



West Northamptonshire Council

Local Pension Board

25 January 2024

Mark Whitby – Head of Pensions

Report Title	Northamptonshire Pension Fund Business Plan and Medium-Term Strategy Business Plan Update report
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Appendix A –Variances against the forecast of investments and administration expenses based on original setting of assumptions.

Appendix B – Northamptonshire Pension Fund Climate Action Plan

1. Purpose of Report

1.1 Good governance requires that updates to the pre-agreed Annual Business Plan and Medium-Term Strategy are provided to the Committee and Board on a regular basis. This update highlights the progress made on the key activities for the period.

2. Executive Summary

2.1 The Northamptonshire Pension Fund have for many years considered it good governance to have in place a Business Plan and Medium-Term Strategy that is agreed annually and regularly monitored by the Committee and Board.

2.2 The report summarises the progress made on each activity for the period under review.

2.3 Section 6 of this report provides a progress update for each business plan activity. The table below provides an overview of the RAG status of each activity.

Paragraph	Activity	RAG status
6.1	Re-tender for benefits and governance consultancy services.	Green
6.2	Re-tender for actuarial consultancy services.	Green
6.3	Re-tender for legal services provider.	Green
6.4	Re-tender for pensions administration and pensioner payroll platform.	Green
6.5	Address and mortality screening Services.	Green
6.6	Review and implement changes required from the Pension Regulator's new Code of Practice.	Green
6.7	Continue to review cyber resilience.	Green
6.8	Implement the best practice recommendations of the good governance review.	Green
6.9	Review the administrative performance of the Fund's additional voluntary contribution providers.	Green
6.10	Complete the Guaranteed Minimum Pension Rectification.	Amber
6.11	Application of the McCloud age discrimination remedy.	Amber
6.12	Prepare for the implementation of Pension Dashboards.	Green
6.13	Processing of undecided leaver records.	Amber
6.14	Continue development of the ACCESS asset pool.	Green
6.15	Continue activities within the Fund's Climate Action Plan.	Green
6.16	Implement the revised Investment Strategy.	Green
6.17	Implement recommendations from the review of the website and digital communications.	Amber
6.18	Implement equality, diversity and inclusion (EDI) best practices.	Green
6.19	Review of investment consultancy contract.	Green

2.4 The tables in appendix A provide an update of the Fund account, investment and administration income and expenditure against the cash flow projection outlined in the Annual Business Plan as agreed by the Pension Committee in March 2023. There are no material variances identified.

2.5 The link to the full Business Plan approved by the Committee in March 2023 is provided in section 7 for full context and reference.

3. Recommendation

3.1 The Board is asked to note the Business Plan Update.

4. Reasons for Recommendation

- To ensure adequate oversight of the key activities of the Northamptonshire Pension Fund.
- To ensure good governance and compliance with the Local Government Pension Scheme Regulations and other relevant legislation and guidance.

5. Report Background

- 5.1 The Pension Committee approved the Business Plan and Medium-Term Strategy 2023/24 on 29 March 2023.

6. Progress against business plan activities

Procurement of Services

6.1 Re-tender for benefits and governance consultancy services

- 6.1.1 Activity: To re-tender for the supplier of benefits and governance consultancy services currently with Aon due to expire 31 March 2024.

6.1.2 Key milestones:

Key Milestones	Dates	On target for completion?
Register to access national LGPS Frameworks.	May 2023.	Completed.
Draft specification of services required an associated documentation.	June – July 2023.	Completed.
Issue invitation to tender to suppliers on the Framework.	September 2023.	Completed.
Evaluate tender responses.	October - November 2023.	Completed.
Award contract.	January 2024.	Completed.

- 6.1.3 Update: The award was issued to Hymans Robertson on 1 December and the standstill period concluded on 11 December. Legal services have been instructed to complete the necessary contract documentation. The contract start date is 1 April 2024.

6.2 Re-tender for actuarial consultancy services

- 6.2.1 Activity: To re-tender for the supplier of actuarial services currently with Hymans Robertson due to expire 31 March 2024.

6.2.2 Key milestones:

Key Milestones	Dates	On target for completion?
Register to access national LGPS Frameworks.	May 2023.	Completed.
Draft specification of services required and associated documentation.	June – July 2023.	Completed.
Issue invitation to tender to suppliers on the Framework.	October 2023.	Completed.
Evaluate Tender responses.	December 2023.	In progress.
Clarification interview/presentation	January 2024	On target
Award Contract.	February 2024.	On target.

