

The response from the Social Fund Commissioner to the call for evidence on *Local support to replace Community Care Grants and Crisis Loans for living expenses*

Introduction

I reply in my capacity as Social Fund Commissioner, having been appointed by the Secretary of State for Work and Pensions to head the Independent Review Service (IRS)¹ which provides an external review of Jobcentre Plus' decisions on applications to the discretionary Social Fund across Great Britain. I hold a separate appointment for Northern Ireland. Our work includes a review of decisions made by Jobcentre Plus on Community Care Grants and Crisis Loans for living expenses, which are the subject of this call for evidence.

Since the inception of the IRS in 1988 Social Fund Inspectors have reviewed over 500,000 decisions. In 2009/2010, Community Care Grant decisions made up 11% of discretionary Social Fund initial decisions in Jobcentre Plus². In contrast, Community Care Grant decisions made up 61% of Social Fund Inspectors' decisions³. This has given us a considerable insight into the difficulties and problems vulnerable people face in relation to issues that include health, independence, housing and family. Our experience of dealing with reviews shows that the Social Fund provides a vital source of assistance for many vulnerable people. My response draws on our experience and evidence from casework, a significant proportion of which relates to Community Care Grants, in order to assist policy makers as they consider the shape of new local provision.

Given the wider context of changes within our society since the Social Fund was established in 1988, I accept the arguments for ensuring greater responsiveness. The Welfare Reform Bill provides for locally based provision to replace Community Care Grants and Crisis Loans for living expenses. This call for evidence seeks input on how central Government

¹The Social Fund Commissioner's statutory duties and powers are set out in primary legislation at section 37 of the Social Security Act 1998 and include appointing Social Fund Inspectors and other staff as he thinks fit; arranging training as appropriate; monitoring the quality of Inspectors' decisions; providing advice and assistance as appropriate to improve standards; and reporting annually to the Secretary of State for Work and Pensions.

² Annual Report by the Secretary of State for Work and Pensions' on the Social Fund 2009/2010

³ The Social Fund Commissioner's Annual Report 2009/2010

could support English local authorities in the development of new assistance and facilitation of learning and best practice. I recognise that the devolved administrations will make their own arrangements. I am aware that Northern Ireland already has its own system in place and is looking separately at future provision.

My response recognises the Government's policy commitment to decentralisation and breaking down barriers between health and social care funding in order to incentivise preventative action.

I note this call for evidence also sets out the Government's commitment to improving the delivery of support to the most vulnerable people in our society. This local support may involve partnership arrangements with other statutory or third sector providers. There is the potential for local support to deliver positive and focused outcomes that balance the needs of service users and taxpayers.

However I consider that any new arrangements must be underpinned by fundamental principles such as: the provision of high quality local support; transparency about the type of assistance which is available; clarity about the situations in which help can be given and who to approach for that help; consistency of approach in relation to delivering local support so there is actual and perceived fairness between different groups of citizens; and safeguards to protect the needs of vulnerable people.

A Changing Landscape

I note that this current consultation on local support is one of several concurrent activities being undertaken in relation to the reform of public services, such as health and social care delivery. I refer to some of these below.

The Government is committed to the integration of health and social care. A Health and Social Care Bill, which provides an opportunity to advance that commitment, has just completed its committee stage. Before the Bill reaches its final stages in Parliament the Government launched, on 6 April, a "listening exercise" to hear the public's views on NHS modernisation.

The Law Commission is currently undertaking a project concerned with a review of the law relating to the provision of social care in England and

Wales. The Commission has consulted on its proposal that a single, clear and modern statute should be introduced to replace what it has described as “a complex legal framework”. On 31 March 2011 the Commission published its analysis of consultation responses. The final report is due for publication in May 2011. Conclusions set out in the final report will inform a White Paper, which will also reflect the conclusions of the Commission on funding of long term care.

Local authorities are undergoing significant change as the Government pursues its decentralisation agenda. The Localism Bill, which sets out the legislative foundation for a shift of power from the centralised state to local level, recently completed its committee stage. The Government is currently consulting on plans to increase accountability and efficiency in local auditing. There is also a wide ranging review to establish which statutory duties are no longer needed (with a view to removing them) in order to give local authorities freedom to operate in a way that meets local needs and priorities.

