



Growth Programme Board

Progress on ESF *(please note this paper should be printed in colour)*

Purpose

This paper will focus on the performance of the ESF Programme, reporting against all key indicators to give members a clear understanding of the overall Programme position. Additionally, a slide presentation, to be delivered at the meeting, will update members of progress on the key issues facing ESF; the combination providing a full and detailed overview of the Programme.

Recommendations

The Managing Authority (MA) asks that GPB members continue to encourage Direct Bid (DB) projects to work with the MA to ensure that claims are submitted by the deadlines set each quarter as the timely submission of claims remains a priority as we move nearer to the end of the programme.

As the focus shifts to ensure Projects can achieve their spend and output targets, the MA requests GPB members support, via their networks, in stressing the importance of accurate and timely progress reports and claims. We would also ask members to encourage projects to be open and honest about their levels of spend and outputs and submit prompt PCRs to change these where there is variation from the agreed profiles.

Summary:

N.B: throughout this report, ESF data is as of 01 May 2022, unless otherwise indicated. The position at the last report, with ESF data to 01 February 2022, is shown in brackets for ease of comparison. The exchange rate used throughout the report is 0.87 unless stated otherwise.

ESF commitment, as of 01 May 2022 was £2.952 billion (£3.047bn), 97.35% (100.44%) of the total ESF allocation. The figure has reduced this month due to some extensive work with removing unspent commitment from closed projects.

The ESF commitment inclusive of forecasted pipeline figures is £3.01bn, 100.24% of the total ESF allocation.

Programme Highlights as of Q4 2021:

- ESF has helped 1,699,054 participants
- of these, 209,226 started employment when they left the Programme (ESF-CR04)
- 154,420 were in education or training upon leaving (ESF-CR02)

The Project Change Request (PCR) caseload has increased since the last report, with 73 new cases (103%). We have seen an increase in open PCRs (68%) with more referrals being received into the MA on underperformance action, and Grant Recipients (GRs) administering the new PCR process and submitting recovery plans following the pandemic.

The value of the Remaining Funds, including the pipeline data of PCRs, and planned activity as of May 2022, is £114.8m. Members should note that the RF calculations account for a level of overprogramming, and therefore this figure does not represent money available to be spent.

The first Interim Payment Application (IPA22) of the calendar year was submitted to the European Commission (EC) on 27 April 2022 for €341m (£288m) total expenditure and €187m ESF – which includes 4% for Technical Assistance Simplified Costs Option (TASCO). We anticipate reimbursement of this at €168m within 60 days of submission.

In N+3 terms, IPA22 brings the Programme to 95% achieved of the cumulative N+3 target needed by the end of 2022, so we are in a healthy position with 3 IPAs remaining in 2022, and our level of confidence regarding achieving the 2022 N+3 target remains high. This assumption is based on knowing the value of claims that have been paid but not yet included in a payment application, claims submitted but not yet paid and the value of committed funds in Q2 2022. It should be noted that we will have claimed just over half (51%) of the overall Programme allocation following IPA22.

The Annual Assurance Package was submitted to the EC in February, with a Total Error Rate of 0.67%, well below the target of 2%. The accounts for the 2020-21 period have been accepted by the Commission.

Work continues to map out the details and scope of the Operational Programme (OP) review with the overarching aims of revising Programme outputs and results targets to reflect the actual cost of provision and rectifying the over-commitment position in Priority Axis (PA) 1. As previously reported, there is a key dependency on the EC response to the potential to move the ESF element of YEI into other PAs. Our expectation is for the bulk of the work to take place during summer, (including securing the necessary approvals from Growth Programme Board (GPB) before submitting to the EC.

ESF Programme Update:

In order to provide members with the latest available information, the Performance Framework data presented has different period end dates for participant and financial elements. Unlike the financial data, which is available monthly, the participant data is only available on a quarterly basis. This paper includes the latest participant data, to Q4 2021, in the table on page 11.

