



Putting Lives at Risk

The Closure of Somali Remittances by Barclays Bank PLC
The Perspective of the Somali Community in the UK

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A Collective Effort

All the organisations whose logos are listed below have endorsed this report.



Summary

The London Somali Youth Forum (LSYF), a coalition of 23 member organisations, is a voluntary organisation based in Camden, London, which brings together young Somali people in London and widely the UK. LSYF seeks to provide a platform and a voice for young Somali people. Our mission is to empower and inspire young Somali people through working in partnership with other agencies, providing leadership and acting as a strategic voice for promoting equality, representation, good leadership and effective decision-making.

This submission, which has been endorsed by many organisations, is intended to be a constructive contribution to the imminent Ministerial Meeting on 16/09/13.

As representatives of the British-Somali community, we believe it is necessary to articulate our views on this very important issue, namely the future of Somali Money Service Business (MSBs), which is critical to lives of our families in Somalia. As British taxpayers, it is our responsibility to keep our government informed about our views, and to work together with the government in seeking solutions to the problems that affect us.

The decision by Barclays PLC to close the accounts of Somali MSBs is a matter of grave and urgent concern to the Somali community in the UK, including our members. It constitutes a viable and essential delivery of support to an estimated 40% of the population of Somalia. MSBs provide fast, reliable, trusted and secure transmission of funds from the Somali-British community, and from Somali diaspora communities elsewhere who send remittances to their relatives in Somalia who depend on this source of income. During the famine of 2011, diaspora organisations worldwide raised millions of dollars in relief aid, and channelled it through Somali MSBs to provide immediate assistance. In addition, MSBs are the primary channel of investment into Somalia, contributing to vital economic growth.

MSBs also enable international humanitarian and development organisations to support Somalis in a country which lacks a strong functioning formal public banking system, and which has experienced war, famine and conflict. They use MSBs to pay their staff, procure assistance and to facilitate distribution of cash payments to food-insecure households as part of their cash-for-work schemes.

These services and activities will be jeopardized if Somali MSBs, which still banks with Barclays, are forced to close their accounts by Barclays at the end of September 2013.

We are therefore requesting the UK Government to do everything in its power to work with British banks to find a durable solution and thereby make it possible for Barclays to reverse its decision to close its accounts with MSBs. Some have already been closed. The accounts of the four remaining companies, namely Dahabshiil, Mustaqbal, Tawakal and Horyaal, are to be closed as of September 30th 2013. The stance of Barclays and its refusal to share any new criteria of compliance make it impossible for these four companies begin any formal negotiations with the Bank. Thus far, these companies have informed the community, they have all satisfied regulators and bank compliance procedures.

The Somali community in the UK understands the concerns expressed by Barclays regarding potential compliance issues related to money laundering and the financing of terrorist activities in Somalia. The answer, we believe, lies in working together with the UK Government, other governments and international regulators, banks and the MSBs to find a solution which protects the interests of Barclays and other banks while ensuring that a vital source of life support to millions of vulnerable people remains intact. Our government and regulatory authorities Somali government, needs to respond by clarifying exactly what a banks like Barclays must do to avoid charges, hefty fines and an unacceptable level of risk so that it can continue to allow Somali MSBs to exist.

This report has the backing of a large and influential cross-section of organisations of the Somali community in Britain. The report addresses many key questions, including:

- ❖ What is the origin and nature of the current crisis? Why has a bank like Barclays, which has serviced Somali MSBs for a long time, come to the conclusion that it must close their accounts?
- ❖ Is the decision of the bank valid and reasonable in the context of the Somali situation?
- ❖ How does this decision impact on the ever-changing political climate in Somalia and the efforts of the international community to rebuild Somalia?
- ❖ What role does the remittance system play in Somalia?
- ❖ Are there alternatives, which are readily available to fill the gaps?
- ❖ What can the British Government do to ensure the lives of the poor in Somalia are protected?
- ❖ How can the banks, remittance companies and authorities work in partnership to resolve this matter effectively?

Speaking as members of the Somali community living in the UK, it is also important to recognise the contributions made by MSBs to our lives and to the lives of the poor in Somalia. MSBs are part of us. They are an integral and critical part of our community. Given the history of Somalia over the past 20 years, it is difficult to exaggerate how crucial they have been to our lives, and even more importantly the lives of our loved ones back in Somalia. As a community we take this opportunity to express our deep appreciation to Somali MSBs. This submission is in itself a testament to our gratitude, and is also a reflection of our determination to play our part in bringing about a lasting resolution to the difficulties they face.

