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Graham Evans MP  
The House of Commons  
London  
SW1A 0AA

10 September 2010

*Dear Sir,*

### **RESPONSE TO PARLIAMENTARY QUESTION**

You tabled Parliamentary Questions on 7 July 2010 requesting information on the following matters:

1. how much (a) the Department and (b) its agencies and non-departmental public bodies spent on employee away days in each year since its inception. 7324
2. how much (a) the Department and (b) its agencies and non-departmental public bodies has spent on travel for its employees in each year since 1997. 7431
3. how much (a) the Department and (b) its agencies and non-departmental public bodies spent on employee training since its inception. 7654
4. how much (a) the Department and (b) its agencies and non-departmental public bodies spent on hospitality in each year since its inception. 7450
5. how much (a) the Department and (b) its agencies and non-departmental public bodies spent on stationery in each year since its inception. 7469
6. how much (a) the Department and (b) its agencies and non-departmental public bodies spent on logo design in each year since its inception. 7488
7. how much (a) the Department and (b) its agencies and non-departmental public bodies spent on televisions in each year since its inception. 7512
8. how much (a) the Department and (b) its agencies and non-departmental public bodies spent on legal advice in each year since its inception. 7575
9. how much (a) the Department and (b) its agencies and non-departmental public bodies spent on light bulbs in each year since its inception. 7632
10. how much (a) the Department and (b) its agencies and non-departmental public bodies spent on (i) electricity, (ii) water, (iii) heating and (iv) telephone services in each year since its inception. 7594
11. how much (a) the Department and (b) its agencies and non-departmental public bodies has spent on information and communication technology in each year since its inception. 7343

12. how much (a) the Department and (b) its agencies and non-departmental public bodies spent on website design in each year since its inception. 7613
13. how much (a) the Department and (b) its agencies and non-departmental public bodies spent on office refurbishment in each year since its inception. 7362

Due to the collective detail and scope of your questions, I undertook to write to you once the information requested had been collated and verified. The information is now provided in the 13 attached annexes. As the Ministry of Justice (MoJ) was established on 7 May 2007, information is provided for the financial years 2007/08, 2008/09 and 2009/10.

MoJ comprises:

- MoJ headquarters ("the Department")
- Four executive agencies: the National Offender Management Service, Her Majesty's Courts Service, the Tribunals Service and the Office of the Public Guardian
- Nine Non-Departmental Public Bodies (NDPBs): The Legal Services Commission; the Youth Justice Board; the Criminal Injuries Compensation Authority; the Information Commissioner's Office; the Criminal Cases Review Commission; the Parole Board; the Judicial Appointments Commission; the Legal Services Board; and the Office of Legal Complaints
- 21 Advisory Non-Departmental Public Bodies
- 35 Probation Trusts

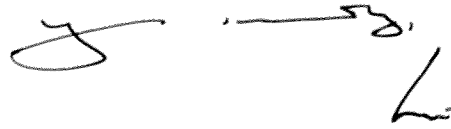
There are a wide range of different accounting systems in use throughout MoJ's arms length bodies. Expenditure is categorised differently in different systems. In some cases the information requested could only be extracted by examination of individual invoices and documents located locally which would incur disproportionate cost.

The following considerations apply to all responses:

- Figures given for the Department include the former Office for Criminal Justice Reform (OCJR). Until December 2008, OCJR continued to use the Home Office's accounting systems which recorded expenditure at a different level of detail to the rest of the Department.
- The Office of the Public Guardian (OPG) was established in October 2007. Its predecessor agency, the Public Guardian Office, had a narrower remit and fewer powers. Expenditure by OPG in 2007/08 is therefore not directly comparable to expenditure in subsequent years.
- Two of the nine Executive NDPBs came into existence after the inception of MoJ. The Legal Services Board was established on 1 January 2009 and began operating on 1 January 2010. The Office for Legal Complaints was established on 1 July 2009 and is due to commence live operations from October 2010.
- The costs of the Ministry's 21 Advisory NDPBs fall on MoJ headquarters. In most cases, it is not possible to identify expenditure relating to Advisory NDPBs separately from the business units in which they are based. This is because the functions carried out by these bodies are performed by staff undertaking other duties for most of their time. For example, the bodies may be Panels, Councils or Committees that meet on a limited number of occasions a year. However, the following Advisory NDPBs function as distinct business units whose costs have been shown separately from the rest of headquarters expenditure: Administrative Justice Tribunals; Civil Justice Council; Family Justice Council; Sentencing Council for England and Wales and the Law Commission.

