



Disciplinary Tribunal Panel Hearing

14 May 2024

**Institute and Faculty of Actuaries
Online Hearing**

Respondent:	Chengyue Zhou Not present and not represented in absence
Category:	Lapsed Student
Region:	China
IFoA Case Presenter:	Alecsandra Manning-Rees (Case Presenter), instructed by the IFoA Karen Nicol (IFoA)
Panel Members:	Catriona Whitfield (Chair/Lay member) Hatim Maskawala FIA (Actuary member) Richard Thompson (Lay member)
Legal Adviser:	Sharmistha Michaels
Judicial Committees Secretary:	Hinna Alim

Charge:

CHENGYUE ZHOU, being at the material time a member of the Institute and Faculty of Actuaries, the charge against you is that:

1. On or around 20 November 2022 you submitted an exemption application to the Institute and Faculty of Actuaries with an altered academic transcript and / or cover letter for the academic year 2020 / 2021 dated 13 January 2022
2. You knew the academic transcript and/or letter at paragraph 1 did not show the correct position for the academic year 2020 / 2021
3. Your actions at paragraph 1 were dishonest by reason of paragraph 2
4. On or around 20 November 2022 you submitted an exemption application to the Institute and Faculty of Actuaries with an altered exemption letter from [University D] dated 12 November 2021
5. You knew the letter at paragraph 4 had been altered
6. Your actions at paragraph 4 were dishonest by reason of paragraph 5
7. Your actions at paragraphs 1 and/or 2 and/or 3 and/or 4 and/or 5 and/or 6 were in breach of the principle of Integrity under the Actuaries' Code of the Institute and Faculty of Actuaries version 3.0 (May 2019)
8. Your actions, in all or any of the above, constituted misconduct in terms of Rule 4.2 of the Disciplinary and Capacity for Membership Schemes of the Institute and Faculty of Actuaries (Effective 1 June 2021).

Service of Charges:

1. The Panel noted that the Respondent was not present and was not represented in their absence. Having considered the submissions of the IFoA's Case Presenter and having

accepted the advice of the Legal Adviser, the Panel was satisfied that the Charges have been served in accordance with the provisions of the Disciplinary Scheme.

Proceeding in the Absence of the Respondent:

2. In considering whether to exercise its discretion to proceed in the absence of the Respondent, the Panel had regard to the submissions of the IFoA's Case Presenter. The Panel considered the advice of the Legal Adviser who referred the Panel to the case of R v Hayward, R v Jones, R v Purvis [2001] QB 862, [2001] EWCA Crim 168 and to the case of GMC v Adeogba and GMC v Visvardis [2016] EWCA Civ 162.
3. The Panel also took account of the correspondence between the IFoA and the Respondent regarding the disciplinary process. The Panel noted the Respondent's emails to the IFoA of 23 April 2023 and 20 May 2023, neither of which indicated any intent to engage in the disciplinary process. No application for an adjournment or re-scheduling was received from the Respondent.
4. The Panel noted that the discretion to proceed in the absence of a Respondent may be exercised if the Panel considers it to be in the interests of justice and therefore must be considered with the utmost care and caution. The Panel must consider matters such as whether the notice and hearing date had been served on the Respondent, whether the Respondent has requested an adjournment, whether they would be likely to attend any adjourned hearing, or whether, in all the circumstances, the Respondent had absented themselves voluntarily from the hearing.
5. The Panel was satisfied that the notice and hearing date had been served on the Respondent.
6. There is a public interest in the resolution of matters of professional misconduct. The guidance in paragraphs 19-21 of GMC v Adeogba and GMC v Visvardis was to proceed unless there was good reason not to do so. The Panel considered that there was no good reason to adjourn the hearing. The Panel considered that the Respondent had chosen not to exercise their right to be present or to instruct a legal representative. Further that no adjournment had been sought by the Respondent and there was no reason to suggest that an adjournment would secure the attendance of the Respondent

on another occasion. The Panel also took into account that there were witnesses in attendance to give evidence, that they had made arrangements to attend the hearing and that any further delay may adversely affect their recollection of events. The Panel was therefore satisfied that the Respondent had chosen voluntarily to absent themselves from the hearing. In the circumstances, the Panel determined that it was in the public interest in the expeditious disposal of the case and the Respondent's own interests to proceed in the absence of the Respondent.