6.2.3 Update: Initial scoring has been completed and bidders have been invited to provide a clarification presentation on 12 January. A verbal update will be provided at the meeting.

6.3 Re-tender for legal services provider

6.3.1 Activity: To re-tender for the supplier of legal services currently with Squire Patten Boggs due to expire 31 March 2024.

6.3.2 Key milestones:

Key Milestones	Dates	On target for completion?
Register to access national LGPS Frameworks.	July 2023.	Completed.
Draft specification of services required an associated documentation.	July – August 2023.	Completed.
Issue invitation to tender to suppliers on the Framework.	September 2023.	Completed.
Evaluate tender responses.	October - November 2023.	Completed.
Award contract.	December 2023.	Completed.

6.3.3 Update: The invitation to further competition documentation was published in October with prospective bidders invited to submit responses by the end of November. The evaluation of responses was concluded in November following the scoring and moderation process the contract was awarded to the incumbent supplier, Squire Patton and Boggs.

6.4 Re-tender for pensions administration and pensioner payroll platform

6.4.1 Activity: To re-tender for pensions administration and pensioner payroll platform currently with Heywood that is due to cease in September 2024.

6.4.2 Key milestones:

Key Milestones	Dates	On target for completion?
Invitation to Further Competition exercise using National LGPS Frameworks.	April - June 2023.	Completed.
Evaluation and award.	July - September 2023.	Completed.
Year 0 transitional period.	October 2023 - September 2024.	Not applicable
Go Live.	1 October 2024.	On target.

6.4.3 Update: Invitation to further competition was published 24 April 2023 with a closing date for responses of 19 June 2023. All suppliers on the framework submitted a bid and following the scoring and moderation process the contract was awarded to the incumbent supplier, Heywood Pension Technologies.

6.5 Review address and mortality screening services

6.5.1 Activity: The current contract for address tracing and mortality screening ceases in June 2023 with no ability to extend.

Following the 12-month extension of the contract a long-term approach is now required from June 2024 onwards.

6.5.2 Key milestones:

Key Milestones	Dates	On target for completion?
Develop a contract to enable the continuation of services past June 2023 (with the assistance of legal services).	April - May 2023.	Completed.
Both parties to sign up to new contract on existing terms.	May 2023.	Completed.
Seek agreement to extend the contract with the current supplier from June 2024 to 31 March 2025.	February 2024.	On target.
Review new LGPS Framework offerings and internal Fraud Hub options.	Rescheduled to 2024/25 (the Framework is now due to be released in April 2024).	This activity will feature in the 2024/25 Business Plan.
Develop approach for procurement of address and mortality screening services.	TBC.	This activity will feature in the 2024/25 Business Plan.

6.5.3 Update: The delay of the LGPS National Framework for Member Data Services from December 2023 to April 2024 has meant that there will be inadequate time to comprehensively review options before the current contract expires in June 2024. The activity has therefore been rescheduled and will feature in the 2024/25 Business Plan (subject to agreement).

Core governance activities

6.6 Review and implement changes required from the Pension Regulator's new Code of Practice

6.6.1 Activity: In March 2021 the Pensions Regulator launched a consultation on its revised code of practice for the pensions industry. The responses to the consultation have taken the Pensions Regulator longer than expected to digest and as such the new code of practice was expected to come into force early 2023. Once the code of practice is in force, the Fund will have six months to achieve full compliance with its contents.

6.6.2 Key milestones:

Key Milestones	Dates	On target for completion?
Develop an action plan of changes required on launch of code of practice.	TBC.	This activity will feature in the 2024/25 Business Plan due to the late release of the Code .
Present action plan to the Pension Fund Committee and Pension Board.	TBC.	This activity will feature in the 2024/25 Business Plan due to the late release of the Code .

Present update on progress on action plan to the Pension Fund Committee and Pension Board.	TBC.	This activity will feature in the 2024/25 Business Plan due to the late release of the Code .
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6.6.3 Update: The General Code of Practice is now due to be released at the end of March 2024 and funds will have 6 months to become fully compliant. This activity will therefore now feature in the 2024/25 Business Plan.

6.7 Continue to review cyber resilience

6.7.1 Activity: Cyber-crime will continue to evolve and become increasingly sophisticated and as such this area will be regularly reviewed and monitored. The cyber action plan will be updated as and when necessary.