- Figures provided for 2009/10 are draft, subject to the completion of auditing of accounts.

I will place a copy of this letter in the House libraries.

A handwritten signature in black ink, appearing to be 'K. Clarke', written in a cursive style.

**KENNETH CLARKE**

## Annex 1:

**To ask the Secretary of State for Justice, how much (a) his Department and (b) its agencies and non-departmental public bodies spent on employee away days in each year since its inception. 7324**

Away days are held mainly for team building, team training, staff communication or business development and planning activities. Such events are held off-site where suitable on-site accommodation is unavailable and where the conduct of the event is facilitated by holding it away from day-to-day business operations.

The Ministry's accounting systems do not separately quantify expenditure on away days. Costs are subsumed within other categories of expenditure, for example conferences, events or training. It would incur disproportionate costs to scrutinise all the individual transactions which might potentially include away day costs across the Ministry, its executive agencies and NDPBs.

All spending on away days is completed in line with internal financial guidance which is consistent with HM Treasury guidance on *Managing Public Money*. Internal guidance on away days is that such events should be occasional occurrences to develop working relationships and achieve Departmental objectives. They are acceptable as long as the event can be justified as good value for money and can demonstrate development achievements. Costs should be reasonable and comparable to the status of the event.

Wherever possible, taking into account room availability, size and flexibility, managers are expected to use Ministry or other public sector buildings for team events and away days rather than using external venues.

## Annex 2:

To ask the Secretary of State for Justice, how much his (a) Department and (b) its agencies and non-departmental public bodies has spent on travel for its employees in each year since 1997. 7431

Expenditure on travel is summarised in the following table:

	<u>2009/10</u>	<u>2008/09</u>	<u>2007/08</u>
	£000's	£000's	£000's
Ministry of Justice headquarters, including Advisory NDPBs not separately identifiable	3,309	4,445	2,237
Advisory NDPBs separately identifiable and not included above	18	36	-
Executive Agencies	19,491	21,969	16,674
Probation Trusts	13,341	16,009	14,630
Executive NDPBs	3,242	3,701	3,050
<b>Total</b>	<b>39,401</b>	<b>46,160</b>	<b>36,591</b>

Within the total above for Executive NDPBs, the Criminal Injuries Compensation Authority, Criminal Cases Review Commission, Judicial Appointments Commission, The Parole Board and Information Commissioner's Office include costs for subsistence. The figures therefore include expenditure on hotels and will be significantly inflated compared to travel only costs. The financial systems in place in these executive agencies do not allow for travel to be separately identified. In order to identify the travel cost each transaction would have to be manually examined which would be a disproportionate cost.

Apart from this, figures above show amounts recorded on accounting systems as travel. In addition to these amounts, some travel expenditure within headquarters, Advisory NDPBs, HM Courts Service, the Tribunals Service and the Judicial Appointments Commission may have been recorded against a wider category of "travel and subsistence" which includes hotel accommodation and subsistence allowances. It would incur disproportionate cost to examine all of the claims within this expenditure category to extract the amounts that relate specifically to travel,

All travel by MoJ staff members is completed in line with the published rules for official travel and subsistence within the staff handbook. The rules are in accordance with the guidelines set out in the *Civil Service Management Code*.

### Annex 3:

To ask the Secretary of State for Justice, how much his (a) Department and (b) its agencies and non-departmental public bodies spent on employee training since its inception. 7654

Most training occurs within the normal working environment in the form of on-the-job learning and development where employees receive detailed procedural and operational training, coaching, and day-to-day advice. Prison and probation officers, however, have to undergo extensive formal training to undertake their duties in accordance with professional standards.

Expenditure on employee training since inception is set out in the following table:

	<u>2009/10</u>	<u>2008/09</u>	<u>2007/08</u>
<i>Rounded to the nearest £000</i>	£000's	£000's	£000's
Ministry of Justice headquarters, including Advisory NDPBs not separately identifiable:	3,194	4,617	5,952
Advisory NDPBs separately identifiable and not included above	44	48	-
Executive Agencies	22,051	24,987	17,182
Probation Trusts	6,272	8,098	6,054
Executive NDPBs	1,130	1,748	1,648
<b>Total</b>	<b>32,691</b>	<b>39,498</b>	<b>30,836</b>

The figures above exclude judicial and magistrates' training costs.

