

AUSTRALIAN
LEGAL SECTOR

ALLIANCE

PROMOTING SUSTAINABILITY

Australian Legal Sector Alliance Sustainability Insight 2019

Swaab

Firm Entry and Benchmarking Summary



Our Firm

Swaab

2019

About Our Firm

Swaab is a multi-award winning, mid-sized commercial law firm offering legal services across a number of core practice areas and industry groups. With 13 partners we have been helping our clients' businesses grow for over 30 years. We have strong capabilities in the areas of commercial and corporate law and our large private client practice provides family law, estate planning and other high net worths personal services. In recent years, we have been recognised for both our excellent client service and our exceptional work environment. We also have a number of international clients for whom we act as attorneys and agents to assist them with their introduction to Australia's business landscape and the development of their business in Australia.

Firm Details

Question	2018 Response	2019 Response	2019 Benchmark	
Firm Name	Swaab	Swaab		
Number of Employees	76	66	Lowest:	66
			Highest:	2,145
			Average:	634
Offices Floor Area	2,261	2,261	Lowest:	1,393
			Highest:	99,999
			Average:	16,877
Number of Offices	1	1		
Supporting files uploaded	N/A			

Person responsible for reporting

Name: Paul Barbour

Title: IT & Operations Manager

Email: pxb@swaab.com.au

User comments and notes

Nil

Our People

About People Programs

We place a high value on the well-being of our people. Our Managing Partner is on the board of the Minds Count Foundation and our firm is a regular supporter by monthly donation. We have partnered with AccessEAP to provide an employee assistance program with 24 hours seven days a week access for our people and their families. We have a range of learning and development initiatives that focus on mental health and well-being. We are a signatory to the Law Council's Diversity and Equality Charter. 53% of our partners are females and we demonstrate a disproportionately high female leadership team. This is something that our firm is extremely proud of because this has happened organically, without any set targets for diversity. We have a high number of part-time employees, both female and male and we have embraced flexible working across all levels of the firm.

Question	2018 Response	2019 Response	2019 Benchmark
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User comments and notes

Nil

Gender Equality

Question	2018 Response	2019 Response	2019 Benchmark	
Gender equality - Policy?	Yes	Yes	Yes	91%
			No	9%
			Currently in development	0%
			Not reported	0%
Gender equality policy - Published	No	No	Yes	72%
			No	28%
			In development	0%
			Not reported	0%
Gender equality - Managed	Yes	Yes	Yes	100%
			No	0%
			Not reported	0%
Gender equality - Managed by	Partner Committee	Partner Committee	Partner	63%
			Director or Manager	66%
			Director or Manager	63%
Gender Equality - Programs	International Women's Day	International Women's Day	International Women's Day	94%
			Employer of Choice for Gender Equality	66%

Pay Equity Ambassador	56%
Male Champion of Change	19%
Board Links Champion	0%
LCA Diversity and Inclusion Charter	0%
Equitable briefing pledge (e.g. CommBar/LCA)	0%
Host or lead external programs and/or forums	0%
Female advancement, mentoring and coaching	0%
Training - Gender awareness unconscious bias	0%
Gender sensitive promotion and recruitment	0%
Internal D&I networks or committees	0%
LSNSW Charter - Advancement of Women	0%
Equal pay controls	0%
DCA major sponsor	0%
Showcasing gender diversity experiences	0%
Women on Boards	0%
UN Womens' Empowerment Signatory	0%
Other programs not included above (please only include programs that are not covered in the broad categories above - max 20 words)	72%

Gender Equality - Targets	No	No	Yes	69%
			No	25%
			Not reported	6%
Gender profile - Partners	57% Male	47% Male	Lowest:	0% Male
			Highest:	95% Male
			Average:	67% Male
Gender profile - Legal staff	44% Male	32% Male	Lowest:	0% Male
			Highest:	55% Male

			Average:	40% Male
Gender profile - Non legal staff	16% Male	14% Male	Lowest:	0% Male
			Highest:	47% Male
			Average:	21% Male

