Australian Legal Sector Alliance
Sustainability Insight
2020

Swaab
Firm Entry and Benchmarking Summary

Our Firm

Swaab   2020

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	2019 Response	2020 Response	2020 Benchmark	
Firm Name	Swaab	Swaab		
Number of Employees	66	64	Lowest: Highest: Average:	64 2,290 659
Offices Floor Area	2,261	2,261	Lowest: Highest: Average:	1,393 41,258 14,080
Number of Offices	1	1		
Supporting files uploaded	N/A			

Person responsible for reporting

Name: Paul Barbour

Title: Head of IT & Business Operations

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 as well as a wellness program that focuses on mental health and well-being. We have also implemented Well being Champions along side our Wellness Committee 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	2019 Response	2020 Response	2020 Benchmark

User comments and notes

Nil

Gender Equality

Question	2019 Response	2020 Response	2020 Benchmark	
Gender equality - Policy?	Yes	Yes	Yes	91%
			No	9%
			Currently in development	0%
			Not reported	0%
Gender equality policy - Published	No	No	Yes	73%
			No	27%
			In development	0%
			Not reported	0%
Gender equality - Managed	Yes	Yes	Yes	97%
			No	0%
			Not reported	3%
Gender equality - Managed by	Partner	Partner	Partner	61%
	Committee	Committee	Director or Manager	70%
	Director or Manager	Director or Manager	Committee	67%
Gender Equality - Programs	International Women's Day	International Women's Day	International Women's Day	100%

			Employer of Choice for Gender Equality	61%
			Pay Equity Ambassador	55%
			Male Champion of Change	15%
			Board Links Champion	3%
			LCA Diversity and Inclusion Charter	33%
			Equitable briefing pledge (e.g. CommBar/LCA)	24%
			Host or lead external programs and/or forums	55%
			Female advancement, mentoring and coaching	48%
			Training - Gender awareness unconscious bias	64%
			Gender sensitive promotion and recruitment	36%
			Internal D&I networks or committees	58%
			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 nor covered in the broad categories above - max 20 words	67%
Gender Equality - Targets	No	No	Yes	73%
			No	24%
			Not reported	3%
Gender profile - Partners	47% Male	50% Male	Lowest:	50% Male
			Highest:	91% Male
			Average:	70% Male

Gender profile - Legal staff	32% Male	38% Male	Lowest:	31% Male
			Highest:	55% Male
			Average:	41% Male
Gender profile - Non legal staff	14% Male	16% Male	Lowest:	9% Male
			Highest:	47% Male
			Average:	22% Male

User comments and notes

Nil

Flexible Working

Question	2019 Response	2020 Response	2020 Benchmark	
Flexible working - Policy	Yes	Yes	Yes	100%
			No	0%
			Not reported	0%
Flexible working policy - Published	No	No	Yes	36%
			No	64%
			In development	0%
			Not reported	0%
Flexible working - Programs and initiatives	Flexible work hours	Flexible work hours	Flexible work hours	100%
	Time in lieu	Remote working tools and systems	Part time options	73%
	Unpaid leave	Time in lieu	Job sharing	97%
	Carer's leave	Unpaid leave	Remote working tools and systems	91%
		Carer's leave	Support for flexible working	42%
		Purchased leave	Time in lieu	97%
		Phased retirement	Unpaid leave	100%
			Carer's leave	97%
			Study leave	88%
			Volunteering leave	55%
			Religious and ceremonial leave	45%
			Purchased leave	82%
			Career breaks	70%
			Subsidised child care	30%
			Phased retirement	33%
			Adjusted KPIs after absences	39%
			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 nor covered in the broad categories above - max 20 words	55%
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:	3
Maternity leave returns	100%	0%	Lowest:	0 %
			Highest:	100 %
			Average:	90 %

User comments and notes

Nil

Diversity and Inclusion

Question	2019 Response	2020 Response	2020 Benchmark	
Diversity policy	Yes	Yes	Yes	97%
			No	0%
			Partial	3%

			Currently in development	0%
			Not reported	0%
Diversity policy - Published	No	No	Yes	56%
			No	44%
			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	58%
	Committee	Committee	Director or Manager	73%
	Director or Manager	Director or Manager	Committee	76%
Disability accessibility standards?	Yes	Yes	Yes	70%
			No	15%
			Currently in development	9%
			Not reported	6%