## Annex 4:

**To ask the Secretary of State for Justice, how much (a) his Department and (b) its agencies and non-departmental public bodies spent on hospitality in each year since its inception. 7450**

Hospitality involves the provision of food, drink and entertainment to non-civil servants. The provision and offering of hospitality is governed by the Department's internal hospitality policy, which is consistent with the principles of the Treasury handbook on Regularity, Propriety and Value for Money at:

[http://www.hm-treasury.gov.uk/psr\\_governance\\_valueformoney.htm](http://www.hm-treasury.gov.uk/psr_governance_valueformoney.htm)

The guiding principle is that gifts and hospitality must only be provided in exceptional circumstances where they:

- are appropriate to the circumstances, for example offered in the course of a normal business meeting; and
- are modest and appropriate, for example token items such as promotional pens or routine hospitality such as coffee and biscuits or a light working lunch where there are external attendees, where meetings are lengthy or internal attendees have travelled long distances.

Attendance at, and hosting of, hospitality events by department, agency and NDPB staff is recorded in local hospitality registers, in accordance with Ministry of Justice policy. This data is not collated or held centrally, and gathering information from local registers (including operational establishments) would only be possible at disproportionate cost.

However, hospitality expenditure and receipt for MoJ Ministers, the Permanent Secretary and Director Generals can be found on the MoJ website at:

<http://www.justice.gov.uk/publications/moj-business-costs-2010.htm>

<http://www.justice.gov.uk/publications/ministers-hospitality-oct-dec-09.htm>

This information is updated and published on a quarterly basis on the MoJ website and can be accessed by any interested party.

Expenditure on hospitality can only be separately identified from other catering expenditure by scrutinising documentation supporting individual transactions to determine what they related to.

**Annex 5:**

To ask the Secretary of State for Justice, how much (a) his Department and (b) its agencies and non-departmental public bodies spent on stationery in each year since its inception. 7469

Expenditure on stationery is summarised below:

	<u>2009/10</u>	<u>2008/09</u>	<u>2007/08</u>
	£000's	£000's	£000's
Ministry of Justice headquarters, including Advisory NDPBs not separately identifiable:	2,371	1,886	1,380
Advisory NDPBs separately identifiable and not included above	42	42	Separate data not available
Executive Agencies	14,779	17,566	18,228
Probation Trusts	3,595	3,223	2,774
Executive NDPBs	798	1,019	1,083
<b>Total</b>	<b>21,585</b>	<b>23,736</b>	<b>23,465</b>

In order to get best value for money and to ensure consistency and quality, the Ministry has a national contract with one supplier for all stationery products. All stationery must be bought through this corporate contract which saves around £1.7m a year compared to the multiple contracts that preceded it.

Approximately half of the agency total relates to NOMS who record expenditure on stationery together with the purchase of books, professional journals, year books and online versions etc. for staff use only.



## Annex 6:

To ask the Secretary of State for Justice, how much his (a) Department and (b) its agencies and non-departmental public bodies spent on logo design in each year since its inception. 7488

The MoJ identity has been created to convey a strong, authoritative, professional image. Our use of the colour, typography, photography and graphic shapes and patterns reflect both our heritage and modern approach to delivering justice. The majority of logos are provided by the in-house Communications Directorate at no charge, including the following:

Financial Year	Department
2006/07	Tribunals Service
2007/08	Court of Protection
	Office of the Public Guardian
2008/09	Youth Citizenship Commission
2009/10	Independent Parliamentary Standards Authority
	National Offender Management Service
	Sentencing Council

HMCS' logo has not changed since its inception in 2005 and has a zero spend.

The following expenditure has been identified by three of the Ministry's Executive Non-Departmental Public Bodies, the Legal Services Board (new body), the Office for Legal Complaints (new body):and the Legal Services Commission.

2009/10	2008/09	2007/08
£000's	£000's	£000's
33	15	6

\* Includes other design costs in addition to the logo. Also includes research and other work. It has not been possible to separate these costs.

The Youth Justice Board still uses its logo which was designed in 2005/06.

