# Submission from Focus Ireland to the Oireachtas Committee on Housing in relation to the deaths of people who are homeless.

**January 2021**

## 1. Introduction

Focus Ireland welcomes the decision of the Oireachtas Committee on Housing, Local Government and Heritage to look at the complex and tragic issue of the death of people who are homeless.

There is a well-established link between higher rates of mortality and experience of long-term homelessness. Although this link appears to exist in different setting across the globe, it is complex and the nature of it varies depending upon the housing, homeless and health services in each context. As Dennis Culhane, noted in a recent study in the context of Covid-19 risk in the US context:

“*Homeless individuals are admitted to the hospital with medical-surgical conditions 10-15 years earlier than comparable, housed individuals, and with age-related impairments typical of housed individuals 20 years older. …. Existing studies of homeless populations have observed obstructive pulmonary disease prevalence between 20 and 30%, compared to 10% for the general adult population*[***[1]***](https://euc-word-edit.officeapps.live.com/we/wordeditorframe.aspx?ui=en-us&rs=en-us&wopisrc=https%3A%2F%2Ffocusireland.sharepoint.com%2Fsites%2Fadvocacyteamsite%2F_vti_bin%2Fwopi.ashx%2Ffiles%2F97d3fc1dff724dd7b30cd1e69c63fbfd&wdenableroaming=1&mscc=1&hid=-13670&uiembed=1&uih=teams&hhdr=1&dchat=1&sc=%7B%22pmo%22%3A%22https%3A%2F%2Fteams.microsoft.com%22%2C%22pmshare%22%3Atrue%2C%22surl%22%3A%22%22%2C%22curl%22%3A%22%22%2C%22vurl%22%3A%22%22%2C%22eurl%22%3A%22https%3A%2F%2Fteams.microsoft.com%2Ffiles%2Fapps%2Fcom.microsoft.teams.files%2Ffiles%2F1300082883%2Fopen%3Fagent%3Dpostmessage%26objectUrl%3Dhttps%253A%252F%252Ffocusireland.sharepoint.com%252Fsites%252Fadvocacyteamsite%252FShared%2520Documents%252FGeneral%252FPolicy%252FDeaths%2520of%2520people%2520who%2520are%2520homeless%252FSubmission%2520from%2520Focus%2520Ireland%2520to%2520the%2520Oireachtas%2520Committee%2520on%2520Housing%2520in%2520relation%2520to%2520the%2520deaths%2520of%2520people%2520who%2520are%2520homeless.docx%26fileId%3D97d3fc1d-ff72-4dd7-b30c-d1e69c63fbfd%26fileType%3Ddocx%26ctx%3Dfiles%26scenarioId%3D13670%26locale%3Den-us%26theme%3Ddefault%26version%3D20201126015%26setting%3Dring.id%3Ageneral%26setting%3DcreatedTime%3A1611827953660%22%7D&wdorigin=TEAMS-ELECTRON.teams.files&wdhostclicktime=1611827952116&jsapi=1&jsapiver=v1&newsession=1&corrid=e295f654-5cec-443b-b178-f76c578004d8&usid=e295f654-5cec-443b-b178-f76c578004d8&sftc=1&sams=1&accloop=1&sdr=6&scnd=1&hbcv=1&htv=1&hodflp=1&instantedit=1&wopicomplete=1&wdredirectionreason=Unified_SingleFlush&rct=Medium&ctp=LeastProtected#_ftn1)*.”*