Other Preliminary Matters

7. The Legal Adviser brought to the Panel's attention the fact that both the Legal Adviser and the IFoA's case presenter are members of the same Chambers and thus have professional knowledge of each other. They do not work closely together, have not spoken about this matter with each other and were not aware that each other was involved in this matter until the Case Papers were served. In these circumstances the Panel was satisfied that this did not create a conflict of interest but thanked the Legal Adviser for bringing the matter to their attention.

Panel's Determination:

8. The Panel found the charge of misconduct proved in all the particulars alleged. The Panel determined that the most appropriate and proportionate sanction was a reprimand, a fine of £2,500 and exclusion from IFoA membership. The Respondent may not apply for readmission for a period of one year.
9. The Panel also ordered the Respondent to pay to the IFoA costs of £4,078.

Background:

10. The Respondent had been a student member of the IFoA since 11 March 2020. The Respondent's membership lapsed on 30 September 2023 due to the non-payment of fees.

11. On 20 November 2022 the Respondent submitted an application for exemption from certain IFoA examinations. The application was accompanied by an academic transcript, with cover letter, both purporting to have been certified by an Associate Professor at University D. The application was also accompanied by an exemption letter purporting to be from the Respondent's Programme Director at University D.
12. The application included a declaration to the effect that the applicant declared "*that the information supplied with the application is correct to the best of my belief.*" The Respondent had signed the declaration.
13. The Respondent's application and accompanying documents were passed to the IFoA's Member Services Team for review. The Member Services Team were unable to find the Respondent on the Recommendation List (prepared by an Independent Examiner listing graduates eligible for exemption). The Member Services Team then sent the Respondent's application and accompanying documents to the IFoA's Quality Team for further investigation.
14. The Quality Team entered into correspondence with the Associate Professor at University D. This correspondence indicated that the documents accompanying the Respondent's application may not have been authentic.
15. The Quality Team wrote to the Respondent asking her to clarify the situation. No reply was received.
16. An allegation was referred to the Disciplinary Investigations Team using the Executive Referral process on 10 March 2023.
17. As the allegation was made prior to 01 August 2023, the allegation was investigated under the Disciplinary Scheme (effective 01 June 2021) that was in force when the allegation was made. The Respondent did not opt to have her case transferred to the new scheme.

Findings of Fact:

18. The Panel was aware that the burden of proof rests on the IFoA, and that the standard of proof is the civil standard, namely the balance of probabilities. This means that the facts will be proved if the Panel was satisfied that it was more likely than not that the events occurred as alleged. There is no requirement for the Respondent to prove anything.
19. In reaching its decisions on the various parts of the charge, the Panel took into account the oral and documentary evidence in this case together with the submissions of the IFoA's Case Presenter. The Panel considered the advice of the Legal Adviser.
20. The Respondent was not in attendance at this hearing and the Panel was satisfied that this absence was voluntary for the reasons set out above. The Panel has drawn no adverse inference as a consequence of the Respondent's absence.
21. Due to the limited engagement by the Respondent with IFoA, the Panel thought it appropriate to proceed as if the Respondent was denying the charges in their entirety.
22. The Panel heard oral evidence from three witnesses: Witness A, Case Manager of the IFoA; Witness B, Senior Quality Executive of the IFoA; and Witness C, Associate Professor at University D. The Panel found all witnesses to be credible and reliable.
23. The Respondent was not currently a member of the IFoA. Rule 4.4 of the Disciplinary and Capacity for Membership Schemes (01 June 2021) states that the Scheme extends to cover former Members who were Members at the time of the conduct which forms the basis for the allegations made. The Panel was satisfied that the Respondent was a Member at the relevant time and therefore the conduct fell to be considered under the Scheme.
24. Charge 1 - On or around 20 November 2022 you submitted an exemption application to the Institute and Faculty of Actuaries with an altered academic transcript and / or cover letter for the academic year 2020 / 2021 dated 13 January 2022.
25. The Panel found Charge 1 proved on the balance of probabilities.