## Annex 7:

To ask the Secretary of State for Justice, how much (a) his Department and (b) its agencies and non-departmental public bodies spent on televisions in each year since its inception. 7512

### Headquarters and executive agencies

Since October 2008 the Ministry of Justice has had one main supplier for the provision of televisions. This contract is for the National Offender Management Service (NOMS) but is also open to the wider MoJ. A provisional date of August 2010 has been set for a full consolidation of the procurement contract so that the entire Department can fully utilise this main supplier when purchasing televisions.

Currently, it is theoretically possible that televisions may be purchased off-contract via the use of the Government Procurement Card (GPC). To investigate whether any televisions had been purchased with the GPC would incur the disproportionate cost of manually examining thousands of card statements held locally.

Television expenditure through the NOMS contract over the last three financial years is shown in the following table, split between in-cell televisions (i.e. prison cells) and other. Prior to October 2008, the wider Ministry operated numerous local contracts and it is not possible to determine total expenditure on televisions for this earlier period without incurring disproportionate cost.

	Rounded £000's		
	2009/10	2008/09	2007/08
In Cell Televisions	(1)(2) 1,411	624	755
Other Televisions	233	251	26
Tribunals Service			10
<b>Total</b>	<b>1,644</b>	<b>875</b>	<b>791</b>

- (1) This amount is from rental fees collected from prisoners for the rental of an in-cell television (£1 a week or 50p a week from each occupant of a multi-occupant cell). The collected fees are channelled through NOMS finances to pay for new and replacement sets.
- (2) The increase in expenditure in 2009/10 from collected rental fees is due to a combination of factors including, but not limited to: increase in demand from prisoners, replacing damaged or faulty sets and supply issues from manufacturers leading to some stockpiling of equipment.

Prison Service funds are **not used** to purchase in-cell televisions. Since 1998, if prisoners would like a television they will be supplied with a 14" cathode ray tube TV, paid for by the prisoners through a weekly rental charge (£1 per week per set).

The Tribunals Service, as with the wider MoJ, has mainly used the central MoJ procurement contract since October 2008.

All these figures exclude any expenditure on preparing for the 'digital changeover', from analogue to digital viewing services.

Between March 2006 and March 2008, 397 televisions were purchased at a total cost of **£516,000** by HM Courts Service, mainly in connection with the Videolinks Project, which allows vulnerable witnesses to take part in trials without actually being present. Videolinks also connects to a number of prisons, which saves money by allowing

certain meetings and proceedings to occur which would otherwise require prisoner transport and accommodation. The £516,000 has **not been included** in the above table since the expenditure cannot be defined over one specific financial year.

### **Executive NDPBs**

Expenditure on televisions by the Ministry's Executive NDPBs and Probation Trusts is as follows:

	£000's		
	<b>2009/10</b>	<b>2008/09</b>	<b>2007/08</b>
Executive NDPBs	4	1	2
Probation Trusts	35	63	24

### **Advisory NDPBs**

The expenditure on televisions by Advisory NDPBs cannot be separately identified within the Ministry's procurement system.

## Annex 8:

### To ask the Secretary of State for Justice, how much (a) his Department and (b) its agencies and non-departmental public bodies spent on legal advice in each year since its inception. 7575

It is not possible to distinguish expenditure on legal advice from expenditure on legal services more generally, for example legal representation. Legal services are provided by in-house and external counsel and solicitors.

MoJ's internal Legal Directorate undertakes advisory work, Bill work, implementation of primary legislation, drafting of secondary legislation and litigation support.

The vast majority of external legal advice is provided by Treasury Solicitors (TSol). TSol is a government department which serves the public by providing legal services to other central government departments and other publicly funded bodies in England and Wales. TSol is usually engaged where the department is involved in actual or potential legal actions ( <http://www.tsol.gov.uk/>).

Commercial lawyers are engaged where specialist skills are required, for example to deal with commercial contracts and transactions, such as property sales.

Expenditure incurred on legal services by the department and its agencies since inception is shown in the table below. Expenditure for in-house staff comprises wages and salaries only. In 2009/10, just over half the expenditure reported for headquarters in the table below relates to the wages and salaries of lawyers employed internally.