N.B: throughout this report, ESF data is as of 01 May 2022, unless otherwise indicated. The position at the last report, with ESF data to 01 February 2021, is shown in brackets for ease of comparison.

Commitment:

- ESF commitment on the 1st of May was £2.952bn (£3.047bn), 97.35% (100.44%) of the total ESF allocation
- In Priority Axes 1 and 2 there are 502 (499) Direct Bid (DB) projects with commitments totalling £1.15bn (£1.245bn) and 157 MOUs for the National Co-Financing Organisations (CFOs) valued at £1.746bn (£1.698bn)
- There are 42 ESF Funding Agreements for Technical Assistance (TA) with a value of £53.1 million and 20 projects for the digital response to COVID-19 Call, totalling £1.22m

Appraisal of Project Change Requests (PCRs):

Progress continues to be made in the appraisal of PCRs. Table One summarises the position on key indicators, enabling members to compare against the position in the last report:

Table One: Breakdown of PCR Activity as of 01 May 2022

PCR Caseload Performance – Summary Position		
Stage of PCR Process	Caseload: Volume	
	Last Report 1st Feb 2022	Current Position 1st May 2022
PCRs Received (since last Meeting)	36	73
Days to assign to an Appraiser (average)	2	5
PCRs Unassigned	0	0
PCRs Open (MA receipt to Decision)	37	62
PCRs Closed (since last Meeting)	41	34
Average days for PCR clearance (MA receipt to Decision)	59	44

Project Change Request Activity:

The MA's performance in this area is summarised in Table One (above), which provides a snapshot of the position as of 1st May. There has been a considerable improvement in the number of PCRs being processed in the period, with 62 PCRs reaching the decision stage, compared with 37 at the previous report, an increase of 67%. However, whilst 34 have been closed, compared to 41 in the previous report, 25 were within the 60 days, at the time of checking approximately, 3 in 4 hitting the target, showing an improvement in quality.

Average clearance is now down to 44 days, which is well within the 60-day target. Although the average processing time is under 60 days, 30% of cases (10 PCRs) took longer than 60 days. Of these:

- 9% took 61-65 days to process, just missing the target (1 was at 61 days and 2 at 63 days)
- 3% (1 PCR) took 79 days. Originally the Contract Manager's (CMs) decision was to reject this case, so detailed discussions were had with the GR and the CM in order to progress to an agreeable outcome.
- 18% (6 PCRs) took over 80 days due to delays mainly attributed to Eclairs issues elongating the process. This includes CLLD projects that we are unable to move quickly on, due to outstanding information

Progress on N+3 2022 Target:

Table Two: N+3 2022 Performance Forecast in Sterling (ESF and Match)

