



Crown Prosecution Service



CPS Wiltshire
AREA BUSINESS PLAN
2003 - 2004

CROWN PROSECUTION SERVICE
WILTSHIRE AREA BUSINESS PLAN 2003/2004

| Contents | Page |
|--|-------------|
| SECTION 1: Introduction | 2 - 3 |
| SECTION 2: Objectives, Priorities and the Delivery of PSA Targets | 4 - 5 |
| Delivery Plan for CPS Wiltshire | 6 - 9 |
| Budget/Resource Analysis | 10 – 12 |
| ANNEX A: Risks to Delivery | |
| ANNEX B: Area Contribution to achievement of PSA targets | |
| ANNEX D: Caseload Forecasts | |
| ANNEX E: Summary of Overall Budget Provision | |
| ANNEXES | |
| F1, F2, F3: Staff profiles and non-ring fenced administration costs | |

SECTION 1: INTRODUCTION

Local Information

This business plan sets out the framework and priorities of the work of the Crown Prosecution Service within the Area of Wiltshire for the year 2003/2004.

The local prosecution service covers the geographical county of Wiltshire including the unitary authority of Swindon.

The five Magistrates courts, dealing with criminal matters, in the County are located in Swindon, Chippenham, Trowbridge, Devizes and Salisbury, although there are plans to close the two smaller courts at Devizes and Trowbridge, but not during the lifetime of this plan. These five courts have petty sessional boundaries, which are drawn along the same lines as the three police divisions. These are North West Wiltshire, South East Wiltshire and Swindon.

More serious criminal cases are heard in the Crown Courts located in Swindon and Salisbury. However, the most serious cases are heard at Bristol and Winchester Crown Courts.

The Wiltshire Constabulary Headquarters are situated in Devizes with Divisional Headquarters in Swindon, Salisbury and Melksham. Each division has an operational support unit that forms the basis of a Criminal Justice Unit. CPS prosecutors and Designated Caseworkers attend the police stations regularly to review cases and to offer advice to operational police officers. The Wiltshire Area CPS Office is situated in the town of Chippenham which itself enjoys good communication links, possessing a main line rail link to London & the West Country and the M4 situated just North of the town. However, within the county, links are rather poor from North to South resulting in an hours travelling time by road from the office to service the Salisbury Courts.

The Crown Prosecution Service in Wiltshire employs a dedicated team of staff consisting of lawyers, Designated Caseworkers, Crown Court Caseworkers and a team of administrators. The Area is divided into four departments. There is the Criminal Justice Unit that deals with cases in the Magistrates Court, a Trials Unit, which deals with cases in the Crown Court, a Youth Unit which, deals with all cases involving young defendants and finally the Area Secretariat, which provides personnel planning, facilities management and finance services to the Area.

How the area contributes to the Crown Prosecution Service and the Criminal Justice System

The Crown Prosecution Service works with the other agencies in the Criminal Justice System to reduce crime and it's associated social and economic costs. As such the Service has a primary objective to ensure the effective delivery of justice.

The Crown Prosecution Service in Wiltshire has developed it's own vision statement to support this goal:

“The purpose of CPS Wiltshire is to provide the local community with a high quality prosecution service, playing a central part in the local Criminal Justice System. We will treat all people fairly, professionally and respectfully.”

How the plan was constructed

Staff at all levels have been consulted in the development of this plan to ensure that the objectives which have been set are considered to be realistic, achievable goals which staff are aware of and happy with.

The plan is set against a background of new initiatives and reforms within the Crown Prosecution Service and the Criminal Justice System as a whole.

The publication of The White Paper 'Justice for All' recommended that the Crown Prosecution Service take over responsibility for determining the charge in all but the most minor offences. Ensuring the right charge is applied in the first instance should guard against the expectations of victims and witnesses being disappointed, thus improving public confidence and reducing delays in processing cases through the system.

Improvements in IT are seen as an essential element in helping the Crown Prosecution Service meet its targets. The Service is implementing a new Case Management System – COMPASS. Wiltshire will see this new system up and running in April 2003. The system should greatly assist in the management and administration of cases through the system thus providing the tools to deliver an efficient, high quality service.

