Announcer: Hello and welcome to the CPA Australia Podcast, your weekly source for accounting, education, career, and leadership discussion.

John Purcell: I'm John Purcell, policy advisor ESG. I'm joined here today by associate professor Jo Ford, from ANU law school. We're discussing a recently completed report titled Regulating Transparency and Disclosures on Modern Slavery Global Supply Chains. Welcome Jo.

Jolyon Ford: Thank you.

John Purcell: I was wondering if you could just start off firstly with the Commonwealth government in November last year passed a Modern Slavery Act. We're here today to discuss its relevance. Jo, your thoughts on why business and particularly accountants need to be engaged in this debate?

Jolyon Ford: Well, I mean the legislation, the Modern Slavery Act is trying to deal with a problem, the prevalence of which the numbers vary, but between 21 million or 40 something million, depending on how it's calculated, people in our region, in the Asia-Pacific region, live in a form of slavery, in effect, and hence the term modern slavery, because it's against the intuitive understanding that slavery was a terrible problem which was dealt with by William Wilberforce, and so on, centuries ago.

I mean, I suppose for your listeners, to put it in context, I could give some examples that are Australian related, because the legislation tends to deal with the problem that Australian companies supply chains and therefore the goods, for example, that end up on Australian supermarket shelves for example, might be tainted in some way by their origin in a developing country where there is a higher human rights risk, where there is weaker governance, and where it's possible that people are involved in, engaged in slavery or slavery-like practises.

In 2016, for example, a well known surfing brand in Australia discovered that its winter range of clothing which it thought was made in China was in fact made in North Korea. The risk that people in North Korea involved in that production were in fact prison labour or in any event, unpaid and forced labour, was very high. This was something that the average Australian consumer would probably be quite alarmed about. They'd be interested to know about that, the firm was alarmed about it and interested to know about it.

But the legislation's attempt to ask as a country, "Well, the firms might have all sorts of responsibilities, but what's the responsibility of Australia to legislate around practises which are taking place outside Australia, involving people who are not the employees of Australian companies, but where in moral terms, it's difficult for us to come to terms with the fact that we're enjoying the fruits, as it were, of someone else's forced labour?"

Another Australian example which was of high profile was in the supermarket retail space, around tuna fish. Cans of tuna that we buy at Coles and Woollies and so on. Because a lot of those products are sourced from the Gulf of Thailand where we know that many people who work on those fishing boats are not free to leave their work. They may be migrants from Myanmar and other places, and quite literally are onboard these fishing boats, their documents are taken away from them.

They can either work or they can go into the sea. That's a form of slavery. It's modern day slavery, modern slavery, and the legislation has attempted to ask that question, what should we ... Consumers can make their own choices of course, but what should we as a country, and through our government, through legislation, set up in order to try and deal ... Even if we can't solve the prevalence of the problem itself in this countries, at least to reassure ourselves that we are not by our purchasing practises, contributing to or exacerbating or prolonging those problems.

John Purcell: This is part of the significant trends towards greater transparency and changing behaviour from business and from consumers [crosstalk 00:04:32]-

Jolyon Ford: I think so. I think the legislation is very particular around this problem of forced labour and human trafficking in supply chains, but I think you can see it as part of a much bigger trend, definitely, around corporate accountability, corporate responsibility, and transparency in terms of the social and environmental conditions under which things are produced, things are extracted, things are transported.

John Purcell: It's here and now and we need to take note?

Jolyon Ford: Absolutely.

John Purcell: What do we understand by the term modern slavery and where does it fit within the wider spectrum of human rights?

Jolyon Ford: I mean, the phrase doesn't ... Modern slavery doesn't itself has a legal, technical meaning. Although, the whole history of the international human rights project can be traced back to the campaign against the slave trade and against slavery itself, but the legislation in Australia that relates to corporate reporting on modern slavery within supply chains imports the definitions of slavery and slavery-like offences and forced labour from the Commonwealth Criminal Code, Divisions 270-271 of the Commonwealth Criminal Code.

But essentially modern slavery is intended to refer to a combination of human trafficking and/or forced labour amounting to slavery or slavery-like practises. But the definitional issues are quite important, as I'm sure we'll talk about today, but the way you asked the question raises it directly, I suppose. Because one of the things about the legislation that this report and our discussion today deals with, in the lead up to that legislation there was a great deal of goodwill from bigger businesses in Australia, the ones that are now reporting entities under the Modern Slavery Act.