User comments and notes

Nil

Flexible Working

Question	2018 Response	2019 Response	2019 Benchmark	
Flexible working - Policy	Yes	Yes	Yes	97%
			No	0%
			Not reported	3%
Flexible working policy - Published	No	No	Yes	39%
			No	61%
			In development	0%
			Not reported	0%
Flexible working - Programs and initiatives	Flexible work hours Time in lieu Unpaid leave Carer's leave	Flexible work hours Time in lieu Unpaid leave Carer's leave	Flexible work hours	100%
			Part time options	0%
			Job sharing	97%
			Remote working tools and systems	0%
			Support for flexible working	0%
			Time in lieu	94%
			Unpaid leave	100%
			Carer's leave	100%
			Study leave	0%
			Volunteering leave	0%
			Religious and ceremonial leave	0%
			Purchased leave	0%
			Career breaks	0%
			Subsidised child care	0%
			Phased retirement	0%
			Adjusted KPIs after absences	0%
			Sabbaticals	0%
			Bonus leave	0%
			Domestic violence leave	0%
			Family and fertility leave	0%

			School Holiday Programs	0%
			Other programs not included above (please only include programs that are not covered in the broad categories above - max 20 words)	59%
Paid parental leave scheme	Yes	Yes	Yes	97%
			No	3%
			Not reported	0%
Parental scheme - Primary and secondary carers	Yes	Yes	Yes	97%
			No	3%
Parental scheme - Aspects	Paid leave for primary care giver	Paid leave for primary care giver	Paid leave for primary care giver	97%
	Paid leave for secondary care giver	Paid leave for secondary care giver	Paid leave for secondary care giver	94%
	Additional leave without pay available	Additional leave without pay available	Additional leave without pay available	97%
Paid parental leave - Primary care giver	NaN	NaN	Lowest:	0
			Highest:	18
			Average:	9
Paid parental leave - Secondary care giver	NaN	NaN	Lowest:	0
			Highest:	18
			Average:	2
Maternity leave returns	66%	100%	Lowest:	0 %
			Highest:	100 %
			Average:	89 %

User comments and notes

Nil

Diversity and Inclusion

Question	2018 Response	2019 Response	2019 Benchmark	
Diversity policy	Yes	Yes	Yes	97%
			No	0%
			Partial	3%
			Currently in development	0%
			Not reported	0%

Diversity policy - Published	No	No	Yes	58%
			No	42%
			In development	0%
			Not reported	0%
Diversity policy - Managed	Yes	Yes	Yes	100%
			No	0%
			Not reported	0%
Diversity policy - Managed by	Partner	Partner	Partner	56%
	Committee	Committee	Director or Manager	69%
	Director or Manager	Director or Manager	Committee	69%
Disability accessibility standards?	Yes	Yes	Yes	69%
			No	16%
			Currently in development	13%
			Not reported	3%

User comments and notes

Nil

LGBTQ+ Inclusion

Question	2018 Response	2019 Response	2019 Benchmark	
LGBTI inclusiveness - Policy	Yes	Yes	Yes	84%
			No	3%
			Not reported	13%
LGBTI inclusiveness policy - Published	No	No	Yes	63%
			No	37%
			In development	0%
			Not reported	0%
LGBTI inclusiveness - Managed	Yes	Yes	Yes	84%
			No	9%
			Not reported	6%
LGBTI inclusiveness - Managed by	Partner	Partner	Partner	53%
	Committee	Committee	Director or Manager	50%
	Director or Manager	Director or Manager	Committee	59%
LGBTI inclusiveness - Activities or programs	Law Council Diversity and Equality Charter	Law Council Diversity and Equality Charter	Membership - Pride in Diversity	56%
			Training - LGBTQ+ awareness	63%
			AWEI survey	47%

IDAHOBIT	63%
Wear it Purple Day	0%
World Aids Day	0%
Membership - Out for Australia	0%
Internal LGBTQ + networks or committees	0%
Pro bono support	0%
LCA Diversity and Inclusion Charter	0%
External LGBTQ+ programs hosting	0%
Training - LGBTQ+ awareness	0%
Gender pronouns promotion	0%
Trans Awareness Week	0%
Pride March	0%
Mardi Gras	0%
Midsumma	0%
Gender affirmation policy	0%
InterFirm events	0%
AWEI award	0%
Stonewall top Global Employer	0%
Other programs not included above (please only include programs that are not covered in the broad categories above - max 20 words)	72%

User comments and notes

Nil

Physical and Psychological Wellbeing

Question	2018 Response	2019 Response	2019 Benchmark	
Psychological well-being - Policy or strategy	Yes	Yes	Yes	97%
			No	0%
			Not reported	3%
Psychological well-being policy or strategy - Published	No	No	Yes	32%
			No	65%
			In development	3%

