



Australian Government
Attorney-General's Department

COST RECOVERY IMPLEMENTATION STATEMENT

AusCheck Background Checking Activity

2015-16

Cost recovery involves charging some or all of the efficient costs of specific government activities undertaken on behalf of the Australian Government to individuals or non-government organisations that receive them. Australian Government entities should minimise cost recovery charges through the efficient implementation of cost recovered activities, while achieving policy objectives and legislative functions of the Australian Government. The Australian Government Cost Recovery Guidelines are available on the Department of Finance website at www.finance.gov.au

1. INTRODUCTION

AusCheck provides fast, fair and reliable background checking services that advance national interests by reducing criminal threats and enhancing national security. Through the provision of background checking services to the aviation, maritime and health sectors, AusCheck reduces the risk of ineligible persons gaining access to secure facilities. By maintaining a database of all persons who have applied for a background check, AusCheck is well placed to support industry in managing their security card holdings. In accordance with the Australian Government Cost Recovery Guidelines, AusCheck recovers the full cost of efficiently delivering background checking activities thereby ensuring users pay for services received.

1.1 Purpose of this Cost Recovery Implementation Statement

This Cost Recovery Implementation Statement (CRIS) documents how AusCheck has implemented its cost recovery arrangements. This CRIS also reports financial and non-financial performance information for background checking activities including financial forecasts for the current financial year and three forward years. The AusCheck CRIS is periodically updated to accurately reflect the cost of delivering background checking activities. AusCheck will maintain this CRIS until the activities or their cost recovery is discontinued.

1.2 AusCheck service standards

The AusCheck Service Charter (the Charter) is published on the publicly available AusCheck website (<http://www.ag.gov.au/CrimeAndCorruption/AusCheck>). The Charter describes the standards AusCheck will apply when undertaking and delivering background checking activities. That Charter also describes the service experience that can be expected when dealing with AusCheck.

Our mission

To provide fast, fair and reliable background checking services to enhance national security and to advance national interests.

Our vision

To deliver excellence in national background checking services.

Our values

Our shared commitment to AusCheck's vision to enhance national security includes values of:

- customer service orientation

- reliable, efficient and consistent service and advice
- best practice business processes
- ongoing process and service delivery improvement through regular evaluation
- cost-effective service for industry
- protection of personal information in accordance with the *Privacy Act 1988*
- dedication to timely, quality service both internally and externally
- active participation with government and industry in policy setting and implementation
- integrity and professionalism
- respect and courtesy
- fairness and consistency
- teamwork.

1.3 Description of the Activity

AusCheck will cost recover for the delivery of one activity – background checks for the Aviation Security Identification Card (ASIC), Maritime Security Identification Card (MSIC) and National Health Security (NHS) schemes. This activity can encompass one of the following check types:

- NHS background check – application without Department of Immigration and Border Protection (DIBP) check (valid for two years)
- ASIC and MSIC background check – application without DIBP check (valid for two years)
- ASIC and MSIC background check – application with DIBP check (valid for two years)
- MSIC background check – application with a follow-up check, without DIBP check (valid for four years)
- MSIC background check – application with a follow-up check, with DIBP check (valid for four years).

While there are a range of policy, legislative and administrative differences between the ASIC, MSIC and NHS schemes, the nature of the background checking activity undertaken by AusCheck is similar for each check type. The business processes that comprise the activity for which AusCheck cost recovers are specified in Section 3.1 of this document.