26. The Panel had before it an email from the Respondent to the IFoA dated 20 November 2022 under cover of which the Respondent had submitted an application for exemption. Attachments to the email comprised an application form, an academic transcript purporting to be for the academic year 2020 / 2021 together with covering letter, both purported to be certified as originals by Witness C (Associate Professor at University D), and the letter referred to at Charge 4 below.
27. The Panel heard evidence from Witness B that the Respondent's 2022 exemption application had been submitted to the Quality Team for further investigation because the Respondent's name did not appear on the Recommendation List. Enquiries were then made of University D. As a result of these enquiries it became apparent that the same academic transcript and cover letter had been used in the Respondent's successful exemption application of 2020. It appeared that the academic transcript and cover letter had been altered to change the grades on the academic transcript and to alter the dates of the purported certification of both the academic transcript and cover letter. The Panel had before it a copy of the Respondent's 2020 exemption application and accompanying documents.
28. The Panel heard from Witness C that as a result of enquiries made of him by the IFoA in January 2023, he became aware that he was purported to have certified documents which accompanied the Respondent's 2022 exemption application. Witness C explained that the certifications are dated 15 November 2022, the enquiry from the IFoA was received within 2 months of that date and that he therefore clearly recalled that he had not certified those documents in November 2022. He added that he was not on campus throughout November 2022 and therefore could not have certified those documents. In addition, he had no recollection of the Respondent being a student during that academic year. He stated that he did recall the Respondent from earlier academic years, that they had graduated, and that the University had regulations to prevent a student repeating a degree that they had already been awarded.
29. Witness C said that he had made enquiry of University D's electronic records and ascertained that the Respondent completed their studies with the University in academic year 2018 / 2019. The Panel had before it the extract from the University's records showing the courses taken by the Respondent in 2018 / 2019 and the grades awarded.

30. The Panel had before it the Respondent's email to the IFoA of 23 April 2023 in which the Respondent said, "*I apologize for my misconduct I did months ago.*" and said that "*I did not remember it at all.*" In a subsequent email on 20 May 2023, the Respondent said that this could be due to issues with their health but that they were not in a position to provide any evidence to support that proposition. The Respondent was advised of the alternate route available through the Capacity for Membership process for cases of serious health issues, they have not chosen to opt for that alternative.
31. The Panel was satisfied on the balance of probabilities that the Respondent had submitted an exemption application to the Institute and Faculty of Actuaries with an altered academic transcript and cover letter for the academic year 2020 / 2021 dated 13 January 2022.
32. Charge 2 - You knew the academic transcript and/or letter at paragraph 1 did not show the correct position for the academic year 2020/2021
33. The Panel found Charge 2 proved on the balance of probabilities.
34. The Panel had before it the Respondent's email of Email IFoA dated 20 November 2022 referred to above. The email indicates that it was sent from Respondent's email and it has been signed off using the Respondent's name.
35. The Exemption Application accompanying that email included a 'Declaration to be signed by the Applicant' which states: "*I apply for exemption from the above subject(s) of the examinations and declare that the information supplied with the application is correct to the best of my belief.*" The Respondent had signed the declaration and dated it 10 November 2022.
36. The Panel had before it the academic transcript and covering letter which had been used by the Respondent to support their successful and correct exemption application of 2020. The Panel also had before it the altered academic transcript and covering letter used by the Respondent to support their 2022 exemption application. They are the same supporting documents, albeit that the documents accompanying the 2022 exemption application had been altered.

37. The Panel had before it the Respondent's email to the IFoA of 23 April 2023 in which the Respondent said, "*I apologize for my misconduct I did months ago.*" and said that "*I did not remember it at all.*" In a subsequent email on 20 May 2023, the Respondent said that this could be due to issues with their health but that they were not in a position to provide any evidence to support that proposition. The Respondent was advised of the alternate route available through the Capacity for Membership process for cases of serious health issues, they have not chosen to opt for that alternative.

38. Panel therefore satisfied on the balance of probabilities that the Respondent had submitted the 2022 exemption application and accompanying documents, had made a declaration in respect of that application, and knew that the academic transcript and the letter referred to at Charge 1 did not show the correct position for the academic year 2020 / 2021.

39. Charge 3 - Your actions at Charge 1 were dishonest by reason of Charge 2

40. The Panel found Charge 3 proved on the balance of probabilities.

41. The Panel considered the advice of the Legal Adviser regarding the test for dishonesty, as set out in Ivey v Genting Casinos (UK) LTDs [2017] UKSC 67 at paragraph 74. The Legal Adviser provided legal advice that the test for dishonesty has two elements: firstly, the actual knowledge or belief of the individual as to the facts. Secondly, would that conduct be viewed as dishonest by applying the objective standards of '*ordinary, decent people*'.

