

AUSTRALIAN  
LEGAL SECTOR

ALLIANCE

PROMOTING SUSTAINABILITY

# Australian Legal Sector Alliance Sustainability Insight 2018

## Swaab

### Firm Entry and Benchmarking Summary



## Our Firm

### Swaab

2018

#### 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 14 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	2017 Response	2018 Response	2018 Benchmark	
Firm Name	Swaab Attorneys	Swaab		
Number of Employees	82	76	Lowest:	39
			Highest:	1,884
			Average:	596
Offices Floor Area	2,261	2,261	Lowest:	661
			Highest:	42,903
			Average:	14,012
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 Optum 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. 43% 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	2017 Response	2018 Response	2018 Benchmark
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### User comments and notes

Nil

## Gender Equality

Question	2017 Response	2018 Response	2018 Benchmark
Gender equality - Policy?	Yes	Yes	Yes 90% No 10% Currently in development 0% Not reported 0%
Gender equality policy - Published	No	No	Yes 61% No 39% In development 0% Not reported 0%
Gender equality - Managed	Yes	Yes	Yes 100% No 0% Not reported 0%
Gender equality - Managed by	Partner Director or Manager Committee	Partner Committee Director or Manager	Partner 58% Director or Manager 58% Committee 61%
Gender Equality - Programs	International Women's Day	International Women's Day	International Women's Day 82% Employer of Choice for Gender Equality 58%

			Pay Equity Ambassador	58%
			Male Champion of Change	21%
			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)	55%
Gender Equality - Targets	No	No	Yes	68%
			No	29%
			Not reported	3%
Gender profile - Partners	57% Male	57% Male	Lowest:	0% Male
			Highest:	92% Male
			Average:	70% Male
Gender profile - Legal staff	43% Male	44% Male	Lowest:	0% Male
			Highest:	54% Male

			Average:	41% Male
Gender profile - Non legal staff	12% Male	16% Male	Lowest:	0% Male
			Highest:	48% Male
			Average:	22% Male

**User comments and notes**

Nil

**Flexible Working**

Question	2017 Response	2018 Response	2018 Benchmark	
Flexible working - Policy	Yes	Yes	Yes	100%
			No	0%
			Not reported	0%
Flexible working policy - Published	No	No	Yes	29%
			No	68%
			In development	0%
			Not reported	3%
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	91%
			Part time options	0%
			Job sharing	85%
			Remote working tools and systems	0%
			Support for flexible working	0%
			Time in lieu	85%
			Unpaid leave	94%
			Carer's leave	91%
			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)	52%
Paid parental leave scheme	Yes	Yes	Yes	94%
			No	6%
			Not reported	0%
Parental scheme - Primary and secondary carers	Yes	Yes	Yes	93%
			No	7%
Parental scheme - Aspects	Paid leave for primary care giver	Paid leave for primary care giver	Paid leave for primary care giver	88%
	Paid leave for secondary care giver	Paid leave for secondary care giver	Paid leave for secondary care giver	82%
	Additional leave without pay available	Additional leave without pay available	Additional leave without pay available	88%
Paid parental leave - Primary care giver	NaN	NaN	Lowest:	0
			Highest:	9,999
			Average:	332
Paid parental leave - Secondary care giver	NaN	NaN	Lowest:	0
			Highest:	9,999
			Average:	325
Maternity leave returns	100%	66%	Lowest:	0 %
			Highest:	100 %
			Average:	83 %

**User comments and notes**

Nil

**Diversity and Inclusion**

Question	2017 Response	2018 Response	2018 Benchmark	
Diversity policy	Yes	Yes	Yes	94%
			No	0%
			Partial	6%
			Currently in development	0%
			Not reported	0%

Diversity policy - Published	No	No	Yes	48%
			No	52%
			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	55%
	Director or Manager	Committee	Director or Manager	61%
	Committee	Director or Manager	Committee	67%
Disability accessibility standards?	Yes	Yes	Yes	61%
			No	19%
			Currently in development	16%
			Not reported	3%

