



**Minutes subject to approval at the next British Swimming Board Meeting**

**BRITISH SWIMMING BOARD**

**Minutes of the meeting held on the 13<sup>th</sup> & 14<sup>th</sup> November 2020 via Zoom**

<b>Present:</b>	Maurice Watkins (MW)	Chair
	Jack Buckner (JB)	CEO
	Alex Kelham (AK)	Swim England
	Keith Ashton (KA)	Swim England
	Jane Nickerson (JN)	Swim England
	Graeme Marchbank (GM)	Scottish Swimming
	Fergus Feeney (FF)	Swim Wales
	Adele Stach-Kevtiz (ASK)	Independent Member
	David Carry (DC)	Independent Member
	Corinne Cunningham (CC)	Independent Member
	Graham Edmunds (GE)	Athlete Representative
	Ash Cox (AC)	Director of Legal & Governance (DOLAG)
	Kathreen France (KF)	Head of Finance (HOF)
	Wendy Lockton (WL)	Director of Business Operations (DOBO)
	Chris Furber (CF)	Performance Director Para Swimming (Friday only)
	David Hoose (DH)	Mazars (Friday only)
	Byron Vaughan (BV)	Executive Officer (EO)
<b>Apologies:</b>	Peter Littlewood (PL)	Senior Independent Member

**1. Welcome and Apologies**

- 1.1. The Chairman welcomed everyone to the meeting which included David Hoose (DH) from the Auditors Mazars who was in attendance to present the findings from the Audit Completion Report. All attendees attended via Zoom due to the current situation regarding Covid-19. Apologies were noted for Peter Littlewood.

**2. Year End Accounts & Audit Findings**

- 2.1. DH confirmed that the report had already been reviewed by the ARC at their recent meeting. DH outlined that the report was a very clean report which reflects well on the HOF, her team and on the organisation. DH confirmed that no significant findings had been highlighted in the report. DH outlined a minor internal control which had been noted in the report in relation to the declarations of interest but confirmed this was just a matter of tidying up the process. GM asked if the current process needs reviewing and the DOLAG will review the process before February 2021 and was grateful for the assistance offered by DH. DH confirmed the report had identified that no adjustments to the accounts were required and that the accounts were robust.

DH outlined that processes continue to work well after a seamless transition of CC taking on the ARC Chair responsibilities following Urvashi Dattani's departure.

- 2.2. A discussion took place between DH and the Board in relation to the Going Concern status of British Swimming. DH was confident that British Swimming was a going concern based on the accounts.
- 2.3. CC queried the existence of the subsidiary companies. ASK and the DOLOG advised that these were created as special purpose vehicles to provide a liability shield should British Swimming decide to deliver a continental or world event. The company would enter into third party contracts. This was discussed by the Board before CC joined the Board.
- 2.4. Executive Staff left the meeting at this stage for the Board to discuss any matters with DH with the exception of the DOBO who stayed to provide IT support for the virtual meeting.
- 2.5. Executive Staff were welcomed back into the meeting and DH was thanked for his attendance. DH thanked the Board for the opportunity to present the Audit Completion Report and thanked the HOF and her team for their support throughout the process.
- 2.6. The Board were asked to approve the accounts and the accounts were unanimously approved. The accounts and letter of representation to be signed by the Chairman. Moving forward the letter of representation will be signed by CC.

### **3. British Swimming Annual Report**

- 3.1. The Chairman thanks the DOBO for all her hard work on the Report which had been completed during a difficult year.
- 3.2. The Board were asked to approve the Annual Report. All present confirmed that they were happy to approve the Report.
- 3.3. The DOBO wished to thank the Swim England Design Team for their excellent support in producing the report.

### **4. Presentation by Chris Furber**

- 4.1. CF joined the meeting via Zoom & presented to the Board. The key headings for the presentation were:
  - What we've been doing
  - Athlete Support & Review
  - Culture Work
  - UK Sport Submission
  - International Influence
  - Current Focus

- Games Planning
- #RaceTheWorldPara
- Tokyo Selection & Classification
- Lockdown 2, staffing, DNA & HIVE

4.2. Following the presentation questions were asked by the Board.

4.2.1. GM queried if there had been any communication with regards to the possibility of reduced athletes numbers for Tokyo. CF informed the Board that information being provided so far by BPA is that athlete numbers will not be lowered but there may be a reduction in the number of staff accreditations. The CEO also reiterated this and outlined that the hope was for minimal disruption to coaches and athletes.

