

## **APPRENTICESHIP UPDATE**

### **Purpose**

1. The purpose of the report is provide Staffing Policy Committee with an update on the progress on apprenticeships within the council's workforce since the implementation of the apprenticeship levy in May 2017, and to outline future plans to ensure the levy is maximised to support the development of our workforce.

### **Background**

2. In October 2013, the government announced a number of reforms to the national apprenticeship programme as a way of introducing more rigorous standards, being more responsive to the needs of employers<sup>1</sup> and to meet the commitment of having 3 million apprenticeships in place by 2020. At the heart of these reforms is the aim to increase both the quantity and quality of apprenticeships.
3. The two elements of the above reforms which will have the most impact for Wiltshire Council are the levy, and the proposed public sector target.
4. The apprenticeship levy is charged at a rate of 0.5% of an employer's pay bill and is collected monthly by the HMRC through PAYE deductions, and is therefore another tax on employment costs. For the council's workforce the contribution was £470k in the first year and the total amount that the Council, including maintained and VC schools, will pay into the levy during any one year roughly equates to £1m.
5. The Public Sector Target is for public sector bodies with more than 250 employees in England to employ an average of at least 2.3% of their staff as apprentices from 2017-2021. This means that the council needs to have approx. 106 apprentices in the workforce each year until 2021, and for schools this is approx. 150 apprentices.

### **Main considerations**

#### **Current position**

6. The current number of apprentices employed by the council is 90 (as at 16 April 2018). Of these 16 are newly recruited apprentices, and 74 are existing staff who are accessing apprenticeship training to upskill and gain qualifications that support their personal development and career progression, and also the council's succession plans. The table in Appendix 1 shows the current breakdown of where these apprentices are employed per corporate director area and the information in Appendix 2 breaks this down further to detail the number of apprentices per service area.
7. In addition to the 90 apprentices currently in place there are a further 8 civil engineering, 3 data analyst and 3 residential care apprenticeships pending. The apprenticeship standards for civil engineering have only recently become available and six of these will be for existing staff who will complete qualifications to support their own development and career progression, as well as two new apprentices. The civil engineering apprenticeships are

important opportunities for services where there has previously been recruitment and retention issues.

8. The total value of the 90 apprenticeships already in place in terms of the draw on our apprenticeship levy account is £622,863. This is the total amount that we will have used from our levy account once the apprenticeship training for these staff is completed. The value of the 14 apprenticeships pending and outlined above is £195,000. The value of each apprentice varies, with a greater draw on our account for those apprentices completing professional qualifications.
9. This current number of apprentices and the 14 pending equates to 98% of the public sector target and means we have 2.2% of our staff as apprentices.

### **How has this been achieved?**

10. We have adopted a clear strategic approach and have focussed on organisational design and effective succession planning. A new role in HR&OD has been implemented to support this. The apprenticeship & training coordinator is responsible, as the council's apprenticeship expert, for providing advice and guidance on apprenticeship standards and the levy, supporting apprentices and also manages the council's levy account.
11. We have made good progress with our apprenticeship numbers and have started to roll out the HR&OD model of a planned approach to its recruitment strategy and succession planning. This is being used in discussion with services, led by the HR business partners and apprenticeship & training co-ordinator to identify opportunities for new apprentices and apprenticeship conversions.
12. A number of actions to attract and recruit new apprentices have been taken, and will continue. This includes:
  - The development and implementation of a recruitment marketing plan for apprenticeships, which includes our own apprenticeship landing page on the Wiltshire Council Careers site and social media channels (internal/external).
  - Working with schools, further education and higher education institutions to identify opportunities for sourcing apprenticeships into the council. This involves building partnerships, attending careers fayres and visiting schools to ensure Wiltshire Council's apprenticeship opportunities gains visibility.
  - Working with services to identify opportunities for apprenticeships in structures where these roles can support effective succession and meet future workforce plans. The aim will be that each service area will employ at least one apprentice.
  - Promoting and raising awareness of apprenticeships and the opportunities the levy provides to support succession planning and address recruitment and retention issues.
  - Ensuring a permanent role in the service establishment is available once the apprenticeship training is complete.
13. A significant proportion of our current apprentices are existing staff who are accessing apprenticeship training to upskill, and this has been achieved by:
  - Identifying opportunities for employee conversions to support succession planning.