**User comments and notes**

Nil

**LGBTQ+ Inclusion**

Question	2017 Response	2018 Response	2018 Benchmark	
LGBTI inclusiveness - Policy	Yes	Yes	Yes	81%
			No	6%
			Not reported	13%
LGBTI inclusiveness policy - Published	No	No	Yes	60%
			No	40%
			In development	0%
			Not reported	0%
LGBTI inclusiveness - Managed	Yes	Yes	Yes	87%
			No	6%
			Not reported	6%
LGBTI inclusiveness - Managed by	Partner	Partner	Partner	52%
	Director or Manager	Committee	Director or Manager	45%
	Committee	Director or Manager	Committee	61%
LGBTI inclusiveness - Activities or programs	Law Council Diversity and Equality Charter	Law Council Diversity and Equality Charter	Membership - Pride in Diversity	58%
			Training - LGBTQ+ awareness	61%
			AWEI survey	48%

IDAHOBIT	52%
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	61%

**User comments and notes**

Nil

**Physical and Psychological Wellbeing**

Question	2017 Response	2018 Response	2018 Benchmark	
Psychological well-being - Policy or strategy	Yes	Yes	Yes	87%
			No	10%
			Not reported	3%
Psychological well-being policy or strategy - Published	No	No	Yes	26%
			No	70%
			In development	4%



			Not reported	0%
Psychological well-being - Managed	Yes	Yes	Yes	84%
			No	10%
			Not reported	6%
Psychological well-being - Managed by	Partner Director or Manager Committee	Partner Committee Director or Manager	Partner	45%
			Director or Manager	61%
			Committee	33%
Psychological wellbeing - Programs or activities	Minds Count -TJMF Guidelines R U OK? program Psychological support/ EAP Mental health first aid training and support	Minds Count -TJMF Guidelines Beyond Blue program R U OK? program Psychological support/ EAP Mental health first aid training and support	Minds Count -TJMF Guidelines	64%
			Beyond Blue program	42%
			R U OK? program	88%
			Black Dog Institute program	36%
			Psychological support/ EAP	85%
			Mental health first aid training and support	76%
			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)	67%
Physical and psychological well-being - Monitoring	Yes	Yes	Yes	58%
			No	23%
			Currently in development	13%
			Not reported	6%
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	21%
			No	75%
			In development	4%
			Not reported	0%
Physical well-being - Managed	Yes	Yes	Yes	90%
			No	6%
			Not reported	3%
Physical well-being - Managed by	Partner	Partner	Partner	36%
	Director or Manager	Committee	Director or Manager	67%
	Committee	Director or Manager	Committee	42%
Physical well-being programs or initiatives	Ergonomics program	Ergonomics program	Ergonomics program	91%
	Flu vaccinations	Flu vaccinations	Proactive health checks	76%
	Subsidised wellness activities and gym membership	Internal exercise sessions	Flu vaccinations	88%
			Free wellness activities such as yoga and subsidised gym membership	85%
			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)	64%

**User comments and notes**

Nil

**Staff Development**

Question	2017 Response	2018 Response	2018 Benchmark	
Staff development program	Yes	Yes	Yes	94%
			No	3%

			In development	0%
			Not reported	3%
Staff development program - Coverage	Partners Lawyers	Partners Lawyers	Partners Lawyers Business Support Staff	88% 88% 85%
Staff development program - Activities and initiatives	Coaching Mentoring Professional skills Internally delivered training programs Attending external training or seminars Substantive Law Personal development Technology training Internal policy training	Coaching Mentoring Professional skills Internally delivered training programs Attending external training or seminars Substantive Law Personal development Technology training Internal policy training	Coaching Mentoring Professional skills Internally delivered training programs Attending external training or seminars Substantive Law Personal development Technology training Internal policy training Other (please specify, max 20 words)	85% 88% 88% 88% 88% 82% 88% 88% 88% 12%
Staff development program - Resourcing	In development	In development	Yes No In development Not reported	97% 0% 3% 0%

**User comments and notes**

Nil

**Data Validation**

Question	2017 Response	2018 Response	2018 Benchmark
I confirm that data validation has been completed for this section	Yes	Yes	Yes 94%