And a lot of that goodwill was as I see it, on the basis that there was an understanding, that there was a clear definition of modern slavery. Because it's very tempting to use that concept to refer to a whole lot of practises which are substandard working conditions, unfair working conditions, difficult manifestations of the global political economy of production, but which are not slavery as we all understand it.

One way to understand the distinction is there's some issues that you would refer to Fair Work Australia and there's some issues that you would go to the federal police, and modern slavery is the latter.

John Purcell: Yes. On that note, it's probably therefore a good entry to have a quick introductory discussion around the Commonwealth Modern Slavery Act which was passed into law November last year. Yeah, pursue with you, if I could, where it sits in relation to the Criminal Code, and Fair Work laws which address I would assume particular issues around deterrents, punishment, and providing remedy to those who have suffered. Really, what is the objective in the passing of these laws by the Commonwealth?

Jolyon Ford: I mean, on one view the legislation has quite a narrow objective. It sits within what you've just described, a whole spectrum of ways of dealing with this problem, which across the Asia-Pacific, is a significant, entrenched problem. In parts of India for example, it has deep cultural and other groundings. It's not a problem that you can imagine a single piece of federal legislation mandating certain kinds of reporting will deal with.

But it's intended to generate, primarily to generate awareness within firms themselves, of the possibility that across their very complex and especially transnational supply chains, the possibility that the goods and services that they are presenting to in the Australian context are tainted in effect by the human conditions under which they were produced.

Going back to your first question, how does modern slavery sit in relation to human rights? Of course, there's all sorts of human rights risks that might exist in a supply chain which won't necessarily be captured within the meaning of modern slavery. It deals with a particular sort of risk around the ideas of forced labour and human trafficking. One of the debates that is afoot is well, does a reporting requirement that deals with this particular, albeit very difficult set of problems, does it help to raise awareness in corporate Australia and in the financial sector too, of human rights risks more broadly that might exist in operations and supply chains?

Or, will it tend as we go forward, tend to focus attention just on this particular set of risks, as complex as they are? But the legislation itself, although it refers to the Criminal Code, in terms of finding a definition of the conduct that is at issue, is on one view and to which something many of your listeners will be familiar with, is a relatively conventional reporting, corporate reporting requirement.

It's mandatory, but not punitive corporate reporting requirement, applying to the largest firms in Australia. Firms with a turnover or annual ... Different thing. An annual consolidated revenue of $100 million or over, so really the largest firms-

John Purcell: Two terms which accountants will be familiar with.

Jolyon Ford: Yeah. And indeed the legislation refers to in defining the entities that will be reporting entities, refers to many times, to meanings derived essentially from accounting standards. In terms of resident company's defined by reference to the Income Tax Assessment Act, but things such as because we have complex corporate structures, so an entity or a group of entities, in deciding, and there is a role for people familiar with these sorts of ideas, deciding who is a reporting entity, or which entity must report on behalf of a group brings in definitions around issues like control which are familiar to people, familiar with the meanings, given to those sorts of things in the accounting standards.

There is a role for people with that training, just in the initial task of indicating who in fact is a reporting entity at all under this legislation. I mean, what the legislation does, it draws on a 2015 legislation in the UK, the Modern Slavery Act in the UK, and it essentially requires the largest firms in Australia to report annually on what steps they are taking within their operations, within their supply chains, to address the risk of modern slavery being present within those supply chains.

The legislation doesn't define supply chain itself. It leaves it really to firms to self-define that and what we found in our research, the CPA supported research, was that most firms are interpreting that to mean suppliers with whom they have a direct payment relationship. But there is a lot of debate around this issue and civil society have a very expansive idea of supply chain and advocates, human rights advocates perhaps not always familiar with the scale and the complexity of some firms' supply chains and the transnational nature of these.

But the idea I think behind the federal government not defining this term was that it would in effect force firms to engage with the issue, because they'd have to have a meaningful self-analysis around what constitutes a supply chain for the purposes of not just reporting, but all the internal audits and due diligence processes that are implicit in being able to report externally.

John Purcell: Yes, and certainly obviously the further you move more deeply into a supply chain, those particular challenges become more apparent. Would you see over time, that practise will evolve? I think one of the interesting areas that you've looked at in the research is what you term incipient practise. Would you like to expand on what you see as being initial uptake, initial practise, and what you'd expect to see evolving over time?