Dr Austin O’Carroll in his recent PhD and elsewhere[[2]](https://euc-word-edit.officeapps.live.com/we/wordeditorframe.aspx?ui=en-us&rs=en-us&wopisrc=https%3A%2F%2Ffocusireland.sharepoint.com%2Fsites%2Fadvocacyteamsite%2F_vti_bin%2Fwopi.ashx%2Ffiles%2F97d3fc1dff724dd7b30cd1e69c63fbfd&wdenableroaming=1&mscc=1&hid=-13670&uiembed=1&uih=teams&hhdr=1&dchat=1&sc=%7B%22pmo%22%3A%22https%3A%2F%2Fteams.microsoft.com%22%2C%22pmshare%22%3Atrue%2C%22surl%22%3A%22%22%2C%22curl%22%3A%22%22%2C%22vurl%22%3A%22%22%2C%22eurl%22%3A%22https%3A%2F%2Fteams.microsoft.com%2Ffiles%2Fapps%2Fcom.microsoft.teams.files%2Ffiles%2F1300082883%2Fopen%3Fagent%3Dpostmessage%26objectUrl%3Dhttps%253A%252F%252Ffocusireland.sharepoint.com%252Fsites%252Fadvocacyteamsite%252FShared%2520Documents%252FGeneral%252FPolicy%252FDeaths%2520of%2520people%2520who%2520are%2520homeless%252FSubmission%2520from%2520Focus%2520Ireland%2520to%2520the%2520Oireachtas%2520Committee%2520on%2520Housing%2520in%2520relation%2520to%2520the%2520deaths%2520of%2520people%2520who%2520are%2520homeless.docx%26fileId%3D97d3fc1d-ff72-4dd7-b30c-d1e69c63fbfd%26fileType%3Ddocx%26ctx%3Dfiles%26scenarioId%3D13670%26locale%3Den-us%26theme%3Ddefault%26version%3D20201126015%26setting%3Dring.id%3Ageneral%26setting%3DcreatedTime%3A1611827953660%22%7D&wdorigin=TEAMS-ELECTRON.teams.files&wdhostclicktime=1611827952116&jsapi=1&jsapiver=v1&newsession=1&corrid=e295f654-5cec-443b-b178-f76c578004d8&usid=e295f654-5cec-443b-b178-f76c578004d8&sftc=1&sams=1&accloop=1&sdr=6&scnd=1&hbcv=1&htv=1&hodflp=1&instantedit=1&wopicomplete=1&wdredirectionreason=Unified_SingleFlush&rct=Medium&ctp=LeastProtected#_ftn2) has highlighted the barriers that people who are homeless experience in engaging with our already stretched health service. Even aside from the daily vulnerabilities arising from living in a homeless shelter, or the much greater vulnerabilities for the small minority of people who sleep rough, this level of general ill-health will contribute to early mortality.

It is important to state that, at the most fundamental level, the solution to the poor health and high mortality among people who are homeless must be to end homelessness itself. Focus Ireland strongly believes that this should be returned to its place as the central, achievable goal of homeless policy. Nevertheless, the Committee is correct that we also have an obligation to look at what needs to be done today for those people who are currently experiencing homelessness.

The decision of the Committee to look at this issue reflects a deep public concern about homelessness and, specifically, the level of reported deaths among people who are homeless. The reaction of the Irish public to the death of people who are homeless manifests some of the best aspects of Irish attitudes to homelessness, but also raises real challenges in understanding and responding to this issue.

One of the difficulties arising in discussion of the issue is the range of competing definitions of what it means to be homeless. Statistical reports which set out a figure for ‘deaths in homeless services’ can include people who are living in permanent supported housing, or are in a hospital bed, who would not be counted as homeless in any other circumstance. Because of the failure to establish a consistent and transparent definition of homelessness for statistical purposes, we find people reported as ‘homeless deaths’ who were not counted as homeless when they were alive.

Reliable statistics, based on agreed definitions, are essential for understanding and addressing complex problems. This highlights again the urgency of convening a broad-based expert group to review the collection of homeless statistics and return to the position where published statistics are consistent and credible.

## 2. Monitoring, reporting and keeping people safe.

For many years Focus Ireland has had a formal policy under which any death of a customer or tenant results in an internal investigation and a formal report to the CEO. The policy has been revised over the years to reflect the experience that the majority of deaths of customers/tenants are due to natural causes, such as an already diagnosed illness. As a result, the review policy now has two phases – in the first case, a review of the circumstances of all deaths of tenants and customers. Where this review highlights particular circumstances to warrant further examination (e.g. unexpected death, accident, suicide) a more detailed review is undertaken. The reviews are internal reviews and are undertaken by a panel of Focus Ireland staff drawn from services other than those where the death occurred. It is important to note that lessons from such reviews are not confined to the causes and circumstances of the death – practices and experience relating to, for instance, communicating with the next of kin are also important areas for learning.

This internal policy has been adopted by Focus Ireland in the absence of an external policy or reporting procedure. At present, the only formal reporting mechanism specific to homeless services is the requirement to inform the DRHE of a death and to record the death on PASS. The ordinary procedures in relation to reporting to the Gardai, obtaining death certificates and coroners hearings, of course, apply to people who are in homeless services as much as to any other person.