4.2.2. ASK raised a query with regards to pressure on facilities for non HPC based athletes. CF advised a lot of work has been undertaken in preparation for a potential 2<sup>nd</sup> lockdown. This would include remote delivery and collaboration with the other disciplines to accommodate athletes where possible in order to gain pool time.

4.2.3. FF queried what consultation had taken place with the home nations on the regional structure which had been presented by CF. CF outlined the thorough consultation process which had taken place and advised the system will need to be agile. CF outlined it is imperative that all coaches and clubs must have a passion for Para Swimming to ensure a successful integration of Para Swimming into the club. FF outlined the positive feedback from Swim Wales on this proposed regional structure.

4.2.4. CC asked if there is a risk of more staff members joining World Para Swimming in the future. The CEO advised that whilst the Para movement has grown the infrastructure at World Para Swimming has not. The CEO reinforced the need to keep a positive relationship with the IPC.

4.2.5. AK praised CF on the “Race Around the World” virtual racing initiative and sought further clarification on how the event is being run. CF provided details to the Board on how the event is being run by starting off small with pre-selected athletes swimming short course on all 4 strokes in multi classification events. Athletes have to provide a video of their race & time which will then be verified by International officials.

4.2.6. A discussion took place with regards to classification concerns and classification opportunities being held at Covid-19 safe venues. CF advised as much information as possible is being provided to athletes to enable them to make informed decisions. CF reiterated that health remains the number one priority.

4.2.7. A discussion took place on selection policies and pre-selection. CF is confident that athletes will be absolutely committed to their preparations for the Games if pre-selected.

- 4.2.8. GE queried what risk the lockdown is potentially having on the talent pool for the future. CF felt that the risk to Para Swimming is not as high risk as it potentially is to able bodied swimming for performance & the talent pathway as swimmers for the able bodied programme are identified from a younger age.
- 4.2.9. GE asked how quickly regional HUBS will be set-up. CF advised the intention is to have 5 set up by 2024 with the aim for these to be sustainable. CF is working with all Home Nations on this.
- 4.2.10. A discussion took place on the equality of funding between Olympic and Paralympic sports and the Board asked if they could be doing more in this area. It was agreed that whilst the cost per medal is different there should be a push for the gap to close.
- 4.2.11. The Chairman thanked CF for his thorough presentation.

## **5. Declarations of Interest**

- 5.1. None received.

## **6. Minutes of the meeting held on the 18<sup>th</sup> & 19<sup>th</sup> September 2020**

- 6.1. The Minutes were agreed as a correct record of the meeting with the only amendment being to an incorrect name spelling to minute 62.4.3. The Minutes to be amended and recirculated.

## **7. Matters Arising from the meeting held on the 18<sup>th</sup> & 19<sup>th</sup> September 2020**

- 7.1.1. 58.1.2. - The Chairman confirmed that wording in the commentary had been updated.
- 7.1.2. 58.1.3. – The Chairman updated that the matter of an extension to the confirmation of the carry forward figures was explored but no flexibility was given. The carry forward figures have now been submitted.
- 7.1.3. 58.2.1 – The Chairman confirmed that the ARC minutes have been amended and recirculated to the Board.
- 7.1.4. 58.3.3. - The Chairman updated that the insurance policy had been checked and details provided to the HOF for the Audit and Risk Committee.
- 7.1.5. 59.3. – The Chairman outlined that the DOLAG would provide a verbal update to the Board on this matter later in the meeting.
- 7.1.6. 60.3.2. – The CEO updated that the matter of potential journalists is ongoing and had been discussed at a recent Senior Management Team. The SMT are identifying potential journalists who will be approached in the new year.

