

# **Senedd Commissioner for Standards Annual Report**

**1 April 2019 – 31 March 2020**

# **The main responsibilities of the Standards Commissioner are to receive and investigate complaints about the conduct of Members of the Senedd, report to the Senedd about his investigations and advise Members of the Senedd and the public about the complaints procedures.**

An electronic copy of this report can be found on the Senedd Commissioner for Standards website: [www.standardscommissionerwales.org](http://www.standardscommissionerwales.org).

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**Sir Roderick Evans  
Commissioner for Standards  
December 2016 – November 2019**



**Douglas Bain CBE TD  
Acting Senedd Commissioner for  
Standards  
November 2019 – Present**

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# 01. Introduction

- 01.01. In the absence of a Commissioner for Standards it falls to me as the Acting Commissioner to submit the annual report for 2019 – 20.
- 01.02. I was appointed as Acting Commissioner on 13 November 2019 following the resignation of Sir Roderick Evans a few days earlier. During his nearly three years as the Commissioner, Sir Roderick instigated some significant changes in the quest for even higher standards of conduct by Members. He called for a review of the Code of Conduct and associated processes, a review that is now underway. He reached agreement with Welsh Labour, the Welsh Conservatives, Plaid Cymru, Brexit Party, the Welsh Liberal Democrats and UKIP on the process for dealing with complaints made to them about the conduct of their Members. Under that process complainants are now made aware of their option of having their complaint dealt with either by the political party or by the independent Commissioner. Under his leadership and in partnership with the Assembly Commission a sexual harassment helpline staffed by trained personnel was established to provide specialist support, when appropriate, to complainants. During his tenure the number of staff seconded to his office was increased to support him in dealing with the increased number and complexity of complaints he received. The other attainments set out in this report are due, in no small measure, to his work.
- 01.03. Anything that I have achieved since my appointment would have been impossible without the understanding and support I have received from those I have encountered at the Senedd. All have gone out of their way to make me feel welcome and to explain to me the way that institution works. Particular thanks are due to the staff of my office, Jonathan Thomas and Abigail Phillips, without whose patience and professionalism my task of taking forward a number of ongoing investigations would have been very much harder and time consuming.
- 01.04. The fact that I live in Northern Ireland presented my staff with the additional challenge of having to work with me remotely. It is a measure of their enthusiasm that they very quickly adapted to this new way of working and found solutions to all the initial difficulties encountered. Little did we know in the period before Christmas 2019 that the move to remote working would stand us in very good stead to deal with the movement restrictions that would be imposed to deal with the Covid 19 pandemic.
- 01.05. In this report, after summarising the statutory duties of the Commissioner I set out information on complaints, other work undertaken and expenditure incurred before outlining work planned for the coming year.
- 01.06. On 6 May 2020, by virtue of the coming into force of Part 2 of the Senedd and Elections (Wales) Act 2020, the titles of the National Assembly, its officers and Members were changed. References to them before that date use the then correct nomenclature.

# 02. Functions and duties of the Commissioner

- 02.01. The office of National Assembly for Wales Commissioner for Standards was created by section 1(1) of the National Assembly for Wales Commissioner for Standards Measure 2009 ('the Measure').<sup>1</sup> Section 5 of the Measure provides for the independence of the Commissioner from the direction or control of the Assembly.
- 02.02. Section 4 of the Measure provides for the appointment of an Acting Commissioner to carry out the functions of the Commissioner if that office is vacant or if the Commissioner is, for any reason, unable to act. An Acting Commissioner has all the powers and duties of the Commissioner.
- 02.03. The functions of the Commissioner are set out in sections 6 and 7 of the Measure and may be summarised as being –
- To receive, investigate and report of any complaint that a Member has failed to comply with a requirement of the Code of Conduct<sup>2</sup> or other relevant provision;<sup>3</sup>
  - To advise Members and members of the public on the process for making and investigating complaints;
  - To give advice to the Assembly on any matter of general principle relating to the standards of conduct of Members, the procedure for investigating complaints or any other matter relating to promoting, encouraging and safeguarding high standards of conduct in the public office of Assembly Member.
- 02.04. Section 19 of the Measure requires the Commissioner, as soon as possible after the end of each financial year, to submit a report to the Assembly on how the functions of the Commissioner have been exercised during that year.