6.7.2 Key milestones

Key Milestones	Dates	On target for completion?
Ongoing monitoring and development of the cyber strategy and action plan via the Business Plan Updates at each meeting of the Pension Committee and Pension Board.	April 2023 – March 2024.	On target.

6.7.3 Update: A separate report on Cyber Resilience is being presented at this meeting.

6.8 Implement the best practice recommendations of the good governance review

6.8.1 Activity: Following consultation with LGPS stakeholders, in February 2021, a number of recommendations for improvement were identified. Some would require the input of DLUHC to amend scheme regulations and publish statutory guidance, others by SAB and others for Funds to implement as best practice. The standards are due to be issued in 2023.

6.8.2 Key milestones:

Key Milestones	Dates	On target for completion?
Develop an action plan to implement the best practice activities.	TBC.	This activity will feature in the 2024/25 Business Plan as the standards have not been released.
Present update on progress on action plan to the Pension Fund Committee and Pension Board.	TBC.	This activity will feature in the 2024/25 Business Plan as the standards have not been released.
Implementation of activities requiring SAB and DLUHC guidance.	TBC.	This activity will feature in the 2024/25 Business

		Plan as the standards have not been released.
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6.8.3 Update: As the standards have not materialised to date the activities will now feature in the 2024/25 Business Plan.

6.9 Review the administrative performance of the Fund’s additional voluntary contribution providers

6.9.1 Activity: The administrative performance of Prudential began to deteriorate in mid-2020 and in February 2022, Prudential’s performance had still not improved. Aon was commissioned to undertake a further review of both Standard Life and Prudential’s administrative performance in October 2022.

The decision was to review again in a further 12 months and to include investment performance.

6.9.2 Key milestones:

Key Milestones	Dates	On target for completion?
Present to the Pension Committee the findings of the independent review alongside any recommendations for action (the timing of this will depend on the co-operation of the AVC providers in providing the necessary information for analysis by Aon.	October 2023.	Completed.

6.9.3 Update: The findings of the AVC review were presented to the Pension Committee in October and the Local Pension Board in November. Actions have been identified as part of the review which are already underway.

Scheme member and data projects

6.10 Complete the Guaranteed Minimum Pension Rectification

6.10.1 Activity: To complete the rectification stage for scheme members, making adjustments to pensions in payment where necessary.

6.10.2 Key milestones:

Key Milestones	Dates	On target for completion?
Manual rectification of outstanding records.	April 2023 – March 2024.	Estimated completion date Q1 2024-25.

6.10.3 Update: As at 30 September, 31% of cases have been completed. As the project was running several weeks ahead of schedule, resources were temporarily diverted to processing of undecided leavers activity (6.13) until 1 January 2024 when resources were returned to this activity. The project is estimated to conclude by 30 June 2024.

6.11 Application of the McCloud age discrimination remedy

6.11.1 Activity: The pension records of scheme members within scope of the McCloud ruling will be rectified following the implementation of the age discrimination remedy, expected via amendment to legislation on 1st October 2023.

6.11.2 Key milestones:

Key Milestones	Dates	On target for completion?
Respond to DLUHC consultation on draft regulations (delayed from 2022 and still pending release).	June 2023.	Completed.
Devise communication plan for members and scheme employers.	September 2023 (rescheduled from May 2023).	Completed.
Undertake scheme member record preparations to identify members in scope of remedy in readiness for the application of the underpin.	April 2023 – September 2023.	Completed.
Application of the revised underpin following release of amended LGPS Regulations.	October 2023 onwards.	Ongoing.

6.11.3 Update: The Fund’s administration system is largely applying the underpin as expected. There will be some continued development in this area where issues are identified. In the meantime, there will be elements of manual intervention to ensure there is no detriment to members or backlogs accruing.

McCloud web pages have been created for members and employers, which link through to centrally produced McCloud resources and wording provided by the LGA has been inserted into existing letters for cases from 1 October 2023 where the underpin applies. Disclosure requirements were met ahead of the 31 December 2023 deadline via the most appropriate method for particular tranches of members including emails, letters, Member Self-Service and the Pension Service website

A draft version of the ‘McCloud prioritisation policy’ was circulated by LGA on behalf of DLUHC on 12 October with the intention to release the final version early 2024. Officers will review the draft policy ahead of the release date and start preparations where possible. Administrator guidance was published by the Local Government Pensions Committee on 15 November 2023.

