

Draft Budget: 2022-23

September 2021



The Welsh Parliament is the democratically elected body that represents the interests of Wales and its people. Commonly known as the Senedd, it makes laws for Wales, agrees Welsh taxes and holds the Welsh Government to account.

An electronic copy of this document can be found on the Senedd website:
www.senedd.wales

Copies of this document can also be obtained in accessible formats including Braille, large print, audio or hard copy from:

Welsh Parliament
Cardiff Bay
CF99 1NS

Tel: **0300 200 6565**

© Senedd Commission Copyright 2021

The text of this document may be reproduced free of charge in any format or medium providing that it is reproduced accurately and not used in a misleading or derogatory context. The material must be acknowledged as copyright of the Senedd Commission and the title of the document specified.

Draft Budget: 2022-23

September 2021





Contents

1. Introduction	6
2. The Budget	7
New ways of working	8
Workforce planning	8
ICT and Broadcasting Service.....	9
Estate Strategy.....	9
Delivering our priorities.....	10
Engagement.....	11
Senedd Reform	12
Office of the Standards Commissioner	13
International Financial Reporting Standard 16 – Leases	13
3. Financial governance and control.....	15
4. Budget for the Remuneration Board’s Determination	16
5. Budget Ambit	18
Annex 1: Budget Overview.....	20
Annex 2: Budget Detail	22

1. Introduction

The Welsh Parliament is the democratically elected body that represents the interests of Wales and its people. Commonly known as the Senedd, it makes laws for Wales, agrees Welsh taxes and holds the Welsh Government to account.

The budget for the Senedd Commission (“the Commission”) is used to meet the running costs of the Senedd. It also covers the costs of salaries and allowances of Members and their staff as determined by the Independent Remuneration Board.

Members of the Senedd carry significant responsibility. They make laws for Wales, represent the interests of Wales and its people, hold the Welsh Government to account and agree Welsh taxes. In turn, the Commission provides the specialist skills, support services and resources to support Members in carrying out their scrutiny, legislative and representational roles.

2. The Budget

The budget for 2022-23 totals £62.942 million and provides for:

- Expenditure under the Commission's direct control, including a Project Fund (the operational budget);
- Depreciation (a non-cash expense);
- The budget for costs associated with the Remuneration Board's Determination for Members' Pay and Allowances;
- A budget for the Office of the Standards Commissioner; and
- The accounting provision for the Members' Pension Scheme under HM Treasury's Annually Managed Expenditure ("AME") heading.

We have provided figures for 2022-23 and the following two years in line with current planning assumptions and, as the last 18 months have demonstrated, we will need to be flexible and agile in our approach, whilst being mindful of the pressures faced by the wider public sector. The budget addresses our essential needs and services those commitments where we have limited or no control. We will continue to manage our budget responsibly.

The operational budget for the Commission presents a 4.39% increase compared to 2021-22. This will fund inflationary and other increases for non-staff budgets, such as changes in the ICT budget where continued hybrid working is generating additional resource requirements. It also provides a 'Project Fund' against which investment plans will be prioritised according to need and the financial and personnel resource required to deliver them. It will also fund the pay award in the staffing budget (2.7% in 2022-23, using the agreed ASHE index-linked five-year pay settlement agreed with the Trade Union Side).

New ways of working

As a Commission, we continuously review how we deliver services. The pandemic has required us to work in more flexible and innovative ways than ever before.

Since the outset of the pandemic, we have demonstrated our ability to continue to use our resources wisely to provide outstanding, innovative parliamentary support to Members under the most challenging circumstances, and to continue to engage with people right across Wales.

Members have taken business decisions which mean that working from home has been their default for the last 12 months, interspersed with periods of hybrid working.

We now have a unique opportunity to build a new, flexible, responsive, and sustainable model of working as we learn more about the post-pandemic world and the preferences of Members in the Sixth Senedd. Supporting Senedd Business is our priority, the flexibility staff have must be set against Business needs, maintaining service levels and ensuring that the approach fits the needs of Members.

Workforce planning

Our people strategy was published in 2019, covers the period to 2023 and is central to the delivery of the Commission's strategic aims. The primary aim is to ensure we have an agile workforce which provides the right skills, knowledge and behaviour to deliver our current goals whilst preparing for future requirements and challenges. This has been heavily influenced by procedural and technological innovations and lessons learned during the pandemic.