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1 <http://www.legislation.gov.uk/mwa/2009/4/contents>;

<http://www.legislation.gov.uk/mwa/2009/4/contents/enacted/welsh>

2 <https://www.assembly.wales/en/memhome/code-conduct-mem/Pages/default.aspx>

3 As defined in section 6(3) of the Measure



# 03. Complaints

## Introduction

03.01. Section 10 of the Measure makes provisions for the investigation of complaints by the Commissioner. Section 10(1) requires the Commissioner to investigate and report on complaints in accordance with Standing Orders and any rules relating to the consideration of complaints adopted by the Assembly. The current rules are the Procedure for dealing with complaints against Assembly Members ('the Procedure').<sup>4</sup> Section 10(2) of the Measure provides that "Subject to subsection (1), it is for the Commissioner to decide when and how to carry out an investigation and to report on its outcome."

## Definition of complaint

03.02. Research undertaken by my staff disclosed that there was no agreed definition of what constituted a complaint. Over the years different working 'definitions' had been employed making it difficult to identify trends and so to take appropriate remedial action. On occasion these 'definitions' resulted in under-reporting of the number of complaints received and determined. For example, where a number of complainants made a complaint against the same Member about substantially the same conduct they were sometimes counted as a single complaint.

03.03. For the purposes of this report 'Complaint' means a communication to the Commissioner alleging that a Member of the Assembly, political party, other organisation or person has contravened one or more of the provisions of the Code of Conduct for Assembly Members<sup>5</sup> ('the Code') or other provision specified in Standing Order 22.2.<sup>6</sup>

03.04. Although complaints that are not in writing and or against a named Member will always be inadmissible it is important to capture information about them. Where a complaint alleges more than one instance of related misconduct it is, for the purposes of this report, regarded as one compliant. Matters referred to the Commissioner by the Clerk of the Assembly under section 9 of the Measure are also regarded as complaints.

## Complaints carried forward from 2018-19

03.05. At the start of the reporting year there were eight complaints carried forward from 2018-19. Seven of them had been made in that year. All of these were brought to a conclusion. Five were found to be inadmissible whilst reports were submitted to the Standards of Conduct Committee ('the Committee') on the other two. The reasons why the eighth complaint, which has been ongoing since October 2017, has not been concluded will be set out in my report on that investigation which I hope shortly to submit to the Committee.<sup>7</sup>

## New complaints

03.06. During the year 106 new complaints were received. Even allowing for the new definition of complaint this is by far the highest number since the office of Commissioner was established in 2009 and an increase of 147% on 2018-19. By the 'definition' of complaint used in 2018 – 19 the increase would have been 33%. Of these new complaints 84 were found to be inadmissible. Six were about failure to register an interest on which no further action was appropriate whilst in a

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4 <https://senedd.wales/en/memhome/code-conduct-mem/Pages/procedure-complaints.aspx>

5 <https://senedd.wales/en/memhome/code-conduct-mem/Pages/code-conduct-mem.aspx>

6 <https://senedd.wales/en/memhome/code-conduct-mem/Pages/standing-orders-conduct.aspx>

7 The report was sent to the Committee on 19 June 2020

further six the complainants decided not to pursue their complaint. Reports on the investigation of two of the remaining admissible complaints were submitted to the Committee and one complaint was dealt with under the rectification procedure provided in paragraph 10 of the Procedure. The admissibility of a further seven complaints had not been determined by year end. These were carried over to 2020 - 21.

**Table 1: Complaints received, source and admissibility**

	2015 -16	2016-17	2017-18	2018-19	2019 -20
Received	24	29	26	43	106
% by Public	95.5	83.3	73.1	86	76.4
% by Member	0	3.3	11.5	7	13.2
% by Clerk of the Assembly	4.5	13.3	15.4	7	10.4
% not admissible	75	89.7	80.8	76.7	85.9
% admissibility not decided by year end	12.5	10.3	11.5	16.3	6.6

03.07. One Member was the complainant in seven of the 14 complaints made by Members. That number includes one complaint made by the Llywydd in that capacity and one self-referral by a Member. There is reason to believe that some of the complaints made by members of the public were made at the instigation of a Member.