Underpinning the success of these new initiatives and reforms are the commitment and professionalism of staff and the standing of the Crown Prosecution Service within the Criminal Justice System and local communities. CPS Wiltshire is committed to the continuing professional development of its staff and working closely with its partners to provide a 'joined-up' Criminal Justice System. We plan to continue to raise awareness, through community engagement, of the role of the Crown Prosecution Service.

Arrangements for monitoring/review

This plan is a living document which will be reviewed in the light of any changes in CPS policy and delivery targets agreed by the Local Criminal Justice Board. The Delivery Plan and the Risk Register will be reviewed by the Area Management Team on a regular basis to enable them to keep track of the Area's progress on our objectives and implement any remedial action or revised targets.

Analysis of the current position

CPS Wiltshire starts this financial year in a strong position having received a very good report on its performance from the HMCPSI Inspection of CPS Wiltshire. In fact Wiltshire was first in a league table of area casework performance based on the Inspectorates findings.

The Inspectorate recognised the problems faced due to the rural nature of the county and this will continue to impact on the Area. However, the Area's experienced and committed staff will continue to be a strong enabling factor in achieving high standards of performance.

An Action Plan was devised to address recommendations made by the Inspectorate and is reviewed by the Area Management Team at regular intervals to ensure objectives are met.

I commend this Business Plan to our staff, our partner CJS Agencies and the people of Wiltshire. It provides a vision of the way forward and the appropriate data to judge our performance in operational matters. We will continually review and where necessary improve the service we provide in order to meet our aim to help in the reduction of crime and the fear of crime and to promote confidence in the Rule of Law by prosecuting offenders fairly and efficiently.

Nick Hawkins
Chief Crown Prosecutor

SECTION 2: OBJECTIVES, PRIORITIES AND THE DELIVERY OF PSA TARGETS

The area objectives in this plan are derived ultimately from the targets set in the Public Service Agreement. They are to:

- *Improve the delivery of justice by increasing the number of crimes for which an offender is brought to justice, to 1.2 million by 2005-2006; with an improvement in all CJS areas, a greater increase in the worst performing areas and a reduction in the proportion of ineffective trials.*
- *Improve the level of public confidence in the criminal justice system, including increasing that of ethnic minority communities, and increasing year on year the satisfaction of victims and witnesses, whilst respecting the rights of defendants.*
- *Increase value for money from the criminal justice system by 3% a year.*

The 2003-2004 priorities for CPS Wiltshire therefore support these aims:

Narrowing the Justice Gap - Area Actions

- Bring an additional 543 offences to justice in the year 2003/2004
 - Implementation of the charging initiative

This will be accomplished by:

- Developing an inter-agency premium service for persistent offenders
- Increasing witness confidence in attending court
- Reducing the number of cracked and ineffective trials by effective case management
- Increasing the number of domestic violence offenders brought to justice
- Developing an effective system for providing early charging advice on all but the minor cases including piloting extended hours coverage.

Improving the level of public confidence - Area Actions

- Continuing to monitor and improve the treatment of victims and witnesses
 - Engaging with the local community

This will be accomplished by:

- Ensuring all lawyers have attended Speaking Up for Justice training
- Improving performance with regard to the issuing and timeliness of letters sent to victims when a case is dropped or the charges substantially altered
- Raising the profile of Victim Personal Statements
- Ensure all lawyers have attended the Racially and Religiously Aggravated Crime Course and inviting representatives of outside organisations to attend such courses
- Attending other external training such as the Multi-Cultural Awareness Days
- Liaising with the Equality and Diversity Officer for the south west region to develop an area strategy for promoting CPS Wiltshire to the local community

Value for Money – Area Actions

- Introduction of the new case management computer system
- Deployment of HCAs

This will be accomplished by:

- Ensuring all staff are trained and the new system is up and running by the target date.
- Lawyer rota /consultation with court listing officers to maximise deployment of HCAs

Delivery Plan and Budget/Resource Analysis

The Delivery Plan provides a detailed breakdown of target dates and actions, which the area needs to meet in order to achieve our objectives. This is followed by a budget/resource paper setting out the costs and resources involved in carrying out the Delivery Plan.

