

GENERAL SYNOD

LEGAL OFFICERS (ANNUAL FEES) ORDER 2024

**THE ECCLESIASTICAL JUDGES, LEGAL OFFICERS AND OTHERS (FEES)
ORDER 2024**

Explanatory Notes

INTRODUCTION

1. The Fees Advisory Commission (“the Commission”) is a statutory body constituted under the Ecclesiastical Jurisdiction and Care of Churches Measure 2018 (“the 2018 Measure”). Of its nine members, three represent the providers of legal services within the Church, three represent the users and funders of such services, and three (from whom the Commission’s Chair must be drawn) are independent.
2. In accordance with the terms of the 2018 Measure, the Commission’s membership is as follows:

The Venerable Robert Cooper (Chair) (nominated by the Appointments Committee);

Ms Anna Spriggs (nominated by the Ecclesiastical Law Association);

The Rt Revd David Williams, Bishop of Basingstoke, Diocese of Winchester (nominated by the House of Bishops);

Ms Josile Munro (nominated by the Appointments Committee);

Mr Carl Fender (nominated by the Appointments Committee);

Mrs Louise Connacher (nominated with the agreement of the Provincial Registrar for Canterbury);

Ms Philippa Hopkins KC (nominated by the Ecclesiastical Judges Association);

The Revd Christopher Smith (nominated by the Church Commissioners); and

Mr Stephen Roberts (Chair of the Guildford Diocesan Board of Finance and nominated by the Inter-Diocesan Finance Forum)

3. The role of the Commission is to recommend to the General Synod the level of fees to be paid to ecclesiastical judges, legal officers and others for performing certain duties and functions, and to prepare annual Orders in the form of Statutory Instruments to give effect to those recommendations (which require the approval of the Synod, prior to being laid before Parliament under the negative resolution procedure). Both Orders require to be laid before the Synod for approval, with a view to their coming into force at the beginning of the following year.
4. The Commission accordingly now lays the two Orders for the year 2025 before the Synod for its approval. These Explanatory Notes explain the approach taken by the Commission to the drafting of the Orders this year.

THE LEGAL OFFICERS (ANNUAL FEES) ORDER 2024

5. Legal Officers (Annual Fees) Orders, made under section 86 of the 2018 Measure, prescribe the annual fee payable to each diocesan registrar for the professional services specified in Schedule 2 to the Order.

Calculation of the retainer since 2015

6. In the period leading up to 2014, retainer levels represented no more than approximately half the true cost of providing legal services across the Church. In 2012-13 a review was commissioned by the Commission to attempt to address the under-remuneration of registrars. This explored various models for remunerating registrars. A wide-ranging consultation conducted as part of this review revealed serious concerns among registrars about the threat which underpayment posed to the ongoing provision of legal support in Church of England dioceses. It also demonstrated a clear steer that both providers and users and funders wanted a retainer-based system to continue, rather than local negotiation. The report recommended a new method of calculating the retainer which was intended to pay on average 75% of the full commercial cost of registrars' services, to be phased in over a number of years.
7. As a result, in 2014 General Synod agreed exceptional phased uplifts over the transitional five-year period 2015-19 in order to achieve a level of remuneration for registrars which reflected commercial legal rates with a 30% charitable discount applied (i.e. on average registrars' remuneration was intended to reflect 70% of their commercial rates). In addition the Commission introduced a more transparent basic formula for calculating the annual retainer as well as improving accountability by requiring diocesan bishops to conduct annual reviews of the provision of legal services with their registrar. Thus in the period 2015-19 annual movements in the national cost of the retainer were driven both by changes in reported hours worked and average charge-out rates as required by the new basic formula, and by the application of the phased uplifts.
8. Since 2014 the basic formula, agreed by Synod,¹ has involved:
 - arriving at a figure for the national cost of the work done by registrars under the retainer by aggregating the average number of hours recorded by them as having been spent on such work over the previous five years, divided as between solicitors and clerks, and then multiplying that by an average of the commercial hourly rates reported by non-London clerks and solicitors;
 - applying a charitable discount to that figure (originally set as 30% in 2014)
 - dividing that cost between the dioceses to arrive at a figure for the retainer for a diocese, by:
 - allocating 30% of the national figure between the dioceses equally (to reflect the fact that every registrar's practice attracts certain unavoidable overheads);
 - dividing the balance between the dioceses by reference to the 'size' of the diocese (assessed by reference to the number of open churches and clergy of incumbent status and above), but subject to:
 - capping the resulting figure so that the 'largest' diocese pays no more than three times what the 'smallest' pays; and
 - applying an additional 10% weighting in the case of London and Southwark to reflect their higher costs.