03.08. Of the total complaints made by Members, seven were made by Independent Members, three by Welsh Labour Members, two by Plaid Cymru Members and one by a Brexit Party Member.<sup>8</sup>

03.09. Of the 11 complaints made by Members against other Members, six were against Welsh Labour Members, three against Brexit Party Members, two against Independent Members and one against a Plaid Cymru Member. Two complaints made by a Member were not about Members.<sup>9</sup>

03.10. Where the Clerk of the Assembly has reasonable grounds for suspecting that a Member has failed to comply with any of the provisions and that the conduct is relevant to her role as the principal accounting officer she must report the matter to the Commissioner who must, except in the case of alleged failure to register or declare an interest, treat it in the same way as any other complaint.<sup>10</sup> Where the alleged contravention is of failure to register or declare an interest the Commissioner must first consider whether there may have been a contravention of section 36(7) of the Government of Wales Act 2006.<sup>11</sup> If he concludes that such a contravention may have occurred the Commissioner must proceed in accordance with the Protocol between the Commissioner for Standards, the National Assembly and the Director of Public Prosecutions.<sup>12</sup> In all other cases the matter is dealt with as an ordinary complaint. During the year the Clerk referred 11 matters to the Commissioner. All of them fell to be dealt with as ordinary complaints.

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<sup>8</sup> The party recorded is the one to which the Member belonged at the time the complaint was made

<sup>9</sup> Ibid

<sup>10</sup> Section 9 of the Measure

<sup>11</sup> <http://www.legislation.gov.uk/ukpga/2006/32/section/36>

<sup>12</sup> <https://senedd.wales/en/memhome/code-conduct-mem/Pages/protocol-standards.aspx>

**Table 2: Reasons for inadmissibility<sup>13</sup>**

	2015-16	2016-17	2017-18	2018-19	2019-20
Not in writing <sup>14</sup> (Criterion i)	0	0	0	0	0
Not about conduct of identified Member (Criteria ii & iv)	1	2	1	1	5
Anonymous complaint or complainant not sufficiently identified (Criterion iii)	0	0	0	1	3
Not within time allowed (Criterion v)	4	0	0	0	2
Insufficient substance to justify further investigation (Criterion vi)	18	26	21	40	82

**Table 3: Further explanation of complaints found inadmissible due to insufficient substance to justify further investigation (Criterion vi)**

	2015-16	2016-17	2017-18	2018-19	2019-20
Expression of opinion	0	3	0	8	53
Insufficient evidence	3	4	6	8	10
Standard of service	7	3	5	9	8
Below registration threshold	0	3	0	0	3
About Ministerial conduct	5	3	2	2	3
About conduct in Siambur	0	1	3	1	0
Other	3	9	5	12	5

03.11. By far the most common reason for complaints being held inadmissible was that they were about expressions of opinion by Members. 37 of the 53 inadmissible complaints in this category were about a Member's use of Nazi imagery in tweets sent at the time of the elections to the European Parliament. Another ten of these complaints were about a Member's tweet criticising Greta Thunberg. Everyone has a right to freedom of expression and in the political sphere that right is enhanced. It is well established that "in a political context, a degree of the immoderate, offensive, shocking, disturbing, exaggerated, provocative, polemical, colourful, emotive, non-rational and aggressive that would not be accepted outside that context, is tolerated".<sup>15</sup> The right of politicians is not absolute and does not excuse gratuitously offensive personal comments.

03.12. The Procedure provides for two possible stages of any investigation of a complaint. At the Preliminary Investigation Stage the Commissioner may make enquiries to enable a decision on the admissibility of the complaint to be made. Only if the admissibility criteria are met does an investigation proceed to the second Formal Investigation Stage. If during the first stage it becomes clear that, even after a formal investigation, there will not be sufficient evidence of a

<sup>13</sup> The admissibility criteria are at paragraph 3.1 of the Procedure

<sup>14</sup> This information has not been recorded to date, but will be in 2020-21

<sup>15</sup> Heesom v Public Service Ombudsman for Wales [2014] EWHC 1504 (Admin) per Higginbottom J @ paragraph 38 and the authorities there cited

breach of the Code or other relevant provision the process stops and the complaint is not admissible.

