant financial loss
* links to terrorism or extremism, including ‘proscribed’ (or banned) organisations, individuals subject to an asset freeze, or kidnapping of staff
* other significant incidents, such as – insolvency, forced withdrawal of banking services without an alternative, significant data breaches/losses or incidents involving partners that materially affect the charity

**It is the responsibility of the charity trustees to decide whether an incident is significant and should be reported.**

The trustees may delegate responsibility for deciding which incidents should be reported to others within the charity, such as employees. However, decisions made by others in the charity should be reported back to trustees (particularly where incidents were ‘borderline’ and making a report was considered but it was decided not to make one).

## Reporting criminal activity

If a reportable incident involves actual or alleged criminal activity then you must also report it to the relevant agencies:

* safeguarding incidents: allegations or incidents of abuse or mistreatment of people who come into contact with your charity through its work should be reported to:
	+ the police and obtain a crime reference number (call 101 or make a report at a local police station), and
	+ the local authority and other relevant agencies, see Protecting people and safeguarding incidents below
* fraud and cyber-crime: allegations or incidents of fraud and cyber-crime should be reported to Action Fraud via its online reporting tool, ensuring a crime reference number is obtained.
* theft: allegations or incidents of theft should be reported to the police (call 101 or make a report at a local police station) and a crime reference number obtained
* links to terrorism and extremism: alleged links to terrorism and extremism should be reported to the police and a crime reference number obtained. This type of incident can be reported to the police in the following ways:
	+ via the National Crime Agency website
	+ call the Metropolitan Police Anti-Terrorist Hotline on 0800 789 321
	+ call 101 or report it at a local police station
* criminal activity overseas: any actual or alleged criminal activity that takes place overseas should be reported to local law enforcement authorities and/or safeguarding organisations in the location where this occurred. There may also be circumstances where it is necessary to report this to UK authorities.

## Guidance on criminal reporting including overseas

An incident that involves actual or alleged criminal activity will usually be reportable to the Commission. Only in exceptional circumstances, such as where the crime and the impact on the charity are minor for example one-off theft of a very small amount of money, will the Commission consider an incident involving criminal activity is not reportable.

Even when other agencies are involved, it is important that charities report the incident promptly to the Commission themselves and do not wait until someone is arrested, charged, or convicted before doing this. What action the charity has taken or are planning to take at the time of reporting should be included in the report.

## Protecting people and safeguarding incidents

Protecting people and safeguarding responsibilities should be a key governance priority for all charities, regardless of size, type, or income, not just those working with children or groups traditionally considered at risk. A charity should be a safe and trusted environment and trustees must take reasonable steps to protect the people who come into contact with their charity through its work from harm. These people include:

* the charity’s beneficiaries, including adults at risk and children
* the charity’s staff and volunteers
* It may also include other people who come into contact with the charity through its work. This might be, for example, people who attend an event run by the charity who are not beneficiaries, staff or volunteers.

## Types of safeguarding incident to report

A report to the Commission will need to be made if a serious safeguarding risk materialises. This will usually be if any of the following occur:

* incidents of abuse or mistreatment (alleged or actual) of beneficiaries of the charity (adults or children) which have resulted in or risk significant harm to them and this happened while they were under the care of the charity
* someone connected with the charity, for example a trustee, staff member or volunteer, was responsible for the abuse or mistreatment (alleged or actual)
* other incidents of abuse or mistreatment (alleged or actual) of people who come into contact with the charity through its work, which have resulted in or risk significant harm to them and are connected to the charity’s activities
* breaches of procedures or policies at the charity which have put people who come into contact with it through its work at significant risk of harm, including failure to carry out relevant vetting checks which would have identified that a person is disqualified in law from holding their position within the charity. This might be, for example, because they are disqualified under safeguarding legislation from working with children and/or adults at risk

The above may include incidents in the workplace that have resulted in or risk significant harm to trustees, staff or volunteers. This does not mean that the Commission expects charities to report every internal staffing incident - **charities need to make a judgement call about which incidents either individually, or as a collection, are serious in the context of the charity**.