These demands and challenges will require mature workforce planning, including a review of current organisational capacity alongside our regular service planning, to assess and define the resources that the Commission needs to deliver its priorities.

Although the pandemic has provided a wealth of opportunities to do things differently, we remain mindful and proactive about looking after the well-being of all those for whom the move to working from home has not been wholly positive.

In the Sixth Senedd we will continue to challenge ourselves and to do so within a budget that provides value for money to the people of Wales.

ICT and Broadcasting Service

One of the services most acutely affected by the pandemic has been the ICT & Broadcasting Service.

Within weeks of the first lockdown there was a clear determination to continue to deliver the Business of the Senedd and the teams within the ICT & Broadcasting Service worked hard to provide a virtual solution.

As soon as circumstances allowed, hybrid meetings were introduced allowing some Members to be present in person on the Senedd estate, whilst the remainder attended virtually. The ICT resource needed to set this up and to provide continued support is significant, with the Senedd's reliance on technology becoming even more vital to service delivery and business continuity. Our learning from the pandemic so far, is that the resources needed to support hybrid working are significantly greater than for either virtual or fully physically present working.

There has been continuing investment in ICT infrastructure and particularly cyber security protection, which will need to be maintained in future budgets to protect the Senedd users and systems.

The Broadcasting contract is due to be renewed during 2022-23 and all options are currently being considered around the potential to bring elements in-house or to re-tender in the existing format. Any increase in the cost of this contract will be funded from the project fund in 2022-23 and built into future service budgets.

The work to upgrade our legislation software is due for conclusion in Spring 2022. The costs of hosting, maintenance and licences has been included in the on-going ICT budget.

Estate Strategy

The Commission will consider the future of the wider estate early in the Sixth Senedd. Whilst the Senedd building itself has proved an iconic and adaptable home, there is a need to review the use of Tŷ Hywel, the Pierhead Building and the North Wales office.

Whilst the pandemic may have fundamentally changed how we use the estate, the unwinding of restrictions, along with a new Commission, new Member preferences, a new pattern of business, and an appetite for agile future ways of working have introduced uncertainties regarding levels of occupancy and patterns of use of the estate. These will take time to become apparent. In the

meantime, the uncertainty will introduce risk into significant estate decisions such as the North Wales office and the replacement of the catering contract.

In making these decisions, the Commission will need to take into account the desire of Members and their staff to work from different locations other than Tŷ Hywel.

To bring all of these considerations into focus, including the implications for the Commission of the Government's future accommodation plans and the potential for future reform of the Senedd, we will work quickly to produce an Accommodation Strategy.

At the start of 2021, a number of changes were made to the furniture in Tŷ Hywel to test different ways of working and facilitate hybrid meetings between building users on and off the estate. In addition, a number of areas were turned into shared working spaces where the level of staff occupancy is expected to suit this type of arrangement.

Delivering our priorities

The budget includes a project fund from which necessary spend over and above the business as usual budgets will be funded.

The Programme and Change Office was established to have oversight of all projects within the Commission and maintain timelines and programme plans for delivery. This work means that the Commission has a comprehensive understanding of upcoming projects, and associated financial and resource requirements, so that they can be scheduled in a way which provides excellent value for the Commission whilst respecting capacity constraints.

The largest project currently on the agenda is the replacement of the windows in Tŷ Hywel. They are 30 years old and are generally in a poor condition with replacement parts unavailable. The terms of the lease place a responsibility on the Commission to maintain the building in a good state of repair, replacing any end of life items such as boilers, doors and windows.

Consultancy work was undertaken in 2020 to consider the scale and cost of the works and recommended that the replacement of the windows is undertaken as one project over 52 weeks to maximise cost efficiency and retain as much cost certainty as possible (in other words, multiple phases may lead to higher costs). The recommended option has been estimated to cost around £6.0 million including fees and irrecoverable VAT. This is not a cost the Commission would be

able to meet from its operational budget. A decision to proceed needs to be taken alongside decisions regarding the long-term future of Tŷ Hywel and as mentioned above, this will be addressed in the accommodation strategy. Potentially, the window replacement could take place during the 2023-24 financial year.

Engagement

Putting people at the heart of parliament continues to be the focus of our communications and engagement work.