- 03.13. The remit of the Commissioner is limited to investigation of alleged contraventions of the Code of Conduct or of other matters governed by Standing Order 22. Poor service by a Member would not be a contravention of any of those matters and accordingly complaints about alleged poor service by a Member are always inadmissible. The remedy for such poor service is through the ballot box not by way of complaint to the Commissioner.
- 03.14. Under Standing Order 2.2 Members are required to register specified financial and other interest in a register maintained by the Table Office on behalf of the Llywydd. Members are required to register any gifts, hospitality, other material benefit or advantage with a value in excess of £320. Where during the preliminary investigation of an alleged failure to register such a benefit it becomes clear that the value is below that threshold the complaint is inadmissible.
- 03.15. Section 8 of the Measure makes clear that the Commissioner has no role in relation to complaints of alleged misconduct by a Minister. Where complaints of such misconduct are received the complainant is directed to the office of the First Minister.
- 03.16. Under the protocol between the Llywydd and the Commissioner I treat complaints about conduct in the Siambr as inadmissible and refer them to her for consideration.
- 03.17. As in previous years a number of complaints were received that Members had failed to deal with other matters, such as the conduct of a police officer or a health service employee. These matters are outside the remit of Members and so of the Commissioner. In all such cases the complainant is contacted and signposted to the appropriate organisation to consider their complaint.

**Table 4: Complaints by subject matter**

	2015 -16	2016-17	2017-18	2018-19	2019-20
Conduct on social media	0	5	0	7	58
Misuse of resources	3	3	4	8	15
Standard of service	9	6	5	9	13
Failure to register	1	4	3	4	9
Outside remit	6	7	7	6	7
Other conduct	3	5	7	9	4
TOTAL	22	30	26	43	106

- 03.18. Despite the high number of complaints about abusive conduct on social media it remains my view that it would be wrong to issue guidance to Members on this subject. Doing so would tend to create the impression that a different lower standard of conduct is acceptable on social media than in print or face to face. I am clear that Members must, before they decide to use social media, consider whether the comment they are making or otherwise engaging with is consistent with the high standards of conduct rightly expected of them. Abuse on social media is, because of its wide circulation, often much more hurtful than abuse during a face to face exchange.
- 03.19. Assembly resources must only be used for by Members for the purpose of their activities as Assembly Members and not for personal, party political or electoral purposes. Complaints received during the year included allegations of the use of Assembly Member Support Staff ('AMSS') for electoral purposes, the use of conference rooms for party political meetings and the use of a constituency office for party political purposes. In the course of my work on a number of

the complaints under this category I have been concerned about inexact and potentially conflicting provisions in the Code, the Rules and Guidance on the Use of Assembly Resources and in a number of documents on the use of Assembly resources in the run-up to elections. I have drawn these matters to the attention of the Clerk of the Assembly and the Committee. I welcome their responses that my concerns will be addressed during the ongoing redrafting of these documents. I welcome both the review of the Code of Conduct being undertaken by the Committee and the review by the Clerk of the Procedure and other documents. I look forward to continuing to participate in this important work.

- 03.20. Under Standing Order 2 Members are required to register within specified time limits certain information regarding their financial and other interests.<sup>16</sup> Failure to register these details timeously is a contravention of the Code about which anyone can make a complaint. As noted at paragraph 03.10 above, the Clerk is under a statutory duty to refer suspected instances of failure to register to the Commissioner. Nine Members were referred to the Commissioner for suspected failure to register. On three occasions the value of the benefit was found to be below the registration threshold. In the other six instances no further action was considered necessary as the registration was only marginally late. I am satisfied that the increased number of complaints of failure to register an interest was due more to a lack of understanding of the requirements rather than any deterioration of conduct.
- 03.21. The four complaints about various matters that did not fall into any of the above categories are grouped together as 'Other'. Interestingly, there were no complaints of alleged contravention of the Dignity and Respect Policy.<sup>17</sup> It is unclear whether that represents an improvement in the conduct of Members or an unwillingness of 'victims' to use the complaints process.

## Complaints carried forward to 2020 – 2021

- 03.22. At the year-end no decision had been made on the admissibility of seven complaints.<sup>18</sup> In two of these no action was being taken to avoid the risk of prejudicing police investigations. Three complaints, including one carried forward from 2018-19, were under investigation.