	<b>2009/10</b>	<b>2008/09</b>	<b>2007/08</b>
Rounded to the nearest £000	£000's	£000's	£000's
Ministry of Justice headquarters, including Advisory NDPBs not separately identifiable (1)	9,419	6,309	7,532
Advisory NDPBs separately identifiable and not included above	4		
Executive Agencies	18,220	22,840	15,758
35 Probation Trusts	3,563	3,533	3,348
Executive NDPBs	1,627	2,317	1,495
<b>Total</b>	<b>32,833</b>	<b>34,999</b>	<b>28,133</b>

(1) Figures for MoJ HQ include in-house lawyers within the central Legal Directorate. Other in-house lawyers are embedded within business areas but their costs are subsumed within the wider category of staff salaries where they cannot be readily distinguished. It would incur disproportionate cost to scrutinise all the individual transactions which might potentially include in-house legal advice costs.

(2) The increase in expenditure in 2009/10 for MoJ HQ is due to a combination of factors including much higher than average levels of maternity leave in 2009/10 (at one point there were more than 10 lawyers on maternity leave at once) requiring additional cover, fewer vacancies following a successful external recruitment campaign and pay increases as part of the four year MoJ staff pay deal.

**Annex 9:**

**To ask the Secretary of State for Justice, how much (a) his Department and (b) its agencies and non-departmental public bodies spent on light bulbs in each year since its inception. 7632**

Light bulbs are not separately identified in any accounting systems in use across the MOJ, its agencies and non-departmental public bodies. Light bulbs are procured through a variety of different means. For some premises, replacement light bulbs are provided within the terms of facilities management contracts and are not separately billed. Where costs are met directly, light bulbs - as low value items - are usually purchased using the Government Procurement Card (GPC) to minimise transaction costs. It would incur disproportionate cost to scrutinise thousands of GPC statements to identify expenditure on light bulbs.

Three of MoJ's Executive NDPBs - the Criminal Injuries Compensation Authority; the Criminal Cases Review Commission and the Information Commissioner's Office - record expenditure within a wider lighting category, which include lighting repairs and installation. Expenditure for these 3 bodies within this wider category is as follows:

<b>2009/10</b>	<b>2008/09</b>	<b>2007/08</b>
£000's	£000's	£000's
5	4	6

Annex 10:

To ask the Secretary of State for Justice, how much (a) his Department and (b) its agencies and non-departmental public bodies spent on (i) electricity, (ii) water, (iii) heating and (iv) telephone services in each year since its inception. 7594

Expenditure details are provided in the table below.

	2009/10	2008/09	2007/08
Rounded to the nearest £000	£000's	£000's	£000's
<b>Ministry of Justice headquarters, including Advisory NDPBs not separately identifiable</b>			
Water	30	113	75
Electricity	2,136	2,560	947
Heating (Gas)	302	424	211
Telephone services	2,739	3,641	3,507
<b>Advisory NDPBs separately identifiable and not included above</b>			
Water	-	-	-
Electricity	<1	1	-
Heating (Gas)	-	-	-
Telephone services	7	7	-
<b>Executive Agencies</b>			
Water	2,367	2,310	2,573
Electricity	18,770	19,374	15,245
Heating (Gas)	39,886	47,131	29,032
Telephone services	6,694	10,482	9,884
Water & Electricity	52,749	53,173	38,378
Water & Electricity & Heating (Gas)	324	332	136
<b>Probation Trusts</b>			
Utilities	2,587	2,897	2,750
<b>Executive NDPBs</b>			
Water	83	88	84
Electricity	606	571	564
Heating (Gas)	95	68	67
Telephone services	816	818	837
All of above where not separable	86	67	56
<b>Total</b>	<b>130,277</b>	<b>144,057</b>	<b>104,346</b>

(1) Savings in the water consumption of MoJ HQ and non-separable advisory NDPBs can be accounted for by the consolidation of MoJ estates and the work of the Sustainability Unit in reducing water consumption in MoJ buildings.

- (2) *For the separately identifiable NDPBs, costs are not listed where they are under £1,000 or are already included in MoJ HQ figures.*
- (3) *The increase in heating costs in 2008/09 can be attributed to the extremely cold winter. This was the 10<sup>th</sup> coldest winter since Meteorological Office records began.*

To ask the Secretary of State for Justice, how much (a) his Department and (b) its agencies and non-departmental public bodies has spent on information and communication technology in each year since its inception. 7343

The following tables show expenditure reported in annual accounts for IT and telecommunications running costs and for IT expenditure on hardware and software that has been capitalised, including assets under construction. Figures for 2009/10 come from draft accounts in some cases and have yet to be published. The IT requirements of Advisory NDPBs are all met by headquarters and are not recharged. Probation Trusts are included within the annual accounts of the National Offender Management Service which is included within the executive agencies totals.