The Role of Somali Money Service Businesses (MSBs)

Since the collapse of the central government in Somalia in 1991, basic financial services have been destroyed by a series of internal wars that have endured for 20 years. In these 20 years, money sent by relatives and friends abroad through MSBs has been the single most important source of income for the population of Somalia.

Every year, the Somali Diasporas send approximately \$1.3 billion to relatives and friends in Somalia, dwarfing humanitarian aid to Somalia. Over £100 million comes from the United Kingdom. Individual transfers are usually less than £200, and often as little as £25: average income in Somalia is under £200, a year. Families depend on the money for food, water, education and healthcare, and to cope with new crises. A recent report by the UN Food and Agricultural Organisation shows that up to 40 percent of families in Somaliland and Puntland receive some form of remittance, and that the money is integral to their survival.

Somali MSBs are also a significant source of employment in a country, which offers few options for jobs. They employ thousands of people in their branches and as agents within the Horn of Africa and across the diaspora. The heartfelt comments below illustrate the place of MSBs in the lives of Somalis here in the UK:

"My family relies 100% on the money that I send from here through Amana Express. If this service is no longer available, it will be a catastrophe for my family in Gedo region as they will not be able to receive the money". Ahmed TFL Employee told us.

"If UK banks decide to close their doors to Somali money transfer companies, this will endanger the lives of my family". Faisal Abdi, IT teacher in Bristol.

The Role of Barclays PLC

In the absence of functioning financial mechanisms in Somalia, we, the Somali community in the UK, recognise and appreciate the contributions made by Barclays PLC over many years, and up to now, in facilitating financial transactions between the United Kingdom and Somalia. We are aware that, by providing facilities to Somali MSBs, Barclays has been instrumental in helping to alleviate poverty and suffering across Somalia.

The Concerns of the Bank

In recent years, fines and penalties have been imposed on some banks because of allegations of money laundering. None of these banks were associated with Somali MSBs and the Somali community. In the wake of these developments, and given the international concerns about security risks or terror financing, Barclays PLC are within their right as a business to make the following statement:

“We want to be confident that our customers can filter out those (remittances) transactions, because abuse of their services can have significant negative consequences for society and for us as their bank”.

However, in the absence of solid evidence, a decision to close all remittance accounts on the basis of fear alone only serves to impose a collective punishment on the poor, which will create unintended consequence. Such an outcome is difficult to justify in relation to Somalia and casts a stigma on the entire Somali community. What Barclays can do is to work with governments and their regulatory bodies, other banks and the association of Somali MSBs, SOMSA, to set up a system that cannot be abused.

A Call for Leadership and Partnership

We of course respect the fact that a business is free to take any decision that they deem to be in their best business interest. At the same time, banks by definition operate with a certain level of risk. This is not unique to the situation Barclays faces with MSBs. It is impossible to envisage a scenario whereby no risk exists. The impetus behind the move by Barclays is clearly based on fear of penalties imposed by regulatory bodies and governments. To avoid such a situation, Our Coalition Government and regulatory authorities need to reassure banks and provide effective as well as comprehensive resolution, because ultimately, MSBs are being penalised for the lack of effective regulatory regimes in receiving countries and this is a wider international problem that is beyond their control and scope.

All parties involved have a duty to limit risks by developing partnerships and procedures that provide the necessary level of confidence to all parties and systems so that we, for our part, can continue to send money to our families.

Somalia is beginning to recover from twenty years of turmoil and anarchy; thanks in large part to the British Government through the courageous leadership of Prime Minister David Cameron, who helped galvanise international political and economic support for Somalia. This recovery will be slow and painful, making it impossible for remittance companies to eliminate 100% of the risks to their businesses or the markets. The Coalition Government consulted the community, in particular by the office of Prime Minister David Cameron and the Foreign Minister, William Hague, in 2012 and 2013 as Britain prepared to help Somalia. During these consultations there was a wide and strong consensus money supplies and funding was essential part of the jigsaw that will facilitate any political and economic development. Under these circumstances, the community believes any restrictions on supply of remittance finance will derail the recovery for Somalia.