Jolyon Ford: Yeah. I mean, part of the rationale behind the legislation that, because as we've already said it, it's mandatory but non-punitive. There are no statutory consequences necessary for not reporting. The minister can seek an explanation from a reporting entity.

John Purcell: Whereas accountants are familiar certainly with strict compliance regimes, the mandated nature of accounting reporting and director's duties in relation to failure to ensure compliance with accounting standards. This sits in, they're quite different.

Jolyon Ford: This is a slightly different beast, I suppose. It follows, so the Australian model follows from the UK example, and it has a three year review period, precisely because some of these key issues such as the lack of statutory consequences for non-reporting or for perfunctory or poor reporting is something that the parliament wants to look at again because at least in parts of civil society, this was seen as quite controversial.

But there is a rationale behind the idea that you would, especially with an issue that is new, it's not new in historical terms, but it's new to Australian business. There is a defensible rationale for a regime which is a little bit safer in the sense that what government didn't want to do was to punish firms that look into their supply chains and find problems. In fact, quite the opposite.

If you see the legislation as intended to be, to stimulate awareness through a mandatory reporting scheme, but to stimulate awareness internalisation of this, the issues, and to do so in a non-threatening way in the sense that you're encouraging firms to look and then if they find problems, to reach out and seek help with them, to institute preventative measures around these, then that gives the legislation a different perspective in terms of the lack of statutory consequences for non-compliance.

The truth is I think because the largest firms in Australia which are the reporting entities here, are familiar with this sort of exercise, some of which come from consequences for non-reporting and some of which don't, it's more likely that these things follow habitual process. It's more likely that they will begin to fold them into those kinds of standards. You asked about incipient practise and what the CPA supported research, what we found when we asked ASX 100 firms and some assurance and advisory and audit firms what they were doing, what they were hearing from clients about what they were doing.

Essentially, the strongest thing that came through was that firms were starting to focus as they prepare to report on the legislation, on how this particular reporting will fit within all the other issues on which they have to, financial and non-financial, reporting issues on which they have to produce for different stakeholders certain types of information. And developing those internal, you can call them due diligence or self-analysis or self-audit kind of processes, in order to be able to report credibly.

So, although the legislation doesn't have a statutory consequence for non-reporting, the reports do have to be signed by a relevant person in the peak governing body of the entity, however that's defined within that particular entity. The fact that, essentially board level approval or sign off is needed will start to focus attention, a great deal on the issues, and the fact that there isn't a penal consequence to non-compliance might not become particularly relevant in that case.

There was a lot of debate before the legislation around what is the best way to achieve these sorts of outcomes? Do you fiddle with director's duties in the way that the UK has done around non-financial risk and so on? But it was decided that this being a signature issue, it needed its own standalone piece of legislation that related to reporting.

What we see firms starting to do is mainly desktop audits, I suppose, so just mapping their supply chains to begin with. Trying, in some of the firms we spoke to, trying to look at this by reference to basically a triaging process. Not simply looking at first tier suppliers necessarily, but especially in large complex companies, which sectors or geographies had particular risk profiles in terms of this particular problem? And to focus attention on that.

But a lot of that exercise is ongoing and it's as you know, a very, very complex thing. When human rights activists put the modern slavery legislation at its highest in terms of is there an incentive to respond on the part of corporate Australia, one of the things they would say is that in looking into your supply chain, to look for these sorts of risks, you're probably going to find all sorts of business disruption and commercial risks for which modern slavery risk is really just a proxy.

That's what we see, that kind of desktop supply chain mapping and auditing, as well as some firms starting to change the way in which they deal with procurement processes, standard forms of contracting and tender, and trying to in effect, as the legislation intends, pass on to their suppliers and therefore to their supplier's suppliers, certain conditions and undertakings around being alive to this possibility or this risk.

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John Purcell: You've identified what is obviously a significant issue around the governance attributes and the requirement that the statements be effectively signed off by effectively [crosstalk 00:20:53]-

Was a principal governing body, the legislation refers to.

John Purcell: At board level. Looking more deeply into that, what has the research shown in relation to organisations' understanding of the ownership of the reporting process and what types of professionals, what parts of organisations are going to be most directly engaged in the development of these reports? Bearing in mind that reporting is the end outcome of a lot of stuff which goes before it.