A significant amount of the apprenticeship funding is being used to train and develop the council's current workforce. Staff remain in, and are paid against their substantive post, whilst they undertake the qualification or training required to complete an apprenticeship.

These opportunities for apprenticeship conversions are being identified within service areas as part of the work to support service re-design and re-structure and as part of regular workforce planning conversations. Heads of service are being encouraged by their HR business partners to take the opportunity to develop their staff and provide effective succession planning to meet both current and future needs. To support these discussions, apprenticeships have been mapped against current role descriptions using the apprenticeship standards which have been developed.

- Accessing apprenticeship levy to fund a new accredited leadership and management programme.

Levy funding to support accredited leadership and management development is being used. This programme will ensure we have clear career pathways and will strengthen leadership and management capabilities within the organisation as part of the overall learning and development offer. As well as providing development for existing managers, this has also provided opportunities for employees who aspire to be a manager to convert onto an apprenticeship that will enable them to acquire the skills and competencies needed to secure their first management position as part of a structured programme that leads to a recognised management qualification. This development aims to support their transition to a new role, and improve management and leadership skills for those already in a managerial role.

14. As well as developing aspirational and existing managers to ensure the council has effective leaders, this approach also supports effective succession planning, aids staff retention and supports staff engagement. The access to apprenticeship training to upskill existing staff also supports personal progression and the achievement of individual career aspirations, whether within or outside the council.

### **What's next?**

15. Plans that have been developed to further increase apprenticeships and sustain the progress and include:

- A further cohort of Leadership and Management apprentices at Level 3 and 5, with the programme starting in October 2018. This is part of a rolling programme of leadership and management development now in place.
- Working with adult care as part of the transformation of services to embed apprenticeships, especially in health and social care roles.
- Opportunities for staff to complete a level 6 Chartered Manager degree as an apprenticeship.
- Involvement in the CIPS (Chartered Institute of Procurement & Supply) level 6 trailblazer.
- Opportunities for staff to complete a level 7 Senior Leaders Masters as an apprenticeship.

16. In addition we are also anticipating the availability of level 8 apprenticeships, and whilst there has been a delay in the availability of social work apprenticeship standards, we are anticipating these being available from the autumn.

17. Other plans include:

- Offering higher-level and degree-level apprenticeships.

There will be opportunities to offer higher level apprenticeships within services in highways and transport, where there have been recruitment and retention issues.

These apprenticeships will provide training to acquire the high level of technical skills and the qualifications required in these services. This will also reduce recruitment and advertising costs and improve succession planning and resilience within the services by providing new and current staff with access to higher level qualifications, and therefore career progression within their service. A review of service structures to create entry level opportunities has also been completed and we now have 1 employee undertaking a Civil Engineering Degree Apprenticeship in Highways & Transport, and as outlined a further 8 in the pipeline.

- Other opportunities to develop higher level/degree level apprenticeship are also being explored, in particular those aimed at roles in services where there are technical/hard to fill roles. The main aim of this approach is to support current workforce plans in services where there has been difficulty recruiting and retaining staff, and where there are limited or no opportunities for lower level apprenticeships. In addition, these apprenticeships have a greater draw on the levy than the lower level apprenticeships. For example, a level 2 business administration apprentice will draw down approximately £2,000 of the apprentice levy, whereas a level 3 team leader apprenticeship draws down £5,000 of funding from the levy, and some level 6 degree/professional level apprenticeships draw down £27,000.

- Limiting recruitment of apprenticeships to roles graded C to E

A level 3 apprenticeship qualification, or equivalent, is required for most posts graded C to E. Therefore there is the opportunity to restrict recruitment to these posts as far as possible to new apprentices where a relevant standard is available, and the 20% off the job training can be accommodated without affecting service delivery. Current workforce data suggests that there is the potential for up to 66 new apprenticeships per year to fill grade C to E posts based on the current headcount and turnover in posts which may be suitable for an apprentice. This approach would further maximise the levy funding we have available, so further work to explore this as a standard process will be taken over coming months

- Targeting services

A structured programme to target service areas where there are currently no apprentices will be developed and actioned, and this will include exploring with managers the options they have to create apprenticeship opportunities in their services. This may include setting a target for achievement. For example based on 67 service areas if all recruited 2 new apprentices, or converted 2 current staff for upskilling, this would represent 134 apprentices and means that we would exceed the proposed public sector target. Further work to explore the viability of this as an option will be taken, taking into account services where this may not be achievable based on service size, and availability of suitable apprenticeship standards as we are aware that there is a delay in certain standards being delivered, (for example in planning), and in some cases there are still no standards being developed.

