

Education, Children and Families Committee

10am, Tuesday, 8 October 2019

Early Years 1140 Expansion Progress and Risk Update

Executive/routine
Wards
Council Commitments

1. Recommendations

- 1.1 The Education, Children and Families Committee is asked to:
 - 1.1.1 note the content of this report.
 - 1.1.2 note the intention to return a report on the revised Early Years Admissions policy to Education, Children and Families Committee in March 2020.
 - 1.1.3 approve the continued distribution of funded ELC places 65% local authority provision and 35% partner provider provision

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Early Years 1140 Expansion Progress and Risk Update

2. Executive Summary

- 2.1 At present the Council is responding well to the challenge of expanding Early Years provision by 2020 and has already implemented extended services in several locations. However, due to the scale of the programme there are some high-level risks associated with delivery of the Council's Early Years 1140 expansion plan which need to be well managed by all those involved. These risks relate principally to the Council's ability to recruit the necessary staff, construct the level of infrastructure required on time to support the delivery of the expansion plan and the impact of the Scottish Government document published in December 2018 "*Funding Follows the Child – National Standard for Funded Providers*", on the supply of Early Years provision within Edinburgh.

3. Background

- 3.1 The city of Edinburgh Council's Early Years' Service provides Early Learning and Childcare (ELC) for approximately 10,000 children aged 3-4 years old and 650 eligible 2-year olds.
- 3.2 216 settings provide ELC in Edinburgh. Approximately 65% of children receiving funded hours attend local authority provision and 35% attend provision in partnership with the local authority. These include the Private, Voluntary and Independent sectors as well as childminders.
- 3.3 'A Blueprint for 2020: The Expansion of Early Learning and Childcare in Scotland - ELC Expansion Planning Guidance for Local Authorities' issued in March 2017 by the Scottish Government set out local authorities' responsibility for the implementation and delivery of an expanded entitlement of 1140 hours of free ELC in their area. The vision for expansion is underpinned by the principles of Quality, Flexibility, Accessibility and Affordability. The City of Edinburgh Council's Commitments 32 and 33 for this administration reflect the vision in the Blueprint:
- 32. Double free early learning and child care provision, providing 1140 hours a year for all 3- and 4-year olds and vulnerable 2-year olds by 2020*

33. Make early years' provision more flexible to fit families' needs and provide additional resources to families in difficulty so that no children are educationally disadvantaged when they start formal schooling

- 3.4 A report outlining the key risks associated delivering the "[Expansion of Early Learning and Childcare from 600-1140 hours by 2020](#)" was approved by the Education, Children and Families Committee in December 2018.
- 3.5 In December 2018 the Scottish Government published *Funding Follows the Child - The National Standard for Funded Providers*, which outlines the ten key criteria that must be in place for all providers of ELC to deliver funded places to children aged 3-4 years old and eligible 2-year olds. (appendix 1)

4. Main report

Progress

- 4.1 Officers from the early years' service and school estate management service have fully engaged with national bodies to influence support for local authorities and to make effective use of data to support our delivery plans and make informed decisions based on lessons learned from our phasing in programme to date. The City of Edinburgh is represented on the National Workforce Project Board and the Scottish Government ELC Partnership Forum.
- 4.2 1,140 funded hour places are currently available in 47/97 local authority settings and 80/117 partner providers. In October 2019 an additional eleven local authority settings will begin phasing in and all remaining partner providers will again be invited to deliver the increased hours.
- 4.3 At present there are three intakes per year for children eligible for funded ELC and children are allocated a place the term following their third birthday or the term following their second birthday for eligible 2-year olds.
- 4.4 In August 2019, the number of three- and four-year olds accessing a funded place was 6,843 of which 2,737 were receiving 1,140 hours. Therefore, approximately 40% of eligible three- and four-year olds have early access to the increased hours.
- 4.5 In August 2019, the number of eligible 2-year olds accessing a funded place was 575 of which 138 were receiving 1,140 hours, approximately 24%
- 4.6 Approximately 35% of Edinburgh's children who are eligible for funded ELC receive their hours in settings that are in partnership with the local authority. Partner providers are currently delivering 1,140 places to 1,347 children and we aim to increase this to 3,500 children by January 2020 at the hourly rate of £5.31. This is an annual rate of £6,053.40 per funded child. Partners also receive £427.50 per year to deliver the meal entitlement element of the funded hours as set out in criteria ten of the National Standard for funded providers (appendix 1).