42. The Panel has found Charge 2 proved on the balance of probabilities so the first part (knowledge) of the Ivey test is satisfied. The Panel has no doubt that by the standards of ordinary, decent people it is dishonest to put forward altered documents in support of an exemption application which forms part of the process of obtaining a professional qualification. It follows that the Respondent's actions at Charge 1 were dishonest by reason of Charge 2.

43. Charge 4 - On or around 20 November 2022 you submitted an exemption application to the Institute and Faculty of Actuaries with an altered exemption letter from [University D] dated 12 November 2021

44. The Panel found Charge 4 proved on the balance of probabilities.

45. The Panel had before it an email from the Respondent to the IFoA, dated 20 November 2022, under cover of which the Respondent had submitted an application for exemption. Attachments to the email comprised an application form, the supporting documents referred to at Charge 1, and also a letter dated 12 November 2021 from the Programme Director at University D. The letter bears the heading 'Academic Year 2021 - 2021' and appears to confirm recommendations for exemptions from IFoA exams.
46. The Panel heard evidence from Witness B, that the Respondent's 2022 exemption application had been submitted to the Quality Team for further investigation, because the Respondent's name did not appear on the Recommendation List. Enquiries were then made of University D. As a result of these enquiries it became apparent that the same exemption letter had been used in the Respondent's successful exemption application of 2020. It appeared that the exemption letter had been altered to change the dates of the academic year to which it related. The Panel had before it a copy of the Respondent's 2020 exemption application and accompanying documents.
47. The Panel heard from Witness C who said that he had made enquiries of University D's electronic records and ascertained that the Respondent completed their studies with the University in academic year 2018 / 2019. The Panel had before it the extract from the University's records showing the courses taken by the Respondent in 2018 / 2019 and the grades awarded.
48. The Panel had before it the Respondent's email to the IFoA of 23 April 2023 in which the Respondent said, "*I apologize for my misconduct I did months ago.*" and said that "*I did not remember it at all.*" In a subsequent email on 20 May 2023, the Respondent said that this could be due to issues with their health but that they were not in a position to provide any evidence to support that proposition. The Respondent was advised of the alternate route available through the Capacity for Membership process for cases of serious health issues, they have not chosen to opt for that alternative.
49. The Panel was satisfied on the balance of probabilities that the Respondent had submitted an exemption application to the Institute and Faculty of Actuaries with an altered exemption letter from University D dated 12 November 2021.
50. Charge 5 - You knew the letter at paragraph 4 had been altered

51. The Panel found Charge 5 proved on the balance of probabilities.
52. The Panel had before it the Respondent's email of Email IFoA dated 20 November 2022 referred to above. The email indicates that it was sent from Respondent's email, and it has been signed off using the Respondent's name.
53. The Exemption Application accompanying that email included a 'Declaration to be signed by the Applicant' which states: "*I apply for exemption from the above subject(s) of the examinations and declare that the information supplied with the application is correct to the best of my belief.*" The Respondent had signed the declaration and dated it 10 November 2022.
54. The Panel had before it the exemption letter from University D which had been used by the Respondent to support their successful and correct exemption application of 2020. The Panel also had before it the altered exemption letter from University D used by the Respondent to support their 2022 exemption application. They are the same supporting document, albeit that the document accompanying the 2022 exemption application had been altered.
55. The Panel had before it the Respondent's email to the IFoA of 23 April 2023 in which the Respondent said, "*I apologize for my misconduct I did months ago.*" and said that "*I did not remember it at all.*" In a subsequent email on 20 May 2023, the Respondent said that this could be due to issues with their health but that they were not in a position to provide any evidence to support that proposition. The Respondent was advised of the alternate route available through the Capacity for Membership process for cases of serious health issues, they have not chosen to opt for that alternative.
56. The Panel was therefore satisfied on the balance of probabilities that the Respondent had submitted the 2022 exemption application and accompanying documents, had made a declaration in respect of that application, and knew that the exemption letter from University D referred to at Charge 4 did not show the correct position for the academic year 2020 / 2021.
57. Charge 6 - Your actions at Charge 4 were dishonest by reason of Charge 5