- 7.1.7. 60.5.3. – The Chairman outlined that this matter is on the agenda under item 6.4 for discussion later in the meeting.
- 7.1.8. 61.2.4. – The Chairman confirmed that the Governance action plan had been completed and the action plan was included in the Board pack. This matter is on the agenda for approval later in the meeting under the report from DOLAG.
- 7.1.9. 61.3.1. – Following a discussion with the Chairman and the CEO's the CEO proposed that Ray Gordon continues in the Masters rep role. The CEO outlined that the Board will be kept apprised on Masters at each Board meeting through a report, as per the other sports. The Board were asked to confirm if they were happy with this approach whereby the CEO would bring an update on Masters to each Board via Ray Gordon. The Board approved this approach with a view to revisit the arrangements should any issues develop.
- 7.1.10. 62.5.2. – The Chairman updated that there is an active Home Country Partnership group for Water Polo, chaired by FF, with regular meetings scheduled. A UK Sport funding bid has been completed and the group will review a back-up plan if this is unsuccessful.
- 7.1.11. 63.1. – The Chairman confirmed that this action was completed and additional speakers were purchased but unfortunately all Board members have had to attend virtually due to the current lockdown in England.
- 7.1.12. 64. – The Chairman confirmed that this matter has been overtaken.
- 7.1.13. GM raised a query with regards to the cyber risk highlighting the need to focus on this during the current climate. The DOLAG confirmed that cyber insurance forms part of the business insurance policy and details have been supplied to the ARC. Whilst no penetration tests have taken place this year due to budget, this does not invalidate the policy. However, if a penetration test is not conducted the following year this may affect future terms, the premium and cover. In the current market insurers are all reviewing the terms of coverage and costs are expected to increase. Risk Register to be reviewed and updated. The Board were informed that there is a separate policy on GDPR. The CEO felt it may be beneficial to have a further discussion with the home nations on this matter at some point moving forward.
- 8. Finance Audit & Risk**
- 8.1. Head of Finance Report**
- 8.1.1. The HOF provided the Board with an overview of the 5 months management accounts to the 31<sup>st</sup> August 2020 and explained the variances within the figures.
- 8.1.2.1. The CEO updated the Board on the MoU outlining that the DOLAG will draft the variation for the CEO's and then Chairs to ultimately sign off. The CEO thanked the home nations CEO's for their support on this matter.



- 8.1.2.2. A discussion took place on the MoU in light of the recent developments in this area. GM queried what mechanisms are in place to ensure Board members are kept appraised on the Swim England forecast and contributions to British Swimming. JN outlined that Swim England will have a clear idea of membership figures by February 2021. It was agreed that an update on this matter should be included on each Board agenda moving forward. It was agreed that JN would keep HOF updated on Swim England figures on a monthly basis.
- 8.1.3 KA asked if rent costs reduce in light of the reduction of British Swimming desks. The HOF confirmed that it has been agreed with Swim England that there will be a reduction and the HOF is liaising with Swim England Chief Financial Officer, Brian Havill in relation to the SLA and associated costs moving forward.
- 8.1.4 It was recognised that there is a move towards sports sharing office space with more flexible and agile working being implemented.
- 8.1.5 ASK sought clarification on the processes that have been undertaken to support employees working from home. The Board were assured that all staff have been provided with the necessary equipment and DSE checks are now underway. The People Report provides the details including a copy of the temporary Agile Working Policy.
- 8.1.6 The CEO confirmed that he and the HOF would keep the Board updated as financial planning continues, especially in light of the current continuity fund bid which has been submitted.
- 8.1.7 It was agreed that the Chairman would sign the British Swimming letter of representation.
- 8.3. ARC Minutes 2020
- 8.3.1. The minutes of the October 2020 ARC meeting were discussed. In light of discussions which had taken place earlier in the meeting CC highlighted the discussion which had taken place in relation to cyber security and assured the Board that this matter is on the ARC agenda for the next meeting.
- 8.4 Risk Register
- 8.4.1. The Board were provided with the latest Risk Register. The HOF confirmed the Risk Register has been reviewed by both the ARC in October and the SMT and had been updated accordingly. The HOF highlighted the risks that had been updated.
- 8.4.2. ASK noted the changes made relating to Anti-Doping and raised whether any Anti-Doping education is available relevant to Board level. The DOLAG agreed this would be a timely exercise due to the current revision of the WADA code being implemented from January 2021 and the new UKAD education strategy. It was agreed that the option for Board members to join a virtual education session would be explored.