All of this activity means that the changes which will occur because of the abolition of the Social Fund must be viewed in the context of an evolving local, legal, social care and welfare landscape. It may appear at first sight that replacement provision for Community Care Grants, and loans paid to vulnerable people at the point of crisis, is most closely related to the support and services delivered by social services departments in local Government. However, given the evolving landscape in terms of health and social care, new arrangements cannot simply be structured around established and permanent provision. It is vital that local support, designed to replace former Social Fund provision, interacts with other local initiatives in ways that deliver positive and improved outcomes.

Current provision for Community Care Grants and Crisis Loans for living expenses

The Social Fund is unique in terms of statutory Government welfare benefit provision because, in specific circumstances, it provides people with cash for items. Although other forms of Government welfare benefit provision are in place, that support does not extend to cash for items. Crisis Loans are meant to provide a safety net in the form of cash for people who have been left without money for food and fuel.

The criteria for receipt of a Community Care Grant and a Crisis Loan are quite distinct. The grant scheme is intended to meet a need for community care by helping vulnerable people, on specified income related benefits, who are facing difficulty arising from special circumstances. Community Care Grant payments are commonly for items. At its inception, the Community Care Grant scheme was designed to complement care provided by local authorities and by other Government and voluntary agencies. Crisis Loans are intended for people who are unable to meet their immediate short term needs, either in an emergency - in relation to some expenses - or as a consequence of a disaster. Crisis Loans can be for items, or living expenses or a mixture of both. The proposed transfer of responsibility to local authorities in relation to Crisis Loans is limited to a form of support designed to replace those Crisis Loans that are currently paid for living expenses.

I note that this call for evidence makes clear that there is no expectation that local authorities will recreate the present system of Community Care Grants and Crisis Loans locally. Support for the vulnerable people who currently use the Social Fund may be delivered in a completely different format under new local arrangements. However, the needs of the individuals who currently apply for assistance under existing Social Fund criteria will still exist in local communities at the point when responsibility for them transfers to local authorities.

In large-scale decision making processes, such as the Social Fund, there is always the possibility of abuse in a small minority of cases. The evidence from our casework and research shows that the existing Social Fund scheme (and the Community Care Grant aspect in particular) targets assistance effectively towards the needs of many vulnerable people and makes a difference to their lives. I acknowledge that the impact of the assistance varies between individuals, but I believe it is important that the positive elements of the current scheme are not overlooked in setting up the new arrangements.

It is clear from our casework that some vulnerable people already receive support from local authorities or other agencies, alongside the more direct monetary help provided by the Social Fund. Together this offers a rounded package of support which improves people's lives. However, we can also see that some vulnerable people are not receiving support from any of those sources when they make their applications to the Social Fund. I note that this

point was echoed in Professor Elaine Kempson's oral evidence given on 24th March 2011 to the Welfare Reform Bill Committee⁴.

My office analysed findings from 500 cases received for review during June 2010⁵. Of these, 446 were Community Care Grant applications and the remainder were Crisis Loan applications. Each case reviewed at the IRS is defined by the customer's personal and very individual circumstances. The findings of this research project highlight some of the underlying social and economic problems facing many of those who approach the Fund for assistance. These underlying problems are likely to continue when the new support arrangements are put in place.

In order to provide an evidence based context, I include an overview of these findings as an Appendix; my full report is available on the IRS website.

Transition to new arrangements

The Government has committed to making a sustainable difference by tackling the root causes of poverty, which have been described by the Secretary of State for Work and Pensions as: family breakdown; educational failure; drug and alcohol addiction; severe personal indebtedness; and economic dependency⁶.

Appropriate support may over a period of time move some people out of dependency. However needs that would formerly have been dealt with by the Social Fund will continue to exist within local communities at the point of transfer to localised provision. From some of the cases we have seen it is clear that at least some of the individuals who have those needs will not be engaging with local services or agencies. It may also be the case that in the early stages of the new arrangements there will need to be more emphasis on the need for reactive support, such as a cooker or cash for food. The preventative measures that might reduce spending on support formerly provided by the Social Fund will take some time to have effect.