However, a report should always be made where the level of harm to the victims and/or the likely damage to the reputation of or public trust in the charity is particularly high (for example, sexual misconduct by the charity’s Chief Executive or another person in a senior position or position of specific responsibility, such as the head of safeguarding). The Commission would also expect to receive a report if the number and nature of staffing incidents indicate there are widespread or systematic issues connected to sexual harassment, abuse and/or other misconduct in a charity. The Examples Table contains some examples of the types of workplace incidents that should be reported.

## The Commission’s role in relation to safeguarding incidents

The Commission’s role is to ensure the charity’s trustees are handling the incident appropriately and, where necessary, putting in place improved governance and internal controls, in order to prevent further harm.

The Commission is not responsible for dealing with incidents of actual abuse or mistreatment and it does not administer safeguarding legislation. It cannot prosecute or bring criminal proceedings, although it may refer concerns on to ‘lead agencies’, such as the police, local authorities and the Disclosure and Barring Service (DBS), as well as to specialist bodies responsible for designated areas, such as education or health and social care.

## Safeguarding incidents that occur outside of the charity

Sometimes charities will become aware of safeguarding incidents that have occurred outside of the charity. This might be, for example, where:

* the charity undertakes specialist work (in line with its charitable purposes) in providing safeguarding services and, as a result, deals routinely with safeguarding incidents that occur outside of the charity
* the charity is alerted to alleged abuse of a beneficiary, staff member, volunteer or someone else who it comes into contact with through its work, which has occurred outside of the charity and:
* the abuse was not connected to its activities in any way
* the person responsible for the abuse was not a trustee, staff member or volunteer

If the charity becomes aware of such incidents it is not expected that they report them to the Commission. However, the charity would be expected to do so if it is found (or alleged) that the incident wasn’t handled appropriately by the charity and this resulted in harm to the person or persons concerned. In such circumstances, a report should also be made to the police and local authority.

## Financial crime: fraud, theft, cyber-crime and money laundering

Fraud, theft, and cyber-crime are different criminal offences. They may relate not just to a charity’s funds and financial assets, but also to other assets, such as databases and confidential or sensitive information. The impact on a charity can be significant, going beyond financial loss. These crimes cause distress to trustees, staff, volunteers and beneficiaries; they may also bring adverse publicity to the charity and damage its good reputation with donors, beneficiaries and the public, as well as that of the charity sector more generally.

The main categories of reportable financial crimes are defined below:

Fraud is dishonesty, involving either false representation, for example ‘identity fraud’, failing to disclose information, or abuse of position, undertaken in order to make a gain or cause loss to another

Theft is dishonestly taking property belonging to another with the intention of permanently depriving the other of it

Cyber crime is any criminal act involving computers and networks. These crimes can be quite complex and difficult to detect, often involving data breaches or identity fraud.

‘Money Laundering’ is the term used where criminals turn the proceeds of crime (‘dirty’ money) into property or money (‘clean’ funds) so that they seem lawful and legitimate - this avoids suspicion or detection. Unfortunately, the good reputation and public confidence enjoyed by a charity can also make it a target for criminals looking for a safe ‘hiding place’ for illegitimate funds.

There is no minimum loss figure that should be reported – **the charity needs to decide whether incidents are serious enough to report, in the context of the charity and its income, taking account of the actual harm and potential risks posed**. However, the higher the value of the loss, the more serious the incident is likely to be, indicating it should be reported. Other factors that are likely to indicate seriousness include:

* where the person accused of taking the funds/assets is involved in the charity, particularly if he/she holds a senior position, for example CEO or has responsibility for financial management, Treasurer on board of trustees, etc
* where the person accused is involved with other charities
* numerous incidents have taken place that appear connected, indicating a pattern or trend
* a single incident has been committed repeatedly over a long period of time
* a number of separate incidents have occurred over a short period of time
* the funds lost/at risk are from a public appeal, collection, or grant funding
* where there are signs of public interest, such as significant media reporting
* where the charity has had to take serious action against an individual, such as disciplinary action, investigation, or suspension

If the charity decides that an incident is not serious enough to report, it is still important that it is handled appropriately and reasonable steps are taken, perhaps by tightening financial controls and procedures, to ensure it doesn’t happen again.

## Unverified or suspicious donations

While the vast majority of donations to charities will be made in good faith, charities can be abused by donors in a number of ways. Examples of this include money laundering but may also include use of donations to dispose of the proceeds of crime or to avoid/evade tax.