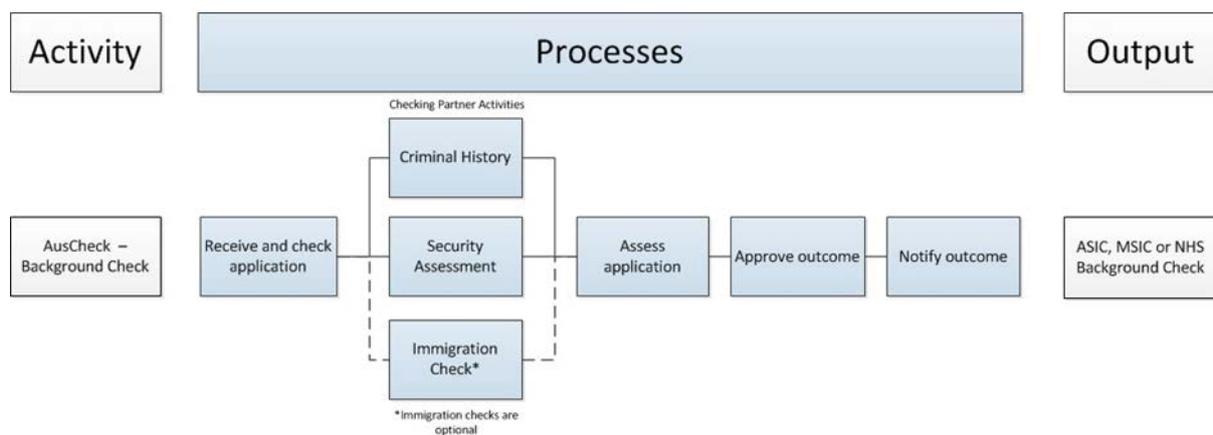
Applications for background checks must be made by an individual to an 'Issuing Body' (for the ASIC and MSIC schemes), or an 'Entity' (for the NHS scheme). The Issuing Body or Entity then makes an application to AusCheck for a background check in relation to that individual.

Issuing Bodies and Entities can be private or government organisations. Authority to be an ASIC Issuing Body is governed by Division 6.3 of the Aviation Transport Security Regulations 2005. Authority to be an MSIC Issuing Body is governed by Division 6.1A of the Maritime Transport and Offshore Facilities Security Regulations 2003. Authority to be an NHS scheme Entity is governed by Part 3 of the *National Health Security Act 2007*.

Issuing Bodies and Entities purchase a background check for a fee from AusCheck. AusCheck coordinates the background check of an individual on receipt of a completed application from an Issuing Body or Entity. When the background check is complete, AusCheck provides advice to the Issuing Body or Entity on the individual’s eligibility to be issued with an ASIC, an MSIC or a NHS scheme authorisation.

The below diagram details AusCheck’s activity, output and associated business processes. Each background check performed by AusCheck is undertaken in the same way, whether this is a check with a two year or four year validity.

Diagram 1: AusCheck Background Check Activity – Breakdown of outputs and business processes



2. POLICY AND STATUTORY AUTHORITY TO COST RECOVER

2.1 Government policy approval to cost recover the activity

In December 2005, the Australian Government agreed to the establishment of a centralised government background checking coordination unit to commence operations from 1 July 2007. The AusCheck Bill 2006 Explanatory Memorandum articulates the authority for AusCheck to recover costs for conducting background checks.

2.2 Statutory authority to impose cost recovery charges

Subsection 18(2) of the *AusCheck Act 2007* provides for charging and recovery of fees and other charges related to the delivery of background checking services. Regulation 11 of the *AusCheck Regulations 2007* authorises the Secretary of the Attorney General's Department to impose a fee for a background check by AusCheck. That regulation provides that the amount of the fee must be based on the nature and the complexity of the background check. Since its establishment in 2007, AusCheck has performed national security background checks for the ASIC and MSIC schemes.

In July 2010, AusCheck commenced a national background checking activity for the NHS scheme on behalf of the Department of Health as part of the Security Sensitive Biological Agents (SSBA) regulatory scheme. Amendments to the *AusCheck Act 2007* and *National Health Security Act 2007* resulted in updates to the SSBA Standards in early 2010. Those amendments prescribe the requirement for individuals involved with Tier 1 SSBA's to undergo a background check coordinated by AusCheck.

Together these provisions provide the legal authority for AusCheck to recover the cost of delivering background checking activities.

3. COST RECOVERY MODEL

3.1 Costs of outputs and business processes of the activity

AusCheck incurs a range of costs related to coordinating and delivering background checking services. This section provides further detail on the types of costs.