To ignore the need for immediate and reactive support might result in escalated costs further down the line. For example, the failure to provide a bed for a young child in order to replace one damaged by ongoing

⁴ <http://www.publications.parliament.uk/pa/cm201011/cmpublic/welfare/110324/am/110324s01.htm>

⁵ <http://www.irs-review.org.uk/infocent/reports/sfc/ExpSFCustomersReport.pdf>

⁶ DWP, July 2010, *21st Century Welfare* Cm 7913

bedwetting, could eventually lead to hospital or care admission and the cost of this might far outweigh the initial outlay for a bed. However preventative support has the potential to reduce the total amount that needs to be spent at a later stage. A challenge in the early stages of this transition to localised provision will be how to achieve the best balance between reactive and preventative support. The balance between provision of reactive and preventative support is likely to shift over time, depending on the extent to which preventative measures deliver positive outcomes.

From our casework it is clear that there will be some people who will always need support in the form of items alongside services or other forms of support.

Case example 1

Mrs C gets Pension Credit and Attendance Allowance. She has arthritis, two replacement hips and diabetes. Her mobility is restricted and she does not go out of the house unaccompanied. Mrs C lives on her own in her own home and a carer calls every day.

Mrs C has had the carpet in her bedroom for over 30 years. It is threadbare in the most used places. Recently, when the carer was moving furniture in the process of cleaning, she tore the carpet somewhere between the doorway and Mrs C's bed. Mrs C has caught her foot several times and stumbled as a result. She has applied for a new carpet explaining she is concerned that next time she will fall.

Given her age and frailty, a fall is likely to lead to hospital admission and a need for help with re-enablement when, or if, Mrs C returns home. Providing a new carpet will improve safety in the home, reduce the risk of Mrs C injuring herself in a fall and help her to stay in her own home for the immediate future. However, it will be difficult to achieve significant improvements in the underlying problems caused by a combination of her age and health concerns. She is likely to need ongoing support in a variety of ways.

There will be others whose need for items diminishes as a result of the support they receive to tackle underlying issues.

Case example 2

Mr P gets Income Support with a Disability Premium and Disability Living Allowance Mobility Component. He has a prosthetic leg, hepatitis C and breathing difficulties. He is prone to infections.

Mr P has been homeless, in and out of prison, and is a recovering drug addict. He has been drug-free for some months. He regularly sees a specialist, GP and key worker. He has been working with his key worker for some time and has reached the point where he can move into a home of his own and live independently. His request is for a grant to help set up his home from scratch.

Although Mr P has significant and long standing health problems the ongoing personal support he has received in relation to those problems means that he is now able to set up home on his own. This is likely to have a positive impact on his general health and help reduce the risk that he will re-offend or take drugs in the future. The provision of basic items that will help him make a home, rather than just having a roof over his head, will play a significant part here. Mr P's health problems may remain but setting up a home will help to tackle the other underlying issues that have had a negative impact on his ability to live in and contribute to society.

Principles to underpin the new arrangements

My responses to earlier consultation papers such as *21st Century Welfare* and the *White Paper on Universal Credit: welfare that works* set out my views on the proposed reforms⁷.

I note that the Welfare Reform Bill does not include any statement of overarching principles in terms of the localised support that will replace the safety net currently provided by Community Care Grants and Crisis Loans

⁷ <http://www.irs-review.org.uk/infocent/reports/sfc/21stCenturyWelfareResponse.pdf>
<http://www.irs-review.org.uk/infocent/reports/sfc/UniCreditEvidence.pdf>

for living expenses. I have consistently stated that however support is delivered (whether centrally or locally) fairness and transparency should be essential components of any new arrangements. I also believe that clarity and consistency of approach are important indicators of fairness and transparency. Other important markers which will promote confidence in the new arrangements will include: openness in relation to access arrangements; easy to understand information about the type of support available; assurance in relation to quality standards and equitable treatment; an independent overview and access to a system of independent redress. I expand on these themes below.

Consistency of approach

A fundamental principle in relation to any welfare benefits scheme in the past has been the need for consistency of approach in relation to the application of the scheme across the country, so that there is fairness between different groups of citizens. Outcomes may differ across localities or communities where this is appropriate to reflect local needs and circumstances. However any difference in outcome should relate to the needs of individuals using the local service; rather than to where the individual lives or the needs or preferences of the organisations which deliver the service. The current discretionary Social Fund scheme recognises that individual situations will differ from case to case and that each case should be decided on all of the circumstances of the individual case.