Focus Ireland would welcome a sector-wide policy and formal reporting process, and a considered recommendation from the Committee to the lead local authority in each of the 9 regional homeless forums would be a constructive step.

It is worth drawing attention to three significant issues which have arisen in relation to our own reporting mechanism, which could usefully inform any national system of review:

- While it is important to identify and correct any misjudgements or procedural errors which have contributed to the death, it is important to avoid the perception that investigations of death are a process for ‘apportioning blame’. It is a sad fact that mortality is part of the human condition and it is very problematic to promote a belief that all deaths could be averted and are therefore inevitably somebody’s fault. Some of the public commentary on this issue has tended towards this tone and does not help to create more responsive and transparent systems.

- Any policy and procedures governing responses to deaths of people who are homeless must also include appropriate bereavement supports and, where appropriate trauma counselling, for the staff of the service, the family of the deceased and his/her friends and associates.

- Finally, it is important to remember that any response to the deaths of people who are homeless, whether it comes from individual homeless NGOs or from local authorities or the HSE, is subsidiary to the formal process of determining the cause of death in the Coroner’s Court. This fact can have significant implications for any review of deaths or even collation of statistics – it can frequently be impossible to finalise report for several months as there are often delays in the coroner completing his/her work. This also has implications for public and media discussion of such tragic events, which is discussed below.

In addition to good practice on reporting of deaths, it is important of course that the Committee look at effective measures to reduce the health risk to people who are homeless. Such measures relate both to physical health and mental health. The excellent work of SafetyNet is an important model here while the issue of access to mental health services was the subject of a recent review[[1]](#footnote-7854) which recommended that: *The high proportion of patients reporting to be homeless suggests the need for a renewed impetus into devising tailored and flexible multi-disciplinary assessments and interventions at ED and primary care levels.*

3. Public and media commentary on deaths

As has been noted the widespread interest and sympathy of the Irish public concerning the deaths of people who are homeless reflects some of the most positive aspects of Irish society: people in Ireland care about homelessness and the human vulnerability it reveals to a much greater extent than is evident in many other countries.

This concern is reflected in much stronger media attention to the deaths of people who are homeless than would be common in many other countries. This level of media and public attention and the public scrutiny it brings are welcome. However, there are some aspects of media reporting and social media commentary by public figures which are problematic.

As has been noted, the absence of a clear and consistent definition of which deaths are considered ‘deaths of a person who is homeless’ leads to misleading comparisons over time and some alarmist commentary. This situation could be improved by a consistent application of ‘homelessness’ and greater direction of resources towards publication of reliable data.

There is a strong tendency in media reporting of the deaths of people who are homeless to conflate ‘rough sleeping’ with all forms of homelessness. For instance, a report this week on RTE contained a single paragraph that stated ‘There were at least 50 homeless deaths in Dublin last year. A recent count by the Simon Community noted 139 people sleeping rough in the city”[[3]](https://euc-word-edit.officeapps.live.com/we/wordeditorframe.aspx?ui=en-us&rs=en-us&wopisrc=https%3A%2F%2Ffocusireland.sharepoint.com%2Fsites%2Fadvocacyteamsite%2F_vti_bin%2Fwopi.ashx%2Ffiles%2F97d3fc1dff724dd7b30cd1e69c63fbfd&wdenableroaming=1&mscc=1&hid=-13670&uiembed=1&uih=teams&hhdr=1&dchat=1&sc=%7B%22pmo%22%3A%22https%3A%2F%2Fteams.microsoft.com%22%2C%22pmshare%22%3Atrue%2C%22surl%22%3A%22%22%2C%22curl%22%3A%22%22%2C%22vurl%22%3A%22%22%2C%22eurl%22%3A%22https%3A%2F%2Fteams.microsoft.com%2Ffiles%2Fapps%2Fcom.microsoft.teams.files%2Ffiles%2F1300082883%2Fopen%3Fagent%3Dpostmessage%26objectUrl%3Dhttps%253A%252F%252Ffocusireland.sharepoint.com%252Fsites%252Fadvocacyteamsite%252FShared%2520Documents%252FGeneral%252FPolicy%252FDeaths%2520of%2520people%2520who%2520are%2520homeless%252FSubmission%2520from%2520Focus%2520Ireland%2520to%2520the%2520Oireachtas%2520Committee%2520on%2520Housing%2520in%2520relation%2520to%2520the%2520deaths%2520of%2520people%2520who%2520are%2520homeless.docx%26fileId%3D97d3fc1d-ff72-4dd7-b30c-d1e69c63fbfd%26fileType%3Ddocx%26ctx%3Dfiles%26scenarioId%3D13670%26locale%3Den-us%26theme%3Ddefault%26version%3D20201126015%26setting%3Dring.id%3Ageneral%26setting%3DcreatedTime%3A1611827953660%22%7D&wdorigin=TEAMS-ELECTRON.teams.files&wdhostclicktime=1611827952116&jsapi=1&jsapiver=v1&newsession=1&corrid=e295f654-5cec-443b-b178-f76c578004d8&usid=e295f654-5cec-443b-b178-f76c578004d8&sftc=1&sams=1&accloop=1&sdr=6&scnd=1&hbcv=1&htv=1&hodflp=1&instantedit=1&wopicomplete=1&wdredirectionreason=Unified_SingleFlush&rct=Medium&ctp=LeastProtected#_ftn3). A reader would reasonably understand from that sentence that the 50 homeless deaths were from the 139 people who were sleeping rough. In fact, as has been noted the 50 deaths do not relate even to the 4,300 adults who are homeless at any one time, but to the well over 10,000 people who have been homeless at some time during the year or are living in accommodation paid for under Section 10 of the Housing Act.