**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	2017 Response	2018 Response	2018 Benchmark
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### User comments and notes

Nil

## Legal Pro Bono

Question	2017 Response	2018 Response	2018 Benchmark	
Pro bono - Strategy	Yes	Yes	Yes	97%
			No	0%
			In development	3%
			Not reported	0%
Pro bono Strategy - published	In development	In development	Yes	48%
			No	39%
			In development	3%
			Not reported	10%
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	45%
			Part-time	41%
			No coordinator or manager	10%

			Not reported	3%
Australian Pro Bono Centre Aspirational Target - Signatory	No	No	Yes No In development Not reported	77% 23% 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	42% 10% 48%

### User comments and notes

Nil

## Non Legal Volunteering

Question	2017 Response	2018 Response	2018 Benchmark	
Support for board positions of organisations for social and environmental good	Yes	Yes	Yes No Not reported	87% 0% 13%
Non legal volunteering - Support	No	No	Yes Currently in development No Not reported	81% 3% 13% 3%
Non-legal volunteering - Activities	NFP Boards	NFP Boards	NFP Boards Organised staff volunteering Paid volunteer time Charity events and appeals Blood donations Student tutoring and mentoring Secondments to NFPs Skilled volunteering program Community volunteering Arts support CPD for community sector lawyers Other programs not included above (please only include programs that are nor	73% 76% 42% 0% 0% 0% 0% 0% 0% 0% 0% 21%

			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	26%
			No	39%
			In development	35%

**User comments and notes**

Nil

**Corporate and Workplace Giving**

Question	2017 Response	2018 Response	2018 Benchmark	
Corporate giving - Program?	Yes	Yes	Yes	94%
			No	3%
			Not reported	3%
Corporate giving - Activities	Firm donation program Matched funding for employee donations	Firm donation program Matched funding for employee donations	Firm donation program	82%
			Charitable foundation	27%
			Workplace giving	3%
			Matched funding for employee donations	58%
			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)	21%
			Host external charity events	0%
Does your firm collect data on levels of staff participation in corporate supported giving programs?	Yes	Yes	Yes	39%
			No	42%
			In development	19%
Corporate sponsored giving - Employee participation	N/A	10	Lowest:	0 %
			Highest:	0 %
			Average:	0 %

**User comments and notes**

Nil

## Indigenous Reconciliation

Question	2017 Response	2018 Response	2018 Benchmark	
Indigenous reconciliation - Policy?	Currently in development	Currently in development	Yes	52%
			No	23%
			Currently in development	23%
			Not reported	3%
Indigenous reconciliation - Managed	Yes	Yes	Yes	79%
			No	0%
			Not reported	4%
			In development	17%
Indigenous reconciliation - Managed by	Partner Director or Manager Committee	Partner Director or Manager Committee	Partner	30%
			Director or Manager	33%
			Committee	48%
Indigenous reconciliation - Activities or programs	Internships and employment	Internships and employment	Reconciliation Action Plan	48%
			Cultural awareness training	52%
			NAIDOC Week	61%
			National Reconciliation Week	48%
			Internships and employment	55%
			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) 33%

**User comments and notes**

Nil

**Data Validation**

Question	2017 Response	2018 Response	2018 Benchmark	
I confirm that data validation has been completed for this section	Yes	Yes	Yes	94%

**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	2017 Response	2018 Response	2018 Benchmark	
Environment -Policy?	Yes	No	Yes	90%
			No	6%
			Currently in development	3%
			Not reported	0%
Environment - Managed	Yes	Yes	Yes	84%
			No	10%
			Not reported	6%
Environment - Managed by	Partner Director or Manager Committee	Partner Director or Manager Committee	Partner	39%
			Director or Manager	45%
			Committee	42%
Green office - Activities or programs	N/A	Earth Hour	World Environment Day	39%
			Office green teams	0%
			Sustainability Advantage (NSW)	6%
			CitySwitch Green Office	27%
			Other programs not included above (please only include programs that are not covered in the broad categories above - max 20 words)	33%
Environmental Targets	No	No	Yes	68%
			No	23%
			Not reported	10%
Environmental Management System (EMS)	No	No	Yes	32%
			No	45%
			Currently in development	10%