I note that the call for evidence stresses the advantage of discretion within a locally based and designed service using existing powers contained in the Local Government Act 2000. This raises the question of how each local authority will offer a local service that provides assistance to vulnerable people, such as those who currently apply for Community Care Grants and Crisis Loans for living expenses. I also note that some witnesses who appeared before the Welfare Reform Bill Committee have expressed their concerns that some local authorities may opt to use the money for other purposes given the financial pressures on their budgets.

Quality standards

My Annual Report, and those of my predecessors, drew attention to deficiencies in the quality of decision making at first line and internal review

levels within Jobcentre Plus. It is important that some form of quality standard is in place in relation to locally based decision making.

Clarity

I recognise that the Government is committed to providing local authorities with maximum flexibility in order to deliver services as they see fit, according to local needs. In order to make best use of the funding transferred from the Department for Work and Pensions, local authorities will need to have a clear vision of how they intend to use this money to improve outcomes for local individuals and families with support needs; some of whom may be facing multiple disadvantage.

Whatever form it takes, locally based provision must have criteria that are clear and easy to understand for local people. The criteria should be applied consistently by local decision makers. There should also be a fair and equitable distribution of resources. This might be achieved by setting out a national framework, or by setting out certain local authority duties. Such measures need not remove a local authority's flexibility to decide what specific action to take locally in order to deliver the Government's overarching ambitions for social care. In the interests of fairness, transparency and promoting public confidence in the new arrangements, I believe that some type of national framework is necessary. This would promote consistency and overarching goals across local areas and also allow local people to assess whether the particular support provided is delivering fair and effective outcomes. In addition, local authorities should be able to demonstrate the added value of the support they provide with the funding transferred for that purpose.

Awareness and access

The Social Fund currently offers clarity in terms of what assistance can be provided, the application process and how to challenge decisions. The overwhelming majority of Social Fund applicants make their independent review application without the involvement of statutory or voluntary agencies. I note that local authority staff and voluntary groups currently play a very important role in assessments and support, and could continue to do so in future. Whatever locally based support system emerges under new arrangements, there should continue to be clarity about who to approach for support and how to do that.

Unless local authorities issue public information about the type of support available locally, there will be significant access issues to address because local people will not be clear about what type of help they may be able to obtain. In the interests of fairness and transparency, people who apply for support need to know that they will be given a decision on the outcome of their request and information about how they can challenge the decision if necessary.

Equity

I note that witnesses appearing before the Welfare Reform Bill Committee have highlighted their concerns that without over-arching principles and ring-fenced funding, there will be variations in accessibility, awareness and outcomes between different localities. In response it is argued that these greater freedoms will result in a more responsive, better targeted and relevant service.

Currently the Community Care Grant scheme is a centrally funded scheme that is cash limited by a national allocation of money which has been static for the past six years at £141 million. The overall budget is distributed between 23 Jobcentre Plus Social Fund districts across Great Britain although the number of processing centres is now far fewer than this⁸. Our casework experience shows that, even with defined Directions and Guidance in place, outcomes for Social Fund customers differ across the country in ways that relate to the state of the budget rather than the individual circumstances of particular customers. My evidence to the Public Accounts Committee⁹ drew attention to this, as did the recently published National Audit Office report examining Community Care Grants¹⁰. To resolve this, the initial distribution of funding to local authorities should be allocated so that it does not transfer the existing inequity into the new local support provision.

⁸ The decision makers in each district are responsible for managing their part of the budget so that they do not spend more than their allocation. The Area Decision Maker in each district must specify the level of priority that may be met from that district's grants budget. Decision makers, including Inspectors, must take account of the Area Decision Maker's guidance when deciding whether an application has enough priority to be paid from the limited budget.

⁹ Committee of Public Accounts 11th Report of Session 2010-11 *The Community Care Grant*

¹⁰ National Audit Office – *Department for Work and Pensions The Community Care Grant Report* HC286 Session 2010-2011

Accountability

I note that it has been argued that local people will be able to hold locally based services to account and would observe that vulnerable people are not always best placed to comment on the services they receive. Although local authorities are accountable in democratic terms to local people for the support and services they deliver, they are also accountable to the wider population and to Parliament for how they use taxpayers' money. I believe there should be some process that provides an independent and national overview, in order to identify and remedy poor local practice and systemic failure and also to promote good practice through shared learning.