6.12 Prepare for the implementation of Pension Dashboards

6.12.1 Activity: In the 2016 Budget, the Government made a commitment that Pension Dashboards would be created by the pensions industry, enabling pension savers to view details of all their pensions together.

The activity will be updated following the DWP announcement to reset the Pension Dashboard Programme and the delay to connection deadlines.

6.12.2 Key milestones:

Key Milestones	Dates	On target for completion?
Continue to work with the pensions administration software supplier to connect to a Pensions Dashboard by revised deadline which is TBC.	TBC following project reset.	TBC once DLUHC issue staging guidance.
Undertake project plan activities to enable connection to the Dashboard including data cleansing activities.	TBC.	TBC once DLUHC issue staging guidance.
Connect to the Dashboard.	31 October 2026	On target.
Pension Dashboard Go Live.	TBC.	TBC.

6.12.3 Update: A staging timetable will be set out in connection guidance and is due to be released late 2023. The staging timetable will indicate when schemes are scheduled to connect, based on their size and type. The table will be updated when the guidance is published to ensure the Fund is compliant with the new requirements. In the meantime, PASA has published value data guidance which provides schemes with good practice approaches to providing data to the dashboards.

6.13 Processing of undecided leaver records

6.13.1 Activity: To reduce the backlog by 2,500 cases per year for the next 2.5 years from a baseline of approximately 8,300 at March 2023.

6.13.2 Key milestones:

Key Milestones	Dates	On target for completion?
Reduce aged cases by 2,500.	April 2023 – March 2024.	On target.
Reduce aged cases by 2,500.	April 2024 – March 2025.	On target.
Reduce aged cases to BAU baseline (<2,000).	April 2025 – September 2025.	On target.

6.13.3 Update: The baseline at April 2023 was just under 8,500 cases. As at 31 December the aged cases outstanding are down to 7,077, a drop of 1,396 cases (16.5%) from the revised April 2023 baseline.

Investment related activities

6.14 Continue development of the ACCESS asset pool

6.14.1 Activity: The ACCESS asset pool Authorised Contractual Scheme (ACS) sub-fund structure is now at a mature stage with ongoing developments prioritising completing the sub-fund pipeline and putting in place supplementary sub-funds as and when required. Other developments within the ACCESS pool include the non-listed work programme, Operator re-procurement, and the Phase II ESG/RI procurement.

6.14.2 Key milestones:

Key Milestones	Dates	On target for completion?
Development of ACS sub-fund pipeline.	April 2023 – October 2024.	On target.
Non-listed (property, infrastructure, private equity, private debt) programme development.	April 2023 – December 2024.	On target.
ESG/RI Phase II procurement and reporting developments.	April 2023 – March 2024.	On target.
Operator re-procurement.	April 2023 – March 2025.	On target.

6.14.3 Update: UK Core Real Estate Mandate has been awarded to CBRE. For the UK Alternative Building Blocks, Apex/ACCESS focus will be on impact investing, affordable housing and long lease investments. PIRC has been appointed as phase two advisor and had attended one RI/ESG group meeting.

6.15 Continue activities within the Fund’s Climate Action Plan

6.15.1 Activity: During 2023-24 the Fund will continue to focus on the milestone dates within the plan which are key to ensure the Fund is on the correct path to achieve “net-zero” carbon emissions by 2050 at the latest.

6.15.2 Key milestones:

Key Milestones	Dates	On target for completion?
To complete the activities against the Climate Action Plan	April 2023 to March 2024	On target.

6.15.3 Update: Implementation of the Climate Aware Passive equities has been completed and this has been reported to the Sept ISC (UBS Climate Aware and Osmosis). In May 2023 the Investment Sub Committee reviewed the progress against decarbonisation targets, adopted a new primary metric for monitoring progress against the existing decarbonisation targets and agreed to include Scope 3 emissions in the Fund’s target setting once reporting improves. In November 2023 the ISC received a positive progress update, with carbon intensity in connection with the Fund’s equity portfolio assessed as having reduced by circa 53.5% as at 30 June 2023 against a 2030 target of a 59% reduction.

6.16 Implement the revised Investment Strategy

6.16.1 Activity: A review of the Fund’s investment strategy was undertaken in March 2023 resulting in changes to its strategic asset allocation (SAA). Work will be undertaken throughout 2023-24 to implement these changes.