¹ For a fuller description, see the Explanatory Memorandum to the 2014 Order (GS 1938-9X)

9. The five-year transition period ended with General Synod's agreement of the 2019 retainers as specified in the 2018 Order. The adoption of the formula agreed in 2014 had resulted in raised income levels: in 2016 the total retainer paid across all dioceses amounted to 53% of the value of work undertaken; in 2017 57%², in 2018 63%, in 2019 66%. Nevertheless, the target of the retainer covering on average 70% of registrars' commercial rates was not being met.
10. In 2019 the Commission concluded that the application of a charitable discount as high as 30% as part of the formula was continuing to cause undue financial difficulties for registrars and would need to be reduced in order to achieve the target of an average of 70% of the full commercial cost of registrars' work being remunerated. It therefore determined to reduce the discount from 30% to 10% over a period. The detailed reasoning is to be found in the Explanatory Notes to the 2019 Order (GS 2147X). Circumstances enabled it to make an immediate reduction from 30% to 20% for the year 2020 but with the understanding that the further reduction to 10% would be spread over the following five years. This approach has been followed in the retainers agreed for 2021, 2022, 2023 and 2024 in each of which years the charitable discount has reduced by 2%. The charitable discount applied by the formula now stands at 12%.
11. In 2020 the national average of the cost of registrars' work remunerated under the retainer reached 70%, which was the target implied in staged uplifts introduced by the Commission (full cost, nationally moderated, minus a 30% charitable discount). Having fallen back to 66% in 2021, in 2022 the national average rose to approximately 70% of the reported value of work undertaken – the milestone implied under the formula in 2020. In 2023, however, the national average again fell back to 66.5% of the value of work undertaken. This indicates that there is further work to be done to achieve the target of 70% of the national average cost of registrars' work being remunerated under the retainer.
12. The Commission notes that the approach agreed by Synod in 2014 was based on a comprehensive review in 2012-13 which considered various options and concluded that the formula struck the best balance between value for money for funders, quality of service for users, and a reasonable rate of remuneration for registrars which would preserve the attractiveness of ecclesiastical law as a specialism. The Commission considers that any significant change to this approach would require another process of review and consultation.
13. The Commission remains of the view that the broad principles underlying the formula which Synod approved in 2014 are well accepted and provide the most suitable basis for the calculation of the annual retainer at the present time. The Commission considers that the annual retainer, as calculated under the formula, continues to represent good value for money – notwithstanding the relatively high increase in the likely total cost of the 2025 retainer (see section E below). The Commission also considers that the annual reviews of work done between bishops and other senior staff and their registrar continue to prove valuable in ensuring that registrars are providing users with legal services as effectively as possible.
14. As it is now 10 years since the formula which is presently used to calculate the annual retainer was approved by Synod, and conscious of concerns about the formula which have been raised in recent years by Synod members, the

² The figures are rounded figures.

Commission proposes to undertake a process of information-gathering following this year's Synod. The aim of this information-gathering exercise will be to ascertain how the current formula is working, and to determine whether a review of the formula is needed.

The Commission's proposals for the 2025 retainers

A. Data collection

15. For the 2025 retainer calculations, the most recent data provided by registrars in their annual returns are from 2023.
16. As set out above, the established formula provides for the calculation of a figure for the national cost of the work reported and takes into account two key variables: the average number of hours recorded over a rolling five-year period, and the average reported hourly rates of non-London registrars.
17. The average moving average total hours worked by clerks and solicitors over the previous 5 years was 28,802 hours in 2023, up 2% from 28,243 hours in 2022.
18. Reported hourly rates increased more than usual in 2023. The average rate for non-London clerks was £149 in 2023, up from £126 in 2022 (an 18% increase); the average rate for non-London solicitors was £287 in 2023, up from £236 in 2022 (a 22% increase).³
19. Schedule 1 to these notes sets out a summary of the median and mean hourly rates for solicitors and clerks reported in 2023 (in part A), and a summary of the total hours of work reported from 2008 to 2023 (in part B).