This tendency is compounded by the tendency in some media coverage to describe the deaths of people who are homeless as ‘deaths on the street.’

One consequence of this persistent high-profile reporting of homelessness as *the same as* sleeping rough is to feed a view that the solution must be more and better homeless shelters. In this way, the deep public concern about the vulnerability of people who are homeless has contributed to the situation where, for many years, more homeless shelter beds have been commissioned than social houses have been built.

Homeless services are also deeply aware of a disturbing number of cases of suicide among homeless people, and there has been a greater awareness of this problem during since the advent of the Covid-19 pandemic. This is also a serious and apparently growing problem in the overall population, and, while it is unclear whether this is a more common among people who are homeless, there is no doubt that this is a significant problem for people who are homeless. However, commentary on the deaths of people who are homeless, particularly on social media, frequently refers to the issue of suicide and severe mental health. While much of this arises from genuine concern and is well-intentioned, it is in direct contravention to the advice from charities dealing with the issue of suicide and much of it can be quite counterproductive.

Finally, it is important to make an appeal for the dignity and privacy of people who are homeless at the time of their death. Very often the deaths of people who are homeless are accompanied by publication of very intimate details of their lives, which were often communicated in confidence. People who are homeless are required to explain very intimate details of their lives in order to be assessed as homeless and receive support. Even before GDPR, considerable efforts were made by the DRHE and by homeless NGOs to protect the private information collected about people who are homeless. However, on a number of occasions some commentators have appeared to set aside these protections on the death of an individual.

Focus Ireland has long had a policy of not commenting on the deaths of people who are homeless until the Gardai have completed their role of informing family members and confirming the identity of the person who has passed away.

It would be helpful for the Committee to consider recommending a voluntary code of practice for media, NGOs and concerning individuals which would give guidance about how these important issues can be discussed, balancing the urgent need for public awareness with the right to privacy of the individuals and their families. The Press Council code of practice ( [Code of Practice (presscouncil.ie)](https://eur01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.presscouncil.ie%2Fcode-of-practice&data=04%7C01%7Cmallen%40focusireland.ie%7Cc85f36c1946c4f65cfa908d8c3b0e0bf%7Cc7297a260db04f71a5c00dddcd51bf58%7C0%7C0%7C637474511747770938%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C1000&sdata=h%2BiSYBkzGCUBokZVci3mS2L%2FViKlq169VJwwkvUqE%2FA%3D&reserved=0) and the media guidelines on suicide drafted by the Samaritans (Media\_Guidelines\_FINAL\_v2\_TABa8C6.pdf (samaritans.org) are good models for this.