			Not reported	0%
Psychological well-being - Managed	Yes	Yes	Yes	94%
			No	0%
			Not reported	6%
Psychological well-being - Managed by	Partner	Partner	Partner	47%
	Committee	Committee	Director or Manager	75%
	Director or Manager	Director or Manager	Committee	41%
Psychological wellbeing - Programs or activities	Minds Count -TJMF Guidelines	Minds Count -TJMF Guidelines	Minds Count -TJMF Guidelines	63%
	Beyond Blue program	Beyond Blue program	Beyond Blue program	34%
	R U OK? program	R U OK? program	R U OK? program	100%
	Psychological support/ EAP	Black Dog Institute program	Black Dog Institute program	41%
	Mental health first aid training and support	Psychological support/ EAP	Psychological support/ EAP	97%
		Mental health first aid training and support	Mental health first aid training and support	88%
			Mental Health Awareness Week	0%
			Resilience at Law	0%
			Training - Mental health awareness and management	0%
			Salary continuance	0%
			External mental health programs hosting	0%
			Domestic violence strategy	0%
			Mental health office champion	0%
			Other programs not included above (please only include programs that are not covered in the broad categories above - max 20 words	78%
Physical and psychological well-being - Monitoring	Yes	Yes	Yes	58%
			No	26%
			Currently in development	6%
			Not reported	10%
Physical health and well-being - Policy or strategy?	Yes	Yes	Yes	90%
			No	6%
			Not reported	3%

Physical health and well-being policy or strategy - Published	No	No	Yes	32%
			No	64%
			In development	4%
			Not reported	0%
Physical well-being - Managed	Yes	Yes	Yes	84%
			No	13%
			Not reported	3%
Physical well-being - Managed by	Partner	Partner	Partner	41%
	Committee	Committee	Director or Manager	66%
	Director or Manager	Director or Manager	Committee	47%
Physical well-being programs or initiatives	Ergonomics program	Ergonomics program	Ergonomics program	100%
	Flu vaccinations	Flu vaccinations	Proactive health checks	72%
	Internal exercise sessions	Internal exercise sessions	Flu vaccinations	100%
	Free wellness activities such as yoga and subsidised gym membership	Free wellness activities such as yoga and subsidised gym membership	Internal exercise sessions	91%
			Gym memberships	0%
			Team events	0%
			Massages	0%
			Wellness awareness and promotion	0%
			Subsidised health insurance	0%
			Onsite fruit and healthy catering	0%
			Life & TPD insurance	0%
			Ergonomics program - offsite	0%
			Health EAP	0%
			Other programs not included above (please only include programs that are not covered in the broad categories above - max 20 words)	75%

User comments and notes

Nil

Staff Development

Question	2018 Response	2019 Response	2019 Benchmark	
Staff development program	Yes	Yes	Yes	97%
			No	0%

			In development	3%
			Not reported	0%
Staff development program - Coverage	Partners	Partners	Partners	97%
	Lawyers	Lawyers	Lawyers	97%
		Business Support Staff	Business Support Staff	97%
Staff development program - Activities and initiatives	Coaching	Coaching	Coaching	94%
	Mentoring	Mentoring	Mentoring	97%
	Professional skills	Professional skills	Professional skills	97%
	Internally delivered training programs	Internally delivered training programs	Internally delivered training programs	97%
	Attending external training or seminars	Attending external training or seminars	Attending external training or seminars	97%
	Substantive Law	Substantive Law	Substantive Law	91%
	Personal development	Personal development	Personal development	97%
	Technology training	Technology training	Technology training	97%
	Internal policy training	Internal policy training	Internal policy training	94%
			Other (please specify, max 20 words)	19%
Staff development program - Resourcing	In development	Yes	Yes	100%
			No	0%
			In development	0%
			Not reported	0%

User comments and notes

Nil

Data Validation

Question	2018 Response	2019 Response	2019 Benchmark
I confirm that data validation has been completed for this section	Yes	Yes	97%

User comments and notes

Nil

Community

About Community Programs

We have a formal sustainability charter which includes focus on pro bono and community engagement. We have a structured alliance with the Minds Count Foundation and Lifeline for whom we do pro bono work. We are working towards formalising and better streamlining our sustainability charter across the firm with respect to pro bono and community focused activities so that we have an internal formal strategy and focus. We take on work experience students and a number of our partners have built relationships through University alumni to support law students as they progress through their university journey. We actively encourage involvement in the not for profit sector, providing support and resources when requested by employees around organisations about which they are passionate. We partner with Corporate Citizen for our workplace giving program. We hold a number of fundraising events throughout the year and any money raised during firm activities is matched by Partners.