## 9. Chairman's Report

- 9.1. The Chair wished to express his good wishes to PL. The Chairman will keep in contact with PL.
- 9.2. The Chairman noted that GE was due to retire in November 2020. Due to the present exceptional circumstances and to ensure an appropriate succession process it was proposed that GE be reappointed to the Board as the Athlete Representative for an additional year to 27<sup>th</sup> November 2021. The Article amendments discussed and approved by previous Board meetings together with the changes made by Special Resolution at the AGM permitted an additional year, in exceptional circumstances. The Board approved the proposal.
- 9.3. AK asked if there would be a transition period for GE and the newly appointed Athlete Representative. The DOLAG confirmed that the working group previously established by the Board would be working on the details for this to ensure a comprehensive handover with GE.
- 9.4. GM queried if any cover is required for PL in light of PL being on the Nominations Group and the SID on the Board. The Chairman assured the Board that this matter will be continuously reviewed and appropriate arrangements made if PL remains unwell.
- 9.5. The Chair updated the Board on the recent LEN Congress that was held virtually due to Covid-19. All nations attended the virtual congress – 52 nations and 104 votes. The virtual Congress was a success with LEN using a company in the UK for the voting process. The DOLAG attended the Congress as the LEN Observer upon invite by LEN to adjudicate the voting process.

## 10. Strategic Issues

### 10.1 Covid-19

- 10.1.1. The CEO updated the Board on the ISL event in Budapest which had good protocols in place. It had proven to be a good decision for the athletes to attend this event providing them with invaluable racing experience.
- 10.1.2. The CEO updated the Board on how the 2<sup>nd</sup> England lockdown had been more challenging than the initial lockdown. Diving were experiencing the toughest challenges in terms of available facilities to train due to the closure of Plymouth and Crystal Palace.
- 10.1.3. The CEO updated the Board on the plans for 2021 domestic events outlining the proposal to announce in the near future the dates for the British Swimming Championships. A number of provisions are being looked at with events taking place behind closed doors with no spectators.

- 10.1.4. The CEO updated the Board on the work which is underway on selection policies for Tokyo 2021 and outlined the potential challenges in terms of balancing fairness whilst protecting medal hopes. DC queried how the selection policy will be communicated. The CEO and DOLAG advised that the NPD's are working closely with the BOA and BPA. The CEO to keep the Board updated on this matter as it progresses.
- 10.1.5. AK queried what plans are in place for vaccines for Tokyo 2021. The CEO advised this will be managed by Team GB.
- 10.1.7. The CEO updated the Board on the weekly Loughborough SMT and Covid-19 calls which continue to be extremely beneficial in terms of shared learnings and knowledge across the sports and departments.
- 10.1.8. The CEO provided the Board with an update on the current TYR partnership. The CEO confirmed he is in regular contact with TYR during the pandemic to support the partnership. The Board to be kept apprised and we will continue to work closely with the home nations on this. The Board were in agreement it is imperative that British Swimming are seen to support partners during this difficult period. GM queried what provision there is for GBR kit. The DOBO assured the Board that 2021 kit is already in the warehouse and order deadlines for 2022 kit will be continually reviewed.
- 10.1.9. The CEO confirmed that a bid has now been submitted to UK Sport for the Continuity Fund. The CEO thanked the HOF for her hard work on preparing this bid. GM queried what discretion British Swimming would have utilising funds should British Swimming be successful with the continuity fund bid. The HOF outlined that this is not yet clear.
- 10.1.10. The CEO outlined the ongoing challenge in terms of balancing finances and operations. This is something which has to be carefully managed on a weekly basis, balancing savings versus delivery. The CEO updated that the furlough situation is discussed on a weekly basis to carefully manage this balance and ensure all tasks can be completed whilst continuing to make as many cost savings as possible. A pragmatic approach is being continually used to utilise staff with spare capacity in other departments.
- 10.1.11. The CEO updated the Board on the partnerships with performance centres outlining that there have been some challenges with Loughborough but both Bath and Stirling have been excellent to work with during Covid-19.
- 10.1.12. The CEO updated the Board on staff morale outlining the flexible working patterns which have been implemented.



10.2. 2024 Strategy

10.2.1 The CEO updated the Board on the UK Sport Bids that have all been submitted. This was a difficult and complex process however the CEO expressed he is comfortable with what has been submitted and hopes for a positive outcome.

10.2.2. The CEO advised that he continues to attend the regular CEO calls with UK Sport. Unfortunately to date the CEO still has no details on what the funding will be moving forward. The CEO outlined that the best scenario will be a 1 year award plus 3 year indicative funding from UK Sport with the worst case scenario being 1 year with no indicative funding for the remaining 3 years. It was agreed that the CEO would update the Board once confirmation of funding has been received.