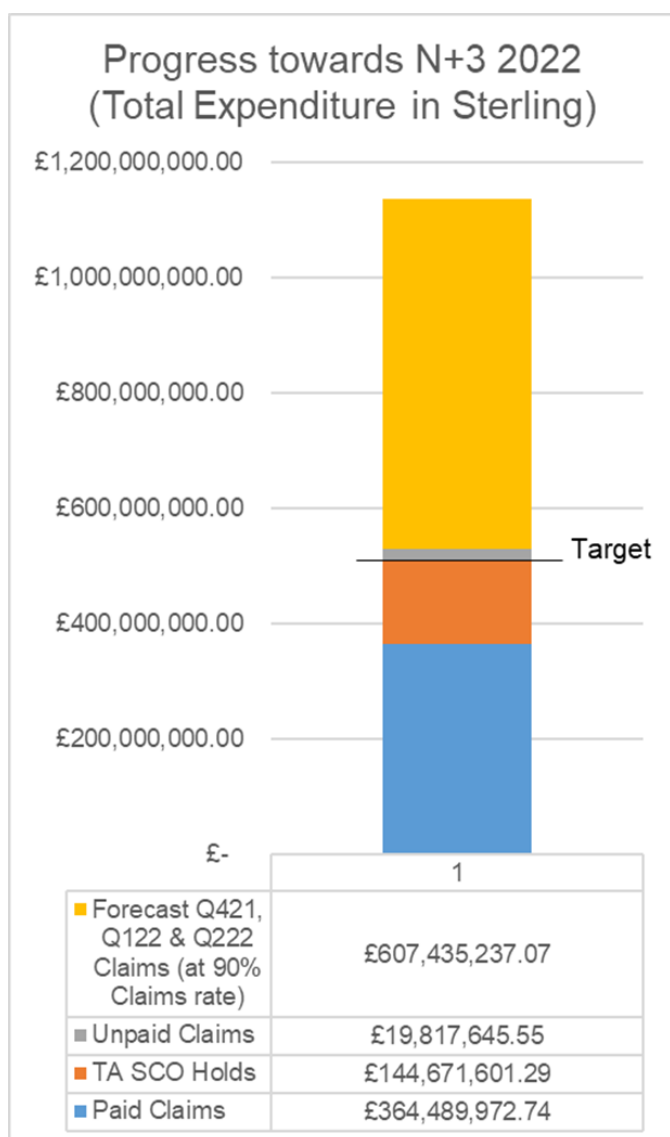


Table Two depicts the progress towards N+3 2022. The figures shown are in Sterling and represent the total claim expenditure and not just the ESF value. Members will note that the actual N+3 target is ESF value only and in Euros but displaying the data in Sterling and including the total value, gives a greater sense of the impact on the size of claims that will make a difference.

- The first IPA (IPA22) of the calendar year was submitted on 27 April 2022. This is our 4th largest IPA of the Programme to date and follows the 3rd largest IPA we submitted last December
- In N+3 terms, IPA22 brings the Programme to 95% achieved of the cumulative N+3 target needed by the end of 2022, so we are in a healthy position with 3 IPAs remaining in 2022, and our level of confidence regarding achieving the 2022 N+3 target remains high. This assumption is based on knowing the value of claims that have been paid but not yet in a payment application, claims submitted but not yet paid and the value of committed funds in Q2 2022
- It should be noted that we will have claimed just over half (51%) of the overall Programme allocation following IPA22
- There is £144.6m previously excluded from the accounts under Article 137.2, for claims where the Technical Assistance Simplified Cost Option (TASCO) 4% addition is in dispute. In order to include this expenditure in any European Commission Payment Application

