



Australian Government

Comcare

REGULATOR PERFORMANCE FRAMEWORK 2015–16

CONTENTS

INTRODUCTION	3
EXECUTIVE SUMMARY	3
BACKGROUND	3
FINDINGS	4
Reporting against the key performance indicators	4

INTRODUCTION

The Australian Government has committed to boosting productivity and cutting red tape by \$1 billion a year. All Government regulators, including Comcare, will review and reduce regulatory burden on individuals, businesses and community organisations. To measure the performance of regulators in achieving the Government's goal, a Regulator Performance Framework has been developed.

In line with the Regulator Performance Framework, Comcare must self-assess our performance once every twelve months. A Reference Group was established to examine measures and these were approved by the Chief Executive Officer (CEO) on 10 April 2015.

Responsibility for the Regulator Performance Framework rests with Comcare's Regulatory Operations Group (ROG). The Operational Support Team will prepare reports and serve as the liaison point between the Department and those coordinating external reviews on this process.

The Regulator Performance Framework also complements Comcare's corporate outcome. This supports participation and productivity through healthy and safe workplaces that minimise the impact of harm in workplaces covered by Comcare.

EXECUTIVE SUMMARY

This is the first annual self-assessment by Comcare against the Government's Regulatory Performance Framework.

The self-assessment identified that Comcare has met 17/20 measurements of its key performance indicators (85%), and partially met three. The three partially met measures are being reviewed for improvement.

BACKGROUND

Comcare's legislation requires the entities we regulate to understand, accept and address their obligations as detailed in the Safety, Rehabilitation and Compensation Act 1988 (SRC), the Work Health and Safety Act 2011 (WHS) and the Work Health and Safety Regulations 2011. While Comcare intervenes where this is not happening, our job is also to assist organisations with improving their work health and safety systems, and reducing injury and illness.

Comcare as the national regulator delivers risk-based, cost-effective and consistent national regulation of workplaces, encouraging compliance to improve health, safety and rehabilitation outcomes through education and appropriate, balanced enforcement.

FINDINGS

The self-assessment found that of the 20 measures, 17 were fully met and three were partially met.

The three measures rated as partially met are:

KPI 4: Compliance and monitoring approaches are streamlined and coordinated.

Measure of Good Regulatory Performance 4.1: Comcare's information requests are tailored and only made when necessary to secure regulatory objectives, and only then in a way that minimises impact.

Comcare is in the process of reviewing measures to ensure legal and policy guidelines are met.

Measure of Good Regulatory Performance 4.3: Comcare uses existing information to limit the reliance on requests from regulated entities and share the information among other regulators, where possible.

Comcare is in the process of reviewing measures to ensure legal and policy guidelines are met.

KPI 6: Comcare actively contributes to the continuous improvement of regulatory frameworks.

Measure of Good Regulatory Performance 6.1: Comcare establishes cooperative and collaborative relationships with stakeholders to promote trust and improve the efficiency and effectiveness of the regulatory framework.

This measure is currently ad hoc whereby feedback may be received either verbally or via email as a result of inspector reports. Comcare's new computer system will assist in capturing feedback from persons conducting a business undertaking (PCBUs).

REPORTING AGAINST THE KEY PERFORMANCE INDICATORS

KPI	Measure	Status
KPI 1: Comcare does not unnecessarily impede the efficient operation of regulated entities.	1.1: Comcare demonstrates an understanding of the operating environment of the industry, or organisation, or the circumstances of individuals and the current emerging issues that affect the sector.	●
	1.2: Comcare takes actions to minimise the potential for unintended negative impacts of regulatory activities on regulated entities or affected supplier industries and supply chains.	●
	1.3: Comcare implements continuous improvement strategies to reduce the costs of compliance for those they regulate.	●
KPI 2: Comcare communicates with regulated entities in clear, targeted and effective manner	2.1: Comcare provides guidance and information that is up to date, clear, accessible and concise through media appropriate to the target audience.	●
	2.2: Comcare considers the impact on regulated entities and engages with industry groups and representatives of the affected stakeholders before changing policies, practices or service standards.	●
	2.3: Comcare's decisions are provided, clearly articulating expectations and the underlying reasons for decisions.	●
	2.4: Comcare's advice is consistent and supports predictable outcomes.	●