User comments and notes

Nil

LGBTQ+ Inclusion

Question	2019 Response	2020 Response	2020 Benchmark	
LGBTI inclusiveness - Policy	Yes	Yes	Yes	91%
			No	0%
			Not reported	9%
LGBTI inclusiveness policy - Published	No	No	Yes	50%
			No	47%
			In development	3%
			Not reported	0%
LGBTI inclusiveness - Managed	Yes	Yes	Yes	88%
			No	6%
			Not reported	6%
LGBTI inclusiveness - Managed by	Partner	Partner	Partner	52%
	Committee	Committee	Director or Manager	58%
	Director or Manager	Director or Manager	Committee	70%
LGBTI inclusiveness - Activities or programs	Law Council Diversity and Equality Charter	Law Council Diversity and Equality Charter	Membership - Pride in Diversity	52%

Training - LGBTQ+ awareness	70%
AWEI survey	42%
IDAHOBIT	64%
Wear it Purple Day	76%
World Aids Day	30%
Membership - Out for Australia	18%
Internal LGBTQ + networks or committees	52%
Pro bono support	27%
LCA Diversity and Inclusion Charter	24%
External LGBTQ+ programs hosting	33%
Training - LGBTQ+ awareness	61%
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 nor covered in the broad categories above - max 20 words	58%

User comments and notes

Nil

Physical and Psychological Wellbeing

Question	2019 Response	2020 Response	2020 Benchmark	
Psychological well-being - Policy or strategy	Yes	Yes	Yes	94%
			No	3%
			Not reported	3%

Psychological well-being policy or strategy - Published	No	No	Yes	35%
			No	61%
			In development	0%
			Not reported	3%
Psychological well-being - Managed	Yes	Yes	Yes	91%
			No	3%
			Not reported	6%
Psychological well-being - Managed by	Partner	Partner	Partner	42%
	Committee	Committee	Director or Manager	79%
	Director or Manager	Director or Manager	Committee	48%
Psychological wellbeing - Programs or activities	Minds Count -TJMF Guidelines	Minds Count -TJMF Guidelines	Minds Count -TJMF Guidelines	64%
	Beyond Blue program	Beyond Blue program	Beyond Blue program	33%
	R U OK? program	R U OK? program	R U OK? program	100%
	Black Dog Institute program	Black Dog Institute program	Black Dog Institute program	39%
	Psychological support/ EAP	Psychological support/ EAP	Psychological support/ EAP	100%
	Mental health first aid training and support	Mental health first aid training and support	Mental health first aid training and support	91%
		Mental Health Awareness Week	Mental Health Awareness Week	52%
		Salary continuance	Resilience at Law	30%
		Mental health office champion	Training - Mental health awareness and management	52%
			Salary continuance	55%
			External mental health programs hosting	27%
			Domestic violence strategy	6%
			Mental health office champion	39%
			Other programs not included above (please only include programs that are nor covered in the broad categories above - max 20 words	76%
Physical and psychological well-being - Monitoring	Yes	Yes	Yes	73%
			No	15%
			Currently in development	6%
			Not reported	6%
Physical health and well-being - Policy or strategy?	Yes	Yes	Yes	88%
			No	9%

			Not reported	3%
Physical health and well-being policy or strategy - Published	No	No	Yes	34%
			No	66%
			In development	0%
			Not reported	0%
Physical well-being - Managed	Yes	Yes	Yes	88%
			No	9%
			Not reported	3%
Physical well-being - Managed by	Partner	Partner	Partner	42%
	Committee	Committee	Director or Manager	70%
	Director or Manager	Director or Manager	Committee	55%
Physical well-being programs or initiatives	Ergonomics program	Ergonomics program	Ergonomics program	100%
	Flu vaccinations	Flu vaccinations	Proactive health checks	73%
	Internal exercise sessions	Internal exercise sessions	Flu vaccinations	100%
	Free wellness activities such as yoga and subsidised gym membership	Team events	Internal exercise sessions	91%
		Onsite fruit and healthy catering	Gym memberships	36%
		Free wellness activities such as yoga and subsidised gym membership	Team events	70%
			Massages	39%
			Wellness awareness and promotion	79%
			Subsidised health insurance	52%
			Onsite fruit and healthy catering	82%
			Life & TPD insurance	0%
			Ergonomics program - offsite	0%
			Health EAP	0%
			Other programs not included above (please only include programs that are nor covered in the broad categories above - max 20 words)	61%

User comments and notes

Nil

Staff Development

Question	2019 Response	2020 Response	2020 Benchmark	
Staff development program	Yes	Yes	Yes	97%