Not reported

13%

**User comments and notes**

Nil

**Climate Change Action**

Nil

Question	2017 Response	2018 Response	2018 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:	16,000
			Average:	1,124

**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	0.0185	0.0006

Scope 2	Tonnes CO2e	Per employee	Per floor area
Purchased Electricity	147.43	1.9398	0.0652

Scope 3	Tonnes CO2e	Per employee	Per floor area
Flights	12.91	0.1699	0.0057
Taxis	3.16	0.0416	0.0014
Hire Cars	0.00	0.0000	0.0000
Personal Vehicles	0.01	0.0001	0.0000

## Electricity

Electricity Type	State	Consumption (kWh)
Purchased electricity (General)	NSW	163,807

## Natural Gas

Gas Type	State	Consumption (MJ)
No data available.		

## Domestic Air Travel

Seat Class	Distance (km)	Number of Flights
Economy	N/A	36
Business	N/A	2

## International Air Travel

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

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

## Car Travel

Vehicle Type	Number of journeys	Distance (km)	Spend (AUD)
Taxi	N/A	N/A	39,515
Hire Cars	N/A	N/A	13
Company Cars	N/A	0	N/A
Personal Cars	N/A	N/A	33

## 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	3,350	Other Certifications	0
A3	80	27	Other Certifications	0
A3	80	48	Forestry Stewardship Council (FSC) certified	20
A4	120	1	Paper category has No Environmental Certifications	100
A4	120	1	Paper category has No Environmental Certifications	0

Paper size	Paper weight (gsm)	Paper purchased (reams)	Green label	% recycled content
A4	250	1	Paper category has No Environmental Certifications	0

### Outsourced Paper Consumption

No of impressions (sheets)	% of impressions that are printed double sided
278,575	20

### Total Paper Consumption

Type	Paper Consumption (kg)
Ream consumption	8,745.58
Outsourced Printing	1,250.98
Total paper consumption	9,996.56

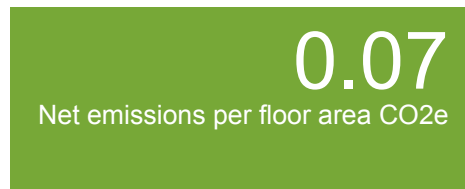
<b>0.52</b> % recycled paper purchased	<b>131.53</b> Total paper consumption per employee	<b>4.42</b> Total paper consumption per floor area
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### Waste

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	2017 Response	2018 Response	2018 Benchmark
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### User comments and notes

Nil

## Sustainable Supply Chain Management

Question	2017 Response	2018 Response	2018 Benchmark	
Sustainable Supply Chain Management - Program?	Yes	Yes	In development	0%
			Yes	48%
			No	42%
			Not reported	10%
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	36%
			Environmental impacts	45%
			Fair labour practices	18%
			Fair consumer and competition practices	0%
			Community development	27%
			Indigenous inclusion	27%
Gender equality	33%			

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)	6%

#### User comments and notes

Nil

### Code of Conduct

Question	2017 Response	2018 Response	2018 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	90%
			No	6%
			Currently in development	3%
			Not reported	0%
Documented complaints and grievance mechanism	Yes	Yes	Yes	100%
			No	0%
			Not reported	0%

#### User comments and notes

Nil

### Risk Management

Question	2017 Response	2018 Response	2018 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	97%
			No	0%
			Not reported	0%
			Currently in development	3%

**User comments and notes**

Nil

**Sustainability Reporting**

Question	2017 Response	2018 Response	2018 Benchmark	
Sustainability Reporting - Published	No	No	Yes	32%
			No	48%
			In development	6%
			Not reported	13%
Firms' AusLSA reporting - Promotion	Yes	Yes	Yes	39%
			No	42%
			In development	10%
			Not reported	10%

**User comments and notes**

Nil

**Data Validation**

Question	2017 Response	2018 Response	2018 Benchmark	
I confirm that data validation has been completed for this section	Yes	Yes	Yes	94%

**User comments and notes**

Nil