6.16.2 Key milestones:

Key Milestones	Dates	On target for completion?
Listed (UK) equity sales to fund increase in index-linked Gilts allocation.	June 2023.	Completed.
Consideration of preferred characteristics of new commitments for Infrastructure.	May 2023.	Completed.

Investment into M&G MAC fund following equity sales.	June 2023.	Completed.
Investment into long-lease property via ACCESS	Q1 2024.	On target.
Republish Investment Strategy	December 2023.	Completed.
Committee makes allocation decision in connection with long lease property.	Q4 2023	Completed.
Investment into timberland via ACCESS	Q1-Q2 2024.	On target.
Investment into BlueBay ESG MAC outside of ACCESS.	Q1 2024.	On target.

6.16.3 Update: Work has been processed to switch the segregated Index Linked Gilts to UBS pooled funds, expected to complete January 2024.

In August 2023, sales of UK Equity were used to fund a +2.5% increase in allocation to M&G Multi-Asset Credit, a further +2.5% due to be allocated to BlueBay MAC once the ESG MAC launched by the ACCESS. In November 2023, due to ongoing delays with the ESG MAC product launch within ACCESS (now January 2024), a decision was made in consultation with the S151 Officer to increase the BlueBay MAC allocation outside of ACCESS to match the Strategic Asset Allocation agreed by the Committee.

Following the ISC's decision to implement a 1% allocation to timberland, APEX is now scoping out a pooled offering, with a chosen supplier expected to be available by the end of 2024. For investments in UK long Lease Property, AVIVA has been approved Cambridgeshire ISC, and subscription procedures commenced in December 2023.

Communications

6.17 Implement recommendations from the review of the website and digital communications

6.17.1 Activity: A review of the Fund's websites was carried out in 2022/23, the review assessed whether the website was still fit for purpose in meeting the needs of stakeholders and explored alternative options including moving the hosting of the member related information pages away from our software supplier Heywood and hosting both member and employer pages internally on a single website.

Approval from the Pension Committee was granted to implement the recommendation from the review.

6.17.2 Key milestones:

Key Milestones	Dates	On target for completion?
Funding for the website development approved.	March 2023.	Completed.
Resources in place eg recruitment.	May 2023.	Completed.
High fidelity designs created.	August 2023.	Completed.
New website built.	March 2024.	On target.

6.17.3 Update: High fidelity designs partly based on the .gov.uk approach to web design have been created and user testing of the different options has begun. The project is currently and expected to remain within the agreed budget of £30,000. At the time of writing this report some recent resource issues mean that officers need to review the delivery plan with the project team. A meeting will be held between publication of this paper and the meeting of the Board. A verbal update will be given at the meeting.

6.18 Implement equality, diversity and inclusion (EDI) best practices

6.18.1 Activity: The Pensions Regulator has published guidance to help improve pension schemes’ equality, diversity and inclusion. Pension schemes have legal duties to scheme members, and good decision making is key to ensuring those duties are met. EDI supports robust discussion and effective decision making and is an important consideration for schemes. The Northamptonshire Pension Fund will be aiming to improve its equality, diversity and inclusion via these best practices.

6.18.2 Key milestones:

Key Milestones.	Dates.	On target for completion?
Fully review TPR guidance and produce an action plan, including delivery of relevant training.	October 2023– March 2024.	On target.

6.18.3 Update: The Pensions Regulator issued a survey to Board members in July 2023 with the intention to collect views on equality, diversity and inclusion. The responses were anonymised and used to improve EDI for pension scheme governing bodies. The next stage is to produce an action plan of the activities the Fund needs to undertake to improve EDI outcomes.

6.19 Review of investment consultancy contract

6.19.1 Activity: To consider an extension to the contract with the Fund’s Investment Consultant from the expiry date of September 2024.

6.19.2 Key Milestones:

Key Milestones	Dates	On target for completion?
For the Committee to consider an extension to the current contract by up to 3 years.	December 2023.	Complete.

6.19.3 Update: The Pension Committee has approved the extension of the Investment Consultant Contract for a full 3 years up to September 2027.

7. Implications (including financial implications)

7.1 Resources and Financial

7.1.1 The financial estimates and associated budgets included with the Business Plan and Medium-Term Strategy were approved by the Pension Committee on 29 March 2023.