- Care Leavers/Looked After Children

The council is the corporate parent to care leavers and looked after children (LAC) in Wiltshire and has a responsibility to improve the lives of these young people. As a result the apprenticeship policy has been updated to include a guaranteed interview to any Wiltshire care leaver or LAC who applies for an apprenticeship with the council, where the role is grade C-E, and the care leaver/LAC has disclosed their status in their application form. Where this requires the care leaver/LAC to complete their functional skills as part of the apprenticeship (this gives them sufficient literacy & numeracy skills

equivalent to GCSE grade C), additional support will be provided by the apprenticeship provider, and the apprenticeship training will not be completed until the apprentice competes their functional skills.

Some initiatives are also being progressed to help to raise the profile of the council with care leavers/LAC's as an employer, as well as providing them with valuable employability skills and experience and pathways to apprenticeships. These are:

- A mock interview scheme for care leavers/LAC's is being developed within the council. These interviews are designed to give young people the chance to experience what may be their first interview, or hone their existing interview skills, in a safe place. They will receive feedback following their interview. Managers who have experience of interviewing have been asked to participate. Future calls for volunteers to be on the interview panel may go wider than just managers, so long as they have significant interview experience. A pack to support the interviewees with preparation, including lots of helpful hints and tips has also been developed. Interviewees will be able to choose between three jobs (facilities operations officer, leisure centre receptionist and apprentice business support officer in planning) to be interviewed for. Interviewers will be provided with all interview questions and a feedback sheet.
  - Opportunities for frontline work experience are being developed, initially in facilities management and leisure, with a view to extending to jobs in our environment services in the future. These week-long placements will be designed to be as flexible as possible, for example, could be undertaken as one day a week for five weeks rather than all in one week. Frontline placements are preferable as no IT equipment or access is needed.
- Business Apprentices
18. The option to develop a pool of business administration apprentices will be explored, possibly targeting school leavers, on the understanding that once they complete their apprenticeships it is likely that there would be a vacancy in the council based on turnover rates for these types of posts. Alternatively, they could be employed via the Wiltshire Temporary Bank until a suitable vacancy becomes available to meet to meet fluctuating demands on services, and to support changes in business priorities and increased demand affecting capacity, for example the long term staff absence and the recent incident in Salisbury. Funding to support this initiative would need to be agreed.

- Social Care Apprentices
19. Options to use the levy funding for social care apprentices within the council and with our provider services in health and social care are being explored. This would support the work to resolve the widespread recruitment and retention difficulties in these services.

### **Apprenticeships in schools**

20. Based on the current number of apprentices employed by the council, and the rate at and basis on which we currently employ apprentices, we are on track to reach the public sector target in relation to council employees. However, our apprenticeship levy also includes levy contributions from maintained/VC schools who therefore have their own target, which equates to approx. 150 apprentices per year.
21. As outlined the council's contribution to the levy in respect of the non-schools pay bill is estimated to be £0.47m and the contribution for maintained/VC schools is 0.53m. These amounts are, as outlined, in one levy account which the council manages as the guidance

has confirmed that we cannot disaggregate the funding for the council to separate the amount that applies to schools.

22. This means that the council has to manage the levy on behalf of schools and as a consequence this has raised resource implications for managing the levy as the management of the schools element of the levy is, and will continue to be, an additional demand on resources in HR&OD, and there has been no potential to recover the cost of this from schools based on current arrangements.
23. The take up of apprentices in schools has been slow. The pace is affected by the size of the workforce in each school and the availability of roles suitable for apprenticeships. Currently there is 1 apprentice employed in our maintained/VC schools, and 3 are currently pending.
24. The apprenticeship & training co-ordinator has recently attended Right Choice events in the county to raise awareness of apprenticeships in schools (maintained & VC schools) and apprenticeship advice and support is now available to schools via this website at a charge.
25. If the availability of these apprenticeship services to schools demonstrate demand on our apprenticeship & training co-ordinator, and capacity becomes stretched, then the income generated will be used to recruit/allocate additional resource to assist with schools so that they can maximise our apprenticeship levy.