The charity should act with due diligence and be mindful of donations from sources that cannot be verified, or the charity may be in breach of its duties under the Finance Act 2011. This means appropriate checks are made before accepting any unverified, anonymous or suspicious donations. The charity will also need to keep records of substantial donors and transactions, in order to avoid a tax liability.

As a guide, **trustees should report unverified or suspicious donations totalling £25,000 or more**, providing the assurance outlined above that appropriate checks have been made before accepting/declining the donation.

The charity should also report if it is concerned about other suspicious financial activity connected to the charity’s funds. This might include requests from third parties to:

* cash a cheque for a large sum of money
* convert large quantities of cash into another currency
* pay a fee to release funds to be donated to the charity

## Other significant financial loss

**The charity should report any significant financial loss due to other causes, where this threatens the charity’s ability to operate and serve its beneficiaries, or where the charity’s financial reserves are not sufficient to cover the loss**. For example:

* significant fire, flood or storm damage destroying or seriously damaging the charity’s main premises
* having to abandon property, for example in a war zone overseas
* losing a court case and having to pay substantial legal fees or damages out of charity funds; charities incurring costs through routine litigation, undertaken in line with charitable aims and on behalf of beneficiaries, are not expected to report
* loss of significant institutional donors, public funding or key delivery contracts that threatens the charity’s ability to operate and being unable to replace these in order to ensure the charity’s survival
* significant financial penalties for breaches or non-compliance imposed by HMRC, Financial Conduct Authority, HSE, ICO, Fundraising Regulator or other regulators

In the most serious cases, the loss could mean the charity cannot continue to operate and may need to ‘wind up’.

As a guide for this type of incident, the Commission would expect you to report any loss of funds or property with a value:

* totalling £25,000 or more, or
* totalling less than £25,000 but which is in excess of 20% of the charity’s income

For amounts lower than the above, the charity should decide if they are significant and should be reported, taking the charity’s income, work and other factors into account. For example, damage to the charity’s main premises might be valued at less than £25,000 or 20% of the charity’s income but it might prevent the charity from delivering vital services to beneficiaries so may be reportable.

## Links to terrorism and extremism

These types of incidents include discovering that someone within or connected to the charity does business with, or has links to, terrorist groups, or is subject to an asset freeze; also, where property has been stolen by terrorist groups, or charity money, personnel or other assets used to support terrorist activities.

The charity should report to the Commission if it becomes aware of allegations being made, or have evidence to suspect that:

* the charity (including trustees, members of staff, volunteers or anyone connected with the charity) has known or alleged links to a proscribed (banned) organisation or other terrorist/ unlawful activity
* someone within or closely connected to the charity, or one of your delivery partners, is placed on a UK or international terrorist list or is subject to an asset freeze
* charity funds or assets have been used to pay bribes, protection money or ransoms
* charity funds or assets have been used/ diverted (perhaps via a delivery partner) to support a terrorist group or for other terrorist purposes
* the charity has been used to circumvent asset freezing measures
* charity personnel have been kidnapped or harmed by terrorist groups, including overseas, when representing the charity or carrying out charity work

The charity should also be aware of the risks to it of being abused for extremist[[1]](#footnote-1) purposes; for example, when carrying out activities and events involving guest speakers or when promoting literature and educational materials, perhaps via the charity’s website and on social media. These should be reported to the Commission if:

* the charity knows or suspect that its premises, or any of the activities that your charity runs, have been misused as a platform for the expression or promotion of extremist views, or the distribution of extremist materials
* the charity becomes aware of media reports alleging that it has been misused for such purposes, particularly if the charity believes these could have a significant negative impact upon its reputation

## Other significant incidents

The charity should make a report to the Commission if:

* the charity discovers that a trustee or a senior manager of the charity is disqualified in law from holding that position; for example, because they have an unspent conviction for fraud or theft, they are an undischarged bankrupt, they are on the sex offenders register or are disqualified as a director under company law.
* something has happened to force the charity into insolvency or to wind up, for example unmanageable debts or reduced income streams
* the charity’s operations are threatened because the main or only bank has withdrawn banking services, and the charity can’t find another bank that will accept it
* the charity is subject to a police investigation or a significant investigation by another agency/regulator. Routine inspections by, for example, Ofsted, Care Quality Commission or Care Inspectorate Wales do not need to be reported, unless they have resulted in significant adverse findings that:
	+ place the future of the charity in doubt, or
	+ are likely to damage the charity’s reputation or public confidence in the charity, or
	+ relate to any of the other categories of serious incidents set out in this guidance
* the charity has experienced major governance problems, such as mass resignation of staff or trustees, or other events, leaving it unable to operate
* the charity’s trustees or employees are the subject of criminal proceedings, in connection with the charity or their role in it
* the charity discovers that there has been a significant data breach or loss within the charity
* the charity discovers that an incident has occurred involving one of the charity’s partners in the UK or internationally, which materially affects the charity, its staff, operations, finances and/or reputation, such that it is serious enough to be reported. Partners in this context includes the following and the people who come into contact with them through their work (such as their beneficiaries, staff, and volunteers):
	+ a delivery partner of the charity
	+ a subsidiary trading company of the charity
	+ an organisation that receives funding from the charity
	+ another charity or organisation that is linked to your charity, for example as part of a federated structure

## How to report

This section explains how to report a serious incident in the charity.

### Action to take

If something does go wrong, the charity should take immediate action to:

* prevent or minimise any further harm, loss, or damage
* report it to the Commission as a serious incident
* report it to the police (and/or other relevant agencies) if you suspect a crime has been committed, and to any other regulators the charity is accountable to
* plan what to say to your staff, volunteers, members, the public, the media and other stakeholders, such as funders
* review what happened and prevent it from happening again – this may include reviewing internal controls and procedures, internal or external investigation and/or seeking appropriate help from professional advisers

The online ‘Report a serious incident’ form should be used to report serious incidents to the Commission. See footnote.[[2]](#footnote-2)

The report should detail what happened and explain it is being dealt with, even if it has already been reported it to the police or another regulator.

If a trustee is reporting the incident, they need to confirm that they have authority to report on behalf of the trustee body. If someone who is not a trustee is reporting the incident, they should explain who they are, their relationship with the charity and confirm that they have the authority of the trustees to report the incident.

There may be circumstances where a serious incident occurs involving more than one charity and the incident should be reported by each of those charities. This might be, for example, where the incident materially affects a number of charities in a federated structure or involves an activity funded by more than one charity. In these cases, the charities can agree for one of the charities to make the report on behalf of all of them, provided that they:

* make it clear to the Commission that they have the authority to do this, and
* tell the commission about the action that each of the charities are taking in response to the incident

When making a serious incident report, provide the following information will need to be provided:

* Contact details, including:
	+ your own contact details
	+ the charity name and, if it’s registered, its registration number
	+ reference numbers and contact details if you’ve reported it to other organisations, like the police
	+ names and registration numbers of other charities involved in the incident, if relevant

Details of the incident needing to be reported include:

* date of the incident
* what happened
* date the charity found out about the incident
* how the charity found out about the incident
* what impact the incident has had on the charity’s beneficiaries, finances, staff, operations, or reputation
* whether trustees are aware of the incident
* also need details of how your charity is handling the incident, including:
	+ which of the charity’s policies or procedures relate to the incident and whether they were followed
	+ what steps the charity has taken to deal with the incident
	+ what steps the charity has taken to prevent similar incidents
	+ where applicable, the charity’s media handling or press lines, including a link to a press release if available

It is important that enough detail is provided in the report to give the Commission a clear picture of what happened and when, the extent of any loss or harm, how it is being dealt with and the possible next steps. It is not necessary to provide the names or any other personal details of any individuals involved in the incident in the initial report – the Commission will come back to the charity if it needs this information.

## If the charity needs to update its report

If, having submitted a report to the Commission, the charity becomes aware of any material changes to the facts that were reported, or any other significant developments, it is important that it lets the Commission know as soon as it become aware of these. This includes letting them know if individuals who were alleged to be responsible for wrongdoing are exonerated or the allegation was found to be false or groundless following further investigation by the charity, the police, or another regulator/agency.

The same form will be used to provide an update on a report submitted This will include:

* contact details
* incident reference number from your confirmation email

## What happens next?

The Commission will let the charity know that it has received the report. It receive an incident reference number in a confirmation email. This number will be required if the wants to make an update to its report.