B. Options

20. The Commission was satisfied that the approach agreed, and subsequently re-endorsed, by the General Synod should continue to be followed. The Commission considers that any material change from that approach would require proper consultation amongst interested parties. Given that the retainer in 2023 only covered an average of 66.5% of the full commercial cost of registrars' work, the Commission considered that the continued reduction of the charitable discount following the approach agreed in 2019 was justified. They noted that on the available evidence the factors which justified the approach agreed in 2019 continue to remain valid (see below). Nevertheless, they also noted that the increase in the overall cost of the retainer as calculated under the formula was unusually large this year.
21. In considering the options, the Commission considered collected data showing the following:
 - 1) The changes in moving average total hours and in rates mean that if the charitable discount were to remain unchanged at 12% the total cost of the 2025 retainer would increase by 23.4% (or £1,069,000), when compared with the 2024 retainer.

³ For additional context regarding this increase in rates please see section D.

- 2) If a charitable discount of 11% were to be applied, the total cost would increase by 24.8% (or £1,134,000) compared with the 2024 retainer.
- 3) If a charitable discount of 10% were applied, the total cost would increase by 26.2% (or £1,198,000) compared with the 2024 retainer.
- 4) Every one percentage point reduction in the charitable discount increases the total 2025 retainer by approximately £64,000.
- 5) In order for the total cost of the retainer to remain the same in 2025 as in 2024 the charitable discount would need to be increased to 28% - this would represent a complete reversal of the approach agreed by Synod in 2019, and would almost entirely unpick the progress made since 2019 towards the objective which Synod has endorsed of achieving proper remuneration for registrars and ensuring that ecclesiastical law remains a sufficiently attractive area of legal practice for the future.

C. Consultation

22. In making its recommendations on the 2025 retainer the Commission was conscious of the view previously expressed by Synod members that the views of Diocesan Boards of Finance (DBFs) should be taken into account. The Commission considered that a new consultation to inform its decision on the 2025 retainer was not necessary, particularly given that a Commission member nominated by the Inter-Diocesan Financial Forum had now been appointed. Nevertheless, in deciding on what recommendation to bring forward regarding the 2025 retainer, the Commission referred to the results of the proportionate informal consultation with dioceses which it carried out in 2023. Details of this consultation and the responses received to it are contained in the Explanatory Notes accompanying the 2023 Fee Orders.⁴
23. In 2023 the Commission consulted on the two choices which seemed in its view most realistic: (1) Continuing the gradual reduction of the charitable discount; and (2) Pausing the reduction of the charitable discount. While some respondents to the 2023 consultation favoured the continued reduction of the charitable discount following the approach agreed in 2019, others favoured a pause in the reduction of the charitable discount. The two headline arguments expressed by those respondents who favoured no further reduction in the charitable discount were (1) the pressures on diocesan budgets; and (2) the size of the charitable discount.
24. In deciding on its recommendation for the 2024 retainer the Commission gave careful consideration to the points raised in consultation responses. In particular, the Commission recognised the strongly held views about the affordability of any further reduction, particularly given the calls on dioceses, and the size of the charitable discount (the two headline arguments which came out of consultation).

⁴ [GS 2299X](#) and [GS2300X](#).

25. However, the Commission considered that there were persuasive, and compelling, countervailing factors to which they should have regard:

- The Commission considered that it is prudent to keep in view the long-term objective of making sure that the specialism of ecclesiastical law remains attractive for law firms as part of their succession planning;
- There was some misconception about the extent of the charitable discount. It is not the case that the application of the formula means that in each diocese the charitable discount which was offered against a firm's commercial rate was only 14% in 2023. The objective of the retainer covering an average of 70% of the commercial value of work done by registrars represents a 30% discount;
- Taking into account evidence of the rates of senior solicitors outside London the Commission considered that the hourly rates which were provided by registrars in 2022 and used to calculate the 2023 retainer represented good value for money;
- Consultation responses from diocesan representatives did not fully take into account that the retainer needs to support an office, not simply the services of a single person. The Commission conducted a check on the value for money provided by the retainer by calculating the effective average rate in 2022 (the total retainer paid in 2022 divided by the total number of recorded hours). This gave an effective annual hourly rate of £134, which the Commission considered to represent good value for money;
- The Commission did not accept that the work undertaken by registrars was necessarily "repeat" work. The Commission considers that the work is not repetitive, but very varied, requiring a significant breadth of knowledge. Further, there is no cap on the work. The Commission considered it reasonably likely that if work were chargeable on a "piece work" basis, the overall cost could be higher than the retainer;
- The Commission challenged the view that the tenure of registrars was very secure. They noted that one year's notice could be given. The Commission had before it evidence that there had been recent changes in the firms providing registry services in a number of dioceses;
- The Commission noted that the burden of any increase would, as before, not fall entirely on diocesan boards of finance: only an average of 58% nationally would do so, since that part of the retainer that is expressed by the Order to represent a liability of the diocesan bishop remains payable by the Church Commissioners.