[[1]](https://euc-word-edit.officeapps.live.com/we/wordeditorframe.aspx?ui=en-us&rs=en-us&wopisrc=https%3A%2F%2Ffocusireland.sharepoint.com%2Fsites%2Fadvocacyteamsite%2F_vti_bin%2Fwopi.ashx%2Ffiles%2F97d3fc1dff724dd7b30cd1e69c63fbfd&wdenableroaming=1&mscc=1&hid=-13670&uiembed=1&uih=teams&hhdr=1&dchat=1&sc=%7B%22pmo%22%3A%22https%3A%2F%2Fteams.microsoft.com%22%2C%22pmshare%22%3Atrue%2C%22surl%22%3A%22%22%2C%22curl%22%3A%22%22%2C%22vurl%22%3A%22%22%2C%22eurl%22%3A%22https%3A%2F%2Fteams.microsoft.com%2Ffiles%2Fapps%2Fcom.microsoft.teams.files%2Ffiles%2F1300082883%2Fopen%3Fagent%3Dpostmessage%26objectUrl%3Dhttps%253A%252F%252Ffocusireland.sharepoint.com%252Fsites%252Fadvocacyteamsite%252FShared%2520Documents%252FGeneral%252FPolicy%252FDeaths%2520of%2520people%2520who%2520are%2520homeless%252FSubmission%2520from%2520Focus%2520Ireland%2520to%2520the%2520Oireachtas%2520Committee%2520on%2520Housing%2520in%2520relation%2520to%2520the%2520deaths%2520of%2520people%2520who%2520are%2520homeless.docx%26fileId%3D97d3fc1d-ff72-4dd7-b30c-d1e69c63fbfd%26fileType%3Ddocx%26ctx%3Dfiles%26scenarioId%3D13670%26locale%3Den-us%26theme%3Ddefault%26version%3D20201126015%26setting%3Dring.id%3Ageneral%26setting%3DcreatedTime%3A1611827953660%22%7D&wdorigin=TEAMS-ELECTRON.teams.files&wdhostclicktime=1611827952116&jsapi=1&jsapiver=v1&newsession=1&corrid=e295f654-5cec-443b-b178-f76c578004d8&usid=e295f654-5cec-443b-b178-f76c578004d8&sftc=1&sams=1&accloop=1&sdr=6&scnd=1&hbcv=1&htv=1&hodflp=1&instantedit=1&wopicomplete=1&wdredirectionreason=Unified_SingleFlush&rct=Medium&ctp=LeastProtected#_ftnref1) Culhane, D., Treglia, D., Steif, K., Kuhn, R. and Byrne, T., 2020*. Estimated emergency and observational/quarantine capacity need for the US homeless population related to COVID-19 exposure by county; projected hospitalizations, intensive care units and mortality*.

[[2]](https://euc-word-edit.officeapps.live.com/we/wordeditorframe.aspx?ui=en-us&rs=en-us&wopisrc=https%3A%2F%2Ffocusireland.sharepoint.com%2Fsites%2Fadvocacyteamsite%2F_vti_bin%2Fwopi.ashx%2Ffiles%2F97d3fc1dff724dd7b30cd1e69c63fbfd&wdenableroaming=1&mscc=1&hid=-13670&uiembed=1&uih=teams&hhdr=1&dchat=1&sc=%7B%22pmo%22%3A%22https%3A%2F%2Fteams.microsoft.com%22%2C%22pmshare%22%3Atrue%2C%22surl%22%3A%22%22%2C%22curl%22%3A%22%22%2C%22vurl%22%3A%22%22%2C%22eurl%22%3A%22https%3A%2F%2Fteams.microsoft.com%2Ffiles%2Fapps%2Fcom.microsoft.teams.files%2Ffiles%2F1300082883%2Fopen%3Fagent%3Dpostmessage%26objectUrl%3Dhttps%253A%252F%252Ffocusireland.sharepoint.com%252Fsites%252Fadvocacyteamsite%252FShared%2520Documents%252FGeneral%252FPolicy%252FDeaths%2520of%2520people%2520who%2520are%2520homeless%252FSubmission%2520from%2520Focus%2520Ireland%2520to%2520the%2520Oireachtas%2520Committee%2520on%2520Housing%2520in%2520relation%2520to%2520the%2520deaths%2520of%2520people%2520who%2520are%2520homeless.docx%26fileId%3D97d3fc1d-ff72-4dd7-b30c-d1e69c63fbfd%26fileType%3Ddocx%26ctx%3Dfiles%26scenarioId%3D13670%26locale%3Den-us%26theme%3Ddefault%26version%3D20201126015%26setting%3Dring.id%3Ageneral%26setting%3DcreatedTime%3A1611827953660%22%7D&wdorigin=TEAMS-ELECTRON.teams.files&wdhostclicktime=1611827952116&jsapi=1&jsapiver=v1&newsession=1&corrid=e295f654-5cec-443b-b178-f76c578004d8&usid=e295f654-5cec-443b-b178-f76c578004d8&sftc=1&sams=1&accloop=1&sdr=6&scnd=1&hbcv=1&htv=1&hodflp=1&instantedit=1&wopicomplete=1&wdredirectionreason=Unified_SingleFlush&rct=Medium&ctp=LeastProtected#_ftnref2) See presentation of findings at Focus Ireland/ School of Social Work and Social Policy (Trinity College Dublin) Lunchtime talk April 2020 <https://bit.ly/3cHBeOQ>