Over the course of the pandemic, we have seen an unprecedented interest in Welsh politics and the work of the Senedd, which has resulted in an increased demand for news stories and higher engagement with our digital output. We will continue to build on this success, focusing resources on creating innovative content to reach new audiences through a variety of platforms and engage them in valuable conversations about the work of the Senedd and how it impacts their lives.

We will be taking full advantage of the new ways of working by utilising digital technology to further enhance audience participation and experience. We will invest in developing a rolling engagement programme as part of our strategy for the Sixth Senedd, which will include face-to-face, virtual and hybrid experiences 'on and off' the estate.

The second election for the Youth Parliament will take place in November 2021. The second term will look at new issues facing young people in Wales and ensure the work and recommendations of the first Youth Parliament are taken forward.

To ensure that we appropriately capture, evaluate and offer ongoing engagement with our audiences we will require continued investment in two major projects: Customer Relationship Management (CRM) and Online Engagement Tools. These projects will be in addition to the development of key areas such as audience insight, social media, and robust evaluation to be more outcome based and impact driven.

Senedd Reform

The debate continues around the Senedd's capacity to undertake its functions effectively. The previous Commission recognised the constraints of the current 60 Member Senedd as one of the key challenges for the future. The strategy for the Fifth Senedd took the opportunity to make the most of the small size to really understand the needs of Members and tailor the services provided.

The Senedd is responsible for holding the Welsh Government to account on the significant number of new functions that the Government is now responsible for which were previously exercised by the European Union. Other changes to the UK's constitutional and Governance arrangements are being put in place, such as the UK Internal Market Act and UK Common Frameworks in policy areas where powers have returned from the EU and intersect with devolved competence. The impact of these changes on the devolution settlement is being assessed by Members.

The pressures on Members and Commission services will remain high and may increase further during the Sixth Senedd. Ensuring that Members and Commission support services are able to carry out their duties effectively is an area where investment may be required, such as support for inter-parliamentary relations.

Faced with the continuing pressures of a 60-Member Senedd, the Commission will now consider how best to focus its support to Members.

Some Members have expressed an appetite to pursue reforming the Senedd's electoral system and size in the Sixth Senedd. The First Minister has expressed a view that "it is for the Senedd itself" to take forward increasing the number of Members of the Senedd, in the first instance.

If, during the course of this Senedd, it becomes clear that the Commission needs to plan for any increase in the size of the Senedd, its budgetary strategy would need to be reworked.

Office of the Standards Commissioner

In its report 'Creating the Right Culture', the Committee on Standards of Conduct recommended that the Commission provide a support and advice function to the Commissioner's office as well as specialist support.

Two roles were created to support the work of the Standards Commissioner and as a Commission we need to protect an element of the budget to allow them to undertake their work. For 2022-23, the budget has therefore been moved from the Commission's operational budget and is now shown separately as a ring-fenced budget. This includes the costs of the two staff members that support the office, in addition to a budget for independent communication and legal advice for Members.

International Financial Reporting Standard 16 - Leases

The new accounting standard, International Financial Reporting Standard 16 - Leases ("IFRS 16"), had been due to take effect from financial year 2020-21. A decision was then made by HM Treasury and the Financial Reporting Advisory Board ("FRAB") to defer the implementation of IFRS 16 until 1 April 2021. In November 2020 a further announcement was made by the FRAB to further defer the implementation until 1 April 2022. Both of these delays were as a result of the circumstances caused by Covid-19.

IFRS 16 requires all leases to be accounted for on a consistent basis. Previously, leases classified as "operating leases" were not recognised and were reported "off-balance sheet". This change primarily affects the treatment of the lease of the Tŷ Hywel building in Cardiff Bay which houses the majority of Commission staff. Tŷ Hywel is not currently classified as an asset and is not depreciated. From 1 April 2022, when it will be recognised as a right-of-use asset, it will be depreciated over the anticipated future lease period.

This change will result in an increase to the depreciation and interest finance charges in the Commission's budget. These charges will be partially offset by a decrease in the office rental cost shown in the budget.

The overall Commission budget will increase. However, these changes will not increase the cash requirement from the Welsh Consolidated Fund. There will be no change in the amount of rent paid to the landlord on implementation of IFRS 16, however the accounting presentation will be different.

The impact of IFRS 16 is not shown in Annex 1 or 2. The Commission's budget will be adjusted, subject to any further delays by HM Treasury and FRAB, to reflect IFRS 16 in the first supplementary budget for 2022-23.