7.1.2 Performance against the financial estimates in the Business Plan will be presented to the Pension Committee and Board each meeting. The Business Plan sets out the cost of each activity where known and where costs become known during the course of the year the Pension Committee and Board will be updated accordingly.

7.2 Legal

7.2.1 There are no legal implications arising from the proposals. All procurement undertaken has been in line with procurement legislation and procedures.

7.3 Risk

7.3.1 The mitigated risks associated with this report has been captured in the Fund's risk register as detailed below –

Risk	Residual risk rating
Those charged with the governance of the Fund and scheme are unable to fulfil their responsibilities effectively	Green
Pension Fund objectives are not defined and agreed.	Green
Failure to provide relevant information to the Pension Committee/Pension Board to enable informed decision making.	Green

7.3.2 Please see the [Northamptonshire Pension Fund Risk Register Executive Summary](#).

7.4 Relevant Pension Fund Objectives

7.4.1 The following objectives as per the Business Plan have been considered in this report -

- To have robust governance arrangements in place, to facilitate informed decision making, supported by appropriate advice, policies and strategies, whilst ensuring compliance with appropriate legislation and statutory guidance.
- To continually monitor and measure clearly articulated objectives through business planning.
- To continually monitor and manage risk, ensuring the relevant stakeholders are able to mitigate risk where appropriate.

7.5 Consultation

7.5.1 Not applicable. The Business Plan is best practice to ensure the Fund is managed appropriately and transparently.

8. Background Papers

8.1 [Agenda for Pensions Fund Committee on Wednesday 29th March 2023, 4.00 pm - West Northamptonshire Council \(moderngov.co.uk\)](#)

Appendix A – Variances against the forecast of investments and administration expenses based on original setting of assumptions

Fund Account	2023/24 Budget	2023/24 Forecast	Variance	Comments
	£000	£000	£000	
Contributions	(117,000)	(121,000)	(4,000)	Contributions in line with current membership numbers
Transfers in from other pension funds	(10,500)	(20,000)	(9,500)	Demand led
Total income	(127,500)	(141,000)	(13,500)	
Benefits payable	118,000	117,000	(1,000)	Benefits in line with current membership numbers
Payments to and on account of leavers	10,000	14,700	4,700	Demand led
Total Payments	128,000	131,700	3,700	

Net (additions)/withdrawals from dealings with members	500	(9,300)	(9,800)	
Management Expenses (Invoiced)	4,078	4,056	(22)	See below
Management Expenses (Non-Invoiced)	13,100	12,100	(1,000)	Calculated using fees from prior year plus actuarial growth assumption on AUM at September 23 to March 24
Total Management Expenses	17,178	16,156	(1,022)	
Total income less expenditure	17,678	6,856	(10,822)	
Investment income	(31,000)	(32,200)	(1,200)	Actual income received to Q2 plus two estimated quarters
Taxes on income (profit) and losses on disposal of investments and changes in the market value of investments	- (138,000)	- (62,300)	- (75,700)	Actual Q2 return followed by actuarial long term growth assumption
Net return on investments	(169,000)	(94,500)	74,500	
Net (increase)/decrease in the net assets available for benefits during the year	(151,322)	(87,644)	63,678	

Management Expenses	2023-24 Budget	2023-24 Forecast	Variance	Comments
	£000	£000	£000	
Total Administration Expenses	2,784	2,445	(339)	See below
Total Governance Expenses	814	888	74	Payroll for final IHLI termination account from 2021 - not included in 23/24 budget and underestimated consultancy costs for the implementation of the investment strategy

Total Investment Invoiced Expenses	480	723	243	New investment mandate with Osmosis
Total Management Expenses	4,078	4,056	(22)	

Administration Expenses Analysis	2023-24 Budget	2023-24 Forecast	Variance	Comments
	£000	£000	£000	
Staff Related	1,819	1,887	68	Budget based on estimated 23/24 pay rates, higher than expected pay awards received.
Altair administration and payroll system	397	370	(27)	Actual maintenance costs lower than expected.
Data assurance	21	25	4	A more proactive approach to address tracing has been undertaken in preparation for Dashboards.
Communications	51	48	(3)	
Other Non-Pay and Income	29	(352)	(381)	Bank interest received to date
County Council Overhead Recovery	467	467	-	
Total Administration Expenses	2,784	2,445	(339)	