3.1.1 Types of Costs

The costs of coordinating background checks across the background checking activity consist of a combination of Direct and Indirect costs.

- Direct costs are those directly attributed to conducting a background check. This includes operational, business development, supplier and variable costs.
- Indirect (also known as overhead) costs are the ongoing business expenses incurred by AusCheck. These include overhead, capital, rent and outgoings costs.

More detailed descriptions of AusCheck's Direct and Indirect costs are included in Table 1.

Table 1: Types of Costs (Direct and Indirect)

Type of cost	Key business processes	Cost driven by
Direct (Operational) Costs	Receipt of background checking applications and forwarding relevant details to checking partners ¹ .	AusCheck
	Assessing a person's criminal history information against the legislative criteria (specified offences and penalties) that determine whether a person is eligible to hold an ASIC, MSIC or NHS check.	
	Managing the processes that lead to a final finding in relation to the background check including affording procedural fairness to the individual before making a decision on the basis of criminal history.	
	Notifying the final outcome of background checks.	
	Maintaining a database of information relating to background checks, including applications and outcomes, and managing appropriate disclosure of that information. Assisting Issuing Bodies with access to and information about the AusCheck IT system.	
	Legal costs of handling appeals against AusCheck's decisions in the Administrative Appeals Tribunal and other legal and policy advice sought on the operation of the background checking schemes ² .	
	Informing and assisting the resolution of complaints (both formal and informal).	
	Subsequent or manual background checks that are required through Self-Reporting of criminal convictions or other periodic background checking requirements.	
	Maintaining an on-line verification service to enable checks of currency of ASICs and MSICs.	
Direct (Business Development) Costs	Informing and developing policy concerning existing background checking schemes and possible future background checking schemes. Making regulatory and legislative changes as necessary.	AusCheck
	Legal fees in support of AusCheck activities, including fees payable to non-government or government legal services for legal advice related to regulatory amendments to the	

¹ AusCheck's checking partners for the purposes of a background check are CrimTrac, Australian Security Intelligence Organisation (ASIO) and Department of Immigration and Border Protection. The prices that checking partners charge AusCheck for their services are treated as supplier inputs.

² On average over the last three years these costs have represented less than 0.01% of the overall cost of a background check.

Type of cost	Key business processes	Cost driven by
	schemes. Travel and training in support of Issuing Bodies and attending meetings to discuss changes to schemes which directly relate to AusCheck.	
Direct (Supplier) Costs	Fees charged to AusCheck by checking partners for providing the specific checking service input.	Checking Partners
Direct (Variable) Costs	Conducting follow-up checks due to criminal convictions for serious offences that may affect an applicant's or cardholder's eligibility.	AusCheck
Indirect (Overhead) Costs	Cross-departmental and cross-portfolio project management and coordination of risk management, fraud control and business continuity arrangements.	Attorney-General's Department
	Financial information reporting, financial planning and record-keeping.	
	Executive management associated costs for the Attorney-General's Department of which AusCheck is a part.	
Indirect (Overhead) Costs	Costs associated with AusCheck audit compliance including Australian National Audit Office activities and CrimTrac audits of AusCheck's usage of criminal history.	AusCheck
	Participation in meetings where AusCheck's input concerning background checking arrangements is relevant and valuable.	
	Freedom of Information (FOI) requests required research and processing ³ .	
Indirect (Rent and Outgoings Fixed) Costs	Accommodation, building maintenance and access, environmental services.	AusCheck
	Mail delivery and collection, reception services.	

3.1.2 AusCheck Activity Costs

The below table reflects as closely as possible the different types of costs that contribute to the overall cost of delivering the background checking activity. The costs are broken into Direct and Indirect. Direct incorporates AusCheck labour, business, checking partner and IT costs. The Indirect includes Departmental overheads, IT costs and rent and outgoings. These costs are based on the volume and demand assumptions set out in Table 4 and their total represents the overall cost of delivering the background checking activity.