KPI	Measure	Status
KPI 3: Actions undertaken by Comcare are proportionate to the regulatory risk being managed	3.1: Comcare applies a risk-based, proportionate approach to compliance obligations, engagement and regulatory enforcement actions.	●
	3.2: Comcare's approach to regulatory risk is regularly reviewed. Strategies, activities and enforcement actions are amended to reflect changing priorities and evolving threats, without diminishing regulatory certainty or impact.	●
	3.3: Comcare recognises the compliance record of regulated entities, including using earned autonomy where this is appropriate. All available and relevant data on compliance, including evidence of relevant external verification is considered.	●
KPI 4: Compliance and monitoring approaches are streamlined and coordinated	4.1: Comcare's information requests are tailored and only made when necessary to secure regulatory objectives, and only then in a way that minimises impact.	●
	4.2: Comcare's frequency of information collection is minimised and coordinated with similar processes including those of other regulators so that, as far as possible, information is only requested once.	●
	4.3: Comcare uses existing information to limit the reliance on requests from regulated entities and share the information among other regulators, where possible.	●
	4.4: Comcare bases monitoring and inspection approaches on risk and, where possible, takes into account the circumstance and operational needs of the regulated entity.	●
KPI 5: Comcare is open and transparent in its dealings with regulated entities	5.1: Comcare's risk-based frameworks are publicly available in a format which is clear, understandable and accessible.	●
	5.2: Comcare is open and responsive to requests from regulated entities regarding the operation of the regulatory framework, and approaches implemented by Comcare.	●
	5.3: Comcare's performance measurement results are published in a timely manner to ensure accountability to the public.	●
KPI 6: Comcare actively contributes to the continuous improvement of regulatory frameworks	6.1: Comcare establishes cooperative and collaborative relationships with stakeholders to promote trust and improve the efficiency and effectiveness of the regulatory framework.	●
	6.2: Comcare engages stakeholders in the development of options to reduce compliance costs. This could include industry self-regulation, changes to the overarching regulatory framework, or other strategies to streamline monitoring and compliance approaches.	●
	6.3: Comcare regularly shares feedback from stakeholders and performance information (including from inspections) with policy departments to improve the operation of the regulatory framework and administrative processes.	●

Legend: ● Indicator is met ● Indicator is partially met ● Indicator is not met

Reporting against each KPI

KPI 1: Comcare does not unnecessarily impede the efficient operation of the regulated entities

Measure of Good Regulatory Performance 1.1: Comcare demonstrates an understanding of the operating environment of the industry, or organisation, or the circumstances of individuals and the current emerging issues that affect the sector

Output/Activity	Evidence	Status	Actions for improvement
Evidence based assessment of regulated entities to inform an appropriate and balanced response	<p>Risk assessment of all notifications received via a two-step review and assessment process to determine the appropriate and proportional regulatory response.</p> <p>Risk assessment procedure has been modified from a 3 x 3 to a 5 x 5 harm assessment matrix to allow for greater nuanced response.</p> <p>Monthly and ad-hoc reporting continues to provide trend information and insights arising from work health and safety (WHS) incident notifications and enquiries received from the jurisdiction to assist and inform regulatory activities.</p>	●	<p>Indicator met</p> <p>New Risk and Analysis team upgrading processes</p>

Measure of Good Regulatory Performance 1.2: Comcare takes actions to minimise the potential for unintended negative impacts of regulatory activities on regulated entities or affected supplier industries and supply chains

Output/Activity	Evidence	Status	Actions for improvement
Regular, ongoing consultation or engagement with stakeholders on policies and procedures, including independent experts and industry associations	<p>Four Licensee Liaison Forums held.</p> <p>Compliance and enforcement policy—consulted with jurisdiction.</p>	●	Indicator met but Comcare will aim to improve further
Documented responsiveness to feedback from regulated entities, including feedback from existing complaint mechanisms and surveys of stakeholders	A 'Lessons Learned Capability Instruction and Action Register' has been developed for ROG. Consultation is underway June '16.	●	Indicator met
Demonstrated consideration of the knowledge base prior to commencing regulatory activities or action	<p>Prior to proposing a response to a WHS incident notification, research is conducted on the PCBU to identify any similar incidents or other issues which may suggest systemic issues with the PCBU's WHS systems. The harm assessment rating is modified according to this intelligence.</p> <p>The Risk and Analysis team also provide intelligence reports on PCBUs to support the activities of Inspectors and Auditors and recommend areas of regulatory focus.</p> <p>Intelligence reports summarise the compliance, claim and notification history of the PCBU as well as identifying any governance issues which might impact on the PCBU's safety culture.</p>	●	Indicator met