26. The Commission considers that these factors remain relevant in deciding on its recommendation for the 2025 retainer.

D. The increase in registrars' reported hourly rates in 2023

27. The Commission noted that the data collected in 2023 showed an unusually high increase between 2022 and 2023 in the reported average hourly rates for non-London clerks and non-London solicitors, which are used under the formula to calculate the retainer. This increase in hourly rates was the main driver in an unusually high increase in the 2025 retainer, as calculated using the formula.
28. The Commission has sought to understand the reasons for the significant increase in registrars' hourly rates reported in 2023, in order to satisfy itself that this increase can be considered reasonable. Proportionate research and sample testing indicated two causes of the increase in the hourly rates: (1) the impact of high inflation in 2022-3, including particularly high wage inflation in the legal sector; and (2) an adjustment in the hourly rates reported by some registrars to reflect the fact that in previous years they had erroneously been reporting a discounted charity rate rather than their commercial rate.

High inflation in 2022-3

29. The Commission had evidence before it that the legal sector was affected by significant wage inflation in 2023, in common with a number of other sectors. This was partly driven by a macroeconomic context of high inflation. Written evidence used by MoJ in calculating fees for secular judges⁵ records that inflation was high in late 2022 and during 2023, reaching a peak of 11% in Autumn 2022 and remaining at 4.8% in Q4 of 2023. A higher than usual pay increase of 7% was awarded to secular judges in 2022-3, partly in recognition of this "challenging macroeconomic context". 2023 saw a high rate of wage inflation across the economy – for example, the Office for National Statistics (ONS) reports that annual growth in private sector regular pay (excluding bonuses) was 8.1% in May to July 2023. ONS statistics show that the legal sector, along with accounting and management consultancy, saw the highest rises in wages as a share of turnover in the 6 months to February 2023.⁶
30. The nature of the legal services industry means that law firms' biggest outgoing is salaries. The close link between wage costs and prices in the legal sector is confirmed by ONS statistics for 2019-23 which show prices increasing almost exactly in line with labour costs in accountancy, law, management consultancy, advertising, architecture, engineering, technical testing, security and office administration.
31. Information from registrars has provided support for the view that wage inflation has driven increases in law firm's charge-out rates in 2023. Registrars have also indicated that law firms have experienced difficulties in recruitment which have increased wage inflation.

Adjustment in reported hourly rates

32. As noted in paragraph 7, the formula used to calculate the retainer uses data received from registrars each year regarding their hourly rates and the number of hours of work recorded. The formula operates on the premise that the hourly

⁵ <https://assets.publishing.service.gov.uk/media/65e092802f2b3b00117cd795/moj-written-evidence-ssrb-2024-25.pdf>

⁶ [Analysis of wage and price increases, UK - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/economy/inflationandpriceindices/articles/analysisofwageandpriceincreasesuk)

rates provided represent a full commercial rate; the retainer then aims to cover 70% of work done with the aim of achieving a discount of 30%.

33. It became apparent during the FAC's consideration of the 2022 data that some registrars appeared to be reporting discounted charity rates, rather than their commercial rates. As a result, a message was sent out to registrars reminding them that their annual returns for 2023 should report their commercial rate and not a discounted rate, to avoid a double discount being applied.⁷
34. The unusually high increase in the average hourly rates reported in annual returns by non-London clerks and solicitors in 2023 – increases of 18% and 22% respectively – indicates that some registrars had previously been reporting discounted rates but corrected this to commercial rates in 2023. The unusually high increase in average reported hourly rates is likely to result from a combination of this adjustment, together with the high wage inflation in 2022-2023 noted above.