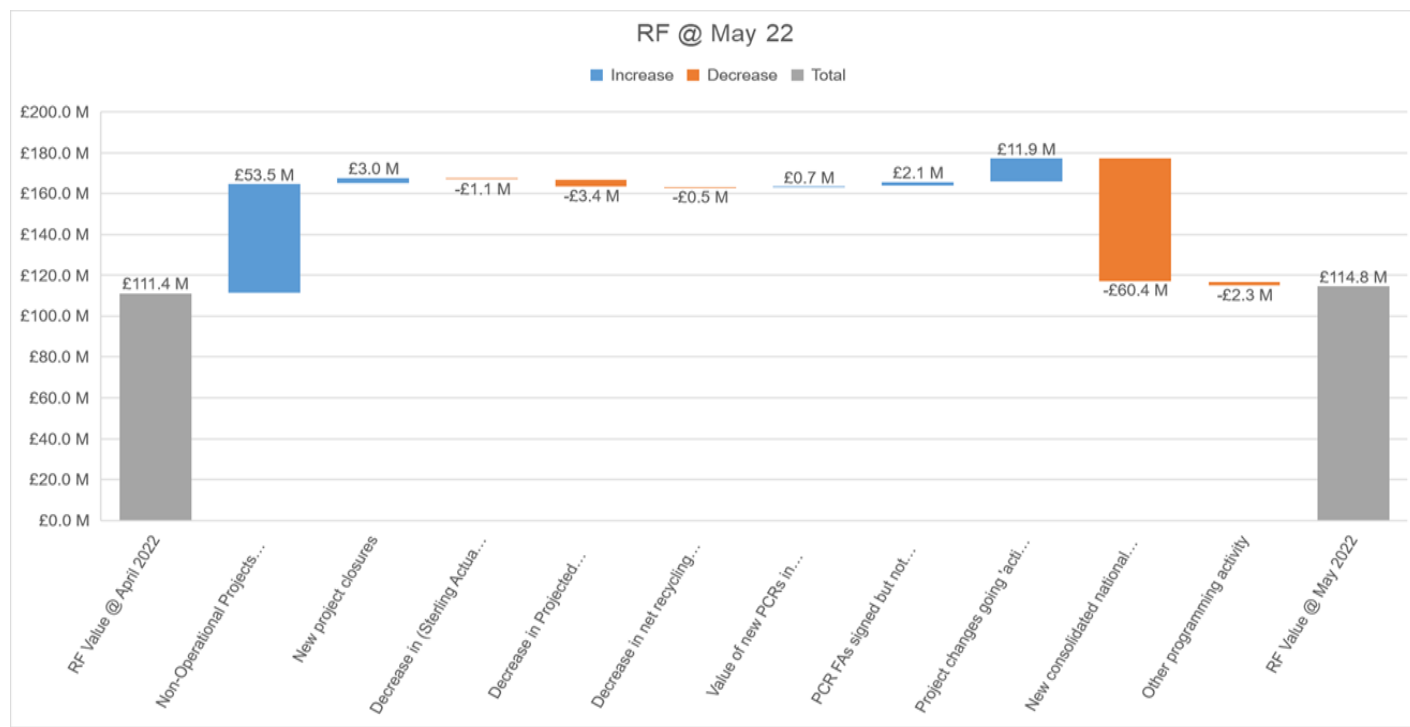
(ECPA), the Certifying Authority (CA) and MA need to conduct a further investigation into the TASCO eligibility of these claims and discuss/agree with the Audit Authority (AA) if they are in line with the further advice received from the EC. We hope to resolve this issue and include the expenditure (with or without TASCO) in one of the 4 payment applications due to be made to the Commission in 2022

Funds Remaining to be Committed:

The value of the Remaining Funds, including the pipeline data of PCRs, and planned activity as of May 2022, is £114.8m. Members should note that the RF calculations account for a level of overprogramming, and therefore this figure does not represent money available to be spent. The MA is also reviewing the assumptions of the RF following the final signing of the last Funding Agreement. This will ensure the calculations are current and account for any changes to the known programme position as it enters into the delivery phase.

The MA continues to monitor the Foreign Exchange Rate (Forex). Following a continued trend of the Pound strengthening against the Euro in recent months, at the end of March, our internal Programme Management Board approved a change of the Forex rate used in RF calculations from 0.86 to 0.84. This is a planning rate used for forecasting how many Pounds we expect to receive per Euro of expenditure. As a result of this reduction, we anticipate receiving fewer Pounds per Euro spent in the future, and as such, the RF decreased by £25.5m. This change was accounted for in April. Please also note that this value includes the previously agreed 'buffer' that the MA do not intent to commit in order to protect the Department from adverse movements in the exchange rate as we move towards closure and the final payment application.

Table Three: Remaining Funds Forex Revaluation



Youth Employment Initiative (YEI) Position:

As previously reported, there were very limited opportunities to invest further funds in the eligible areas and we can report that a number of YEI Projects are returning funds to the Programme due to underspends to date. We have also recently received an enquiry from the West Midlands Combined Authority which we will respond to separately, but we do not believe this will allow the release of significant funds.

Members will recall that at the last meeting we mentioned the possibility of surrendering the YEI and moving the allocated ESF match funding to other areas of the Programme (within the same CoR).

The MA raised this with Growth Programme Board (GPB) in December, where the majority of members were supportive. The Commission raised their preference for further efforts to be made to utilise the remaining funds. They suggested we formally propose what flexibilities would be needed in order to commit the funds, for example around geography or extension limits. That was done and it is our understanding that the flexibilities requested cannot be accommodated and the movement of funds detailed above remains our best option at this time. We have sought final confirmation of our proposed approach from the Commission and await a response.