³ These costs cover AusCheck's time for research and processing. FOI application fees and charges are covered by the Attorney-General's Department.

Table 2: Activity Costs

Costs	2015-16 (1 July to 30 June)	2014-15 (1 July to 30 June)
Direct		
– <i>AusCheck Costs</i> ⁴		
○ <i>AusCheck Labour costs</i>	\$2,528,528	\$2,459,407
– <i>AusCheck Business Development Costs</i>		
○ <i>Legal Fees</i>	\$100,000	\$101,141
○ <i>Travel and Training</i> ⁵	\$233,403	\$92,403
– <i>Checking Partner Charges</i> ⁶		
○ <i>CrimTrac Charges</i>	\$3,712,403	\$2,987,053
○ <i>ASIO Charges</i>	\$4,842,265	\$3,896,156
○ <i>DIBP Charges (where applicable)</i>	\$55,529	\$43,612
– <i>IT Costs</i>		
○ <i>Maintenance and Support</i>	\$758,945	\$725,668
○ <i>Development</i> ⁷	\$668,266	\$963,000
Indirect		
– <i>Attorney-General’s Department’s Costs</i>	\$977,656	\$949,371
– <i>IT Costs</i>		
○ <i>Depreciation</i>	\$179,872	\$595,132
– <i>Rent and outgoings</i>		
○ <i>Rent</i>	\$258,960	\$249,000
○ <i>Office and Administration Expenses</i>	\$16,442	\$16,442
Total Activity Cost per Year (excl DIBP) ⁸	\$14,276,740	\$13,034,773

3.1.3 Checking Partner Charges

Checking partner charges include services provided by CrimTrac for criminal history checks, the Australian Security Intelligence Organisation (ASIO) for security assessments and the Department of Immigration and Border Protection (DIBP) for right to work checks. These charges are detailed in Table 3.

⁴ Labour costs will be higher during 2015-16 to cater for the expected increase in background check applications.

⁵ Travel and training – now provides for workshop forums with issuing bodies.

⁶ Checking Partner charges – have increased to cater for the expected increase in background check applications.

⁷ IT development – includes costs associated with supporting the AusCheck system replacement project – see section 7: Financial Performance for further information.

⁸ DIBP charges have been excluded from the total as they are attributable to some checks only (i.e. where an immigration check is requested as part of a background check)

Table 3: Checking Partner Charges

Australian Government Entity	From 1 July 2015
CrimTrac	\$23.00 per check Any change in CrimTrac charge imposed will be directly reflected in AusCheck fees.
ASIO	\$30.00 per check Any change in the ASIO charge imposed will be directly reflected in AusCheck fees.
DIBP	\$7.85 per check Any change in the DIBP charge imposed will be directly reflected in AusCheck fee. This charge is levied on a per usage basis (i.e. in addition to the standard AusCheck application fee). Issuing Bodies continue to have the option of obtaining the same information from the DIBP Visa Entitlement Verification Online (VEVO) service which is provided by DIBP free of charge.

3.1.4 Fee Changes

AusCheck uses the past four years historical data to project expected background check numbers. These numbers along with input from industry form the basis for calculating the background check fee. AusCheck monitors actual background check lodgement against CRIS projections ensuring shifts in demand would be identified quickly.

There are three key circumstances which may result in AusCheck changing its fees during the 2015-16 financial years. The first being where the Australian Government makes major regulatory changes to an existing background checking scheme. The second being where one of AusCheck’s checking partners (CrimTrac, ASIO, DIBP) changes the charges they impose on AusCheck, this change to charges would be passed on (AusCheck’s checking partner agreements request at least three months’ notice of fee changes). Finally, a significant change in the demand for AusCheck’s background checking services may result in a fee adjustment.

In the unlikely circumstance that a fee increase or decrease was required during a CRIS cycle, AusCheck will endeavour to consult with affected industry participants early in the change process.