E. Value for money

35. Noting the unusually high increase in the total cost of the retainer in 2025 resulting from the application of the formula to the 2023 data (see paragraph 20), the Commission gave careful consideration to the question of whether the retainer continues to represent value for money to those using and funding registry services.
36. The calculation of the retainer is based upon the most recent average rates charged by non-London clerks and non-London solicitors. A summary of the 2023 rate data is set out in Schedule 1. The 2023 average hourly rate for non-London solicitors used to calculate the 2025 retainer was £287 ex VAT. Proportionate market sampling was undertaken to ascertain how that average hourly rate compared with typical rates for solicitors outside London. This indicated that £287 ex VAT was a significantly lower hourly rate than typical commercial rates charged by senior solicitors in regional firms in 2024, and lower than typical discounted charity rates charged by senior solicitors in regional firms in 2024. The Commission also had before it evidence of rates for senior solicitors outside London in 2022, with a commercial hourly rate being approximately £335 ex VAT, and with a charity hourly rate being in the region of £285 ex VAT. The Commission concluded that an average hourly rate of £287 ex VAT in 2023 continued to represent good value for money, taking into account that a further discount is applied to that rate as part of the calculation of the retainer (as noted above the formula aims to achieve a target of the retainer covering an average of 70% of the cost of work done by registrars).
37. The Commission also calculated the effective average rate paid to registrars in 2023 (the total retainer paid in 2023 divided by the total number of recorded hours). In doing so, the Commission took into account the important factor that the retainer often supports the work of both legal clerks as well as legal officers. Taking into account the total retainer in 2023 (£4.4M) and the recorded number of hours across both clerks and legal officers (28,802), **the effective annual hourly rate is £159**. The Commission considers that such a rate represents good value

⁷ This message was sent out by FAC members acting on their own initiative, rather than being mandated by the FAC.

for money to users and funders of registry services.

F. Recommendation

38. The Commission acknowledges that the total increase in the cost of the retainer between 2024 and 2025 is likely to be higher than in previous years, and that this may be a concern to dioceses. Having considered the reasons behind the increase in the reported hourly rates of non-London clerks and solicitors in 2023, however, the Commission considers the increase to be reasonable.
39. As noted above, the Commission considers that the retainer continues to represent good value for money for funders and users. A “piece-work” approach to paying for legal advice is unlikely to represent a more cost-effective approach, and the increases in hourly rates noted above would apply whether or not registrars were paid under the retainer.
40. The Commission also noted that the burden of the increase would, as before, not fall entirely on diocesan boards of finance: only an average of 58% nationally would do so, since that part of the retainer that is expressed by the Order to represent a liability of the diocesan bishop remains payable by the Church Commissioners.
41. The Commission considered carefully whether the reduction of the charitable discount should be paused, or even increased, given the likely size of the increase in the retainer in 2025. The Commission noted, however, that the data demonstrates that in 2023 the retainer only covered a national average amount of 66.5% of the cost of the work done by registrars— falling short of the target of 70% implied under the formula. To increase this shortfall would hinder the achievement of the objective which Synod has endorsed of ensuring proper remuneration for registrars and ensuring that ecclesiastical law remains a sufficiently attractive area of legal practice for the future.
42. Taking those factors into account, the Commission considered that it was right to continue the gradual reduction of the charitable discount agreed by Synod in 2019, **but to slow it down**. The Commission therefore **recommends a reduction in the charitable discount from 12% to 11%**. This continues the approach set out in 2019 but is a smaller reduction than the 2% reduction made in previous years.
43. The effect is that the total amount payable by way of the retainer will increase from £4.58 million in 2024 to **£5.7 million** in 2024 (an average increase of **24.8%** nationally), with percentage increases in individual retainers ranging from 24% to 25%.
44. In line with the practice adopted in 2022, the Commission has excluded the provision of advice in relation to safeguarding matters from the scope of the retainer. (The relevant provision is paragraph (18) of Schedule 2.) Such work is remunerated otherwise than by the retainer. In that respect, it is treated in the same way as work in connection with clergy discipline, which is also excluded from the scope of the retainer.
45. As noted in paragraph 13 above, the Commission intends to undertake an information gathering exercise in 2024-5, involving those providing registry

services, and those using and funding those services. This will seek to ascertain how the formula adopted following the comprehensive review in 2012-13 is working, and whether there is a case for carrying out a further review of the methodology used to calculate the retainer.

46. The Commission notes that it is required to inform itself of the duties of the offices of legal officers and to that end notes its expectation that registrars will endeavour to keep an accurate record of their work in order that the Commission can make properly informed recommendations.

THE ECCLESIASTICAL JUDGES, LEGAL OFFICERS AND OTHERS (FEES) ORDER 2024

47. Ecclesiastical Judges, Legal Officers and Others (Fees) Orders, made under s.86 of the 2018 Measure, prescribe fees for faculty proceedings and certain other proceedings in ecclesiastical courts, as well as the fees of the Provincial Registrars, the Vicars-General and other holders of legal offices. In practice the great bulk of the work remunerated under the terms of such Orders relates to faculty proceedings, for which provision is made in Table 1 of the 2024 Order (though the holding of a hearing, which is likely to attract the highest fees, is an infrequent occurrence).