Community Led Local Projects (CLLD):

There is a fundamental difference in the way CLLD is set up within the two Managing Authorities

- In ESFD, CLLD is Investment Priority (IP)1.5 so sits within PA1 alongside other provision and its performance, or underperformance, is 'offset/balanced-out' by the other provision within the PA – bearing in mind that this other provision also includes CFOs

In ERDF, CLLD sits within its own Priority Axis (PA 8), so the performance is very stark because there is no other provision to 'offset' the underperformance

At 'local' level, we manage the performance of CLLD in line with all other ESF projects, and as such in Spring of 2021, an exercise was administered jointly between DWP and DLUHC to review the performance of all the CLLD projects.

All CLLD projects were asked to submit a Delivery Plan, providing detailed information of where the overall CLLD Programme was positioned, in terms of current and future delivery. The Delivery Plans, which included information about the projects performance and how this would be managed, were jointly reviewed by ESF and ERDF CMs. At ESF MA level recommendations for the ESF projects were reviewed by Delivery Managers and a decision was reached regarding next steps in managing underperformance, which included the submission of Recovery Plans and/or PCRs. For one project, this resulted in withdrawal, and for a number of projects PCRs were instigated to de-commit funds and deliverables. In addition, one poorly performing project was not extended, resulting in its closure at the end of Q2 2022.

The CLLD projects' performance against their recovery plans / PCRs continues to be monitored on a quarterly basis and where variance continues to exceed 15%, they are subject to ongoing formal underperformance action.

ESF Claim Performance against Profile:

Table Four: TOTAL (ESF & MATCH) CLAIMS AGAINST PROFILE BY ORGANISATION TYPE

CLAIMS SUMMARY				
Org Type	Cumulative Profile to Q4 2021	Cumulative Claims	Slippage	Percentage Claimed
Direct-Bid	£1,350,938,687	£969,269,979	-£381,668,708	71.75%
ESFA	£1,365,201,108	£1,382,987,169	£17,786,061	101.30%
DWP	£290,571,352	£272,935,255	-£17,636,096	93.93%
HMPPS	£358,681,044	£316,245,409	-£42,435,635	88.17%
NLCF	£463,026,671	£437,806,201	-£25,220,470	94.55%
TOTAL	£3,828,303,079	£3,379,244,013	-£449,059,066	88.27%

Profile correct as of 01/05/22

Claims data extracted from RP1010, run date of 01/05/22

Spend includes both ESF & Match funding

Direct Bids Update:

The Project Inception Visits (PIVs) for all Direct Bid projects have now been completed and subject to clearance of any outstanding formal Action Points, the vast majority of projects are in a position to submit their first financial claim from Q1 2022. Encouraging the timely submission of claims continues to be a priority.

As can be seen from table four, the 'slippage' in the Direct Bid projects is reducing. We will continue to maintain a strong focus on effective management of underperformance within projects. CMs have issued letters alerting their projects where the spend or any individual deliverable (output or result) is currently more than 15% behind the contracted profiles. Discussions will continue to take place throughout the claims cycle to agree the most effective way for the project to address the underperformance. The MA is also liaising with our legal advisors to determine the scope to use the terms of the Funding Agreements to automatically de-commit unused funding from projects.

CFO Updates:

The National Lottery Community Fund (TNLCF): All Q4 claims have now been approved and paid. The claims process highlighted two MOUs where spend was exceeding the 15% tolerance level. Upon further investigation and discussion with the Fund it was discovered that the financial profiles for the two MOUs were incorrect. This has now been rectified via the PCR process and MOU variations have been issued.

Q1 2022 claims are on schedule to be submitted by the end of this month. At the recent Monthly Meeting TNLCF reported that they are in the process of carrying out a spend review with all their grant holders in order to establish and act on any potential underspend. This review will conclude at the end of June with a view to informing the MA of any potential underspend at MOU level by the end of July.