3.2 Volume and Demand Assumptions

The projections for new and renewed background checking applications in this CRIS period are forecast based on AusCheck's historical data (past four years). Industry was also consulted about

their expectations of how many ASIC, MSIC and NHS scheme applications would be lodged during 2015-16. Based on this information, an increase of 7.8 per cent representing overall growth in demand for all background checks is projected for 2015-16. AusCheck's projections for the number and type of background checks are presented in Table 4.

AusCheck continues to track a seasonal trend in background check lodgement. This trend results in a higher number of checks being lodged every second year due to the ASIC and MSIC two yearly renewal cycle. As indicated in Table 4, AusCheck's demand projections indicate a high number of checks will be lodged during 2015-16 in line with renewal cycles. This trend was taken into account by AusCheck when developing projections and determining costs for 2015-16.

Table 4: Expected Demand

Background Checking Scheme	2014-15 (1 July 2014 to 30 June 2015)	2015-16 (1 July 2015 to 30 June 2016)	2016-17 (1 July 2016 to 30 June 2017)
Aviation Security Identification Card (ASIC)	76,632	99,502	81,169
Maritime Security Identification Card (MSIC)	53,040	61,658	59,743
National Health Security (NHS) Check	200	248	223
Total Expected Demand	129,872	161,408	141,135

3.2.1 Changes in demand

Changes to demand affect the fees for AusCheck's activities. If demand decreases significantly fees may increase as all costs other than checking partner costs will be borne across a smaller number of checks. Conversely, if demand increases significantly fees may decrease.

AusCheck has in place periodic monitoring arrangements to track application lodgement. This monitoring ensures actual check numbers are tracked against expected demand. AusCheck also periodically monitors expenditure to ensure this correlates with the expenditure projected in this CRIS.

3.3 Summary of AusCheck Fee Structure

AusCheck uses the cost estimates described in Table 2 and the demand assumptions described in Table 4 to determine background check fees. Table 5 provides a summary of the fees for the background checking activity that AusCheck provides. The application fee for ASICs, NHS checks and two year MSICs are the same. These applications involve the same business processes.

The four year MSIC costs are the same as those involved in two x two year MSICs, however, the four year card involves an additional administration cost of \$3.00 over the four years. This additional cost covers related IT system development (capital investment), financial support requirements and application follow-up unique to this check type.

Applications that require a DIBP check as part of the background checking process incur an additional charge of \$7.85. This charge will be applied to the relevant application type outlined in table 5.

Table 5: AusCheck fees for 2015-16

Output Name	Type of cost recovery charge⁹	Amount
NHS Background Check (two years)	Fee	\$92.50
ASIC and MSIC Background Check (two years)	Fee	\$92.50
MSIC Background Check (four years)	Fee	\$188.00

4. RISK ASSESSMENT

AusCheck is responsible for appropriately managing risks that relate to the background checking process. AusCheck has a number of processes in place to mitigate risk, which includes:

- a robust business continuity plan that ensures AusCheck can operate in the event of an emergency or unforeseen outage
- a comprehensive IT maintenance agreement that ensures continuity of service and limited system downtime
- regular IT threat and risk assessment including penetration testing to ensure the system is protected against malicious and unauthorised access
- security clearance of AusCheck staff to ensure appropriate protection of personal information
- comprehensive operating procedures that are underpinned by legislation, ensuring information is appropriately protected and managed
- regular auditing of access to the AusCheck IT system consistent with access level requirements and to ensure the system is being used appropriately

⁹ The fees imposed do not include the cost for any activity or service to government that is not integral to the regulatory activity.

- periodic monitoring and management of AusCheck’s cost recovery arrangements.

AusCheck’s Cost Recovery Risk Assessment (Attachment A) will be finalised following consultation.

5. STAKEHOLDER ENGAGEMENT

AusCheck conducts a number of activities including annual surveys, meetings, workshops and telephone conferences to share information and determine stakeholder satisfaction. AusCheck also provides a helpdesk facility to answer stakeholder queries, support issue resolution and accept feedback. AusCheck is committed to providing a high quality service. The AusCheck Service Charter sets out the feedback and complaints handling processes. The AusCheck Service Charter can be accessed from www.ag.gov.au/AusCheck.