Question	2018 Response	2019 Response	2019 Benchmark
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User comments and notes

Nil

Legal Pro Bono

Question	2018 Response	2019 Response	2019 Benchmark	
Pro bono - Strategy	Yes	Yes	Yes	94%
			No	0%
			In development	6%
			Not reported	0%
Pro bono Strategy - published	In development	In development	Yes	47%
			No	43%
			In development	3%
			Not reported	7%
Pro bono Managed	Yes	Yes	Yes	94%
			No	3%
			In development	3%
			Not reported	0%
Pro bono coordinator - Managed by	Partner	Partner		
Pro bono coordinator - Full-time or part-time role	Full-time	Full-time	Full-time	43%
			Part-time	43%
			No coordinator or manager	7%

			Not reported	7%
Australian Pro Bono Centre Aspirational Target - Signatory	No	No	Yes No In development Not reported	78% 22% 0% 0%
Australian Pro Bono Centre Aspirational Target - Plan	No date currently set	No date currently set	Target currently met Goal date has been set No date currently set	41% 13% 47%

User comments and notes

Nil

Non Legal Volunteering

Question	2018 Response	2019 Response	2019 Benchmark	
Support for board positions of organisations for social and environmental good	Yes	Yes	Yes	88%
			No	0%
			Not reported	13%
Non legal volunteering - Support	No	No	Yes	75%
			Currently in development	9%
			No	13%
			Not reported	3%
Non-legal volunteering - Activities	NFP Boards	NFP Boards	NFP Boards	75%
			Organised staff volunteering	88%
			Paid volunteer time	44%
			Charity events and appeals	0%
			Blood donations	0%
			Student tutoring and mentoring	0%
			Secondments to NFPs	0%
			Skilled volunteering program	0%
			Community volunteering	0%
			Arts support	0%
			CPD for community sector lawyers	0%
			Other programs not included above (please only include programs that are nor	31%

covered in the broad categories above - max 20 words

Does your firm collect data on the levels of staff participation in non-legal volunteering?	In development	In development	Yes	25%
			No	38%
			In development	38%

User comments and notes

Nil

Corporate and Workplace Giving

Question	2018 Response	2019 Response	2019 Benchmark	
Corporate giving - Program?	Yes	Yes	Yes	91%
			No	9%
			Not reported	0%
Corporate giving - Activities	Firm donation program Matched funding for employee donations	Firm donation program Matched funding for employee donations	Firm donation program	88%
			Charitable foundation	31%
			Workplace giving	50%
			Matched funding for employee donations	72%
			Internal appeals and collections	0%
			External charity events and appeals	0%
			Other programs not included above (please only include programs that are not covered in the broad categories above - max 20 words)	28%
			Host external charity events	0%
Does your firm collect data on levels of staff participation in corporate supported giving programs?	Yes	Yes	Yes	31%
			No	41%
			In development	28%
Corporate sponsored giving - Employee participation	N/A	5%	Lowest:	0 %
			Highest:	90 %
			Average:	24 %

User comments and notes

Nil

Indigenous Reconciliation

Question	2018 Response	2019 Response	2019 Benchmark	
Indigenous reconciliation - Policy?	Currently in development	Currently in development	Yes	53%
			No	16%
			Currently in development	28%
			Not reported	3%
Indigenous reconciliation - Managed	Yes	Yes	Yes	74%
			No	7%
			Not reported	4%
			In development	15%
Indigenous reconciliation - Managed by	Partner Director or Manager Committee	Partner Director or Manager Committee	Partner	44%
			Director or Manager	41%
			Committee	56%
Indigenous reconciliation - Activities or programs	Internships and employment	Internships and employment	Reconciliation Action Plan	56%
			Cultural awareness training	56%
			NAIDOC Week	69%
			National Reconciliation Week	56%
			Internships and employment	63%
			Scholarships and student mentoring	0%
			Indigenous employment and internship programs	0%
			Affirmative ATSI procurement	0%
			Pro bono support	0%
			Volunteering and secondments	0%
			Collaboration for reconciliation	0%
			Funding and donations	0%
			Indigenous Business Month	0%
			Indigenous Literacy Day	0%
Supply Nation Membership	0%			
CareerTrackers participation	0%			