		No	0%
		In development	3%
		Not reported	0%
Staff development program - Coverage	Partners	Partners	Partners	94%
	Lawyers	Lawyers	Lawyers	94%
	Business Support Staff	Business Support Staff	Business Support Staff	94%
Staff development program - Activities and initiatives	Coaching	Coaching	Coaching	94%
	Mentoring	Mentoring	Mentoring	94%
	Professional skills	Professional skills	Professional skills	94%
	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	94%
	Technology training	Technology training	Technology training	97%
	Internal policy training	Internal policy training	Internal policy training	97%
			Other (please specify, max 20 words)	18%
Staff development program - Resourcing	Yes	Yes	Yes	100%
			No	0%
			In development	0%
			Not reported	0%

User comments and notes

Nil

Data Validation

Question	2019 Response	2020 Response	2020 Benchmark	
I confirm that data validation has been completed for this section	Yes	Yes	Yes	100%

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	2019 Response	2020 Response	2020 Benchmark

User comments and notes

Nil

Legal Pro Bono

Question	2019 Response	2020 Response	2020 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	44%
			No	44%
			In development	6%
			Not reported	6%
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	48%
			Part-time	42%
			No coordinator or manager	3%

			Not reported	6%
Australian Pro Bono Centre Aspirational Target - Signatory	No	No	Yes	79%
			No	21%
			In development	0%
			Not reported	0%
Australian Pro Bono Centre Aspirational Target - Plan	No date currently set	No date currently set	Target currently met	42%
			Goal date has been set	21%
			No date currently set	36%

User comments and notes

Nil

Non Legal Volunteering

Question	2019 Response	2020 Response	2020 Benchmark	
Support for board positions of organisations for social and environmental good	Yes	Yes	Yes	91%
			No	0%
			Not reported	9%
Non legal volunteering - Support	No	No	Yes	79%
			Currently in development	9%
			No	9%
			Not reported	3%
Non-legal volunteering - Activities	NFP Boards	NFP Boards	NFP Boards	85%
			Organised staff volunteering	85%
			Paid volunteer time	52%
			Charity events and appeals	67%
			Blood donations	45%
			Student tutoring and mentoring	48%
			Secondments to NFPs	24%
			Skilled volunteering program	30%
			Community volunteering	48%
			Arts support	0%
			CPD for community sector lawyers	0%
			Other programs not included above (please only include programs that are nor	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	21%
			No	36%
			In development	42%

User comments and notes

Nil

Corporate and Workplace Giving

Question	2019 Response	2020 Response	2020 Benchmark	
Corporate giving - Program?	Yes	Yes	Yes	94%
			No	6%
			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	91%
			Charitable foundation	33%
			Workplace giving	67%
			Matched funding for employee donations	70%
			Internal appeals and collections	76%
			External charity events and appeals	48%
			Other programs not included above (please only include programs that are nor covered in the broad categories above - max 20 words	27%
			Host external charity events	15%
Does your firm collect data on levels of staff participation in corporate supported giving programs?	Yes	Yes	Yes	39%
			No	33%
			In development	27%
Corporate sponsored giving - Employee participation	5%	10%	Lowest:	5 %
			Highest:	90 %
			Average:	33 %

User comments and notes

Nil

Indigenous Reconciliation

Question	2019 Response	2020 Response	2020 Benchmark	
Indigenous reconciliation - Policy?	Currently in development	Currently in development	Yes	58%
			No	15%
			Currently in development	24%
			Not reported	3%
Indigenous reconciliation - Managed	Yes	Yes	Yes	79%
			No	4%
			Not reported	4%
			In development	14%
Indigenous reconciliation - Managed by	Partner	Partner	Partner	48%
	Director or Manager	Director or Manager	Director or Manager	45%
	Committee	Committee	Committee	64%
Indigenous reconciliation - Activities or programs	Internships and employment	Internships and employment	Reconciliation Action Plan	64%
			Cultural awareness training	70%
			NAIDOC Week	73%
			National Reconciliation Week	61%
			Internships and employment	67%
			Scholarships and student mentoring	30%
			Indigenous employment and internship programs	33%
			Affirmative ATSI procurement	33%
			Pro bono support	55%
			Volunteering and secondments	27%
			Collaboration for reconciliation	21%
			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 nor covered in the broad categories above - max 20 words		39%

User comments and notes

Nil

Data Validation

Question	2019 Response	2020 Response	2020 Benchmark	
I confirm that data validation has been completed for this section	Yes	Yes	Yes	100%