What is indisputable is that the decision by Barclays to close remittance accounts, on the basis of fear alone, will make Somalia's recovery much more difficult. It sends the wrong message to international businesses, potential investors and donors at a time when Somalia needs market confidence to forge ahead and revive its fragile economy, and thereby pave the road to sustainable development. This is not the time for Barclays PLC to undermine Somali remittances companies, which provide 40% of national GDP.

On the contrary, this will, in fact, only serve to strengthen the hand of the terrorist organisation, Al Shabaab, which will be able to argue that the West does not care about Somalia. Thanks to the deployment and sacrifices, which are being made by the soldiers of AMISOM and the economic and political support of western countries for AMISOM, Al Shabaab is today weaker than at any time in recent years. Their demise provides Somalis, and friends of Somalia, a rare chance to rebuild the economy and the country. Nothing should be done to thwart or delay such an opportunity, coming after twenty years of mayhem and unspeakable human suffering.

The concerns expressed by Barclays can only be resolved through effective partnership between the authorities and businesses concerned to develop the necessary instruments for financial control capable of creating and sustaining confidence and reducing the associated fears. Remittance companies need to be supported with capacity building measures and given time to help develop these instruments, with the support of regulatory bodies, business partners and the community.

The Humanitarian Implications

Somalis in the UK use the Somali MSBs to contribute to life-saving humanitarian initiatives run by Somali NGOs and international agencies. Stopping remittance services would have catastrophic repercussions for the delivery of humanitarian assistance to Somalis in need, both inside the country and to Somali refugees, for example in neighbouring Kenya. This is precisely why a large number of NGOs have raised the alarm, stating in categorical terms that the decision by Barclays would have adverse effects on their ability to provide assistance. According to Somali MSBs operating in the 20-year-old Dadaab camp, which houses two-thirds of Kenya's 500,000-strong Somali refugee population, more than a third of camp residents depend on remittances sent from abroad. It is not only concern for immediate family members, which has caused anxiety in our community, as the comment below illustrates.

"I use Dahabshiil here in Manchester to send money to an orphanage centre in Ceerigaabo. Their lives depend on the donations sent by my friends and me via such agencies. If this system of transferring money is forbidden, the children will not be able to eat, go to school and get the basic healthcare they need."

Mo Farah, the double Olympic gold medallist, has been a high-profile campaigner on this issue.

The Economic and Financial System

The demise of the central government in Somalia in 1991 also meant the collapse of the country's commercial banking sector. There are currently no strong formal financial institutions operating in Somalia which are part of the global banking network which are capable of responding to the needs of the UK Somali community to support their families back home. Nor are there fully functioning regulatory bodies which have an international reach and which can fill any potential gaps, if Barclays closes all remittance accounts by 30th September 2013. The absence of a strong formal banking sector has significantly constrained Somalia's private sector in terms of its ability to access credit and other financial services. Furthermore, the scarcity of capital has made it impossible to encourage and harness domestic savings.

In this vacuum, remittance companies have grown and flourished in Somalia. It is estimated by the World Bank that remittances from Somalia's diaspora for the purposes of household income amount to some US\$360 million annually, accounting for 22.5% of total household income. In addition to remitting funds from the Somali diaspora to Somalia and the Horn of Africa, remittance companies effectively act as quasi-banking institutions, facilitating the transfer of funds within Somalia, ensuring the transfer of funds for domestic and foreign trade and offering deposit facilities. Remittance companies are currently the only functioning financial institutions operating in Somalia. They have filled a major void.

Mobile money services are already in use in some parts of Somalia, but these facilities are not yet available to Somalis and Somali MSBs in the U.K. There is still a long way to go for this service to fully meet the needs of the markets and serve international transfers. Making that happen will require time and coordination with regulatory authorities, Somali MSBs and respective UK and Somali Governments to facilitate an orderly transition. Under these circumstances, the community feels there will be a major gap in the system if Barclays proceeds with its decision by 30th September 2013.

In the absence of immediate alternative, the Somali community in the U.K calls on the Coalition Government to take an active leadership role on this serious issue. The community is requesting the Government to put forward a plan of action that can re-assure British – Somali citizens who are anxious, confused and feel powerless in preventing the closures of bank accounts, which has enormous repercussions for the survival and welfare of their families in Somalia.