Other programs not included above (please only include programs that are not covered in the broad categories above - max 20 words) 50%

User comments and notes

Nil

Data Validation

Question	2018 Response	2019 Response	2019 Benchmark	
I confirm that data validation has been completed for this section	Yes	Yes	Yes	97%

User comments and notes

Nil

Environment

Environmental Management

We are committed to our green initiatives, both simple and complex, which include stationary recycling drives, waste recycling, reducing power usage through such initiatives as lighting reductions and introduced utilities such as follow me print to avoid unnecessary printing. We are currently developing a paper-lite program to encourage everyone to reduce paper use.

Question	2018 Response	2019 Response	2019 Benchmark	
Environment -Policy?	No	No	Yes	78%
			No	6%
			Currently in development	16%
			Not reported	0%
Environment - Managed	Yes	Yes	Yes	81%
			No	13%
			Not reported	6%
Environment - Managed by	Partner Director or Manager Committee	Partner Director or Manager Committee	Partner	34%
			Director or Manager	53%
			Committee	41%
Green office - Activities or programs	N/A	Earth Hour	World Environment Day	34%
			Office green teams	0%
			Sustainability Advantage (NSW)	6%
			CitySwitch Green Office	25%
			Other programs not included above (please only include programs that are not covered in the broad categories above - max 20 words)	34%
Environmental Targets	No	No	Yes	69%
			No	19%
			Not reported	13%
Environmental Management System (EMS)	No	No	Yes	25%
			No	50%
			Currently in development	13%

Not reported

13%

User comments and notes

Nil

Climate Change Action

Nil

Question	2018 Response	2019 Response	2019 Benchmark	
Renewable electricity generated onsite	0	0	Lowest:	0
			Highest:	0
			Average:	0
Renewable electricity generated onsite unit	kWh	kWh	kWh	100%
			MJ	0%
			GJ	0%
Carbon offset credits purchased	0	0	Lowest:	0
			Highest:	18,000
			Average:	1,181

User comments and notes

Nil



Carbon emission sources

Scope 1	Tonnes CO2e	Per employee	Per floor area
On-Site Combustion	0.00	0.0000	0.0000
Company Vehicles	0.00	0.0000	0.0000
Refrigerants	1.41	0.0213	0.0006

Scope 2	Tonnes CO2e	Per employee	Per floor area
Purchased Electricity	136.36	2.0661	0.0603

Scope 3	Tonnes CO2e	Per employee	Per floor area
Flights	9.51	0.1441	0.0042
Taxis	2.29	0.0347	0.0010
Hire Cars	0.08	0.0012	0.0000
Personal Vehicles	0.02	0.0003	0.0000

Electricity

Electricity Type	State	Consumption (kWh)
Purchased electricity (General)	NSW	151,513

Natural Gas

Gas Type	State	Consumption (MJ)
No data available.		

Domestic Air Travel

Seat Class	Distance (km)	Number of Flights
Economy	N/A	14
Business	0	N/A

International Air Travel

Seat Class	Distance (km)	Number of Flights
Economy	N/A	6
Business	0	N/A

Seat Class	Distance (km)	Number of Flights
First Class	0	N/A

Car Travel

Vehicle Type	Number of journeys	Distance (km)	Spend (AUD)
Taxi	N/A	N/A	28,625
Hire Cars	N/A	N/A	482
Company Cars	N/A	0	N/A
Personal Cars	N/A	N/A	84

Refrigerant Loss

Fridge Type	Number of Units
Bar Fridges/freezers	1
Standard Fridges/freezers	7
Commercial Fridges/freezers	0
Standalone Air Conditioning Units	5

Inhouse Paper Consumption

Paper size	Paper weight (gsm)	Paper purchased (reams)	Green label	% recycled content
A4	80	2,819	Forestry Stewardship Council (FSC) certified	0
A3	80	33	Forestry Stewardship Council (FSC) certified	0
A4	120	6	Paper category has No Environmental Certifications	0

Paper size	Paper weight (gsm)	Paper purchased (reams)	Green label	% recycled content
A4	250	0	Paper category has No Environmental Certifications	0