Measure of Good Regulatory Performance 1.3: Comcare implements continuous improvement strategies to reduce the costs of compliance for those they regulate

Output/Activity	Evidence	Status	Actions for improvement
Demonstrated engagement with relevant organisations to learn from peer experiences and share better practices	Comcare engages with other work health and safety regulators through its involvement in Safe Work Australia (SWA) and the Heads of Workplace Safety Authorities (HWSA).	●	Indicator met
Demonstrated involvement of regulated entities in the review of cost recovery processes and costs	<p>The following stakeholder engagement activities took place in reviewing the cost recovery framework and costing model in preparation for the 2016–17 Cost Recovery Implementation Statement (CRIS):</p> <p>Licensees Liaison Forum Meeting, & Department of Finance meeting.</p> <p>Oct `15—Licensee fee working group teleconference, and Department of Finance meeting.</p> <p>Dec `15—Briefing paper CEO, Licence Fees Paper to SRCC, and Licensees Liaison Forum meeting.</p> <p>Feb `16—Licensee fee working group teleconference, Quarterly Licence Fee Report provided all Licensees, and Department of Finance meeting.</p> <p>Mar `16—Licensee fee working group teleconference and report, Licensees Liaison Forum meeting, Information Paper to SRCC, and Department of Finance meeting.</p> <p>Apr `16—Licensee fee working group teleconference, Briefing paper CEO, Department of Finance meeting.</p> <p>May `16—Licensee fee working group teleconference, Licensee indicative letters, Licensee consultation on FTE calculation method, Briefing paper CEO, and Department of Finance meeting.</p> <p>Jun `16—Licensee fee working group teleconference, Licensee consultation on transition year variable charging, Licensees Liaison Forum meeting, Licence Fees Paper to SRCC, and Department of Finance meeting.</p>	●	Indicator met
Costs of compliance reduced	The ROG Service Delivery Reform project was initiated to explore improvements and identify opportunities to review core digital business processes within ROG. It aligns with the government commitment to digital strategy underpinning Comcare's digital first approach.	●	Indicator met

KPI 2: Comcare communicates with regulated entities in clear, targeted and effective manner

Measure of Good Regulatory Performance 2.1 Comcare provides guidance and information that is up to date, clear, accessible and concise through media appropriate to the target audience

Output/Activity	Evidence	Status	Actions for improvement
Communication is compliant with government policy and Comcare governance structure	Web Content Accessibility Guidelines (WCAG) 2.0 compliance for external website and electronic publications, clearance by Communications and CEO or other governance as required. Consider feedback received positive and negative.	●	Indicator met

Measure of Good Regulatory Performance 2.2: Comcare considers the impact on regulated entities and engages with industry groups and representatives of the affected stakeholders before changing policies, practices or service standards

Output/Activity	Evidence	Status	Actions for improvement
Documented evidence of consultation and consideration of the impact on stakeholders when considering change to policies, practices or service standards	Comcare undertook external consultation on a draft of the <i>Compliance and enforcement policy</i> , including face-to-face information sessions for external stakeholders held in Canberra, Melbourne and Sydney.	●	Indicator met, however an engagement strategy is currently being developed—this will place more structure around the consultation process

Measure of Good Regulatory Performance 2.3: Comcare's decisions are provided, clearly articulating expectations and the underlying reasons for decisions

Output/Activity	Evidence	Status	Actions for improvement
Maximum, minimum and average time for decision	Internal Reviews—five undertaken in 2015–16, all completed within the 14 days specified by s226(1) of the WHS Act. Professional Standards Reviews—five conducted in 2015–16, two exceeded the KPI timeframe, and the other three were completed inside the designated timeframe (21 business days). Directors Reviews—one and the 14-day completion timeframe was not met.	●	Indicator met
Published timeframes for decision making subject to the complexity of the decisions	Other than the statutory timeframe appearing in section 226 of the WHS Act, Comcare does not have published timeframes for making decisions.	●	Indicator met but information about timeframes for decision making will increasingly be incorporated into Regulatory Guides or other guidance material for regulated entities