Political Developments in Somalia

Somali has been through a dramatic shift over the last two twelve months. A new Parliament and Government have been appointed in the most representative political process in a generation. Somali has a provisional constitution. The economy is recovering due in large part to Diaspora investment delivered through MSBs and is returning to help re-build their nation of origin, which can only facilitate stability and development for Somalia. Above all, there is a sense of hope as Somalis are beginning to determine their future. Through the leadership of David Cameron, the community has been fortunate to count on the support of the British Government, which has shown great leadership and determination to aid the recovery of Somalia politically, economically and peacefully. The community appreciates the resolve of the Coalition Government to rally international support and political capital. These developments have given rise to sense of hope and optimism for the future of Somalia among Somali community across U.K.

We are realistic about the limited leverage or pressure a government can exert to reverse a commercial decision made by Barclays PLC. We do, however, believe that consultations between the government and Barclays can, at a minimum, delay imminent closure of accounts. A delay would enable remittance companies, the Somali Government, the British Government, banks and other parties involved to articulate together alternative arrangement for transferring money overseas.

The Six Pillars of the Somali Government's Strategy

The Somali federal government had outlined a public policy framework, which details its top priorities to meet the needs of its citizens and has laid strong foundations for building reliable and functioning state institutions. The 6 pillars that have been identified include: full stability, economic recovery, peace building, service delivery, international relations, unity and integrity of the country. It is almost impossible to achieve any of the above pillars without financial facilitation of Somali Money Transfer companies from the diaspora.

"The remittances are critical to Somalia's existence. They money does not only support families and livelihoods, but also goes into investment – citing building boom that is currently on-going across the country, fuelled by remittance money". Max Gaylard, The United Nation's humanitarian coordinator for Somalia.

The international community, including the UK Government has committed millions of dollars to enable the Somali federal government to make strides in executing its policy framework. The Somali government is itself obliged to continue using Somali MSBs to conduct the business of government.

This underscores the urgency of an intervention by the UK government to prevent closure of the accounts of Somali MSBs so it does not jeopardise the political, economic, social and developmental gains, which have already been achieved on the ground in Somalia.

The President of Somalia, Hassan Sheikh Mohamud, made this appeal to Barclays.

"We understand Barclays' corporate responsibility and its duty to its global customers to maintain a reputation for tackling financial crime, but that does not have to mean pulling the rug from under the feet of people battling extreme poverty - and before our fledgling government can step in to help," Somali President Hassan Sheikh Mohamud

Other Somali leaders echoed his comments.

"Account closures will lead to economic disaster", Somaliland President, Ahmed Mohamoud Silaanyo

"Restrictions on money flows or transfers to Somali regions have the potential to become a new unintended economic sanction for the people of Somalia" Puntland President, Abdirahman Farole

Negative Impact on the Ground

Opening Pandora Box

The Somali authorities said last year that about \$2bn (£1.2bn) in remittances – a significant percentage of GDP – is channelled to the country through *Hawala*, or small money-transfer businesses. According to Oxfam, an estimated \$162m is sent to Somalia annually by the UK's Somali diaspora. There are fears this flow of money could go underground through unlicensed agents. Barclays has justified its stand by saying it wishes to minimise the risk of falling foul of money-laundering regulations. But, ironically, its decision may actually create unintended consequences, as highlighted by the Chairman of UK Money Transmitters Association, Dominic Thorncroft, when he stated, *"the move could lead to more money laundering."*

The head of the African Development Bank (ADB), Dr. Donald Kaberuka, echoed this analysis. In a letter to Barclays, he asked Barclays to reconsider its decision, adding: "While the other affected countries have alternatives, Somalia and the greater Horn do not. "As a result those transfers would probably be driven to high-risk, high-cost informal channels."

Impact on Security and Stability

If there is no immediate resolution, Barclays' determination to close the accounts of Somali MSBs on 30 September 2013 will affect the four remaining companies, which, together, have hundreds of locations and payout sites across Somalia and the Horn of Africa.

Local economies are fragile. The move by Barclays has the potential to restrict money supplies, creating an environment where people compete for meagre resources, thereby creating unintended security problems. Such an outcome is counter-productive: it will scupper the efforts and plans of the British Government for Somalia, and destroy the progress, which has been made by Somalia and its regions. It will also inflict serious damage on the huge investments we have made to Somalia as a Somali diaspora community in the UK.