58. The Panel found Charge 6 proved on the balance of probabilities.
59. The Panel had considered the advice of the Legal Adviser on the test for dishonesty as set out in Ivey v Genting Casinos (UK) LTD [2017] UKSC 67 at Charge 3 above and heard their advice on the two part test for dishonesty.
60. Having found Charge 5 proved on the balance of probabilities the Panel was therefore satisfied that the first part of the Ivey test was satisfied. The Panel had no doubt that by the standards of ordinary, decent people it is dishonest to put forward altered documents in support of an exemption application which forms part of the process of obtaining a professional qualification. It follows that the Respondent's actions at Charge 4 were dishonest by reason of Charge 5.
61. Charge 7 - Your actions at Charges 1 and / or 2 and / or 3 and / or 4 and / or 5 and / or 6 were in breach of the principle of Integrity under the Actuaries' Code of the Institute and Faculty of Actuaries version 3.0 (May 2019)
62. The Panel found Charge 7 proved on the balance of probabilities.
63. The Panel reminded itself of the Integrity principle of the Actuaries' Code (version 3.0 18 May 2019) specifically the requirement that "*Members must act honestly and with integrity*".
64. The Panel also considered the "Guidance to support the principles and amplifications in the Actuaries' Code" (Version 1 April 2019). Specifically at paragraph 3.1 "*Members are expected to demonstrate high standards of behaviour*", at paragraph 3.2 "*Integrity is generally accepted as a fundamental requirement to act in an ethical and professional manner.*" and at paragraph 3.3 "*Acting with integrity in a professional setting will generally mean being straightforward and honest in your professional and business relationships and dealing fairly with those around you.*"
65. The Panel was referred to the guidance provided in Wingate and Evans v SRA EWCA Civ 366 which refers to integrity as being "*a useful shorthand to express the higher standards which society expects from professional persons and which the professions expect from their own members*". The Panel was also referred to the guidance provided

in Newell-Austin v SRA [2017] EWHC 411 which describes Integrity as connoting “*moral soundness, rectitude and steady adherence to an ethical code*”.

66. The Panel was satisfied that since Charges 1, 2, 3, 4, 5 and 6 have been found proved and since dishonesty has been found proved under Charges 3 and 6, it follows that the Respondent’s actions were in breach of the principle of Integrity under the Actuaries’ Code of the Institute and Faculty of Actuaries version 3.0 (May 2019).
67. Charge 8 - Misconduct Charge - Your actions, in all or any of the above, constituted misconduct in terms of Rule 4.2 of the Disciplinary and Capacity for Membership Schemes of the Institute and Faculty of Actuaries (Effective 1 June 2021).
68. The Panel considered whether the charges found proved amounted to Misconduct. In considering this matter, the Panel took account of the definition of Misconduct, which for the purposes of the Disciplinary Scheme, is defined as any act or omission or series of acts or omissions by a Member, in their professional or non-professional life, which falls significantly short of the standards of behaviour, integrity, competence or professional judgement which other Members or the public might reasonably expect of a Member (Rule 2.1) .
69. Misconduct needs to be serious, falling well below the standard expected of a Member in the circumstances. It has been described as being conduct which fellow professionals would find deplorable.
70. The Panel considered the advice of the Legal Adviser who had pointed the Panel to the cases of Roylance v GMC (No 2) [2001] 1 AC 311 where it was stated that to constitute misconduct the conduct complained of must be serious and that the conduct falls short of what would be proper in the circumstances.
71. The Panel has found a specific breach of the Actuaries Code proved. It has found that the Respondent’s actions were dishonest. The Panel is satisfied that other members of the profession and the wider public would consider that falsifying documents in order to obtain exemptions from a professional examination is behaviour falling far short of what is expected of a Member. The profession and the public need to rely on the qualifications which Actuaries obtain, and which help to demonstrate their competence to do their jobs. Falsifying documents in order to obtain exemptions from professional exams inevitably

risks undermining trust in the profession and its regulator. The Panel is satisfied that the Respondent's actions, as found proved in Charges 1, 2, 3, 4, 5, 6 and 7 amounted to Misconduct.