Jolyon Ford: Sure. I mean, what our research revealed is that this is a key question. In fact, many of the people we interviewed were very keen to hear of what their peers and competitors and others were doing in terms of which part of an organisation is most appropriate to take a lead on it. Of course, and it goes from your question, because of the principal governing body or board level sign off, at some level that's where ownership of the issue sits, but in practical terms, what we found is that firms are taking a whole different variety of approaches in terms of this, because as with all sorts of just even sustainability accounting, sustainability reporting, firms differ in terms of does this sit within a corporate end risk part of the organisation or government and external relations?

These sorts of strategic decisions about responsibility can have quite significant consequences in terms of the overall internalisation of the underlying problem. Because one of the things that as scholars we're interested in, in terms of this internal, almost management question, is one of the risks of these kinds of reporting mechanisms is that they can lead to a mere compliance mentality, where the focus is very much on the production of the item that constitutes compliance, which in this case is a report.

And less so on the finding and solving and preventing aspect of the legislation which when you stand back from it is its overarching social goal, which is to try and reduce of modern slavery in supply chains. Who has responsibility or ownership for it within the firm might have quite significant consequences for whether that exercise becomes a little bit procedural and you see under the UK legislation's now three or four year's old, a little bit of cut and paste, things don't change necessarily year to year and the temptation is to trot up the same report.

That's one of the criticisms really with this model is that it could become a rather narrow response to what is quite a complex problem. But definitely firms are taking very different approaches to it. What our research found was that the financial sector in particular is struggling with this, because of course, even if you just take the Big Four banks for example, they are both procurers with the supply chain of stationery and office products and so on, but also have portfolios, lending portfolios.

They're still struggling with coming to terms with what is their obligation in terms of reporting on those parts of their business, which obviously sit in a very different part of the organisation.

John Purcell: Some issues that they've had to confront with various degrees of effectiveness around climate change.

Jolyon Ford: Right. And even bigger beast in a sense, because it's so crosscutting. I mean, it's too early to say really which almost professional discipline or professional services discipline is taking a lead in this regard. Law firms would say, "Well, this is a matter that relates to federal legislation" but the expertise that at least we see as being triggered or implicated in this kind of exercise is quite varied, really. Because it relates to an exercise in mapping and auditing and understanding relationships, quite complex relationships between different parts of an entity, and different parts of a supply chain which are exercises that are quite familiar to some kinds of professionals.

But also to the activity, if one detects a problem within the supply chain, that triggers a whole different set of expertise around, "Well, how do we reach out to in effect to benefit to people who are not our employees, or even necessarily the employers of our supplier?" There's a whole range of skillsets that might come into play, but it's almost in some respects, too soon to say.

John Purcell: Maybe going off on, as a little bit of a tangent perhaps, would it be fair to say that a significant part of the corporate sector's approach to this is over and above managing reputational risk? Is within this a desire to actually do the right thing and improve a lot of those people impacted by the nature of their businesses.

Jolyon Ford: Well I mean, the regulatory rationale for the legislation is, because of the non-punitive nature of it, is essentially that the government's only role is to set up this reporting requirement, but leave it to the market and consumers to in effect police behaviour, and to reward fulsome reporting and therefore in effect, reward fulsome embrace of the underlying social objective, or to punish firms that treat this in a perfunctory way.

The difficulty with that assumption is that it's not obvious that there exists in Australia a critical mass of engaged, aware, motivated consumers who would act on the information that these reports produce in the ways that the legislation envisages. Instead, what we're seeing is that because the legislation relies on both market and consumer pressure, it's within the market and institutional investors, in others who are to some extent leading in terms of asking questions and we subtitled the report A Conversation Starter, because what the research that we did under this project revealed was that at very least this legislation and the phrase itself modern slavery, I mean, who could not at least sit up and take a little bit of notice?

Or, who's going to come out against it, right? At least provides a conversation starter within firms and within firms, sometimes within the same, operating in the same geographies and so on, around how can they not just comply in a reporting sense, but how can they in effect do away with the issue as one that they at least in their own, in respect of their own supply chains, will not have to be as concerned about in future?

I do think that they're, and certainly in the lead up to the legislation in terms of parliamentary inquiry and then the senate inquiry relating to the bill as it then was, unless you're an extremely cynical person, you would say that among corporate leaders in Australia, there was a genuine desire to look into this issue and to tackle it. But also a desire to be given a little bit of space in doing so, because it's a new problem, it's a complex problem.