Taking Note of Progress

Within the Financial Action Taskforce (FATF), which sets international standards on MSBs, there is still a strong view that money remittance companies always pose a higher money laundering and terrorist financing risk than other financial institutions and service providers. 2001 was a wake-up call for many countries and supervisors regarding the lack of regulation and oversight of money remittance companies.

But the situation has since dramatically changed. In the past 10 years, many countries have introduced new laws and regulations to govern the affairs of money remittance companies, requiring either a license or registration with a competent authority, subjecting them to rigorous requirements, and monitoring their services. The Somali MSBs, which use the services of Barclays, have so far complied on all levels of financial monitoring and regulations within the bank and relevant regulatory bodies.

In this context, we, as a community, do not understand why Barclays continues to work with Money-Gram, Western Union and Sigué, which have been fined for money laundering in the United States, while at the same time shutting Somali money transfer companies, which currently have accounts with Barclays Bank and which have not violated any rules. The Somali community cannot use Money-Gram, Western Union and Sigué as they do not have a presence in most of the Somali territories, and those MSBs that are strongly represented throughout the Somali territories are being shut down.

The fact that Barclays Bank intends to maintain the accounts of Money-Gram, Western Union and Sigué, while closing Somali MSBs, appears discriminatory to us. It defies logic for Barclays to argue that it cannot maintain the accounts of Somali MSBs because of the risk factor associated with money laundering and or terrorist activities, while maintaining the accounts of western money transfer companies found guilty of money laundering. This speaks of discrimination, and must therefore be dealt with by the government.

What can be done about restoring formal remittances to Somalia? The community feels balancing financial integrity and financial inclusion is the key here. In order to avoid informal and underground transactions, it is important that people and businesses have access to regulated financial institutions. What is required is an approach based upon real, demonstrated risk rather than mere hypothetical risk. Furthermore, receiving countries should build their regulatory regimes, as risk aversion by financial institutions in the sending countries stems in part from the real or perceived weaknesses of MSBs regimes in the recipient countries.

Recommendations

As representatives of the Somali community in the UK, we would like to table the following recommendations addressed to all stakeholders.

To Barclays Bank

- ❖ Barclays should extend the deadline for closing the remaining Somali MSBs accounts by 12 months to allow the elaboration of a comprehensive solution, which works for banks, governments, MSBs and the Somali community. Remittance transfers must not be driven underground, even in the short term, as this can victimise and criminalise the Somali community in the UK. Regulators should encourage and support such an extension.
- ❖ Banks should review how they manage risk in this sector and develop specialised services for MSBs engaged in remittance transfers. Banks should share with Somali MSBs their new eligibility criteria so they can try to meet these criteria. Banks should acknowledge their cooperate social responsibility to the poor, the fragility of the remittance sector, and the critical role that Somali MSBs play. They should review MSBs' applications on a case-by-case basis and identify key risks and mitigation opportunities both on the transferring and the receiving end (partnership)
- ❖ Barclays bank should recognise the unique role of Somali MSBs, including what they represent for the UK Somali community, and help ensure that this service continues.

To Somali MSBs

- ❖ Somali MSBs should endeavour fulfil any new requirements imposed by the UK government and international regulators.
- ❖ Somali MSBs should organise themselves and empower their newly established association, (SOMSA), to become fully operational in Somalia. SOMSA should be an independent institution and operate as a channel between Somali MSBs and regulators.
- ❖ Somali MSBs, with the support of SOMSA, should set standards and benchmarks for quality assurance and compliance, in collaboration with all interested parties engaged in these issues.
- ❖ Develop a system of collaboration within the money transfer industry; invest in improved standards and strengthened self-regulation. This should include agreement on ways of working across the industry, investment in systems to identify and report suspicious activities, investment in the training and monitoring of agents, improving reporting and documentation.
- ❖ Put additional resources into developing money transfer technology for Somalia, including reaching out to the Somali diaspora in the UK to promote e-transfers and mobile money transfers once this facility becomes fully operational.