National Insurance costs

On 7 September 2021 HM Government announced an increase of 1.25% to the rate of National Insurance contributions paid by employees and employers from April 2022 and is therefore a likely additional pressure on the Commission's 2022-23 budget.

Given the timing of the announcement, and its proximity to the Commission's budget submission timetable, the Commission has decided not to change its budget estimate at this stage. However, a further review will take place to consider the impact of this increase, along with other emerging uncertainties and pressures.

The budget is set on the basis of need and has little capacity for additional demands, therefore it is likely that this will result in a Supplementary Budget during 2022. The total impact of the increase is likely to be in the region of £300k across all salary costs (Senedd Members, Member support staff and Commission staff).

3. Financial governance and control

The Senedd Commission Audit and Risk Assurance Committee (“ARAC”) supports the Commission and the Principal Accounting Officer regarding their responsibilities for risk management, internal control and corporate governance.

As part of its role, ARAC maintains a strong interest in, and oversight of, the internal financial control environment. Updates on accounting policies and the budgetary position are considered by ARAC and it takes a keen interest in the audit of the Annual Report and Accounts. Members of the Committee have also provided oversight and challenge of the assurance framework and governance statement.

External and Internal Audit provide important sources of assurance to ARAC and the Accounting Officer. The Auditor General for Wales (“AGW”) is the Commission’s external auditor and he is supported in his work by Audit Wales. For the 2020-21 financial year an unqualified opinion was issued on the financial statements.

In 2019, Finance Committee issued a Statement of Principles for Directly Funded Bodies to consider when preparing their annual budget estimates. The Commission has kept these principles firmly in mind in the preparation of its budget estimate for 2022-23. The estimates are transparent and the evidence of the need for, and benefit from, the resources requested is provided in this narrative document.

The Executive Board (the “Board”) has strategic responsibility for ensuring that the Commission's resources are used effectively, provides challenge to service leaders to strive for continuous improvement and drives efforts at delivering efficiencies. The Board is responsible for approving the Commission's annual investment plans and for prioritising investment to best effect. The Board ensures that resource capacity planning aligns with the Commission's goals and priorities and provides governance and assurance to significant change projects.

4. Budget for the Remuneration Board's Determination

The Independent Remuneration Board is the body that determines the pay and remuneration of Members and their support staff; and the system of financial support needed for Members to fulfil their responsibilities as elected representatives.

The Remuneration Board's Determination provides the funding to cover the expenses associated with being a Member and / or an Office Holder, for example:

- running an office and engaging with constituents;
- salaries and travel expenses of support staff;
- residential accommodation in Cardiff for Members whose home is a significant distance from the Senedd (eligibility criteria apply); and
- support for the Party Groups and policy research.

The Determination sets the basic salary for Members and additional office holder salaries. The Determination also sets the mechanism for increases to these salaries; in 2022-23 it is expected that Member salaries will increase in line with the average earnings in Wales as measured by the Annual Survey of Hours and Earnings ("ASHE"), capped at 3%. The basic salary for Members at the start of 2022-23 is budgeted at £69,678 which assumes a 3% increase on the current salary level.

Members can employ staff to support them in all aspects of their role. The budget for support staff costs for 2022-23 is £9.393 million, which includes an uplift of 3%. An increase of 3% has also been applied for the following two years, since support staff costs also follow ASHE, capped at 3%. From the start of the Sixth Senedd, Member Support Staff have access to a pension scheme whereby their contributions are matched by the Commission (up to a maximum of 3%), in addition to the existing 10% employer contribution. For the 2022-23 budget a take-up rate of 50% of staff at the maximum 3% contribution level has been assumed.

Allowance has been made for an anticipated £0.5 million of staff turnover (where budget is released due to staff vacancies).

In 2020-21 underspends were generated from the office costs and travel budgets which enabled new costs, such as home working allowances for support staff and DSE equipment, to be absorbed. During 2021-22 Members are likely to reassess how they use their allowances to adapt to these new ways of working, which will assist in clarifying requirements in future budget planning cycles.

The Remuneration Board reviews the other elements of its Determination on an annual or periodic basis to ensure that they remain appropriate, for example, a Return to the Offices Covid-19 Fund has been established, to meet the costs of health and safety measures identified from Members' risk assessments of their workplaces (excluding those on the Senedd estate). For the purpose of providing indicative figures for future years, an inflationary uplift of 2% has been assumed.