ACTION/DELIVERY PLAN FOR CPS WILTSHIRE 2003/2004

| NATIONAL OBJECTIVE: | AREA OBJECTIVE | RESPONSIBILITY | TARGETS/ACTIONS |
|----------------------------|---|------------------------|--|
| Narrowing the Justice Gap | To bring an additional 543 recorded offences to justice in the year 2003/2004 (baseline 10,851 offences in the year 2001/2002) | Lead - CJU Head | CPS Wiltshire is adopting and using the County Action Plan for Narrowing the Justice Gap and the Premium Service for the prosecution of Persistent Offenders |
| | Effective and resource efficient implementation of the new Charging initiative | Lead - CJU Team Leader | Pilot of 'C' division to start by 31 May 2003 'A' division implementation by 31 July 2003 'D' division implementation by 30 Sept 2003 |

| NATIONAL OBJECTIVE: | AREA OBJECTIVE | RESPONSIBILITY | TARGETS/ACTIONS |
|---|---|--|--|
| <p>Improving the Level of Public Confidence</p> | <p>Continue to monitor and improve the treatment of victims and witnesses</p> | <p>Area Training Officer</p> <p>CJU Team Leader</p> <p>CJU Head</p> <p>CJU & TU Head</p> | <p>Ensure all lawyers have attended the Speaking Up For Justice training course by 31 March 2004</p> <p>Increase to 75 % (from the national average of 70%) the number of letters sent to victims within 5 days of the decision to discontinue or substantially alter charges</p> <p>Raise the profile of Victim Personal Statements with lawyers by issuing instructions to lawyers to ensure they are used in court. Target Date: 30 June 2003</p> <p>Ensure that 96% of complaint letters received from members of the public/MPs are answered within the set national timescales</p> |

| NATIONAL OBJECTIVE | AREA OBJECTIVE | RESPONSIBILITY | TARGETS/ACTIONS |
|---|---|-------------------------------------|---|
| <p>Improving the Level of Public Confidence</p> | <p>Community Engagement and to meet our duty under the Race Relations (Amendment) Act to positively promote race equality and good race relations</p> | <p>Lead - Area Business Manager</p> | <p>Ensuring all lawyers have attended training on Racially & Religiously Aggravated Crime by 31 December 2003</p> <p>Ensuring that a representative from a suitable organisation is invited to attend each course</p> <p>Arranging for staff to attend the Multicultural Awareness Day training course organised by the Wheatsheaf Trust by 31 December 2003</p> <p>Establishing community engagement targets for the area with the EDO by 30 September 2003 – to include promoting the CPS to outside organisations eg. Schools etc</p> <p>Ensure new ABM attends Race Hate Crime Forum on a regular basis and promotes relevant CPS Policies</p> <p>Continued area representation on the LGBT Network</p> |

| NATIONAL OBJECTIVE | AREA OBJECTIVE | RESPONSIBILITY | TARGETS/ACTIONS |
|--------------------|---|----------------|---|
| Value for Money | Introduction of the new case management computer system | Lead – TU Head | <p>Area to go live: 7 April 2003</p> <p>All staff to be trained on the new system by 30 April 2003</p> <p>Monitoring of benefits by issuing a quarterly staff survey</p> <p>Development of interface with the police by 30 September 2003</p> |
| | Deployment of HCAs | TU Head | <p>To meet the target for HCA sessions or review by 30 June 2003</p> <p>To increase the number of crown court trials undertaken by HCAs by 30 July 2003</p> |

BUDGET/RESOURCE ANALYSIS

| | |
|---------------------------|--|
| National Objective | Narrowing the Justice Gap |
| Area Objective 1 | Bring an additional 543 offences to justice in the year 2003/2004 |
| Actions | Developing inter-agency service for persistent offenders Increasing witness confidence in attending court Reducing the number of cracked/ineffective trials Increasing the number of domestic violence offenders brought to justice |
| Resources | CJU Head: Meetings to develop inter-agency service or persistent offenders <i>Time / T&S</i> Quarterly case completion meetings <i>Time / T&S</i> Meeting to develop system for staggering of witnesses <i>Time / T&S</i> Meeting with police to finalise Domestic Violence Service Level Agreement <i>Time / T&S</i> Coverage of 5 extra district judge courts per week during April, May and June to tackle cracked/ineffective trial figures <i>Negotiated fees for Agents sessions £12,000</i> |
| Area Objective 2 | Implementation of the Charging initiative including extended hours coverage |
| Actions | Pilot of C division – 31 May 2003 A division implementation – 31 July 2003 D division implementation – 30 September 2003 |
| Resources | CJU Team Leader: Meetings with police to establish system <i>Time / T&S</i> 50K budget allocation to cover 1 x extra lawyer and development of technical equipment for out of hours cover to include 1 x laptop and mobile phone <i>£34000 C1 lawyer / £10000 equipment</i> <i>£6,000 contingencies, furniture, GAE</i> |