Delivery models

- 4.7 We are on track to provide all eligible children with a 1,140 place from August 2020. Whilst a variety of delivery models will be available for parents across the city e.g. forest kindergarten, childminder, full year or term time settings, parents may need to travel to access their preferred model.
- 4.8 Edinburgh is currently in partnership with 117 providers from the private, voluntary and independent sector and almost all these settings provide extended childcare for parents between the hours of 8.00am and 6.00pm, with some offering hours beyond this. Although seventeen local authority settings were open all year round, none of these provided ELC between 8.00am and 6.00pm. Following consultation, eleven local authority settings started delivering 1,140 hours of funded ELC all year round between 8.00am and 6.00pm in August 2019 and we plan to increase this to forty-seven settings by August 2020.
- 4.9 We have used our supply and demand data to determine the model of delivery that will be available for parents within local authority settings across the city. Where there is a high demand for local authority provision, but limited supply, the local authority provision will be delivered over a full year model. The report to the Education, Communities and Families Committee provided details on the settings identified to deliver 1,140 hours over a full year. Due to changes to the capital programme we will now increase the number of settings open full year to increase the capacity for 1,140 places in the local authority. See appendix 2 for the full list of local settings.
- 4.10 To increase flexibility for parents we are now working in partnership with twenty-three childminders across the city, delivering funded places to thirty-six children.
- 4.11 The forest kindergarten provision at Laurieston Castle, Cliftonhall and Cammo have been very popular with children and parents. Three additional sites will be operational in October 2019 at Craigmillar, Bonaly, and Newbattle Abbey.
- 4.12 We intend to publish a guide for parents at the end of October 2019 outlining the different models for the delivery of 1,140 hours and where the models will be available.

Workforce

- 4.13 The report to the Education, Communities and Families Committee in December 2018, noted an estimated additional 650 staff would be required by session 2020/21 to deliver 1,140 hours. During session 2016/17 and prior to the early years expansion programme, the early years' service employed approximately 670 FTE staff across a variety of roles including, manager, senior, practitioner and support worker posts. Since August 2017, we have gradually increased staffing across all roles and by August 2019 approximately 360 additional staff joined the early years' service.
- 4.14 We estimate approximately one hundred and seventy-five staff will be recruited to meet the expansion requirements for academic session 2019-2020. This recruitment will be supported by national activity which will include a focus on over

25-year olds, career changers/returners to work and those from under-represented groups.

- 4.15 The final phase of the expansion for academic session 2020-21 will see an estimated further one hundred and seventy-five staff recruited across a variety of posts.

National Standard

- 4.16 The Scottish Government published the Funding Follows the Child - National Standard in December 2018. This outlines ten criteria that all providers of funded ELC must meet (appendix 1).
- 4.17 94% of local authority and 90% of partner providers in Edinburgh meet the three quality criteria requirements of the national standard, which are 1. *Staffing Leadership and Management*, 2. *Development of Children’s Cognitive Skills, Health and Wellbeing* and 3. *Physical Environment*. The Early Years Quality Improvement team have established action plans to support all settings to meet the quality requirements of the National Standard. The remaining seven criteria of the National Standard include payment processes, fair work practices and the delivery of food. 100% of local authority settings meet the remaining seven criteria however, the percentage of partners meeting the remaining criteria will be established following consultation in October 2019.

Allocating 1,140 places

- 4.18 In December 2017 the Education Communities and Families Committee approved the criteria for identifying settings to begin phasing in the increase hours early and how the places were to be prioritised.
- Capacity to expand within the existing local authority early years setting.
 - Children residing in areas of deprivation SIMD 1&2
 - Children living in households where the parent/carer is in receipt of one or more of the benefits.
 - The criteria within the Early Years Admissions policy.

We now need to review the Early Years Admissions Policy as we move toward universal entitlement to 1,140 hours from August 2020, taking account of cross boundary protocols to prioritise Edinburgh’s children and the criteria within the Funding Follows the Child – National Standard for funded providers.