[[3]](https://euc-word-edit.officeapps.live.com/we/wordeditorframe.aspx?ui=en-us&rs=en-us&wopisrc=https%3A%2F%2Ffocusireland.sharepoint.com%2Fsites%2Fadvocacyteamsite%2F_vti_bin%2Fwopi.ashx%2Ffiles%2F97d3fc1dff724dd7b30cd1e69c63fbfd&wdenableroaming=1&mscc=1&hid=-13670&uiembed=1&uih=teams&hhdr=1&dchat=1&sc=%7B%22pmo%22%3A%22https%3A%2F%2Fteams.microsoft.com%22%2C%22pmshare%22%3Atrue%2C%22surl%22%3A%22%22%2C%22curl%22%3A%22%22%2C%22vurl%22%3A%22%22%2C%22eurl%22%3A%22https%3A%2F%2Fteams.microsoft.com%2Ffiles%2Fapps%2Fcom.microsoft.teams.files%2Ffiles%2F1300082883%2Fopen%3Fagent%3Dpostmessage%26objectUrl%3Dhttps%253A%252F%252Ffocusireland.sharepoint.com%252Fsites%252Fadvocacyteamsite%252FShared%2520Documents%252FGeneral%252FPolicy%252FDeaths%2520of%2520people%2520who%2520are%2520homeless%252FSubmission%2520from%2520Focus%2520Ireland%2520to%2520the%2520Oireachtas%2520Committee%2520on%2520Housing%2520in%2520relation%2520to%2520the%2520deaths%2520of%2520people%2520who%2520are%2520homeless.docx%26fileId%3D97d3fc1d-ff72-4dd7-b30c-d1e69c63fbfd%26fileType%3Ddocx%26ctx%3Dfiles%26scenarioId%3D13670%26locale%3Den-us%26theme%3Ddefault%26version%3D20201126015%26setting%3Dring.id%3Ageneral%26setting%3DcreatedTime%3A1611827953660%22%7D&wdorigin=TEAMS-ELECTRON.teams.files&wdhostclicktime=1611827952116&jsapi=1&jsapiver=v1&newsession=1&corrid=e295f654-5cec-443b-b178-f76c578004d8&usid=e295f654-5cec-443b-b178-f76c578004d8&sftc=1&sams=1&accloop=1&sdr=6&scnd=1&hbcv=1&htv=1&hodflp=1&instantedit=1&wopicomplete=1&wdredirectionreason=Unified_SingleFlush&rct=Medium&ctp=LeastProtected#_ftnref3) <https://www.rte.ie/news/regional/2021/0125/1192003-dublin-homeless-meals/>

1. [Homelessness, emergency care and mental health. Inner-city emergency department psychiatry referrals: a retrospective descriptive analysis | SpringerLink](https://eur01.safelinks.protection.outlook.com/?url=https%3A%2F%2Flink.springer.com%2Farticle%2F10.1007%2Fs11845-020-02392-3&data=04%7C01%7Cmallen%40focusireland.ie%7C8b03d05bc6a44147509908d8c3afddad%7Cc7297a260db04f71a5c00dddcd51bf58%7C0%7C0%7C637474507392839642%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C1000&sdata=DweIQSm8%2BgA9KMFP3eZQjgeyiNxPQWLyAsoX%2FedVyuM%3D&reserved=0)   
    [↑](#footnote-ref-7854)