10.3. Aquatics in Britain

10.3.1. The CEO updated the Board on the Aquatics in Britain work outlining that unfortunately due to the pandemic not as much progress has been made as would have been hoped for. Good work is taking place with facilities however longer term strategic plan is challenging due to the pandemic with a lot of work still in the pencil planning mode.

10.4. BAME & Equality

10.4.1 ASK updated the Board on the work which has been carried out in this area and an open discussion was encouraged between the Board members. A number of challenges were identified including the need to respond sensitively and not reactively and the potential for utilising champions and role models for key messaging in this area. Furthermore it was recognised that language in this area changes regularly and this is a rapidly changing world with no commonality of language in one group. All were in agreement that they would greatly appreciate some guidance to ensure the correct language and terminology is used. There was a collective agreement that there is a need to re-language member teams, being mindful of the Sporting Equals survey recommendation against BAME stereotyping. The Board agreed that there is a requirement to consult and agree equality language across British Swimming and the Home Nations to help guide 'lines to take' on how to address all member communities. ASK to initiate this piece of work on behalf of British Swimming for wider circulation to the Home Nations for their input.

10.4.2. A discussion took place about how British Swimming could be more diverse and how barriers to people swimming need to be better understood. GE suggested getting groups involved asking why they choose one sport over the other. JN outlined that research Swim England have carried out suggests that if an ethnicity cannot see a role model in a particular sport they are reluctant to get involved. FF updated the Board on the diversity group which has been created in Wales and the work of Alice Dearing with the Black Swimming Association was recognised and praised. Building on from this the Board were in agreement that moving forward athletes should be actively engaged in an advisory capacity in how to tackle racial stereotyping and language with Aquatics.

10.4.3. Long term it was agreed that this agreed language needs to be woven into insight and education. It was agreed that there needs to be a review of equality training and education options for all Board members and the equality leads within the Home Nations should champion this with their relevant Boards.

10.4.4. It was agreed that the equality leads would prepare a briefing paper setting out the priorities for Equality in Aquatics to be circulated to the Board in January 2021 ahead of the February 2021 British Swimming Board meeting to allow for Director's review and input prior to the meeting.

## **11. Points arising from Executive Reports**

11.1. No points were raised in addition to those which had already been discussed.

## **12. Items for Decision**

### 12.1 BDO Governance Action Plan

12.1.1 The DOLAG updated the Board on the Governance Action Plan which had been provided to the Board in advance of the meeting. This is based on the BDO Assurance Document as provided to the Board at the September meeting. The Board to be kept updated as the action plan is progressed. The Board approved the Action Plan.

### 12.2. British Swimming Anti-Doping Rules 2021

12.2.1 The DOLAG updated the Board on proposed changes to the British Swimming Anti-Doping Rules ("the Rules") following the introduction of the new World Anti-Doping Code due to come into effect on 1<sup>st</sup> January 2021. AC proposed that, as in 2015, British Swimming adopt the UKAD Anti-Doping rules subject to any modifications necessary to ensure compliance with FINA rules. As FINA have not yet completed their amendments the DOLAG proposed that the Board provide delegated authority for the DOLAG to proceed with the implementation of the Rules and to make such changes to the Rules as are necessary to conform to both FINA and UKAD Anti-Doping Rules in order to ensure that the rules are effective as of 1<sup>st</sup> January 2021. The Board approved this proposal.

### 12.3. Masters Rep – BS Board

12.3.1. This matter had been discussed in detail earlier in the meeting and a proposal for Ray Gordon to remain as Master Rep had already been approved by the Board.

### 12.4 Sunday Times

12.4.1. The DOLOG updated the Board on the latest situation with regards to the Sunday Times report as discussed at previous Board meetings. The DOLAG advised an agreement had been made with the Sunday Times publishing an apology. It was agreed that the DOLAG would provide the Board with a copy of the apology published on the iPad Sunday Times format. AK said that she would have liked to have known about the pending publication so that there could be no surprises with someone mentioning its publication to her without her knowledge.