Engagement with industry regarding the AusCheck CRIS document and related fees was carried out. AusCheck consulted with partner agencies CrimTrac, ASIO and DIBP about service charges during March 2015. Comments were sought from ASIC and MSIC Issuing Bodies and NHS Registered Entities between 24 April and 8 May 2015. Comments were also sought from the Department of Infrastructure and Regional Development and the Department of Health on 24 April 2015.

6. FINANCIAL ESTIMATES

The table below outlines the financial estimates of providing the background checking services. This table will be updated as required as outlined at Section 9: Key Forward Dates and Events.

Table 6: Estimated Expenses and Revenue

	2015-16	2015-16	2016-17	2017-18	2018-19
	Estimates provided at commencement of 2015-16	Figures updated throughout 2015-16	Estimates (based on current background check costs)	Estimates (based on current background check costs)	Estimates (based on current background check costs)
Expenses X	14,276,740		13,737,422	15,435,056	14,475,238
Revenue Y	15,008,362		13,144,073	16,133,070	14,114,581
Balance = Y - X	731,622		-593,349	698,014	-360,657
Cumulative balance	6,624,542		6,031,193	6,729,207	6,368,550

7. FINANCIAL PERFORMANCE

The table below details AusCheck actual expenses and revenue for the background checking activity since commencement.

Table 7: Actual Expenses and Revenue

	2007-08	2008-09	2009-10	2010-11	2011-12	2012-13	2013-14
Capital Expenditure	\$1,630,472	\$1,225,084	\$0	\$56,556	\$0	\$257,494	\$0
Expenses X	\$7,934,488	\$7,611,479	\$7,294,690	\$7,305,285	\$10,821,203	\$10,546,682	\$12,994,160
Revenue Y	\$7,692,489	\$6,441,398	\$8,751,445	\$7,920,279	\$13,200,254	\$11,742,848	\$14,652,194
Balance = Y – X	-\$241,999	-\$1,170,081	\$1,456,755	\$614,993	\$2,379,051	\$1,196,166	\$1,658,034
Cumulative balance	-\$241,999	-\$1,412,080	\$44,675	\$659,668	\$3,038,720	\$4,234,886	\$5,892,920

AusCheck does not have policy responsibility for the ASIC, MSIC and NHS schemes. Changes to relevant policy can significantly impact AusCheck's cost recovery. For example, changes to the MSIC Scheme in 2010, which introduced bi-annual checks, more than doubled background check numbers for that scheme. This resulted in a significant increase in background check demand and revenue which exceeded projections and culminated in a cumulative surplus. Continually surging demand in recent years has, despite best efforts to correctly estimate checking volumes, also resulted in higher than expected revenue. Delays in the replacement of the AusCheck IT system has resulted in lower than expected expenditure in previous years due to the time taken to comprehensively review redevelopment options and conduct thorough requirements analysis.

AusCheck intends to utilise the surplus to update the AusCheck IT system, improving the service delivered by upgrading the technology and delivering new capability. Examples of the benefits of the updated system may include automation of immigration checks through DIBP and the ability to verify identity documents via the AusCheck system. A project to determine the updated system design and costs is now underway and this is scoped to include replacement of software and hardware. Completion of the system upgrade is currently scheduled for December 2016.

A detailed review of actual costs in previous years and current year to date (2015-16) costs has informed the projections used to determine the 2015-16 fees. That review identified a cost reduction opportunity for two and four year background checks. Periodic reviews of revenue against expenditure will further support their alignment over the 2015-16 business cycle.

8. NON-FINANCIAL PERFORMANCE

8.1 Standards of Service

AusCheck is committed to the provision of professional and consistent standards of service. Our standards of service state that we will:

- act in a helpful and professional manner
- provide accurate, concise and well-considered advice in plain English
- provide AusCheck system access of 99 per cent agreed availability time - we will notify our stakeholders of planned outages for system maintenance
- acknowledge 100 per cent of all applications in one business day
- complete AusCheck's part in the background checking process in five business days or less in 98 per cent of the time (excluding time awaiting responses from checking partners or the person being checked)
- provide access to an update on application progress within twenty eight business days, where completion within five business days is not possible
- where we are unable to assist, do our best to refer applicants/users to the most appropriate agency.