This activity will also inform any potential lottery grant funding which can be released for 'mainstream' lottery projects to support any gaps in employment and skills provision post the end of the ESF Building Better Opportunities Programme.

Her Majesty's Probation and Prison Service (HMPPS): Submitted nil claims for Q4 2021 as per agreement with the MA. Spend performance in within 3% of profile for the CFO3 project, and performance remains strong with all outputs and results meeting or exceeding targets – with the exception of one deliverable which is within 5% of profile. Slippage for HMPPS is in part accounted for due to the nil Q4 2021 claims and will be reduced with the Q1 2022 submission, however approximately 6% underspend is due to the delay in project activity for Resettlement Hubs. The performance for the Resettlement Hubs is still on an upward trend following the delayed start to activity, and HMPPS are confident all profiles will be met by programme end, this is supported further by the agreement to extend participant sign-ups to November 2023.

There has been good work between the MA and HMPPS to gain new contacts in certain LEP areas where joined up working had so far proved difficult, and it is envisaged that these relationships will help build awareness of and referrals into the Activity Hubs.

DWP: A number of DWP CFO claims were delayed in agreement with the MA, these have now been submitted and the MA is working to process the payment of those claims. The final claims for the MOU's which had not been extended have now been paid and full project closure activity is almost complete.

PCRs for two extension MOUs to enable ten outstanding claims to be paid have been submitted. These have been issued along with a PCR to reduce the value of the Combined extension MOU by £1.5m ESF. Based on additional DWP analysis it is anticipated that there will be a need to further reduce the value of the Combined extension MOU. DWP will be submitting another PCR to fully reflect anticipated performance - after implementing recovery actions following the pandemic.

Once all outstanding claims have been submitted and paid this will bring DWP closer to 100% of profile. The last referrals to the core DWP ESF contracts took place in September 2021, DWP Match contract referrals continue through to October 2022.

ESFA: The majority of Q4 2021 claims were submitted on time and the MA will complete approval and payment by the end of May. A small number could not be submitted due to technical issues with Eclaims which is being addressed. The MA has allocated additional resource to CFO claims approval to speed up the claims process and ensure that claims are paid within 90 days of receipt.

The ESFA have addressed the difficulties experienced with the completion of compliance work during the pandemic and this is now up to date. ESFA are monitoring performance closely and will conduct an in-depth performance review at their formal performance point at the end of June. This will give them a greater steer in terms of current performance trends and determine scope to increase or decrease their contracts with providers within the remits of their current MOU value. This will also allow them to determine how much of the funds are surplus and can be returned to the MA. Early indications are that the majority of their contracts are performing well, and it is very few contracts where funds will need to be returned.

Table Five: Total (ESF & MATCH) Expenditure by PA & CoR

CLAIMS SUMMARY					
Priority Axis	Category of Region	Cumulative Profile to Q4 2021	Cumulative Claims	Slippage	Percentage Claimed
1	Less-Developed	£74,984,982	£57,818,115	-£17,166,867	77.11%
1	Transitional	£604,125,866	£483,508,698	-£120,617,168	80.03%
1	More-Developed	£1,958,012,556	£1,707,476,419	-£250,536,137	87.20%
1	YEI	£90,962,591	£255,058,015	£164,095,424	280.40%
2	Less-Developed	£34,980,709	£27,950,218	-£7,030,490	79.90%
2	Transitional	£264,095,126	£233,739,544	-£30,355,582	88.51%
2	More-Developed	£725,511,771	£563,640,267	-£161,871,504	77.69%
3	Less-Developed	£3,897,695	£2,654,276	-£1,243,419	68.10%
3	Transitional	£15,908,074	£9,788,846	-£6,119,228	61.53%
3	More-Developed	£54,773,270	£36,559,175	-£18,214,095	66.75%
4	Less-Developed	£35,606	£35,605.81	£0	100%
4	Transitional	£175,932	£175,932.37	£0	100%
4	More-Developed	£838,901.00	£838,901.00	£0	100%
TOTAL		£3,828,303,079	£3,379,244,013	-£449,059,066	88.27%