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	2019 Response	2020 Response	2020 Benchmark	
Environment -Policy?	No	No	Yes	79%
			No	3%
			Currently in development	18%
			Not reported	0%
Environment - Managed	Yes	Yes	Yes	85%
			No	12%
			Not reported	3%
Environment - Managed by	Partner	Partner	Partner	42%
	Director or Manager	Director or Manager	Director or Manager	55%
	Committee	Committee	Committee	45%
Green office - Activities or programs	N/A	Earth Hour	World Environment Day	45%
			Office green teams	0%
			Sustainability Advantage (NSW)	6%
			CitySwitch Green Office	33%
			Other programs not included above (please only include programs that are nor covered in the broad categories above - max 20 words	30%
Environmental Targets	No	No	Yes	70%
			No	18%
			Not reported	12%
Environmental Management System (EMS)	No	No	Yes	27%
			No	45%
			Currently in development	18%

	Not reported	9%

User comments and notes

Nil

Climate Change Action

Nil

Question	2019 Response	2020 Response	2020 Benchmark	
Renewable electricity generated onsite	0	0	Lowest:	0
			Highest:	6
			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:	1,268

User comments and notes

Nil

122.93	1.92	0.05
Gross total emissions CO2e	Gross emissions per employee CO2e	Gross emissions per floor area CO2e

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	0.34	0.0054	0.0002

Scope 2	Tonnes CO2e	Per employee	Per floor area
Purchased Electricity	107.55	1.6804	0.0476

Scope 3	Tonnes CO2e	Per employee	Per floor area
Flights	13.50	0.2109	0.0060
Taxis	1.48	0.0232	0.0007
Hire Cars	0.06	0.0009	0.0000
Personal Vehicles	0.00	0.0000	0.0000

Electricity

Electricity Type	State	Consumption (kWh)
Purchased electricity (General)	NSW	119,496

Natural Gas

Gas Type	State	Consumption (MJ)

No data available.

Domestic Air Travel

Seat Class	Distance (km)	Number of Flights
Economy	N/A	10
Business	0	N/A

International Air Travel

Seat Class	Distance (km)	Number of Flights
Economy	N/A	4
Business	N/A	2

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	18,521
Hire Cars	N/A	N/A	376
Company Cars	N/A	0	N/A
Personal Cars	N/A	N/A	0

Refrigerant Loss

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

Inhouse Paper Consumption

Paper size	Paper weight (gsm)	Paper purchased (reams)	Green label	% recycled content
A4	80	1,838	Forestry Stewardship Council (FSC) certified	0
A3	80	42	Forestry Stewardship Council (FSC) certified	0
A4	118	1	Paper category has No Environmental Certifications	0

Outsourced Paper Consumption

No of impressions (sheets)	% of impressions that are printed double sided
97,163	0

Total Paper Consumption

Type	Paper Consumption (kg)
Ream consumption	4,798.69
Outsourced Printing	484.80
Total paper consumption	5,283.49

0	82.55	2.34
% recycled paper purchased	Total paper consumption per employee	Total paper consumption per floor area

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	97

Carbon mitigation activities

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

122.93	1.92	0.05
Net total emissions CO2e	Net total emissions per employee CO2e	Net emissions per floor area CO2e

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	2019 Response	2020 Response	2020 Benchmark

User comments and notes

Nil

Sustainable Supply Chain Management

Question	2019 Response	2020 Response	2020 Benchmark	
Sustainable Supply Chain Management - Program?	Yes	No	In development	0%
			Yes	58%
			No	39%
			Not reported	3%
Does your firm have a formal program to manage the risks of Modern Slavery in our procurement?	N/A	No	In development	50%
			Yes	31%
			No	19%
Does your firm plan to provide modern slavery statement under the Federal legislation?	N/A		Yes	0%
			No	0%
			In development	0%
			Not Reported	0%

User comments and notes

Nil

Code of Conduct

Question	2019 Response	2020 Response	2020 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	97%
			No	3%
			Currently in development	0%
			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	2019 Response	2020 Response	2020 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	2019 Response	2020 Response	2020 Benchmark	
Sustainability Reporting - Published	No	No	Yes	36%
			No	42%
			In development	12%
			Not reported	9%

Firms' AusLSA reporting - Promotion	Yes	Yes	Yes	52%
			No	27%
			In development	9%
			Not reported	12%

User comments and notes

Nil

Data Validation

Question	2019 Response	2020 Response	2020 Benchmark	
I confirm that data validation has been completed for this section	Yes	Yes	Yes	100%

User comments and notes

Nil