The Commission will assess the nature and level of any risks and look at how the charity is dealing with the incident, and may take steps to verify the details, for example by contacting the police. Once the Commission has completed this assessment, it will let the charity know the outcome. It may come back to the charity first if it:

* needs more information about the incident
* considers the charity needs regulatory advice and guidance
* has to use its legal powers to protect the charity and/or the people who come into contact with the charity through its work
* requires the charity to provide future, timely updates, for example on the outcome of an investigation
* needs to monitor the progress of the charity in dealing with the incident

## Reporting multiple incidents

The Commission recognises that some incidents may occur more frequently within certain charities because of the scope and/or nature of their activities, or the size of the organisation. For instance:

* a charity may be more vulnerable to fraud if it undertakes a lot of complex financial trading
* where a charity is running services for children or adults at risk, there may be more allegations or incidents involving safeguarding failures
* where charities work overseas (particularly in high-risk areas), they may be more vulnerable to harm and loss In such instances, the charity can request the Commission’s permission to submit multiple reports. The Commission may agree to multiple reporting, provided that:
	+ the Commission is satisfied that the charity has appropriate policies and procedures, and mechanisms for the application of those policies/procedures, in place to deal with serious incidents
	+ particularly serious or significant incidents are reported straight away and separately

If the Commission agrees that the charity can submit regular multiple (‘bulk’) reports, these can be submitted periodically rather than by making separate (‘single’) reports for each incident. Many larger and well-established charities have accounting and audit systems in place for periodic reporting to their own boards. It may be possible for these reports to be used or adapted for the Commission, so long as they include the information outlined in section above,

If the charity chooses to submit a bulk report in this way, it should be confident that each incident listed is serious enough to report. It should also provide sufficient detail about each incident and the action taken to deal with it. The Commission may have to contact the charity for more information, and possibly to issue timely guidance, if the relevant and appropriate information is not provided.

* incidents that attract significant media attention that results in or risks significant harm to the charity’s reputation
* incidents involving a significant live and ongoing risk to the charity’s operations, money, assets, property, or the people who come into contact with it through its work
* incidents that involve links to terrorism and extremism

## Declaration in the annual return

As a matter of good practice, all charities, regardless of size or income, should report serious incidents to the Commission promptly.

Any charity whose income is over £25,000, must, as part of the annual return, sign a declaration confirming there were no serious incidents during the previous financial year that should have been reported to the Commission but were not. If incidents did occur, but were not reported at the time, these should be submitted before the charity’s Annual Return is filed, so that a declaration can be made. Until all serious incidents have been reported, a declaration cannot be made, or the annual return completed.

 If trustees fail to report a serious incident that subsequently comes to light, the Commission may consider this to be mismanagement, for example where the trustees have failed to manage the risks properly and breached their legal duties. This may prompt regulatory action, particularly if further abuse or damage has arisen following the initial incident.

## Data protection, confidentiality, and data sharing

When you submit a serious incident report the Commission asks the person submitting the incident report to provide the following personal data:

* the name, telephone number, email address and connection with the charity so that the Commission can contact the person for clarification or further information if required (the Commission also needs a record of the person submitting the report on behalf of the charity)
* the name, date of birth and address of any trustees of the charity who are disqualified and the reason for disqualification so that the Commission can verify the information, assess any risks to other charities and determine whether any regulatory action is required
* where the charity has reported the serious incident to another regulator/agency, the name and contact details of the contact at that regulator/agency so that the Commission can contact them for more information if required and, in some cases, coordinate the response

The Commission does not otherwise require the charity to provide any personal or third party’s personal data and no further personal data should be provided unless an incident cannot be reported without doing so.

The Commission will contact the reporter to ask you for additional information or data if it is considered necessary for them to have it.

1. HM Government’s definition of Extremism: Extremism is the promotion or advancement of an ideology based on violence, hatred, or intolerance, that aims to:

negate or destroy the fundamental rights and freedomsof others; or

undermine, overturn or replace the UK’s system of liberal parliamentary democracy, and democratic rights; or

intentionally create a permissive environment for others to achieve the results in (1) or (2). [↑](#footnote-ref-1)
2. <https://register-of-charities.charitycommission.gov.uk/report-a-serious-incident> (see [↑](#footnote-ref-2)