I believe that transparency should encompass the support the scheme provides and what outcomes can be expected, how to access that support and what outcomes are being delivered. Any data that the local authority makes available to the public must be made available in a form that is easy to access, relevant and meaningful to them. Local people will need clear, easy to understand information on the quality of services being provided and the outcomes achieved.

Independent redress

The Welfare Reform Bill and the call for evidence are silent on the subject of redress, both in terms of reviewing the decision and the process. I believe that the right to an independent grievance process should be an integral part of any decision making system that seeks to meet the needs of poor and vulnerable people. The process for redress within the context of any system should be simple and efficient, with as few layers of bureaucracy as possible. Our experience tells us that Social Fund customers want a prompt resolution to decisions that affect their daily lives. The urgency of the needs they present underlines this and I am certain that this will not change in the future within any locally based provision.

I want to make it clear that I am not arguing for the retention of my own independent statutory role or that of Social Fund Inspectors within the Independent Review Service, which will be abolished with the passage of the Welfare Reform Bill. It is for others to assess our role, our effectiveness and the possibilities offered by our independent review model. However, I have consistently made the point that our poorest and most vulnerable fellow citizens have a right to a voice through some means of independent redress.

There are, of course, instances where local authorities have a statutory duty to perform a function and make their own diverse arrangements to deliver that function. Parking enforcement by local authorities is one such instance. However, local authorities have an overarching and independent appeals body that deals with related parking appeals. The Traffic Penalty Tribunal is the final stage of appeal for motorists or vehicle owners against a penalty issued by a local authority in England (outside London) and Wales¹¹. So, there is already at least one established model within local authorities of an overarching national grievance process. An independent national grievance process appears capable of being delivered by a mutual organisation.

It is possible that the potential for error may be heightened during the initial phase of the new arrangements because of unfamiliarity with the needs or issues presented for decision making. Fairness is a fundamental component of any decisions taken about whether, or how, to offer support to vulnerable people. Whilst the best outcome is the right decision first time, there will inevitably be cases that need to be looked at again. Where a dispute is not resolved internally, an independent and transparent examination is a crucial part of ensuring the process is fair and is seen to be fair.

In order to promote public confidence, local decisions should be subject to independent scrutiny outside local authority structures and control. This would assure Ministers, as well as the public, that locally based decisions about support are credible and fair.

Delivering local support

I note that the call for evidence paper sets out an expectation that the new support systems developed at local level will not seek to recreate Community Care Grants and Crisis Loans. It anticipates that local authorities will want to reflect the needs of their communities and build upon programmes and services already in place. This does call for some form of evaluation by local authorities as to whether their existing programmes and service provision might need adjustment, in order to absorb this transferred responsibility and respond in ways that deliver positive outcomes. It is not clear whether there is an intention to prescribe which sector within local

¹¹ <http://www.trafficpenaltytribunal.gov.uk/site/scripts/documents.php?categoryID=4126>
Lord Chancellor's Department, Research Series No. 5/02, "...It's only parking but...", Professor John Raine and Stephanie Snape

authorities would have lead responsibility for delivery. I note that it can be argued that the responsibility for locally based support provision would appear to be most closely aligned to services delivered through social services departments.

Local authority social services departments currently must assess anyone who appears to be in need of any community care services that they provide. At the initial point of contact, some questions are asked in order to assist social services staff to assess whether an individual appears to be in need of services they provide. It does not follow that everyone who contacts the initial point of contact within social services departments progresses beyond this stage. If they are refused an assessment of needs these individuals can make a complaint to the local authority.

People who currently apply to the discretionary Social Fund for Community Care Grants do so by completing an application form that captures wide-ranging information about their circumstances. Social Fund applicants receive a decision in writing and can ask for an internal review. If they remain dissatisfied after receiving the internal review decision they can apply for an independent review. People currently make telephone applications in respect of Crisis Loans for living expenses and are able to challenge the related decision by following the route already described for Community Care Grants. There is no filter and so anyone has a right to make an application and receive a decision. There is clarity about the application process and the system for redress.

The existing decision making and process models for dealing with discretionary Social Fund applications and local authority community care assessments differ significantly. Without knowing what type of support will be offered with the transferred funding it is difficult to judge whether existing mechanisms will match the needs of the new arrangements. It should also be noted that sometimes the introduction of new arrangements can have unintended consequences. One example of this was the rise in crisis loan applications experienced by DWP following the transition to a remote telephone application process. People who have previously applied for discretionary Social Fund grants or loans may have expectations that the new locally based arrangements are not designed or intended to meet. This is likely to present various capacity and resource challenges, at least in the early stages of the transition.