The budget to fund the Remuneration Board's Determination for 2022-23 and the following two years is shown in Table 9.

5. Budget Ambit

This budget submission is laid in compliance with the Senedd Standing Order 20.13 to assist in the compilation of the Annual Budget Motion required by Section 125 of the Government of Wales Act 2006.

The submission covers the resource and cash requirements of the Senedd Commission for the year ending 31 March 2023.

The Budget Motion will authorise the net resources to be used for the services and purposes of Members and Senedd Services. The motion includes the maximum income (or accruing resources) that may be retained for use on those services and purposes instead of being paid into the Welsh Consolidated Fund. It will also set out the cash amount that will be needed from the Welsh Consolidated Fund to meet the anticipated net amounts falling due for payment by the Commission.

The 2022-23 Budget for the Senedd addressing these requirements is set out in Table 1.

Table 1: 2022-23 Budget for the Senedd against requirements

Senedd requirements	2022-23 £000
<p>Resources other than accruing resources for use by the Senedd Commission ('the Commission') on resource and capital costs associated with the administration and operation of services to support the Senedd; promotion of the Senedd including payments to the Electoral Commission and others; payments in respect of the Commission for Standards and Remuneration Board; any other payments relating to the functions of the Senedd or functions of the Commission.</p> <p>Resources other than accruing resources for use by the Commission in respect of the decisions of the Remuneration Board and expenditure in respect of Members of the Senedd Pension provision</p>	<p>£62,942 Table 2</p>
<p>Accruing resources for retention pursuant to section 120(2) of the Government of Wales Act 2006 and use by the Commission from the disposal of fixed assets and other capital income for use on the purchase or acquisition of fixed assets, rental income, gifts, grants, cheques, recharges and income from commercial sales and other services provided to the public or others for use on administrative costs of the Senedd.</p>	<p>£220 Table 8</p>
<p>Amount to be issued from the Welsh Consolidated Fund to meet the anticipated amounts falling due for payment in the year and in respect of the above services and purposes less expected receipts and recoverable VAT</p>	<p>£59,242 Table 3</p>

Annex 1: Budget Overview

Table 2: Budget Overview

Budget Heading	2021-22	2022-23	2023-24	2024-25
Commission Related Expenditure	£000	£000	£000	£000
Staff salaries and related costs (Table 4)	£26,325	£27,417	£28,033	£28,598
Accommodation and facilities (Table 5)	£7,798	£7,809	£7,867	£7,926
ICT costs (Table 6)	£2,380	£2,614	£2,720	£2,736
Other costs (Table 7)	£2,202	£2,055	£2,055	£2,055
Total Revenue Expenditure	£38,705	£39,895	£40,675	£41,315
Total Income (Table 8)	(£220)	(£220)	(£220)	(£220)
Capital Expenditure (Table 10)	£500	£500	£500	£500
Project Fund (Table 10)	£460	£1,000	£1,000	£1,000
Total operational resource (excluding non-cash items)	£39,445	£41,175	£41,955	£42,595
Depreciation and amortisation (non-cash)	£2,250	£2,250	£2,250	£2,250
Total Commission related expenditure	£41,695	£43,425	£44,205	£44,845
Member related expenditure				
Members' salaries and related costs (Table 9) ⁽¹⁾	£16,819	£17,552	£18,072	£18,606
Budget for the Office of the Standards Commissioner (Table 11)	£0	£165	£168	£171
Election related expenditure	£2,600	£0	£0	£0
Members' pension finance costs	£1,800	£1,800	£1,800	£1,800
Total Commission budget	£62,914	£62,942	£64,245	£65,444

⁽¹⁾ As per the Remuneration Board's Determination

Table 3: Reconciliation of the new resource requirement to the cash drawing from the Welsh Consolidated Fund

Net cash requirement	2022-23 £000
Members' net revenue requirement	£17,552
Budget for the Office of the Standards Commissioner	£165
Commission net revenue requirement	£42,925
Net capital requirement	£500
Annually managed expenditure	£1,800
Subtotal	£62,942
Adjustments	
Depreciation	(£2,250)
Movements in provisions	(£1,800)
Movement in debtors and creditors	£350
Subtotal	(£3,700)
Net cash requirement from the Welsh Consolidated Fund	£59,242