Outsourced Paper Consumption

No of impressions (sheets)	% of impressions that are printed double sided
189,326	0

Total Paper Consumption

Type	Paper Consumption (kg)
Ream consumption	7,220.03
Outsourced Printing	944.66
Total paper consumption	8,164.69

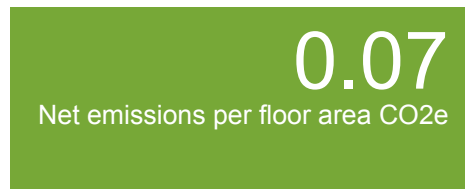
0 % recycled paper purchased	123.71 Total paper consumption per employee	3.61 Total paper consumption per floor area
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Waste

Waste type	Facilities available	Percentage of sites where available
Paper & cardboard recycling	Available	100
Comingles recycling	Available	100
Organic waste treatment/recycling	Available	100
e-Waste reuse or recycling	Available	100

Carbon mitigation activities

Activity	Tonnes CO2e
Emissions Avoided from Green Tariff Electricity	0.00
Voluntary carbon offsetting	0.00



Governance

About Governance Programs

Swaab has introduced a formal policy on sustainability. The five pillars of the firm's sustainability initiative are people, community, environmental, pro bono and supply chain. At Swaab, sustainability is regarded as an integral part of our business management practice. We have a sustainability committee comprised of partners and staff who take responsibility for each pillar of the sustainability initiative. The sustainability committee have been successful this year in establishing a firm-wide response to sustainability. Projects include indigenous internship program, increased community engagement through corporate citizen, developing a paper lite-program, moving to carbon neutral paper, engaging with suppliers regarding CSR as part of our procurement process, recycling drives, setting a formal pro bono budget and strengthening our relationship with Lifeline and Minds Count. We are a signatory to the Law Council's Diversity and Equity Charter. The sustainability committee has been successful in keeping sustainability on the partnership and management's agenda on a regular basis.

Question	2018 Response	2019 Response	2019 Benchmark
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User comments and notes

Nil

Sustainable Supply Chain Management

Question	2018 Response	2019 Response	2019 Benchmark	
Sustainable Supply Chain Management - Program?	Yes	Yes	In development	0%
			Yes	53%
			No	44%
			Not reported	3%
Sustainable Supply Chain Management - Application	To both existing and new suppliers and products	To both existing and new suppliers and products	To new suppliers and products	0%
			To both existing and new suppliers and products	100%
Sustainable Supply Chain Management Coverage	Environmental impacts	Environmental impacts	Human rights	47%
			Environmental impacts	50%
			Fair labour practices	22%
			Fair consumer and competition practices	0%
			Community development	31%
			Indigenous inclusion	34%
Gender equality	41%			

Sustainable development goals	0%
Modern Slavery	0%
Diversity and Inclusion	0%
Fraud bribery & corruption	0%
UN Global compact and SDGs	0%
Other (please specify, max 20 words)	9%

User comments and notes

Nil

Code of Conduct

Question	2018 Response	2019 Response	2019 Benchmark
Code of conduct in place	Yes	Yes	Yes 100%
			No 0%
			Currently in development 0%
			Not reported 0%
Code of conduct - Training?	Yes	Yes	Yes 94%
			No 3%
			Currently in development 3%
			Not reported 0%
Documented complaints and grievance mechanism	Yes	Yes	Yes 97%
			No 3%
			Not reported 0%

User comments and notes

Nil

Risk Management

Question	2018 Response	2019 Response	2019 Benchmark
Risk management plan	Yes	Yes	Yes 100%
			No 0%
			Not reported 0%

Business Continuity Plan (BCP) or Emergency Response Plan (ERP)	Yes	Yes	Yes	90%
			No	3%
			Not reported	0%
			Currently in development	6%

User comments and notes

Nil

Sustainability Reporting

Question	2018 Response	2019 Response	2019 Benchmark	
Sustainability Reporting - Published	No	No	Yes	34%
			No	44%
			In development	9%
			Not reported	13%
Firms' AusLSA reporting - Promotion	Yes	Yes	Yes	44%
			No	31%
			In development	9%
			Not reported	16%

User comments and notes

Nil

Data Validation

Question	2018 Response	2019 Response	2019 Benchmark	
I confirm that data validation has been completed for this section	Yes	Yes	Yes	97%

User comments and notes

Nil