Even if you define supply chain very narrowly as suppliers with a direct payment relationship, that for some firms, Nestle and Unilever, big firms, is an extremely complicated exercise. So, although my friends in civil society and advocacy circles want to push and push and push, as we all understand and so they should, in parts of corporate Australia there's, at least as we can see from our research, there is a lot of goodwill. There is a desire to engage with this issue and to try and within one's own sphere, so to speak, do what one can to at least mitigate the risk that one's own procurement practises will in some way be furthering this problem.

John Purcell: Again, from an accounting perspective, one of the issues that we often explore at great length and there's obviously a significant amount of research around this subject matter, and the idea is to who is the audience of reporting? Now, obviously you've identified a significant part of the audience will be civil society. Would imagine also that investors, shareholders would be interested. For those who are interested in these reports, where would we find them?

Jolyon Ford: Right. Well, some Australian, largest Australian firms, some of them have been reporting into the UK legislation since that set foot in 2015, if they do business in the UK in a relevant way. But one of the advances of the Australia legislation on the UK one was the decision to set up a government backed in effect, repository, statutory based repository of reporting, so that those reports would be available in one place, as it were.

Because one of the issues, as you'll know well, and your listeners will know well, one of the issues with this sort of reporting, we live in an age of transparency. It's a post-Hayne commission age in Australian terms, and one of the issues I see as an academic working on these things is just the proliferation, not just of reporting requirements, but of information.

So, we're producing more and more information and one of the questions we have to ask is what is the quality of that information? How comparable is it? Who's using it and what do they use it for, and how do they use it? There are some questions around are there some emerging technologies which can help us to filter this flood of information in order to be able as investors, as shareholders, as consumers to make more informed decisions?

Because if legislation like this is not producing reasonably good quality and accessible information, you have to ask what it's for at some level. There's a role there for all sorts of organisations to help in terms of making sense of this information for the purposes for which it was originally produced.

There are all sorts of ideas out there in civil society that we don't just need a list of reporting entities and a hosting of all annual reports, but that one should rank them in some way.

John Purcell: This goes back, again, I think to the other part of your subtitle to the research title that it's not a tick ... Or, well is it or is it not a tick the box exercise?

Jolyon Ford: Right. Well, I mean, these things already exist, for example, in relation to the [inaudible 00:33:35] and they're all organisations that evaluate company reporting by reference to in one case, 16 criteria, in one case, 8 criteria, and attempt to in effect name and shame firms as excellent in reporting and as, what's the word I used earlier? Perfunctory.

I mean, this relates actually to one of the two rationales that the minister used when introducing the legislation into parliament, in the second reading speech, if you would. Those two rationales were that although this is a non-punitive regime, the idea was that the introduction of the legislation would in his terms, race to the top among corporate, biggest companies in Australia.

In other words, the idea that this would lead competitors or even if they weren't competing necessarily in certain sectors, to try and produce the most fulsome and useful reporting. There's a big research question I think that exists around that, which is under what conditions does a race to the top happen? Because it's a wonderful idea, but you need to know what are the markets and competition conditions under which this virtuous cycle upwards of going beyond compliance, when does that happen?

I mean, we can look at other areas for insights. The second thing that the minister mentioned was that the rationale was based heavily on reputational risk. I think we also need to do a bit more research around that in some respects, because not every firm, not every kind of firm in every sector is equally exposed to reputational risk, or is consumer facing for example, in any relevant way. And yet, they might be quite significant players when it comes to this sort of issue in supply chain.

Reputational risk might drive and incentivize reporting among some actors, but won't necessarily be a major incentive for others. So, it remains to be seen really, how significant those drivers are in terms of performance and compliance under this act. One of the things that we've talked about a little bit in the paper is that the role for professional services firms, for want of a better phrase, in that race to the top logic, because if you think of a firm that is involved in advice and assurance and production of reporting and all the things that go along with that, you can imagine it might be servicing more than one reporting entity.

It's possible that over time, these actors become the agents of the race to the top, because they're able to share best practise as between different reporting entities. In pursuit of what I referred to earlier, I suppose, which is better quality information that helps in this overarching goal of transparency. Because merely reporting information doesn't necessarily of itself generate transparency.

In fact, in an age of excessive volumes of information, it could have the contrary effect. It could inhibit transparency to flood the market with information, reported information, which is of no particular quality or comparability, or use to stakeholders.