## Trends

- 03.23. Because of the differing ways in which complaints have in the past been recorded it is not easy to identify trends. The recording protocol now in place should make that task easier in the future. It is, however, plain that this year has seen another very significant increase in the number of complaints received. What is not clear is whether this represents a greater interest in the standards of conduct of Members, a deterioration in the conduct of Members or a greater awareness of the complaints process.
- 03.24. One regrettable practice that became apparent during the year was the willingness of a small number of Members to use the complaints process as a political weapon. As noted above, one Member was responsible more than half of all complaints made by Members. It was also clear that on other occasions a small number of Members had used a member of the public to make a complaint on their behalf. There is, of course, nothing wrong with Members making complaints when they genuinely believe that there has been misconduct but the emerging practice of using the complaints process to score political points is to be deprecated.
- 03.25. The level of inadmissible complaints continued at the high level seen over the last five years. Dealing with inadmissible complaints is wasteful of resources including, on occasion, the time of the Member whose conduct is the subject of the complaint. It may be that to some extent this high

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16 <https://senedd.wales/en/memhome/code-conduct-mem/Pages/standing-orders-conduct.aspx>

17 <https://senedd.wales/en/help/contact-the-assembly/con-complaint/Pages/Dignity-and-Respect-Policy.aspx>

18 One of these has now been held admissible and is under investigation; four have been held inadmissible

level is due to a lack of public understanding of the complaints process. In Section 06 of this report I set out remedial action I intend to take in 2020 – 21.

# 04. Other work

- 04.01. During the year no formal requests from the Assembly for advice on any matter of general principle were received. The Commissioner's right, under section 7 of the Measure, to give advice to the Assembly on matters of general principle was exercised once. In addition I have on a number of occasions given informal advice to the Committee in relation to its work on revision of the Code of Conduct.
- 04.02. On numerous occasions during the year the staff of the Commissioner's Office provided advice to the public on the complaints process.
- 04.03. During his tenure Sir Roderick worked with the Committee on its review of the Code of Conduct and the associated policies and procedures. To inform that review he had discussions with the office of the Parliamentary Commissioner for Standards to consider how their experiences might inform any action to be taken in Wales.
- 04.04. In the summer the Welsh Labour and Brexit groups agreed to follow the protocol on the processing of complaints received by them about their Members. As a result all Assembly parties have now agreed to its provisions.
- 04.05. Following my appointment I received helpful and comprehensive briefings from the Clerk of the Assembly and senior staff of the Assembly Commission.
- 04.06. I offered to meet with each of the political parties and with independent Members to explain to them how I proposed to carry out my duties and to answer their questions. This offer was availed of by the Welsh Labour Group and UKIP and by the leader of the Welsh Conservative group on behalf of its Members. I also had a useful and informative meeting with the Committee.
- 04.07. At a meeting with South Wales Police it was agreed in principle that there should be a protocol or memorandum of understanding in relation to the disclosure of information between the Commissioner and the police. At the year-end work on the terms of the proposed memorandum was well advanced.
- 04.08. I have contributed to the work of the Committee in two important areas: the review of the Code of Conduct and related guidance documents and the abolition of the requirement for Members to register financial and other interests both with the Assembly and the Electoral Commission.
- 04.09. I responded to the Remuneration Board's consultation 'Review of the Determination for the Sixth Assembly' and recommended the inclusion of provisions to reduce a fraud risk identified in the course of an investigation. That risk was due to the absence of any requirement for Members to maintain any records of the daily hours worked by their AMSS on Assembly related work. In the absence of such records the way is open to a Member who wishes to exploit the system to use his or her AMSS for party political or electoral work during time that they are being paid out of public funds.
- 04.10. Since the office was established in 2009 media enquiries about the work of the Commissioner have been dealt with by the Assembly Press Office. To avoid any risk of a perceived conflict of interests between the Assembly and the independent Commissioner arrangements have been put in place for media requests for information about the Commissioner's work to be handled by the private sector. Arrangements have also been established for the independent transcription of evidence hearings and interviews.



# 05. Expenditure

05.01. Under the terms of the Measure, the Assembly Commission must pay the Commissioner the salary and allowances agreed in the terms and conditions of appointment. The Commission must also pay all reasonable expenses lawfully incurred by the Commissioner in employing staff, securing the provision of goods or services, or paying allowances or expenses to witnesses.<sup>19</sup> Throughout the year every effort has been made to keep expenditure to the minimum consistent with performance of the duties of the Commissioner.