Conclusions

My response to this call for evidence has sought to identify a number of issues that I believe must be addressed if any locally based provision to support vulnerable people is to be effective in terms of delivery. Given the wider context of changes within our society since the Social Fund was established in 1988, I accept the arguments for ensuring greater responsiveness. But I believe it is important that the positive elements of the Social Fund scheme are not overlooked in setting up the new arrangements.

Any new locally based arrangements must be underpinned by principles such as the provision of high quality local support; transparency about the type of assistance which is available; clarity about the situations in which help can be given and who to approach; consistency of objectives in relation to delivering local support so there is actual and perceived fairness between different groups of citizens; and safeguards to protect the needs of vulnerable people. I believe it is possible to adopt these principles without compromising the ability of local authorities to respond to and provide for distinctive needs within their local communities.

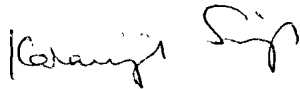
Although I have focused on the role of local authorities throughout much of this response, I also believe that the third sector has a crucial role to play in any locally based provision.

I am aware of current Government consultations on plans to increase accountability in local auditing in local Government. The responses to that consultation may help to identify an appropriate model in relation to accountability for the new local support arrangements. An alternative approach would be to include an auditing or feedback function to local authorities within an overarching independent grievance process.

It is important that any decision making process seeks to get things right first time and that any review process is timely, efficient, customer focused and provides value for money.

I believe that the right to an independent grievance process should be an integral part of any decision making system that seeks to meet the needs of poor and vulnerable people. The process for redress within the context of any system should be simple and efficient, with as few layers of bureaucracy as possible. In order to promote public confidence, local decisions should be

subject to independent scrutiny outside local authority structures and control, such as already happens with parking appeals. This would assure Ministers, as well as the public, that locally based decisions about support are credible and fair.

A handwritten signature in black ink, appearing to read 'Karamjit Singh'.

Karamjit Singh CBE
Social Fund Commissioner for Great Britain
15th April 2011

Appendix

Report on the findings on the experiences of Social Fund Customers June 2010

A significant number of Social Fund applications were made by young single mothers (i.e. in the 16-24 age bracket), with a high proportion of those cases also containing evidence of health problems affecting at least one member of the family; and in some of these cases the customer already has a very high level of indebtedness.

Over half of the cases examined were made by people of middle working age (aged between 25 and 49) and the vast majority of these particular customers experience multiple disadvantage. For example, a significant number of the cases had evidence of one or more family members suffering from physical or mental health problems or, in some cases, a combination of these.

A very high proportion of applications to the Fund in this research sample were from people needing to create or re-establish a home from scratch (40% of the cases examined); with nearly 20% of all applications examined involving someone who has experienced a period of homelessness. The catalyst for this can be for a variety of reasons, such as leaving some form of care, but also where there has been an irretrievable breakdown in relationship with a partner or other family members; being the victim of crime; or due to long-standing health problems, sometimes coupled with other issues such as substance misuse.

There were a significant number of applications for help from families with young children, including those from single parent families, and those where there is evidence of family fragmentation. Again, in many of these cases there is additional evidence of multiple disadvantage, which is likely to need a range of greater interventions than offered by the Social Fund alone.

74 of the cases examined (14.8%) involved people with two or more of the following social disadvantages: learning difficulties; physical or mental health problems; homelessness; drug or alcohol problems; ex-offenders; children leaving care, or where there are ongoing custody issues.

Less than a third of the Community Care Grant applications included details of third party support.

The average amount requested by customers was just under £1,600. Over 40% of the requests were for multiple household items; and over 40% of customers wanted help to replace existing items, in some cases where the customer had applied for the same form of assistance in the previous twelve months.

The level of debt for some customers is also an area for consideration. Just under 15% of the cases examined showed the customer to have a Social Fund debt of more than £1,000; and in many cases this was coupled with other substantial debts to third parties. Furthermore, around a third of all customers in the sample were found to be spending more than 10% of their weekly income on debts and in many of these cases the level of indebtedness was hand-in-hand with other disadvantages.