Profile correct as of 01/05/22

Claims data extracted from RP1010, run date of 01/05/22

Spend includes both ESF & Match funding

Underperformance Strategy

The 'Types' of Underperformance

Slippage

1. There are two 'types' of underperformance. The first relates to where a GR is unable to spend, and claim, all of their funding. This is often known as 'slippage' and arises where the forecast spend of the project is higher than is actually being spent. This occurs for a number of reasons, such as slower than planned recruitment of staff, fewer events and workshops than were originally planned, lower contracted values in procurements than were budgeted for etc. It is extremely common as very few organisations can accurately forecast their expenditure over a three-year period (the normal length of an ESF project).

2. Once this 'slippage' occurs, then very few GRs are content to voluntarily 'hand back' the predicted underspend, preferring to hold on to it – just in case the project has an opportunity to catch up, and recover the position later. In these cases, the project will seek to 'slip' the funding to the right, moving it to later expenditure periods within the project – hence the term 'slippage'.

3. In recognition of this being a common issue, the ESF Programme has provided a 15% tolerance against expenditure headings within projects. Where projects are within the tolerance, we do not normally take any formal action to recover the funds, but CMs will still discuss the situation with GR and seek assurances on the project's activity to return to the profile.

4. Given that the ESF Programme is now approaching its end, it is important that we can recover these underspends, and commit the funding to other activity that will utilise it before the end of the Programme. The mechanism we use to do this is known as '**decommitment**'.

5. In order to progress the decommitment the ESF Contract Manager will work with the project, to discuss the likelihood of the project 'catching up' with the spend profile and getting back on track. These conversations are underway with all affected projects in the Programme. In addition, formal letters have been issued to all projects informing them that we are aware of their 'slippage' and we expect prompt action to be taken.

6. Should a GR not agree to the submission of a PCR to 'hand back' the unused funding, then we can use the terms of the FA to recover the funds.

7. The MA will consider the options based on advice but is confident that they will be in a position to recover the unused funds from projects over the coming weeks and months.

Non-Delivery

8. The second 'type' of underperformance relates to where projects are not delivering their targets (outputs). Each project is funded on the basis of supporting a set number of participants or enterprises. The exact number is agreed through the appraisal process, and forms part of the terms and conditions of their grant. However, where a project is not delivering that, then the MA has the right to '**claw back**' a portion of the grant to act as a financial penalty. This is differentiated from 'decommitment' as **claw back** is the recovery of funds that the GR has already spent, whereas **decommitment** is the recovery of funds that they have not and will not spend.

9. The volume of projects outside of the tolerance could lead to the conclusion that the Programme will fail to meet its overall targets, but in fact, this is unlikely to be the case. This is due to two main reasons: firstly, the under-achievement of the Direct Bids is currently being offset by over-achievement of the CFO projects; and secondly, the direct bids themselves appeared to have been over-optimistic in the numbers of participants that they could support in return for the amount of grant applied for.

10. The Programme is currently on track to deliver its overall targets for the European Commission, despite the impact of the Pandemic and the lower than expected levels of performance in the direct bids.

11. The MA is therefore considering the position on this, and what actions we need to take going forward.

Priority Group Actuals Performance:

The table on page 11 illustrates 'actual performance' for sub-group by CoR and members are asked to note that this now includes Participant data until the end of Q4 2021. As explained earlier in this paper, the Performance Framework Financial and Participant data have different period end dates - the "Actuals" data is available once per quarter and will be included in this update when available.

Sub-Group Actuals Performance by Category of Region:

This table illustrates the performance picture by sub-group and CoR and shows total committed to date against the end of Programme target.