EY1140 Infrastructure Programme Update

- 4.19 In May 2018 the “Early Years 1140 Expansion of Early Learning and Childcare from 600 – 1140 hours by 2020. Current progress and next steps” report approved by Committee stated that the projected shortfall in places across the city following the introduction of the 1140 hours entitlement would be “almost 3,000 places for 3-4 year olds and... 360 places for 2 year olds.” The expansion plan approved by Committee and submitted to the Scottish Government to secure funding for the expansion was based on meeting much of this shortfall by changing the opening hours and management arrangements at existing facilities. The remaining 2,000 places would be provided through a £39.6m infrastructure investment programme

made up of 13 refurbishment projects, 21 new build and replacement projects and the establishment of 7 Forest Schools.

However, since May 2018, a number of factors have reshaped the infrastructure programme:

- The capacities assumed for individual projects in the original plan have changed as a greater understanding of the expectations and regulations governing the expansion of Early Years has developed through discussions with the Scottish Government and Scottish Futures Trust.
- As some proposals have developed beyond the basic studies that informed the initial plan, the limitations and complexities of individual sites have become clearer and new opportunities have emerged.
- The tendering of new nursery buildings has highlighted that the £/m² metric used by the Scottish Government in determining each authorities funding allocation was optimistic and is a challenging target given current market conditions.
- Landscaping has proved particularly challenging due to a lack of contractors with the necessary expertise and very high quotes for work.
- Several projects have not progressed pending their involvement in the Council's Service Design process or are in a slower development process as part of a wider development scheme (such as a Housing lead project).

4.20 The revised programme is set out in Appendix 3. This shows that the infrastructure programme is now made up of 8 refurbishment projects, 18 new build and replacement projects, the relocation and reuse of 2 modular buildings and the establishment of 13 Forest Schools. This reshaped programme continues to deliver the 2,000 places required.

4.21 By August 2020 it is anticipated that all refurbishment projects will have been completed, all forest schools will have been established, the two temporary nursery facilities will be in place and 6 of the 18 new build and replacement projects will have been completed. This will provide 1,000 of the 2,000 places required. A further 650 places will be provided by August 2021. It is acknowledged that the three intakes per academic year for funded ELC will mean that not all places will be required in August.

4.22 However, the high costs returned as part of the recent tender of the 5 new nurseries are now being experienced across other projects and this presents a risk to the Council's ability to maintain a programme that delivers the necessary places within the available budget. The strategy being adopted remains to prioritise projects where alternative options to meet demand cannot be identified or are unreasonable and those in low SIMD areas. Accordingly, all projects will remain under review as the programme moves forward.

5. Next Steps

- 5.1 Overall progress measured using a suite of indicators within the Communities and Families Service Plan to ensure that our children have the best start in life, can sustain relationships and are ready to succeed.
- 5.2 Outcomes from Inspections from Education Scotland and the Care Inspectorate provide information on quality across the service.
- 5.3 Feedback on the Council's commitments 32 and 33.
- 5.4 The delivery of the Council Early Years infrastructure expansion plan within allocated budgets.

6. Financial impact

- 6.1 Edinburgh currently has a baseline revenue budget of £30,000,000 to deliver 600 hours of ELC.
- 6.2 Following the agreement of the multi-year funding package, Edinburgh has been allocated a total recurring revenue of £48,025,000 by 2021-22. This will be issued as a specific grant annually as follows:

Table 1: Edinburgh's revenue funding package

Financial Year	Revenue Funding
2020-2019-20	£26,019,000
2020-21	£17,035,000
2021-22	£4,971,000

- 6.3 Edinburgh has been allocated a total capital funding of £39,480,000 to support the expansion.

Table 2: Edinburgh's capital funding package

Financial Year	Capital Funding
2017-18	£2,580,000
2018-19	£12,400,000
2019-20	£14,500,000
2020-21	£10,000,000

7. Stakeholder/Community Impact

- 7.1 This report sets out the risks associated with the delivery of Edinburgh's Early Years 1140 expansion plan. Principally these risks relate to the commitments made by the Council and the Scottish Government to deliver 1140 hours of funded ELC and to ensure that the new provision made is accessible and flexible to meet the needs of Edinburgh's families.