| | |
|---------------------------|--|
| National Objective | Improving the Level of Public Confidence |
| Area Objective 1 | Continue to monitor and improve the treatment of victims and witnesses |
| Actions | All lawyers to complete Speaking Up for Justice training Improve performance for issuing of letters sent to victims Raise the profile of victim personal statements Set target for complaint letters replied to within national timescales |
| Resources | Lawyer training costs (agent cover, accommodation, T&S) Costing pppd £230 agents/ £90 accommodation/ T&S Training and time of new CJU Business Manager to take on the role of Victim & Witness Co-ordinator Time / T&S |
| Area Objective 2 | Engaging with the local community |
| Actions | All lawyers to complete Racially & Religiously Aggravated Crime Course and representatives from outside agencies to be invited to attend Representative number of staff to attend Multicultural Awareness training Establish community engagement targets with EDO ABM attendance on Race Hate Crime Forum Area representation on LGBT Network |
| Resources | Lawyer training costs (agent cover) £230 per day £75 per head for staff to attend Multicultural Awareness training £75 pp attendance / £230 agents pp x 6 staff Time out of office/court to attend events and give talks to promote the CPS Time / T&S |
| National Objective | Value for Money |
| Area Objective 1 | Introduction of new case management computer system |
| Actions | Staff training Monitoring of benefits Liaison with police |
| Resources | Local Implementation Team meetings Time / T&S Training costs will be neutral to the area as funding is provided to cover agents costs during training Meetings with police to develop police interface Time / T&S |

| | |
|-------------------------|---|
| Area Objective 2 | Deployment of HCAs |
| Actions | Meet the agreed target for HCA sessions for the year 2003/2004 Increase the number of crown court trials undertaken by HCAs |
| Resources | Lawyer resources for training and deployment <i>Time / Extra lawyer or extra agents to cover Magistrates' sessions not covered due to HCA Court work</i> |

KEY RISKS TO ACHIEVEMENT OF PSA TARGETS 2003-2004

AREA/ SERVICE CENTRE:

P43 - Wiltshire

Please show below the five principal risks you have identified to delivery of PSA targets during 2003/04

| A | B | C | D | E | F | G | H |
|-----|--|---------------------------|----------------------------------|---|--|---------------------------------------|--|
| No. | Risk | Owner | Likelihood/ Impact (H,M,L) | Existing Countermeasures | Risk Assessment Effectiveness and Sufficiency of countermeasures | Risk Status (red, amber, green) | Proposed Countermeasures (With action/review dates) |
| 1 | <i>Value for Money</i> - HCA deployment is dependant upon Crown Court listing | TU Head | High/High | a) Liaison with listing officers b) Control of lawyer rotas | a) More efficient listing would lead to greater effectiveness b) Good degree of effectiveness | Amber | Recruit more lawyers and increase the number of HCAs |
| 2 | <i>Value for Money</i> - Staff will not embrace the opportunity that Compass will give them | Local Implementation Team | Medium/High | Communication with staff | Too early to measure | Amber | Continued communication and liaison with staff and using Area Champions and Super Users to promote the system |
| 3 | <i>Narrowing the Justice Gap</i> - Translating the measure in the Action Plan for Narrowing the Justice Gap into increasing the number of cases brought to justice in accordance with the target | CCP & CJU Head | Medium/High | Implementation and monitoring of the Inter-agency Action Plan and the CPS Action Plan | Too early to measure | Amber | Regular quarterly inter-agency meetings, Continued case file monitoring, ensuring staff are kept informed to meet the target |
| 4 | <i>Improving Public Confidence</i> - Failure to meet the target for letters sent to victims | CJU Team Leader | Medium/Medium | Designated member of staff to monitor issuing of letters | Effective | Amber | Recruit and train more lawyers and train new CJU Business Manager to take on the responsibility of Victim & Witness Co-ordinator |
| 5 | <i>Community Engagement</i> - Lack of Area Business Manager (ABM) to fulfill community engagement commitments | CCP | High/High | Other staff taking on this responsibility where possible | Without an ABM there are insufficient resources to cover this effectively | Red | Appointment of an Area Business Manager |