48. As previously, the Commission has set the fees, wherever possible, so as to be broadly equivalent to those determined by the Ministry of Justice to be payable to secular judges when exercising similar functions, rather than being simply increased by reference to inflation. The Commission notes that the Ministry of Justice agreed that secular judicial fees should increase by 7% in the year 2023-4. An initial recommendation of 3.5% was made by the Ministry of Justice to the Senior Salaries Review Board (SSRB). The SSRB, however, made a recommendation of 7% due to wage growth across the country exceeding forecasts available at the time MoJ's evidence was published, and persistent recruitment shortfalls in the District Bench. The Lord Chancellor accepted this recommendation in full and an increase of 7% was awarded to secular judges in 2023-4.

49. In principle, the Commission continues to be of the view that the most recent agreed pay award for secular judges is an appropriate benchmark for judicial fees under the Order. Nevertheless, in the case of the 2024 Order the Commission was conscious that one of the two factors cited as justifying the 7% increase in fees for secular judges - persistent recruitment shortfalls in the district bench - appeared to be specific to the secular judicial context. Aware of current pressures on finances, the Commission concluded that it was not appropriate to adopt the full 7% increase awarded to secular judges. Noting that the other factor - wage growth across the country - applied to both ecclesiastical and secular judges, the Commission considered that it would also be inappropriate to follow the MoJ's initial recommendation of 3.5%. The Commission has therefore recommended an increase of **5%** in the 2024 Order.

CHANCELLORS' INFORMAL RETAINERS

50. Finally, consistent with the approach set out in the Explanatory Notes for the Orders laid before the Synod for approval in July 2016⁸, which it has followed in subsequent years, the Commission considers it appropriate to benchmark Chancellors' informal retainers to 14% of the registrar's retainer in the relevant diocese. Taking into account the Commission's proposal regarding the charitable discount (see above), there is a commensurate adjustment required to the level of informal retainers so that they meet that figure.
51. The Commission will continue to keep the position under review as it prepares next year's Orders.

On behalf of the Commission
The Venerable Robert Cooper
June 2024

⁸ GS 2036-7X.

Schedule 1

A. Rates in 2023

Median and mean hourly rates for solicitors and clerks

The mean figures for clerks and solicitors based outside London, shown in bold in the table below, are used in the calculation of retainers. For comparison, the mean figures from 2022 for Clerks and Solicitors based outside London were £126 and £236 respectively.

	Median	Mean
Clerks based in London	£150	£164
Solicitors based in London	£313	£305
Clerks based outside London	£150	£149
Solicitors based outside London	£290	£287

B. Hours worked, 2008-2024

Average hours vary from year to year. A 5-year moving average is therefore used in retainer calculations. The table below shows the available data. The moving average total hours worked by clerks and solicitors, shown in bold in the table below, are combined with the rates charged to produce a calculated value of work done.

	Average hours per diocese			Total hours			Moving average of 5 years, hours per diocese			Moving average of 5 years, total hours		
	Clerk	Legal	Total	Clerk	Legal	Total	Clerk	Legal	Total	Clerk	Legal	Total
2008	379	327	707	15,177	13,086	28,263						
2009	371	354	726	14,112	14,179	28,291						
2010	328	357	685	13,109	14,277	27,386						
2011	345	365	710	13,793	14,617	28,410						
2012	380	386	766	14,066	15,449	29,515	361	358	719	14,051	14,322	28,373
2013	405	387	791	14,969	15,474	30,443	366	370	736	14,010	14,799	28,809
2014	313	400	712	12,506	15,984	28,490	354	379	733	13,689	15,160	28,849
2015	345	382	727	13,810	15,263	29,073	357	384	741	13,829	15,357	29,186
2016	292	356	648	11,694	14,245	25,939	347	382	729	13,409	15,283	28,692
2017	276	356	632	11,023	14,250	25,273	326	376	702	12,800	15,043	27,844
2018	335	332	667	13,420	13,285	26,705	312	365	677	12,490	14,605	27,096
2019	337	358	695	13,465	14,328	27,794	317	357	674	12,682	14,274	26,957
2020	332	375	707	13,299	14,989	28,288	314	355	670	12,580	14,219	26,800
2021	341	405	746	13,652	16,195	29,847	324	365	689	12,972	14,609	27,581
2022	351	363	715	14,045	14,536	28,581	339	367	706	13,576	14,667	28,243
2023	348	390	737	13,908	15,590	29,498	342	378	720	13,674	15,128	28,802