Delivery

- 7.2 The finance template detailing Edinburgh's estimated cost of delivering 1140 hours was submitted to the Scottish Government in March 2018. The estimated revenue cost took account of the flexibility for parents offered by partner providers and the fact approximately 35% of Edinburgh's children attend partner provision. Should the percentage of children receiving their funded hours in partner provision increase beyond 35%, there would be a risk to the council's commitment to deliver best value as the revenue cost of delivering 1,140 hours in partner providers is greater than local authority provision.
- 7.3 Delivery models – Whilst all children will receive their funded hours, parents may not be able to access their preferred model of delivery in their first choice setting. The changes to the capital build programme as outlined in this report will increase the number of local authority settings delivering 1140 hours over a full year and reduce the availability of term time only options.

Workforce

- 7.4 It is acknowledged 62 members of the early years workforce may be affected by the UK withdrawing from the European Union. It is not yet known what impact this could have on recruitment and retention of early years staff.
- 7.5 382 staff (excludes teachers) work in settings moving from term time to full year provision by August 2020. These staff have sessional terms and conditions and we are working with Human Resources and the Trade Union address the changes that may be required.

National Standard

- 7.6 Funded providers must meet all criteria within the National Standard. Should the number of providers unable to meet all criteria rise significantly above the current estimates, there is a risk that the supply of funded places may be reduced.
- 7.7 Eight of our current partner providers are from the Independent sector. Since publication of the National Standard in December 2019, two independent sector providers have formally notified the early years service of their intention to no longer provide funded ELC when their current contract ends in June 2020. This will create a potential shortfall of 80-100 places. Should the remaining six independent sector providers also decide to no longer continue partnership with the local authority, the shortfall of ELC places will increase to 450. There is a risk that there may be insufficient capacity within local authority and other providers should parents choose not to access non-funded ELC in the independent sector

8. Background reading/external references

- 8.1 [“Expansion of ELC from 600-1140 hours by 2020”](#), Education, Children and Families Committee, 14 August 2018
- 8.2 [“A Blueprint for 2020: The Expansion of ELC in Scotland”](#)

9. Appendices

- 9.1 Appendix 1 10 National Standard criteria for all ELC settings to meet to be a funded provider, based on research and evidence of effective ELC
- 9.2 Appendix 2 Local Authority settings moving from term time to full year provision.
- 9.3 Appendix 3 Revised 1,140 Infrastructure Programme

Appendix 1

10 National Standard criteria for all ELC settings to meet to be a funded provider, based on research and evidence of effective ELC. These are:

Staffing, leadership and management

Development of children’s cognitive skills, health and wellbeing

Physical Environment

Self-Evaluation and Improvement

Parent and Carer engagement and involvement in the life of the setting

Inclusion

Business Sustainability

Fair Work Practices, including Payment of the Living Wage

Payment Processes

Food

Most criteria are supported by several sub-criteria and are also linked to Care Inspectorate quality evaluations.

Appendix 2 – Local Authority settings moving from term time to full year provision.

<u>Greengables NS</u>	Ferryhill NC	Hope Cottage NS	Ratho NC
Broughton NC	Flora Stevenson's	St Leonard's NS	Currie NC
Leith Walk NC	<u>Granton NC</u>	<u>Liberton NS</u>	Juniper Green NC
Stanwell NS	Corstorphine NC	<u>Prestonfield NC</u>	Nether Currie NC (new provision)
<u>Duddingston NC</u>	Carrick Knowe NC	Spinney Lane NS	Longstone NC
<u>Craigentenny NC</u>	<u>Kirkliston NS</u>	St John Vianney NC	St Mark's NC
Leith NC	Queensferry NC	<u>Taobh na Pairce</u>	<u>Balgreen NS</u>
<u>Abbeyhill NC</u>	Davidson's Mains		Stenhouse NC
St John's	<u>Wardie NC</u>		Tynecastle NS
	<u>Murrayburn Campus</u>		<u>Sighthill NC</u>
	<u>Gylemuir</u>		<u>Bonaly</u>
	Stockbridge		Pentland
	<u>Craigroyston NC</u>		
	<u>Forthview</u>		
	St David's		
	<u>Pimiehall</u>		
	St Cuthbert's (new provision)		