To the UK Government

- ❖ Clarify the precise situation, in terms of demands from regulators, faced by banks, which deal with Somali MSBs.
- ❖ Provide the necessary expertise, through capacity building, to help improve the financial controls of remittance companies. The system of money

transfers requires on-going adjustments to meet market and regulatory needs. This can only be achieved through an effective partnership between Government authorities, Barclays and remittances companies who are affected by bank closures. Putting the remittance system on a strong footing requires time and concerted and collaborative effort from government and the private sector. The community favours improvements to what is already working, has been tested and found to be reliable, which is readily available to meet the everyday financial transfer needs of the poor in Somalia.

- ❖ The UK Government should support Somalia to establish a robust banking sector and regulate its payment systems through technical assistance and capacity building and as part of a broader financial inclusion strategy.
- ❖ The Government should engage key international regulators to ensure other countries' regulations do not adversely impact on regulated remittance flows. Since US legislation, in particular, is a major element in the risk analysis of UK-based banks, the UK government should use its influence to promote a robust and transparent system that has the buy in of key international stakeholders.
- ❖ Consider all measures that would serve to build trust and confidence between the banks and Somali MSBs.
- ❖ Should the closure of accounts by 30 September 2013 materialise, we are requesting the government to intervene by providing a workable alternative. The community is aware of the case of Huntingdon Life Sciences, when its employees and the company faced difficulty in finding banking services amid the controversy surrounding their work. In this particular case, the government of the day stepped in and helped to facilitate the involvement of the Bank of England, which agreed to provide banking services to the Huntingdon Life Sciences through its in-house banking services. We make this suggestion in the confidence that the government shares our conviction that the crisis facing Somali MSBs calls for leadership and thoughtful consideration and cannot be left to market decisions alone.

To the Somali British Community

- ❖ Support British Government Initiatives for Somalia: The Somali community in the UK should stand ready to contribute, in whatever way possible, to initiatives by the British government, for productive investment in Somalia.
- ❖ Community engagement: Despite its worries, we call on all British Somalis to safeguard the trust and strong relationship which has been built between the community and the British Government, and on Somali community organisations to mediate this situation with their networks to gain broad consensus about the way forward.

To the Somali Authorities

- ❖ Rapidly pass legislation to strengthen the Somali banking system and facilitate regulation of international transfers working with foreign governments and banks and Somali MSBs. In addition to establishing a much-needed formal banking system, Somali regulation to prevent money laundering should demonstrate the Federal Government's willingness to listen to the concerns of international partners, as well as build the confidence of banks.

Conclusion

As community leaders we recognise and appreciate the delicate balance between government intervention and the right of markets and companies in the United Kingdom to act independently. This is indeed a long-standing democratic value, which is essential for the prosperity of our nation. With regard to MSBs, we believe the current impasse can be avoided by spelling out precisely what banks must and must not do in order not to fall foul of regulatory bodies. It is the responsibility of the UK government to address this question, in a comprehensive and unambiguous manner.

If Barclays PLC withdraws the accounts of these Somali transfers companies by 30 September 2013, at this critical juncture for Somalia, without a workable alternative or contingency plan suitable for Somali MSBs, there will be enormous ramifications for the people of Somalia, for the local economy and aid agencies operating in the country.

Remittances play a key role in meeting the urgent food, health, shelter, water, and assistance needs of the people in the Horn of Africa. These rights enshrined in the International Covenant on Economic, Social and Cultural Rights (CESCR) is 'positive' rights, which cannot be progressively realized without the cooperation of public and private sectors. Indeed, the UK government recognizes that the private sector development to which these remittances contribute is vital, not just for protection of human rights, but also for peace and development. The corporate responsibility to respect human rights obliges Barclays to avoid causing or contributing to adverse un-intended human suffering through their own activities.

At the same time, it is crucial to underline the uniqueness of the Somali remittance transfer companies and the importance of their role in Somalia. In the absence of an effective Somali Central Bank, and coordinated international/national management systems, the services they provide in facilitating the efficient transfer of money to a poverty stricken society in Somalia cannot over-estimated.

For HMG to do nothing to maintain such a system would defeat the objectives and gains already made through the last two London Conferences for Somalia organised by Her Majesty's Coalition Government in 2012 and 2013.

As British citizens and taxpayers we believe there is a strong Public Policy case regarding this issue that requires further time and evaluation.

This case gives HMG an opportunity either to confirm that it has no concerns with the operations of the Somali MSBs or, if it does, to spell out the measures these MSBS must take to reform and to give them the time and guidance they need to effect the necessary reforms.