#### **Commissioning training provision and managing the councils levy account**

26. Several procurement exercises have been undertaken to ensure the council has a framework of preferred training providers, as one single training provider cannot meet all of our apprenticeship requirements. In addition the council is required to demonstrate that it is securing value for money, and has to meet the apprenticeship levy rules relating to procurement of training providers published by the Education and Skills Funding Agency (ESFA).
27. The apprenticeship & training co-ordinator, who is the council's apprenticeship expert and who commissions the provision of apprenticeship training, monitors the quality of the training provision and manages our levy account. Some of these tasks were previously carried out by the training providers but under the new levy funding reforms they are now the responsibility of the council and this role. Other tasks carried out by this role include monitoring attendance at training, supporting apprentices who are finding the training difficult and liaising with managers to ensure the apprentices are adequately supported.
28. The implementation of the apprenticeship levy has also had an impact on the capacity within the payroll team, as management of the interface with the HMRC, configuration of payroll to ensure that the levy is paid appropriately and the reconciliation payments that are made is now the responsibility of this team. This additional demand on team has so far been absorbed within existing resources.

#### **Levy opportunities to support the economy**

29. From April 2018, employers can transfer up to 10% of their apprenticeship levy to smaller firms who do not contribute to the levy. This has been designed to allow larger employers to support their supply chains, and local SME's (small & medium size enterprises).
30. For 2018/19, the ESFA have stated that employers can only transfer up to 10% of the levy to one employer but from 2019/20 employers will be able to transfer up to 10% to multiple

employers. This will allow us to support our local economy and many of our local micro businesses and SME's to grow. HR&OD will work closely with our services, the employment & skills team, Higher Futures and the SWLEP to ensure businesses are supported.

## **Conclusion**

31. Our realistic and achievable plan to employing apprentices needs to add value to the organisation, considering current job types/roles and the future skills/capabilities needed, and needs to be developed and matched against the new apprenticeship standards available.
32. Progress has been good in the first year since the levy was implemented. The council has already achieved 96% of the target for apprenticeships and future plans means that the target should be met and sustained.
33. There is still some work to do to develop the understanding of the opportunities the levy now provides with some services, and plans to target services to employ apprentices or convert existing staff to apprentices to support their own succession plans and to support personal development and career progression for their staff will assist with this.
34. New apprenticeship standards are being developed all of the time and as they become available we will continue to work with services to identify how they can make use of these new standards to aid recruitment and retention issues, for example in social work.
35. Whilst advice and support is available to schools it is unlikely that the public service target in respect of the schools workforce will be met. Identifying apprenticeship opportunities in schools is more difficult due to the size of the workforce in each school which means there are limited opportunities for new apprenticeships and limited capacity to provide the level of supervision needed. However we are confident that the council will exceed its own target for apprentices, and this will contribute to the overall target of approx. 256 that are needed by 2021.
36. Feedback from the council's National Apprenticeship Service account manager about the progress we have made has been very positive, and he has endorsed our approach with the actions we have taken and initiatives outlined in this report. Feedback is that we are ahead of many other organisations and are embedding a sustainable approach to utilising our apprenticeship levy, in particular by ensuring that on successful completion of an apprenticeship a permanent job is available.

## **Financial considerations**

37. As outlined in paragraph 4 the apprenticeship levy is charged at a rate of 0.5% of an employer's pay bill and is collected monthly by the HMRC through PAYE deductions. Based on current calculations this means that the council's contribution to the levy per annum will be approx. £0.47m, with schools (maintained and VC) contributing £0.53m to the same levy account. These figures are an approximation as our staff numbers fluctuate and, therefore, so does our employer's pay bill.
38. Funding for apprenticeship training stays in our digital account for 24 months and then any unused funding will disappear.
39. Based on the 90 apprentices currently in place and the 8 that are pending we will have used £622, 863 of our levy by the time the apprenticeship training is complete. However for some apprenticeship the full cost of the training will not be drawn from the levy for up to 3

years, and in particular for this will be the case for some of the higher level apprentices. It is important therefore that every step is taken to create opportunities for apprenticeships to maximise our return on the levy.

40. As outlined in paragraph 10 a new role in HR&OD is now in place to co-ordinate and monitor the apprenticeship programme of work, support the apprentices, provide advice and support to council services and schools and manage the councils levy account. This resource costs around £39,000 per annum the cost of this has been absorbed within the HR&OD revenue budget.