Sanction:

72. In considering the matter of sanction, the Panel had regard to the submissions of the IFoA's Case Presenter. The Panel considered the advice of the Legal Adviser. The Panel also had careful regard to the Sanctions Guidance (November 2021). The exercise of its powers in the imposition of any sanction is a matter solely for the Panel to determine and it is not bound by the Sanctions Guidance.
73. The Panel was aware that the purpose of sanction is not to be punitive although it may have that effect. Rather, the main objective of any sanction is to protect members of the public, to promote and maintain public confidence in the profession and declare and uphold proper standards of conduct and competence. The Panel is mindful that it should impose a sanction, or combination of sanctions necessary to achieve those objectives and in so doing it must balance the public interest with the Respondent's own interests.
74. In considering sanction, the Panel took into account the following aggravating factors:
- the Respondent's behaviour had been found to be dishonest;
 - the Respondent would have gained unfair advantage by the attempted behaviour;
 - whilst the behaviour may be considered an isolated incident it was not an aberration of the moment as it displayed an element of planning and preparation;
 - the Respondent's co-operation with the investigation has been minimal.
75. The Panel also took into account the following factors in mitigation:
- the Respondent had no previous regulatory findings against them and was previously of good character;
 - whilst the Respondent has not shown any detailed insight, they have apologised for their behaviour.
76. Whilst the Respondent had pled their health in mitigation, they have not provided any evidence in support of that plea, so the Panel did not feel able to give any weight to this.

77. The Panel considered whether this was a case that warranted no sanction but concluded that this would be incompatible with its finding of dishonesty.
78. The Panel considered whether to impose a Reprimand determined that this would form part of an appropriate sanction in this case, giving a clear public declaration that the Respondent's Misconduct was unacceptable.
79. The Panel considered whether to impose a Fine. The Panel had no submissions before it as to the Respondent's specific financial circumstances, however it was aware from the other evidence presented to it that the Respondent appeared to be in employment, although not as a qualified Actuary. The Panel was concerned about the aggravating factors and went on to consider all the sanctions available to it before concluding that, given what it knew about the Respondent's unqualified employment it considered that a fine of £2,500 would form part of an appropriate sanction given all the circumstances.
80. The Panel considered whether to impose a period of education, training or supervised practice but concluded that this was not appropriate as the Respondent was no longer a member of the IFoA.
81. The Panel considered whether to impose a period of suspension or the withdrawal of a Practising Certificate, this was not applicable in this case.
82. The Panel considered whether to exclude the Respondent from Membership of the IFoA. The Indicative Sanctions guidance states that expulsion or exclusion should be the sanction where, and only where, the Misconduct found proved is of such gravity that the reputation of the profession or the public interest requires that the Member is no longer able to practice or claim membership of the profession. The Panel noted the wording of the Indicative Sanctions Guidance that: "*Dishonesty will usually lead to expulsion or exclusion.*" Exclusion is the order where membership has already ceased; expulsion where membership is current.
83. The Panel decided to exclude the Respondent from membership for a period of one year. The Panel decided upon a short period of exclusion in recognition of the fact that the Respondent had been a student member and this would provide an opportunity to make such an application for readmission if they wished.

84. Someone excluded from membership who wishes to re-join the IFoA must make an application to the IFoA which must be placed before a Disciplinary Tribunal Panel for approval or refusal. The Panel considered that if the Respondent so applied they would be required to explain what steps they had taken to ensure such conduct did not recur.

Costs:

85. The IFoA made an application for costs of £4,078 incurred in preparation for the hearing and attendance at the hearing by the IFoA's Case Presenter. The Panel noted that costs included administrative costs and costs incurred by the Panel, Legal Adviser.

86. The Panel had regard to the Guidelines for Disciplinary Tribunal Panels and Appeal Tribunal Panels on the award of costs (17 August 2022).

87. The Panel considered the costs sought to be at a reasonable level, and that the work done and costs incurred justified that amount of cost. The Panel therefore ordered the Respondent to pay the IFoA costs of £4,078.

Right to appeal:

88. In accordance with Rule 18 and the Appeals Regulations, the Respondent has 28 days from the date that this written determination is deemed to have been served upon them in which to appeal the Panel's decision.

Publication:

89. Having taken account of the Publication Guidance (May 2019), the Panel determined that this determination will be published and remain on the IFoA's website for a period of five years from the date of publication. A brief summary will also be published in the next available edition of *The Actuary Magazine*.

That concludes this determination.

Date of publication: 27 June 2024