Output/Activity	Evidence	Status	Actions for improvement
Decisions are accompanied by statement of reasons and advice about relevant review or appeal mechanisms, where appropriate	<p>NB: These reviews are not under the auspices of the Safety, Rehabilitation and Compensation Commission (SRCC). WHS Act Internal Reviews—requires decision to be accompanied with reason but no obligation to advise on review of rights.</p> <p>SRC Act Reviews of rehabilitation authority determinations—requires statement of reason and statement on review of rights.</p> <p>Operational Support—The inspector report T301 contains information on 'Review of Certain Inspector Decisions'. The prohibition notice T330 contains information on 'Internal Review of Decision' and 'External Review' as does the improvement notice T328.</p>	●	

Measure of Good Regulatory Performance 2.4: Comcare's advice is consistent and supports predictable outcomes.

Output/Activity	Evidence	Status	Actions for improvement
Approved procedures for communications are available for staff use when interacting with regulated entities	<p>Two MOUs exist with communication procedures—Defence and Australia Post</p> <p>Operational Support—A list of MOUs is published in the regulator toolkit under 'Regional Operations (Inspectorate)—MOUs, External communication Protocols and Agreements'. This includes 16 documents.</p> <p>No safety alerts issued by inspectorate in the period.</p>	●	Indicator met
Advice provided to regulated entities is consistent with communication policies	As above	●	Indicator met

KPI 3: Actions undertaken by Comcare are proportionate to the regulatory risk being managed

Measure of Good Regulatory Performance 3.1: Comcare applies a risk-based, proportionate approach to compliance obligations, engagement and regulatory enforcement actions

Output/Activity	Evidence	Status	Actions for improvement
Risk management policies and procedures are available to regulator staff and the public	Comcare has developed a risk management framework which is compliant with the Commonwealth Risk Management Policy. The framework includes: > a single Risk Management Policy > risk Management Plans > risk registers for each plan > guidance that provides information, rules and guidance on risk management and related processes.	●	Indicator met
Compliance, enforcement strategies and actions are consistent with agreed risk management policies, are implemented	As above	●	Indicator met
Quality assurance processes are in place for use	As above	●	Indicator met
Comcare maintains its risk management capability	P118 'Regulatory Operations—Conduct of Reviews' and Quality audit plan published on intranet under 'Operational Support—ROG Business Planning 2014–15' contains processes in place. ROG is adaptable to the jurisdiction and needs of the community through: > flexible staff model SHARP (asbestos response team) and DIBP (response team for detention centre matters) > workforce planning > risk model.	●	Indicator met

Measure of Good Regulatory Performance 3.2: Comcare’s approach to regulatory risk is regularly reviewed. Strategies, activities and enforcement actions are amended to reflect changing priorities and evolving threats, without diminishing regulatory certainty or impact

Output/Activity	Evidence	Status	Actions for improvement
Documented approaches in place to review risk approaches regularly including considering with stakeholders on risk approaches	The risk management framework is monitored and reported against quarterly in consultation with risk and control owners. The reporting document is cleared through ROG’s Group Leadership Forum before being provided to the Corporate Risk Team for oversight.	●	Indicator met
Documented enforcement strategy includes options for graduated compliance actions consistent with regulators’ powers	Current <i>Compliance and enforcement policy</i> includes graduated compliance consistent with Comcare’s powers. ROG has identified a number of additional treatment options within its risk management plan that are currently being implemented as a part of the ROG transformation project. These additional controls have been specifically designed to address identified gaps with regulatory risk.	●	Indicator met

Measure of Good Regulatory Performance 3.3: Comcare recognises the compliance record of regulated entities, including using earned autonomy where this is appropriate. All available and relevant data on compliance, including evidence of relevant external verification is considered.