- 12.5. The DOLAG updated the Board on a tribunal which British Swimming have been asked to provide evidence on where Swim England and British Swimming were co-respondents. The Employment Tribunal found in favour of Swim England and British Swimming and the DOLAG will circulate the Judgement once received.

### **13. Board Liaison Updates**

#### **13.1. Swimming**

- 13.1.1 AK and DC both outlined the benefits of the ISL in terms of providing invaluable competitive opportunities for athletes. In addition coaches at the event had expressed that they felt privileged to be able to attend an event during such challenging times.

#### **13.2. Diving**

- 13.2.1 ASK updated the Board on her recent visit to the London Aquatics Centre. ASK advised that spirits within the Diving team appear positive and the Crystal Palace and Plymouth team members have integrated well to the London Aquatics Centre.
- 13.2.2 ASK advised that the recent Diving coaches forum was held online.
- 13.2.3 ASK outlined that there is real optimism for a normal event calendar in 2021 and the team are excited for the year ahead.
- 13.2.4 ASK informed the Board that FINA are looking for contingency options for obtaining Olympic qualification sports should there be no Diving World Cup in 2021.
- 13.2.5 ASK highlighted an area of risk in relation to the Diving team's Olympic pre camp being in South Korea and if arrivals from South Korea to Japan will be required to quarantine on arrival if the Covid-19 pandemic doesn't improve.
- 13.2.6 A discussion took place with regards to ASK being the only Board Liaison for Diving. It was agreed that the CEO would consider options for a second Board Liaison to support ASK.

#### **13.3. Para Swimming**

- 13.3.1 DC updated the Board on his involvement in the creation of the remote model delivery and maximising the use of the HPC in Manchester which CF had presented to the Board on the previous evening.
- 13.3.2 GE advised the Board that the athletes are delighted to be part of designing the programme for the future. Athletes have responded to say that for those not part of the HPC the remote working has enabled them to feel part of the program with all athletes able to have access to nutrition and support services.

- 13.3.4. GE updated that work has been taking place to ensure the mental health well-being of athletes especially with Lockdown 2.0 in England. GE thanked the Swimming programme for accommodating Para Swimmers in Bath.
- 13.3.5. GE updated the Board on the 23 athletes who are requiring classification before the Paralympics outlining that this matter is at the forefront of programme.
- 13.3.6. A discussion took place in relation to centralisation and decentralisation training models. The CEO outlined risks to both models and feels comfortable with a more hybrid model combining both.
- 13.4. Artistic Swimming
- 13.4.1 JN informed the Board that the UK Sport World Class progressive funding bid has been submitted.
- 13.4.2. JN updated that the Duet are continuing with training during lockdown and have access to S&C. The Duet will be competing in a virtual land based FINA event in December 2020.
- 13.4.3. JN advised that no further details have yet been provided by FINA on the Olympic Qualification event.
- 13.5. Water Polo
- 13.5.1. FF advised the Board that it has been a difficult few months for Water Polo due to Water Polo being a contact sport. In addition Water Polo are at the mercy of pools, clubs and operators being able to provide pool time.
- 13.5.2. FF informed the Board that leadership meetings are planned for the next 12 months with good work taking place across the management team.
- 13.5.3. FF outlined that as per other sports Water Polo are awaiting on announcements from UK Sport in relation to future funding following the recent submission of their bid.
- 13.6. High Diving
- 13.6.1. KA advised that, due to Covid-19, no High Diving camps or competitions had taken place. Athletes are training in pools where possible.
- 13.6.2. High Diving are awaiting on the IOC with regards to whether High Diving will be included in Paris 2024 Olympic Games.



**14. AOB**

14.1. ASK queried whether there were any plans to hold a 2020 British Swimming Staff Day and if so were Board members to be invited. The CEO updated on the plans being put in place for a remote Staff Day. The SMT are discussing the schedule for the day and the attendance.

14.2. FF queried the plans for Board members travelling to Tokyo for Olympic & Paralympic Games. The CEO advised that attendance will ultimately come down to budgets. The forthcoming changes in FINA and also developments at the IPC, both linked to international influence provided an increased justification for the Chairman and CEO to attend both events if budgets permitted.

**15. Date of Next Meeting**

15.1. The next meeting is to take place 5<sup>th</sup> – 6<sup>th</sup> February 2021, Quay Hotel & Spa, Deganwy. Board members will be advised if plans change due to Covid-19.