Outputs

ESF-CO01 - Unemployed, including long term unemployed	CoR	Whole Programme Target	Committed	% achieved of overall target	Committed to Q4 21	Actual to Q4 21	% achieved to Q4 21	ESF-CO15 - Participants from ethnic minorities	CoR	Whole Programme Target	Committed	% achieved of overall target	Committed to Q4 21	Actual to Q4 21	% achieved to Q4 21
	M	668,560	182,449	102.45%	599,047	684,948	114.3%		M	343,547	144,863	109.08%	385,118	374,736	97.3%
	T	152,341	69,886	160.03%	162,498	243,788	150.0%		T	42,485	87,081	110.50%	45,405	46,947	103.4%
	L	19,518	6,720	54.53%	14,697	10,643	72.4%		L	869	21,722	115.34%	1,574	1,002	63.7%
	Total	840,419	259,055	111.78%	776,242	939,379	121.0%		Total	386,901	253,666	109.25%	432,097	422,685	97.8%
ESF-CO03 - Inactive	CoR	Whole Programme Target	Committed	% achieved of overall target	Committed to Q4 21	Actual to Q4 21	% achieved to Q4 21	O6 - Participants without basic skills	CoR	Whole Programme Target	Committed	% achieved of overall target	Committed to Q4 21	Actual to Q4 21	% achieved to Q4 21
	M	414,355	192,206	58.61%	291,039	242,853	83.4%		M	245,113	121,013	82.19%	192,193	201,459	104.8%
	T	102,537	29,133	83.22%	75,944	85,336	112.4%		T	67,535	48,710	97.80%	59,249	66,049	111.5%
	L	18,644	7,048	52.54%	12,048	9,796	81.3%		L	8,246	3,246	42.48%	4,745	3,503	73.8%
	Total	535,536	228,387	63.11%	379,031	337,985	89.2%		Total	320,894	172,969	84.46%	256,187	271,011	105.8%
O4 - Participants over 50 years of age	CoR	Whole Programme Target	Committed	% achieved of overall target	Committed to Q4 21	Actual to Q4 21	% achieved to Q4 21	ESF-CO16 - Participants with disabilities	CoR	Whole Programme Target	Committed	% achieved of overall target	Committed to Q4 21	Actual to Q4 21	% achieved to Q4 21
	M	265,392	215,020	83.33%	215,909	221,150	102.4%		M	290,379	177,535	92.77%	256,797	269,374	104.9%
	T	74,713	77,443	99.51%	63,183	74,349	117.7%		T	80,023	80,267	130.72%	80,420	104,606	130.1%
	L	10,154	6,156	69.20%	8,190	7,026	85.8%		L	12,473	12,050	70.20%	9,605	8,756	91.2%
	Total	350,259	298,619	86.37%	287,282	302,525	105.3%		Total	382,875	269,852	99.96%	346,822	382,736	110.4%
YEI-O12 - Participants with disabilities	CoR	Whole Programme Target	Committed	% achieved of overall target	Committed to Q4 21	Actual to Q4 21	% achieved to Q4 21	YEI-O9 - Unemployed participants (YEI)	CoR	Whole Programme Target	Committed	% achieved of overall target	Committed to Q4 21	Actual to Q4 21	% achieved to Q4 21
	M		17,245		10,633	10,807	101.6%		M		39,315		37,468	31,592	84.3%
	T		6,880		10,294	9,914	96.3%		T		17,491		39,201	37,883	96.6%
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	Total	24,310	24,125	85.24%	20,927	20,721	99.0%		Total	81,650	56,806	0.00%	76,669	69,475	90.6%
YEI-O10 - Long-term unemployed participants (YEI)	CoR	Whole Programme Target	Committed	% achieved of overall target	Committed to Q4 21	Actual to Q4 21	% achieved to Q4 21	YEI-O11 - Inactive participants not in education or training (YEI)	CoR	Whole Programme Target	Committed	% achieved of overall target	Committed to Q4 21	Actual to Q4 21	% achieved to Q4 21
	M		8,064		13,769	13,622	98.9%		M		27,236		16,481	15,706	95.3%
	T		2,754		17,122	14,513	84.8%		T		15,849		14,155	11,135	78.7%
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	Total	28,830	10,818	97.59%	30,891	28,135	91.1%		Total	28,830	43,085	0.00%	30,636	26,841	0.0%