Output/Activity	Evidence	Status	Actions for improvement
Documented enforcement strategy which allows for the compliance records of regulated entities to be considered in determining regulatory actions	Current <i>Compliance and enforcement policy</i> allows for compliance history to be considered in regulatory response. Comcare uses an information management system to manage the entire suite of its regulatory functions. This system allows the entry of all compliance monitoring activities as a result of incident notifications and other intelligence. It captures information to understand where our risks in the jurisdiction exist, previous responses, and what corrective actions were implemented. This information allows Comcare to build a significant base of historical data and the ability to apply consistent decision making for regulatory response.	●	Indicator met
Demonstrated engagement with regulated entities to inform them of the regulators’ expectations	Operational Support—Regulatory Management System (RMS)/Integrated Regulatory Information System (IRIS) indicates that 798 reports have been sent from 1 Jan 2015–31 May 2015. Note: This includes SHARP Activities.	●	Indicator met

KPI 4: Compliance and monitoring approaches are streamlined and coordinated

Measure of Good Regulatory Performance 4.1: Comcare's information requests are tailored and only made when necessary to secure regulatory objectives, and only then in a way that minimises impact

Output/Activity	Evidence	Status	Actions for improvement
Evidence of collected information being acted upon, stored and re-used, where appropriate	Manual process to review s155 and assess whether it has been reused. There may also be issues with s271 of the WHS Act in reusing information.	●	Operational Support to commit to an audit in the future to check ongoing compliance with this measure
Documented decision-making procedures for information requests requiring consideration of the necessity of a request and the impact of the request	These procedures are being reviewed as part of the ROG SDR project and will now be: > Using 171 Powers at the Workplace > Using 155 Regulator Powers	●	To be reviewed

Measure of Good Regulatory Performance 4.2: Comcare's frequency of information collection is minimised and coordinated with similar processes including those of other regulators so that, as far as possible, information is only requested once

Output/Activity	Evidence	Status	Actions for improvement
Number of inspection visits co-ordinated with similar regulators	Recorded in RMS/IRIS. Nine Austrans visits from January–May and one Workcover NSW visit to Villawood IDC. State transport has occurred in 2016 and is recorded in RMS/IRIS. This is a coordinated visit with state police, state WHS regulators, EPA and roads regulators.	●	Indicator met
Volume of information shared and received among regulators	In response to HWSA recommendation to promote greater consistency and harmony across the various regulators, the National Workplace Inspector Training and Development Reference Group (NWITDRG) was established. A formal workshop was held in Melbourne from 23–25 February 2016 coordinated by Comcare.	●	Indicator met

Measure of Good Regulatory Performance 4.3: Comcare uses existing information to limit the reliance on requests from regulated entities and share the information among other regulators, where possible

Output/Activity	Evidence	Status	Actions for improvement
Evidence of collected information being acted upon, stored and re-used, where appropriate	Regular requests are made for various reports/data. Whether these are acted upon is unknown. Each case is assessed on its own merits and s271 of the WHS Act may prohibit the sharing of information.	●	With the new IRIS team and the Risk and Analysis team, improved data collection and reporting is expected
Evidence of available information obtained from other sources, with input not required from regulated entities	Risk and Analysis provide a monthly report (Insights) to ROG as well as ad hoc reports.	●	Indicator met
Number of complaints received from regulated entities about information requests and availability of information from other sources	The Feedback (Complaints) team provide weekly WIP report to Comcare Executive and quarterly report to SRCC, Senate Estimates covering Commonwealth agencies and Licensees.	●	Indicator met
A procedure of requests for information by the regulator includes a documented assessment and confirmation that the information is not already available	These procedures are being reviewed as part of the ROG SDR project and will now be: > Using 171 Powers at the Workplace > Using 155 Regulator Powers	●	To be reviewed

Measure of Good Regulatory Performance 4.4: Comcare bases monitoring and inspection approaches on risk and, where possible, takes into account the circumstance and operational needs of the regulated entity

Output/Activity	Evidence	Status	Actions for improvement
Feedback mechanisms to seek stakeholder views on monitoring and inspection methodology	Feedback either verbal/email following inspector report.	●	Indicator met—the new IRIS computer system provides a lessons learnt field for input of information which will improve this process
Monitoring and enforcement strategies that allows for a range of regulatory responses	The <i>Compliance and enforcement policy</i> allows for a range of compliance and enforcement responses.	●	Indicator met—the new policy sought feedback from stakeholders
Regular review and assessment of agreed monitoring and compliance strategies, including use of earned autonomy approaches	Refer to response to KPI 1.2. Work is underway to develop a risk assessment model to better inform Comcare's regulatory responses and identify areas of greatest harm to the sector.	●	Indicator met and improvements planned