Appendix 3 - Revised 1,140 Infrastructure Programme

PROJECT NAME	PROJECT TYPE	Grant Allocation (£)	Estimated Completion (at August 2018)	Project Status	Latest Cost Estimate (£)	Revised Estimated Completion	Comments
Projects in Original Expansion Plan							
Clifton Hall Forest School	Forest School	50,000	2018/19	Complete	50,000	1-Aug-18	-
Lauriston Castle Forest School	Forest School	50,000	2018/19	In Development	50,000	1-Aug-20	Operational but options for shelter being considered - including making use of facilities in Lauriston Castle.
Dean Park PS Nursery Class	Refurbishment Works	215,000	2018/19	Under Construction	189,114	10-Aug-19	Complete with exception of landscaping.
Moffat Early Years Centre	Refurbishment Works	65,352	2018/19	Under Construction	76,800	15-Aug-19	Complete with exception of landscaping.
Abbeyhill PS Nursery Class	Refurbishment Works	44,600	2018/19	Complete	25,000	15-Aug-19	Complete with exception of landscaping.
Prestonfield Primary School Nursery Class	Refurbishment Works	150,000	2018/19	Under Construction	213,058	12-Aug-19	Complete with exception of landscaping.
Brunstane Primary School Nursery Class	Refurbishment Works	325,000	2018/19	Under Construction	335,853	1-Oct-19	Complete with exception of landscaping.
Queensferry Primary/Early Years Centre	Refurbishment Works	55,000	2018/19	Complete	157,000	1-Oct-19	Scope of works increased to provide greater capacity.
Catering Equipment	Catering for Early Years Expansion	90,000	2019/20	In Development	90,000	-	Allocation to be confirmed.
Refurbishment / reinstatement of production kitchens	Catering for Early Years Expansion	520,000	2019/20	In Development	520,000	-	Location for new kitchen provision to be confirmed.
Cammie Forest School	Forest School	50,000	2019/20	In Development	70,000	1-Aug-20	Operational - shelter, storage and wc provision being developed.
Nether Currie PS Nursery Class	New Build	1,518,507	2019/20	Under Construction	1,537,673	14-Apr-20	On schedule. Scope reduced due to site limitations.
Granton Primary School Nursery Class	New Build - Replace Existing	2,296,901	2019/20	Under Construction	2,355,727	14-Apr-20	On schedule.
St Marks Primary School Nursery Class	New Build - Replace Existing	1,776,908	2019/20	Under Construction	2,313,079	1-Jun-20	On schedule.
Craigiekninn Primary School Nursery Class	New Build - Replace Existing	2,205,634	2019/20	Under Construction	2,610,577	1-Jun-20	On schedule.
St John Vianny Primary School Nursery Class	New Build - Replace Existing	2,043,275	2019/20	Under Construction	2,306,537	1-Jun-20	On schedule.
Echline Primary School Nursery Class	New Build - Replace Existing	1,547,007	2019/20	CANCELLED	-	-	Cancelled due to new provision at Bulyeon Road Primary; increased capacity at Queensferry EYC; Forest School proposal and high cost compared to places provided.
Hope Cottage Nursery School	Refurbishment Works	95,000	2019/20	CANCELLED	-	-	No requirement.
St Leonards Nursery School	Refurbishment Works	100,000	2019/20	CANCELLED	-	-	No requirement.
St Peters Primary School Nursery Class	Refurbishment Works	90,000	2019/20	CANCELLED	-	-	No requirement.
Stanwell Nursery School	Refurbishment Works	175,000	2019/20	Commissioning	175,000	15-Aug-20	Scope of works to be confirmed.
Canal View Primary School Nursery Class	Refurbishment Works	145,000	2019/20	CANCELLED	-	-	No requirement.
Clovenstone Primary School Nursery Class	Refurbishment Works	120,000	2019/20	Commissioning	40,000	15-Aug-20	Minor works to allow 1140 delivery.
Mortonhall Forest School	Forest School	50,000	2020/21	CANCELLED	-	-	Site not appropriate
Hermitage Forest School	Forest School	50,000	2020/21	In Development	70,000	9-Jan-20	Shelter, storage and wc provision being developed.
Meadow Field Forest School	Forest School	50,000	2020/21	In Development	70,000	9-Jan-20	Shelter, storage and wc provision being developed.
Craiglockhart Forest School	Forest School	50,000	2020/21	In Development	70,000	9-Jan-20	Shelter, storage and wc provision being developed.