05.02. Table 5 sets out this expenditure for the period April 2019 to March 2020.

**Table 5: Expenditure for April 2019 to March 2020**

	2015 -16 £	2016 -17 £	2017 -18 £	2018 – 19 £	2019 – 20 £
Commissioner salary <sup>20 21</sup>	19858	17816	19535	26105	17446
Commissioner T&S	0	73	180	0	376
Hospitality & other costs	0	0	0	0	0
Acting Commissioner salary <sup>22</sup>	0	0	0	4786	10188
Acting Commissioner T&S	0	0	0	695	2655
Acting Commissioner Hospitality & other costs	0	0	0	0	0
<b>Total Commissioner and Acting Commissioner expenditure</b>	<b>19858</b>	<b>17889</b>	<b>19715</b>	<b>31586</b>	<b>30665</b>
Staff salary <sup>23</sup>	3742	4070	5756	44798	123630
Staff T&S <sup>24</sup>	0	0	0	0	504
<b>Total Staff costs</b>	<b>3742</b>	<b>4070</b>	<b>5756</b>	<b>44798</b>	<b>124134</b>
Other liabilities incurred <sup>25</sup>	0	0	0	0	1661
<b>TOTAL COMMISSIONER OFFICE EXPENDITURE</b>	<b>23600</b>	<b>21959</b>	<b>25471</b>	<b>76384</b>	<b>156460</b>

19 Section 3 and Schedule paragraph 5

20 Up to resignation of Commissioner on 11 Nov 2019

21 Commissioner salary includes the annual retainer

22 All costs associated with the Acting Commissioner are from appointment date on 13 Nov 2019

23 In November 2018 the staff compliment of the Commissioner's office was increased from one part-time member to one full-time and one part-time member. Staff are seconded by the Assembly Commission

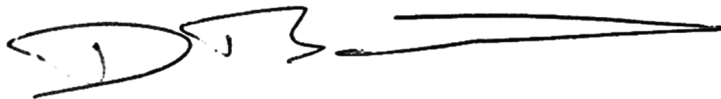
24 Prior to 2019-20 these costs were not attributed to the Commissioner's office

25 Includes the provision of goods and services such as transcription of interviews and the data protection fee. The costs are not an exhaustive list and do not include, for example, the cost of office heat and light or of ICT support. Consideration will be given to the inclusion of these costs in the 2020-21 annual report



# 06. The year ahead

- 06.01. My appointment as Acting Commissioner will end as soon as a new Commissioner is appointed and it will be for that person to determine the priorities for the remainder of 2020 -21.
- 06.02. Until then I will, in addition to the complaint investigation function, bring greater openness and transparency to the office of Commissioner by publishing on the website information on my financial and other interests under broadly the same categories as required of Members.<sup>26</sup> I also intend to publish information on any gifts or hospitality above the registration threshold for Members that I receive and which are related in any way to my role as Acting Commissioner. I will also consider the desirability of publishing monthly statistics about the complaints work undertaken.
- 06.03. In an attempt to reduce the number of inadmissible complaints received, new user friendly guidance on the complaints process will be produced. This will make clear that the ability of the Commissioner to seek expert assistance when, for example, investigating an alleged contravention of the Dignity and Respect Policy. I will consider how, other than publishing on the Commissioner's website the new guidance could best be brought to the attention of the public.
- 06.04. I will continue my dialogue with South Wales Police with a view to concluding the Memorandum of Understanding early in the coming year. Consideration will be given to seeking similar memoranda with other forces.
- 06.05. Work to improve systems and governance with my office will be undertaken. Statistics will be gathered on requests for advice on the complaints process. Consideration will be given to setting performance targets for complaint handling and to collating information on the full cost of the Commissioner's office.
- 06.06. Along with my staff I look forward to meeting with our opposite numbers from other jurisdictions in the British Isles at the Standards Conference now scheduled to take place in Cardiff in the autumn. This event provides a useful opportunity to learn of and share best practice on standards issues.
- 06.07. My staff and I will continue to work as sustainably as practicable. I will continue to keep the number of occasions on which I travel from Belfast to Cardiff to the minimum consistent with the effective performance of my duties. To that end the use of remote meetings, which started before the Covid 19 lockdown, will continue and be increased. My office will continue to operate on a largely paperless basis with hard copy documents being produced only when absolutely necessary. Home working, which has proved successful during that lockdown, will continue where appropriate.
- 06.08. I will continue to assist the Committee and the Clerk in their important work of revising the Code of Conduct and related guidance.



**Douglas Bain CBE TD**

**Acting Senedd Commissioner for Standards**

**22 June 2020**

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<sup>26</sup> The information was published on 20 April 2020