To the nearest £000	<u>2009/10</u>	<u>2008/09</u>	<u>2007/08</u>
<b>MoJ headquarters</b>			
Capital	47,907	40,407	41,333
Running costs	144,920	140,276	153,036
<b>MoJ core total</b>	<b>192,827</b>	<b>180,683</b>	<b>194,369</b>
<b>MoJ Agencies (including Probation Trusts)</b>			
Capital	33,280	23,841	1,823
Running costs	584,594	473,271	171,633
<b>MoJ Agencies total</b>	<b>617,874</b>	<b>497,112</b>	<b>173,456</b>
<b>Executive NDPBs</b>			
Capital	6,715	3,417	4,023
Running costs	9,050	6,288	6,374
<b>MoJ NDPBs total</b>	<b>15,765</b>	<b>9,705</b>	<b>10,397</b>

- (1) *The increase in MoJ Agencies' running costs can be attributed to an increase in service concession charges, as well as changes in the accounting reporting systems under the International Financial Reporting Standards (IFRS) regulation.*
- (2) *The increase in running costs for Executive NDPBs for 2009/10 can be attributed to the increased costs of the Legal Services Commission due to increased costs in running new systems.*



**Annex 12:**

**To ask the Secretary of State for Justice, how much (a) his Department and (b) its agencies and non-departmental public bodies spent on website design in each year since its inception. 7613**

Expenditure on website design has been incurred by the following parts of MoJ since its inception:

	<b>2009-10</b>	<b>2008-09</b>	<b>2007-08</b>
Rounded to the nearest £000	£000's	£000's	£000's
<b>MoJ HQ</b>	99	112	Comparable figures are not available for 2007-08 because of organisational and accounting changes.
<b>Executive agencies:</b>			
Office of the Public Guardian	nil	nil	47 (costs incurred between 31/10/07 – 24/11/08)
<b>Executive NDPBs:</b>			
YJB	5	1	7
The Parole Board for England and Wales			19
Criminal Injuries Compensation Authority (CICA)	13	34	nil
Criminal Cases Review Commission (CCRC)	23	nil	nil
Information Commissioner's Office (ICO)	4 <sup>1</sup>	69 <sup>2</sup>	8 <sup>3</sup>
Judicial Appointments Commission (JAC)	nil	47	nil
Legal Services Board	2	2	LSB was fully constituted on 1 January 2009
Office for Legal Complaints	13	-	OLC was fully constituted on 1 July 2009
<b>TOTAL:</b>	<b>159</b>	<b>265</b>	<b>81</b>

<sup>1</sup> This figure includes costs up to 20 April 2010.

<sup>2</sup> This cost represents an entire project – separation of the design costs is not possible.

<sup>3</sup> We have provided costs where we have been able to separate the design element from the whole project. However, in some cases this has not been possible. We have focused on redesign or any changes we have made to an existing design.

**Annex 13:**

**To ask the Secretary of State for Justice, how much (a) his Department and (b) its agencies and non-departmental public bodies spent on office refurbishment in each year since its inception. 7362**

Based on available data, the costs of office refurbishment are shown below.

	<u>2009/10</u>	<u>2008/09</u>	<u>2007/08</u>
Rounded to the nearest £000	£000's	£000's	£000's
Ministry of Justice headquarters, including Advisory NDPBs not separately identifiable	172	851	85
Advisory NDPBs separately identifiable and not included above (1)	84	75	112
Executive Agencies	7,695	8,606	2,140
35 Probation Trusts (2)			
Executive NDPBs	4,287	5,500	2,206
<b>Total</b>	<b>12,238</b>	<b>15,032</b>	<b>4,543</b>

*(1) Expenditure is usually met by headquarters and not recharged. The amounts shown relate to the Law Commission.*

*(2) Expenditure is met by the National Offender Management Service. Where costs are separable, they are included within the executive agency total.*

The costs given are for refurbishment works to the fabric and structure of buildings and do not include items such as furniture. Some refurbishment projects may be part of other building work (relocations to rationalise the estate, maintenance, extensions, etc.), but it is not possible to disaggregate this data.