Annex 2: Budget Detail

Table 4: Analysis of staff salaries and related costs

	2021-22	2022-23	2023-24	2024-25
	£000	£000	£000	£000
Commission staff costs	£27,196	£28,417	£29,033	£29,598
Standards Commissioner's staff costs ⁽¹⁾	£129	£0	£0	£0
Vacancy / churn provision	(£1,000)	(£1,000)	(£1,000)	(£1,000)
Total	£26,325	£27,417	£28,033	£28,598

⁽¹⁾ Standards Commissioner staffing support costs are now in Table 11

Table 5: Analysis of Accommodation and Facilities costs

	2021-22	2022-23	2023-24	2024-25
	£000	£000	£000	£000
Rent and rates incl. car parking	£4,307	£4,307	£4,334	£4,363
Maintenance and works	£980	£1,030	£1,030	£1,030
Security	£773	£773	£773	£773
Utilities	£582	£582	£594	£606
Cleaning	£537	£533	£544	£554
Catering	£399	£399	£407	£415
Photocopier rentals	£160	£125	£125	£125
Furniture and fittings	£60	£60	£60	£60
Total	£7,798	£7,809	£7,867	£7,926

Table 6: Analysis of ICT costs

	2021-22	2022-23	2023-24	2024-25
	£000	£000	£000	£000
ICT Services	£514	£571	£571	£571
Broadcasting	£683	£682	£788	£804
Licences and maintenance	£1,083	£1,261	£1,261	£1,261
Revenue and consumables	£100	£100	£100	£100
Total	£2,380	£2,614	£2,720	£2,736

Table 7: Analysis of other costs

	2021-22	2022-23	2023-24	2024-25
	£000	£000	£000	£000
Promoting awareness and understanding	£289	£271	£271	£271
Training and development	£339	£374	£374	£374
Language contracted	£270	£300	£300	£300
Printing, stationery and postage	£229	£76	£76	£76
Other HR costs	£166	£166	£166	£166
Insurance and legal costs	£144	£141	£141	£141
Staff T&S	£132	£127	£127	£127
Publications	£127	£127	£127	£127
Other travel and subsistence	£103	£95	£95	£95
Audit	£75	£75	£75	£75
Remuneration Board related costs	£62	£37	£37	£37
Specialist advice	£45	£46	£46	£46
Academic engagement	£40	£40	£40	£40
Consultancy	£30	£30	£30	£30
Hospitality	£29	£29	£29	£29

	2021-22	2022-23	2023-24	2024-25
	£000	£000	£000	£000
Accounting and financial services	£31	£31	£31	£31
Uniforms and clothing	£15	£15	£15	£15
Vetting	£10	£10	£10	£10
Other items <£20k	£66	£65	£65	£65
Total	£2,202	£2,055	£2,055	£2,055

Table 8: Analysis of Income

	2021-22	2022-23	2023-24	2024-25
	£000	£000	£000	£000
Sales - the Senedd shop	(£20)	(£20)	(£20)	(£20)
Accommodation - rental income	(£58)	(£58)	(£58)	(£58)
Car park and other income	(£142)	(£142)	(£142)	(£142)
Total	(£220)	(£220)	(£220)	(£220)

Table 9: Analysis of Members' salaries and related costs

	2021-22	2022-23	2023-24	2024-25
	£000	£000	£000	£000
Senedd Members' salaries and on-costs	£6,731	£6,453	£6,647	£6,846
Members' Support Staff salaries and on-costs	£8,942	£9,393	£9,675	£9,965
Allowances and office costs	£2,146	£2,206	£2,250	£2,295
Anticipated underspend	(£1,000)	(£500)	(£500)	(£500)
Total	£16,819	£17,552	£18,072	£18,606

Table 10: Priority projects for 2022-23

	2022-23
	£000
Engagement and outreach activities	£200
EFM planned expenditure	£600
ICT planned expenditure	£400
Future ways of working	£300
Total	£1,500

Table 11: Budget for the Office of the Standards Commissioner ⁽¹⁾

	2021-22	2022-23	2023-24	2024-25
	£000	£000	£000	£000
Staff costs	£0	£141	£144	£147
Legal advice	£0	£24	£24	£24
Communications	£0	£0	£0	£0
Total	£0	£165	£168	£171

⁽¹⁾ Costs were previously included in Table 4