SECTION 3: AREA CONTRIBUTION TO ACHIEVEMENT OF PSA TARGETS

ANNEX B

AREA: **P43 - Wiltshire**

| PSA: | Area Outturn Q1-3 2002/03 % | National outturn Q1-3 2002/03 % | National target 2003/04 | Numerical Target 2003/04 % | Area target proposed by IRPB | Area target proposed by Area |
|--|--------------------------------------|--|--|-------------------------------------|---------------------------------------|---------------------------------------|
| Narrowing the Justice Gap | | | | | | |
| % Unsuccessful outcomes in Magistrates' Courts | 15 | 22 | 5% reduction | 17 | 14 | 14 |
| % Unsuccessful outcomes in Crown Court | 25 | 25 | 5% reduction | 20 | 18 | 20 |
| % of offences by Persistent Offenders brought to justice | | | 5% to 15% increase | | | |
| % Ineffective trials in MC | | | x% reduction | | | |
| % Ineffective trials in CC | | | y% reduction | | | |
| Introduce Shadow Charging Scheme | | | By December 2003 | | | |
| Public Confidence | | | | | | |
| Quality of review: % of initial & continuing review decisions complying with the Code | | | 95% year on year | | | |
| Quality of disclosure: % of primary disclosure complying with CPIA | | | 5% points increase | | | |
| Quality of disclosure: % of secondary disclosure complying with CPIA | | | 5% points increase | | | |
| PYOs: time from arrest to sentence | | | 71 days | 71 days | | 71 days |
| Proceeds of crime: assets recovered | | | To be developed | | | |
| Regular engagement with minority groups which support victims of domestic violence; and ethnic communities | | | Increase Areas with regular engagement | | | |
| Value for Money | | | | | | |
| | | | To be developed | | | |

| | Area Outturn Q1-3 2002/03 | National outturn Q1-3 2002/03 | National target 2003/04 | Numerical Target 2003/04 | Area target proposed by IRPB | Area target proposed by Area |
|--|---------------------------------|-------------------------------------|-------------------------------|--------------------------------|---------------------------------------|---------------------------------------|
| CPS Performance Measures | | | | | | |
| All Areas to input data into ICMS enabling reporting of domestic violence, racially & religiously motivated offences, homophobic crime, rape & child abuse | | | Subject to rollout | | | |
| Timeliness & quality of Direct Communication with Victims from the Quality Process | | | To be developed | | | |
| Representative workforce in terms of gender, ethnicity, and disability | | | To be developed | | | |
| % replies to complaints within 10 days | 100 | 88 | 95% | | 100 | 96 |
| % replies to MPs' correspondence within 15 days | 100 | 94 | 95% | | 100 | 96 |

ANNEX D

NARRATIVE EXPLANATION OF VARIANCES THAT EXCEED +/- 5%

Advices

An increase in the number of advices given by the Area are expected to rise during the year with the introduction of the charging initiative and the Area giving out of hours advice

Select an Area:

P43 - Wiltshire

ANNEX D

| | Actual | Actual | Estimated | Average | Forecast | Change on previous year | | Forecast | Change on previous year | | Forecast | Change on previous year | |
|---------------------------------|---------------|---------------|---------------|---------------|---------------|-------------------------|-----------|---------------|-------------------------|-----------|---------------|-------------------------|-----------|
| | 2000-01 | 2001-02 | 2002-03 | 2000-2003 | 2003-04 | Absolute | % | 2004-05 | Absolute | % | 2005-06 | Absolute | % |
| Magistrates Courts | | | | | | | | | | | | | |
| B1 Advice only | 1096 | 1057 | 851 | 1,001 | 902 | 51 | 6% | 940 | 38 | 4% | 940 | 0 | 0% |
| B7 Other proceedings | 327 | 61 | 76 | 155 | 78 | 2 | 3% | 80 | 2 | 3% | 78 | -2 | -3% |
| C1 Pros Dropped | 1080 | 1064 | 1171 | 1,105 | 1141 | -30 | -3% | 1135 | -6 | -1% | 1125 | -10 | -1% |
| C3 Bind over | 157 | 140 | 149 | 149 | 147 | -2 | -1% | 145 | -2 | -1% | 140 | -5 | -3% |
| C4 Written off | 559 | 537 | 420 | 505 | 420 | 0 | 0% | 425 | 5 | 1% | 420 | -5 | -1% |
| C6 Trial EW | 77 | 73 | 90 | 80 | 93 | 3 | 3% | 90 | -3 | -3% | 92 | 2 | 2% |
| C5 Guilty plea(s) of which : | 9366 | 9991 | 10009 | 9,789 | 10160 | 151 | 2% | 10199 | 39 | 0% | 10300 | 101 | 1% |
| C5.01 Motoring | 4495 | 4725 | 4732 | 4,651 | 4779 | 47 | 1% | 4800 | 21 | 0% | 4848 | 48 | 1% |
| C5.02 Theft and Handling | 1151 | 1430 | 1433 | 1,338 | 1469 | 36 | 3% | 1480 | 11 | 1% | 1494 | 14 | 1% |
| C5.03 Other E W/Indictable | 2194 | 2315 | 2320 | 2,276 | 2388 | 68 | 3% | 2395 | 7 | 0% | 2419 | 24 | 1% |
| C5.04 Other Summary | 1526 | 1521 | 1524 | 1,524 | 1524 | 0 | 0% | 1524 | 0 | 0% | 1539 | 15 | 1% |
| C7 Trial Summary | 232 | 221 | 225 | 226 | 230 | 5 | 2% | 235 | 5 | 2% | 235 | 0 | 0% |
| Magistrates' Court Total | 12,894 | 13,144 | 12,991 | 13,010 | 13,171 | 180 | 1% | 13,249 | 78 | 1% | 13,330 | 81 | 1% |
| MC Option Set G2 Late guilty | 122 | 161 | 215 | 166 | 210 | -5 | -2% | 215 | 5 | 2% | 215 | 0 | 0% |
| MC Option Set L1 Juveniles | 1071 | 1329 | 1356 | 1,252 | 1390 | 34 | 3% | 1385 | -5 | 0% | 1398 | 13 | 1% |
| Crown Court | | | | | | | | | | | | | |
| C1 Committal for sentence | 211 | 183 | 217 | 204 | 220 | 3 | 1% | 220 | 0 | 0% | 222 | 2 | 1% |
| C2 Appeal | 92 | 75 | 102 | 90 | 100 | -2 | -2% | 102 | 2 | 2% | 100 | -2 | -2% |
| C3 Written off | 6 | 5 | 5 | 5 | 5 | 0 | 0% | 5 | 0 | 0% | 5 | 0 | 0% |
| C4 Prosecution dropped | 20 | 32 | 53 | 35 | 52 | -1 | -2% | 51 | -1 | -2% | 50 | -1 | -2% |
| C5 Bind over | 3 | 7 | 4 | 5 | 4 | 0 | 0% | 4 | 0 | 0% | 4 | 0 | 0% |
| G1 Timeous guilty | 180 | 193 | 191 | 188 | 190 | -1 | -1% | 192 | 2 | 1% | 195 | 3 | 2% |
| G2 Late guilty | 40 | 38 | 44 | 41 | 44 | 0 | 0% | 44 | 0 | 0% | 43 | -1 | -2% |
| G3 Guilty/not guilty contest | 12 | 11 | 15 | 13 | 15 | 0 | 0% | 15 | 0 | 0% | 15 | 0 | 0% |
| G4 All not guilty | 78 | 74 | 90 | 81 | 91 | 1 | 1% | 92 | 1 | 1% | 94 | 2 | 2% |
| S51 Section 51 cases | 76 | 112 | 110 | 100 | 112 | 2 | 1% | 110 | -2 | -2% | 113 | 3 | 3% |
| Crown Court Total | 642 | 618 | 721 | 660 | 721 | | | 725 | 4 | 1% | 728 | 3 | 0% |
| OVERALL TOTAL | 13,536 | 13,762 | 13,712 | 13,670 | 13,892 | 180 | 1% | 13,974 | 82 | 1% | 14,058 | 84 | 1% |

(NB Overall total excludes Juveniles & Late Guilty Pleas)

Actual data for previous years can be obtained from the CIS

Areas need only enter identification data and figures in the yellow cells.

Please supply a narrative explanation of any variances that exceed + / - 5%