We have consistently met these Service Charter Standards. We measure and track performance, including by obtaining qualitative feedback, through stakeholder engagement forums and the annual AusCheck Survey.

9. KEY FORWARD DATES AND EVENTS

The following key forward dates and events have been identified by AusCheck as key to implementing and managing this CRIS:

Date	Event
May 2015	Stakeholder engagement on a new CRIS format
July 2015	Commencement of a new-format CRIS
December 2015	Incorporate previous year actual expenses and revenue and report on non-financial performance
February 2016	Review and update CRIS to reflect changes

10. CRIS APPROVAL AND CHANGE REGISTER

Date	Description	Approved by	Comments
20 May 2015	Certification of the CRIS	Secretary of the Attorney-General's Department	nil
30 June 2015	Agreement to the CRIS	Attorney-General	nil

Attachment A - Cost Recovery Risk Assessment – AusCheck 2015-16

Implementation risks	Low	Medium	High
1. What is the proposed change in annual cost recovery revenue for the activity?	<5% <input checked="" type="checkbox"/>	5 < 10 % <input type="checkbox"/>	>10% or new <input type="checkbox"/> <input type="checkbox"/>
2. What is the total proposed annual cost recovery revenue for the activity?	0 - \$10m <input type="checkbox"/>	\$10m < \$20m <input checked="" type="checkbox"/>	\$20m + <input type="checkbox"/>
3. What does the policy proposal or change in the cost recovered activity involve?	Change in the level of existing cost recovery charges <input checked="" type="checkbox"/>	Change in the structure of existing cost recovery charges and/or composition of payers <input type="checkbox"/>	Introduction of cost recovery for a new activity or for an existing activity (or its components) that has not been cost recovered previously <input type="checkbox"/>
4. What type of cost recovery charges will be used?	Levies only <input type="checkbox"/>	Fees only or fees and levies <input checked="" type="checkbox"/>	Fees, levies and other charges <input type="checkbox"/>
5. What legislative requirements are necessary for imposition of cost recovery charges?	Does not involve an Act of Parliament (e.g. Regulations, Determinations etc) <input type="checkbox"/>	Involves an Act of Parliament (e.g. enabling Act or levy imposition Act) <input checked="" type="checkbox"/>	Requires State/Territory legislative changes or referral of powers to the Commonwealth <input type="checkbox"/>
6. Does the proposal involve working with other Commonwealth, State/Territory and/or local government entities?	No <input type="checkbox"/>	Yes - with Commonwealth entities only <input checked="" type="checkbox"/>	Yes – with Commonwealth and State/Territory entities <input type="checkbox"/>
7. What will be the expected impact of cost recovery on payers? <i>This may depend on, among other things:</i> <ul style="list-style-type: none"> the change in the level of charges the number of people affected the cumulative effect from other government charges/regulation the economic conditions etc. 	Low <input checked="" type="checkbox"/>	Medium <input type="checkbox"/>	High <input type="checkbox"/>
8. What consultation has occurred with payers and other stakeholders about the proposed cost recovery?	Consulted - no significant issues raised <input checked="" type="checkbox"/>	Consulted – significant issues raised but can be addressed <input type="checkbox"/>	Not consulted <u>or</u> consulted and significant issues raised but ongoing sensitivities <input type="checkbox"/>

Overall CRRA rating:	LOW <input type="checkbox"/>	MEDIUM <input checked="" type="checkbox"/>	HIGH <input type="checkbox"/>
Supporting Analysis: Further detail is provided in Section 4, Page 11.			
Entity sign-off: Michael Pahlow	Date: 19/05/2015		
Finance comment: Nil	Date: 19/05/2015		