Craigmount HS Cluster	New Build	1,352,620	2020/21	CANCELLED	-	1-Aug-22	No appropriate site identified; alternative delivery being introduced at cluster nurseries.
Gracemount HS Cluster (St Catherine's)	New Build	1,279,246	2020/21	ON HOLD	1,279,246	1-Aug-22	Additional capacity to be built as part of new St Catherine's RC Primary replacement following conclusion of Service Design.
Gilmerton PS Nursery Class	New Build - Extend Existing	1,013,979	2020/21	In Development	1,751,636	1-Aug-21	Progressing with design work.
Kirkliston NS	New Build - Extend Existing	1,706,303	2020/21	In Development	2,526,997	1-Aug-21	Progressing with design work.
New South Edinburgh PS Nursery Class	New Build - part of new PS	1,352,620	2021/22	In Development	1,352,620	15-Aug-20	Delivery as part of new school.
New Broomhills PS Nursery Class	New Build - part of new PS	1,279,246	2020/21	Under Construction	1,279,246	15-Aug-20	Delivery as part of new school.
New Victoria Primary School	New Build - part of new PS	1,333,479	2020/21	In Development	1,333,479	15-Aug-21	Delivery as part of new school.
Ratho Primary School Nursery Class	New Build - Replace Existing	1,352,620	2020/21	In Development	2,519,475	15-Aug-20	Progressing with design work. Cost includes Rising Rolls - 3 new classrooms at Ratho PS.
Broughton Primary School Nursery Class (Powderhall)	New Build - Replace Existing	2,296,901	2020/21	In Development	2,296,901	29-Jul-21	Part of Powderhall Housing development - progressing with design work and consultation.
Carrick Knowe Primary School Nursery Class	New Build - Replace Existing	1,611,021	2020/21	In Development	1,446,375	1-Aug-21	Progressing with design work.
Royal High Primary School Nursery Class	New Build - Replace Existing	1,528,627	2020/21	CANCELLED	-	-	No appropriate site identified; alternative delivery being introduced at cluster nurseries.
Sighthill Primary School Nursery Class	New Build	2,296,901	2020/21	ON HOLD	2,322,344	1-Aug-22	Temporary Nursery expansion until Service Design in Wester Hailes complete.
Leith Academy Cluster	New Build	2,296,901	2021/22	ON HOLD	2,322,344	1-Aug-22	No appropriate site identified - high priority area.
Craigroyston HS Cluster (Pennywell)	New Build - Pennywell Housing Development	2,630,162	2021/22	In Development	3,272,227	1-Aug-21	Part of Housing redevelopment of Pennywell - progressing with design work.
Calderglen NS	New Build - Replace Existing	2,127,824	2021/22	ON HOLD	2,322,344	1-Aug-22	On hold until Service Design in Wester Hailes complete.
New Projects							
Hawkhill Forest School	Forest School	-	-	In Development	70,000	9-Jan-20	Site appraisal under way - shelter, storage and wc provision being developed.
Bonaly Forest School	Forest School	-	-	In Development	70,000	9-Jan-20	Development of existing facilities at Bonaly Scout Camp.
Heriot Watt Forest School	Forest School	-	-	In Development	70,000	9-Jan-20	Site appraisal under way - shelter, storage and wc provision being developed.
Newbattle Forest School	Forest School	-	-	In Development	25,000	9-Jan-20	Site appraisal under way - shelter, storage and wc provision being developed.
Corstophine Hill Forest School	Forest School	-	-	In Development	70,000	9-Jan-20	Site appraisal under way - shelter, storage and wc provision being developed.
Craigmillar Forest School	Forest School	-	-	In Development	70,000	9-Jan-20	Site appraisal under way - shelter, storage and wc provision being developed.
Queensferry Forest School	Forest School	-	-	In Development	70,000	1-Oct-19	Site appraisal under way - shelter, storage and wc provision being developed.
Sighthill Primary School Nursery Class (TU)	Temporary Unit	-	-	Under Construction	400,000	1-Oct-19	Awaiting necessary permissions to proceed.
St Cuthbert's RC Primary Nursery Class (TU)	Temporary Unit	-	-	Under Construction	250,000	13-Aug-19	Complete with exception of landscaping.
Cost Estimate Subtotal					40,445,652		
Attributable to Rising Rolls Budget (Ratho PS)					1,000,000		
Grant Allocation					39,386,635		
Total EY1140 Infrastructure Cost Estimate					39,345,652		
Diff					40,989		