KPI 5: Comcare is open and transparent in its dealings with regulated entities

Measure of Good Regulatory Performance 5.1: Comcare's risk-based frameworks are publicly available in a format which is clear, understandable and accessible

Output/Activity	Evidence	Status	Actions for improvement
Enforcement strategy and risk approach are published	Comcare has been reviewing its approach to compliance and enforcement activities to ensure our regulatory approach is aligned with the <i>Public Governance, Performance and Accountability Act 2013</i> . Subsequently we have developed a new <i>Compliance and enforcement policy</i> which sets direction for improving our performance as a regulator into the future and explains our compliance and enforcement activities.	●	Indicator met
Communications with regulated entities include clear and consistent reasons for the communication and, where relevant, linkage with the risk framework	Comcare CEO and General Manager ROG are consistently in contact with Senior Officers of our regulated entities and receive feedback on our regulatory performance from them directly. Additionally, Comcare facilitates forums and consultation processes that bring together senior representatives from our jurisdiction partners to give them the opportunity to provide feedback, for example Defence Liaison Forum or regulator cost recovery.	●	Indicator met

Measure of Good Regulatory Performance 5.2: Comcare is open and responsive to requests from regulated entities regarding the operation of the regulatory framework, and approaches implemented by Comcare

Output/Activity	Evidence	Status	Actions for improvement
Communications and Intelligence and Data Analysis Documented responsiveness to feedback from regulated entities, including feedback from existing complaint mechanisms and surveys of regulated entities	Comcare has a number of review processes in place to ensure people's rights and entitlements are protected when making regulatory decisions from compliance activities under the WHS and SRC Acts. Comcare adopts an escalating model of review and seeks to resolve all matters internally as a first priority through to external reviews by the Fair Work Commission (FWC) or Administration Appeals Tribunal (AAT).	●	Indicator met

Measure of Good Regulatory Performance 5.3: Comcare's performance measurement results are published in a timely manner to ensure accountability to the public

Output/Activity	Evidence	Status	Actions for improvement
Performance measurement results are published in a timely manner	Performance measurement results have been published as required. Comcare provides information publicly on an annual basis on the agreed performance indicators listed within our annual report. This includes information relevant to the delivery of: prosecutions, stakeholder forums, education programs.	●	Indicator met

KPI 6: Comcare actively contributes to the continuous improvement of regulatory frameworks

Measure of Good Regulatory Performance 6.1: Comcare establishes cooperative and collaborative relationships with stakeholders to promote trust and improve the efficiency and effectiveness of the regulatory framework

Output/Activity	Evidence	Status	Actions for improvement
Documented procedures allow active and regular engagement with stakeholders and used to improve the regulatory framework	Ensure procedures are documented appropriately and accessible for reporting on a quarterly basis.	●	To be reviewed
Feedback mechanisms are available and made known to all stakeholders	As above	●	To be reviewed

Measure of Good Regulatory Performance 6.2: Comcare engages stakeholders in the development of options to reduce compliance costs. This could include industry self-regulation, changes to the overarching regulatory framework, or other strategies to streamline monitoring and compliance approaches.

Output/Activity	Evidence	Status	Actions for improvement
Number of stakeholder events held to facilitate participation in the development and/or amendment of regulatory frameworks	Comcare undertook external consultation on a draft of the Compliance and Enforcement Policy, including face-to-face information sessions for external stakeholders held in Canberra, Melbourne and Sydney. Self-assessment (rehab) tool for annual assessment. Low risk employers could undertake a self-audit (timeframe TBA but less than annually). Comcare looking at cross jurisdictional monitoring, compliance etc. to assist in self-regulation.	●	Indicator met

Measure of Good Regulatory Performance 6.3: Comcare regularly shares feedback from stakeholders and performance information (including from inspections) with policy departments to improve the operation of the regulatory framework and administrative processes

Output/Activity	Evidence	Status	Actions for improvement
Documented procedures facilitate the flow of information between the regulator and policy departments	There are no documented procedures in place; however Comcare has longstanding arrangements in place that allows it to engage with the Department on policy matters.	●	Indicator met
Performance data, feedback from regulated entities, and/or advice is provided by the regulator to the policy departments	Comcare relays feedback from jurisdictional stakeholders regarding gaps within the regulatory framework to facilitate improvements—for example, reach stacker licensing.	●	Indicator met