### **Legal considerations**

41. Legal considerations have been sought and taken into consideration around procurement regulations and implications.

### **Equalities considerations**

42. The apprenticeship programme will support the council in fulfilling its responsibilities under the Public Sector Equality Duty/PSED (2010) through increasing equality of opportunity and improving life chances, particularly for those groups named within the Equality Act (e.g. disabled people) and vulnerable groups such as children in care.
43. Actions developed as part of a wider council strategy will ensure that full consideration is paid to the Equality Act and the PSED.

### **Risks**

44. A lack of engagement from services in recruiting new apprentices and/or converting existing staff to apprentices is a risk to the achievement of the public sector target for apprentices which must be achieved by 2012, and means that the council would not maximise the use of the funding that we have contributed to the levy, which is significant.
45. There is a risk that the capacity in HR&OD required to support the apprenticeship programme may not be continue to be available. The cost of the new apprenticeship & training coordinator role has been absorbed within the HR&OD revenue budget against which there are further salary savings targets for 2018/19. In addition the service is meeting increased demand as a result of significant transformation programmes that are taking place, for example ASC transformation and FACT (families & children transformation). The position will be monitored and steps will be taken in consultation with the corporate leadership team to address this when required.

### **Recommendations**

46. It is recommended that Staffing Policy Committee note the contents of this report and that a further report will be provided in 12 months to give a further update on the progress of apprenticeships.

**Joanne Pitt**  
Director, HR&OD

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**Report author: Heather Keaveney, OD Delivery Manager**



## Appendix 1

### Number of Apprenticeships per Corporate Director Area

Corporate Directors							
Vacant Adult Social Services		Terence Herbert Children & Education		Alistair Cunningham Growth, Investment & Place		Dr Carlton Brand Communities, Resources & Digital	
Apprenticeship	No. enrolled	Apprenticeship	No. enrolled	Apprenticeship	No. enrolled	Apprenticeship	No. enrolled
CMI L6 Degree Apprenticeship		CMI L6 Degree Apprenticeship		CMI L6 Degree Apprenticeship		CMI L6 Degree Apprenticeship	
L3 HR Support		L3 HR Support		L3 HR Support		L3 HR Support	1
L5 HR Consultant/Business Partner		L5 HR Consultant/Business Partner		L5 HR Consultant/Business Partner		L5 HR Consultant/Business Partner	5
L4 Data Analyst		L4 Data Analyst	1	L4 Data Analyst		L4 Data Analyst	
L3 Digital Marketer		L3 Digital Marketer		L3 Digital Marketer		L3 Digital Marketer	
L4 Social Media & Digital Marketing		L4 Social Media & Digital Marketing		L4 Social Media & Digital Marketing		L4 Social Media & Digital Marketing	1
L3 Lead adult care		L3 Lead adult care		L3 Lead adult care		L3 Lead adult care	
L2 Business Administration		L2 Business Administration		L2 Business Administration		L2 Business Administration	
L3 Business Administration		L3 Business Administration	4	L3 Business Administration	2	L3 Business Administration	4
L4 Business Administration		L4 Business Administration	1	L4 Business Administration		L4 Business Administration	1
CMI L3 Diploma in Principles of Leadership & Management	4	CMI L3 Diploma in Principles of Leadership & Management	4	CMI L3 Diploma in Principles of Leadership & Management	7	CMI L3 Diploma in Principles of Leadership & Management	7
CMI L5 Diploma in Leadership & Management	7	CMI L5 Diploma in Leadership & Management	4	CMI L5 Diploma in Leadership & Management	11	CMI L5 Diploma in Leadership & Management	17
L3 Assistant Accountant		L3 Assistant Accountant		L3 Assistant Accountant		L3 Assistant Accountant	2
L3 Building Control		L3 Building Control		L3 Building Control	1	L3 Building Control	
L6 Degree Apprenticeship in Civil Engineering		L6 Degree Apprenticeship in Civil Engineering		L6 Degree Apprenticeship in Civil Engineering	1	L6 Degree Apprenticeship in Civil Engineering	
L3 Plumbing & Heating		L3 Plumbing & Heating		L3 Plumbing & Heating		L3 Plumbing & Heating	
L3 Carpentry		L3 Carpentry		L3 Carpentry		L3 Carpentry	
L3 Vehicle Mechanic (old framework)		L3 Vehicle Mechanic (old framework)		L3 Vehicle Mechanic (old framework)	1	L3 Vehicle Mechanic (old framework)	
L3 Customer Service		L3 Customer Service		L3 Customer Service		L3 Customer Service	1
L3 Management (old framework)		L3 Management (old framework)		L3 Management (old framework)	3	L3 Management (old framework)	
<b>Total</b>	<b>11</b>	<b>Total</b>	<b>14</b>	<b>Total</b>	<b>26</b>	<b>Total</b>	<b>39</b>