John Purcell: And I also think from an accountant's perspective, there's also an important element in this race to the top to make sure that what information is produced is reliable, credible, and prepared in a rigorous manner. We would certainly see a role for accounting in a number of perspectives, as these matters unfold.

Jolyon Ford: I think so. One of our co-authors, Aziz Islam, who's a professor of accounting in Queensland, now in the UK, one of his comments as we were putting the report together was ... One of the things we talked about a lot was his reference to the changing nature really of the profession in terms of not just the non-financial risk and accounting around those sorts of familiar ideas, but really a much more profound shift around what is the role of individuals with these particular sets of skills, but able to provide a more comprehensive, very commercial perspective to their clients in a way that fulfils their needs in a much more general sense, as expectations around the role and responsibility of business in society are changing quite quickly.

John Purcell: And as a consequence, the expectations about the role and the responsibilities of particular professions within organisations.

Jolyon Ford: Right. Because we've talked about board sign off on Modern Slavery Act reports, but there's also a degree of sign off by those professionals in terms of the work they do that goes towards the firm's reporting practises and the integrity of their own practises around that information, which is in this particular context, as I've referred to already, quite a daunting exercise. Because these supply chains extend transnationally, and even very sophisticated firms that we've talked to don't necessarily have a great deal of visibility on their suppliers, let alone further down the supply chain.

So, it's a challenging time but again, there's opportunity whenever these sorts of challenges arise, and these are the sorts of things that stimulate change and the way in which we work, and the way in which we view the scope of our work. I think that's a really interesting space more generally around standing back from this particular piece of legislation around you can call it stakeholder engagement, around sustainability, social impact, social environmental impact.

These are things that at some level, at least more sophisticated players like investors and shareholders, institutional investors, they want a degree of detail that requires some technical skills to put together. You can't just simply produce glossy sustainability reports as you might have 10 or 15 years ago, and to be able to not certify, but to be able to make certain statements about the nature of one's supply chains, you're going to have to engage certain skillsets in order to [crosstalk 00:41:04].

John Purcell: And I think also, your observation is quite relevant from an investor perspective. Increasingly they expect businesses to be able to look over further extended time horizons and I'd suggest that this also is indicative of the expectation that businesses be able to look outside of the organisations beyond their immediate impacts, further down the track.

Jolyon Ford: Yeah, absolutely. This week, there was a stakeholder engagement event that the federal government, the business engagement unit that exists around the Modern Slavery Act put together. One of the themes that came through very strongly was that at least the government's intention behind the legislation, behind budgeting for a business engagement unit to support the legislation was not just awareness raising, but helping firms to reach out to all sorts of different actors who would help them, in effect.

Not just to produce as we've said, the narrow compliance product, but to address in a preventative and ongoing cyclical sense, because ideally reporting as you said is the end product, but ideally the end is also the beginning, because it's a cyclical process of due diligence or whatever you want to call it.

That came through very strongly at that event, which is that this is a shared challenge, it's not civil society hammering business and business resisting. At least as things stand in the bigger corporations in Australia at the moment, there's a lot of goodwill, there's a lot of intent to try and do this properly and to reach out to service providers, professional services firms, to civil society, to try and understand even the initial exercise that we talked about, which is what is our supply chain and where does our responsibility begin and end?

John Purcell: Yes. That's been a very rewarding conversation, Jo. Is there any further final comments that you would like to add as we move to wrapping up?

Jolyon Ford: Not really. I mean, just I suppose I'd refer people to the report and in doing that, I suppose there was a caveat in the sense that the legislation's very new, and so although we think our interviews and surveys were representative of at least the ASX 100 type firms who would be the reporting entities we covered, things are moving in the sense that firms are still to a large extent, coming to terms with what does the legislation require of them, and how will they best, in their internal processes-

John Purcell: But we do say the legislation is new, but the reporting requirement will kick in fairly quickly.

Jolyon Ford: It will, absolutely. And of course, what firms can do, there is three or four years of practise under the UK legislation. The UK legislation is slightly different. It's not as prescriptive as to what a report should include, but there's a lot of good practise, there's a lot of helpful reflective analyses of reporting practises under there that can be used to get up to speed, as it were, on this ahead of the first reporting chapter.

John Purcell: Indeed. Thank you very much.

Jolyon Ford: Thank you, John.

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