## Appendix 2

### Number of apprenticeships per Service area

Directorate	Service Area	Apprentice New Starts	Apprentice Upskillers	Total
Public Health	Health Promotion & Prevention		2	2
	Public Health			0
Social Care - Interim	Adult Care Ops - Access and Reablement		6	6
	Adult Care Ops - Continued Support		3	3
	<b>Total</b>	<b>0</b>	<b>11</b>	<b>11</b>
Commissioning	Commissioning - Community Services			0
	Joint Commissioning	1	1	2
	Specialist Commissioning		1	1
Family & Children's Services	0-25yr SEND Service		2	2
	Child Sexual Exploitation Team			0
	Childrens Support & Safeguarding	1	2	3
	CSI Secondment			0
	Early Help			0
	Family & Children's Services			0
	Peformance & Information Team	1	1	2
	Placement Servi - Fostering and Adoption	2		2
	Quality Assurance & Principal Social Wrk			0
Education and Skills	Education and Skills			0
	Employment and Skills		1	1
	School Effectiveness	1		1
	<b>Total</b>	<b>6</b>	<b>8</b>	<b>14</b>
Econ Reg, Emp & Skills, Major Projects	Dev Mgmt, Operations & Spatial Planning		1	1
	Development Management			0
	Econ Reg, Emp & Skills, Major Projects			0
	Economic Regeneration			0

Directorate	Service Area	Apprentice New Starts	Apprentice Upskillers	Total
	Major Projects Services			0
	Operations		3	3
	Spatial Planning Services			0
Highways and Transport	Highways and Streetscene - North		2	2
	Highways and Streetscene - South			0
	Highways and Transport			0
	Highways Assets & Commissioning		6	6
	Passenger Transport		1	1
	Sustainable Transport			0
Housing and Commercial Development	Housing - Strategy & Assets		3	3
	Housing Operations and People		3	3
	Strategic Asset & FM		4	4
Waste and Environment	Culture and Operational Change	2	1	3
	Environment Services			0
	Waste and Environment			0
	Waste Management Commissioning			0
	Waste Services			0
	<b>Total</b>	<b>2</b>	<b>24</b>	<b>26</b>
Finance & Procurement	Business Services Finance			0
	Finance	2		2
	Finance - Care			0
	Finance - Corporate		1	1
	Finance - ENV		1	1
	Finance & Procurement			0
	NEW Pensions			0
	Pensions			0
	Revenue and Benefits			0
	Strategic Procurement			0

Directorate	Service Area	Apprentice New Starts	Apprentice Upskillers	Total
HR & OD	HR & OD			0
	HR Operations		2	2
	Payroll and Service Development	2	1	3
	Resourcing	2	3	5
	Strategic Delivery	1	1	2
Legal & Democratic	Democratic Services		3	3
	Electoral Services			0
	Legal & Democratic			0
	LEGAL SERVICES		2	2
	Registration Service	1		1
Communities and Communications	Communications (Events and Marketing)			0
	Communications (News and Information)			0
	Communities and Communications			0
	Community Engagement & Governance		5	5
	Leisure Operations			0
	Leisure Strategy		2	2
	Library Heritage and Arts			0
	NEW CITY HALL			0
	Corporate Leadership Team	Corporate Leadership Team		2
Corporate Services and Digital	Corporate Services and Digital			0
	Customer Services			0
	Information Services		1	1
	Policy Partnerships & Assurance		4	4
	Programme Office		3	3
	Systems Thinking			0
	<b>Total</b>	<b>8</b>	<b>31</b>	<b>39</b>
	<b>Grand Total</b>	<b>16</b>	<b>74</b>	<b>90</b>