Parliamentary briefing



Economic Activity of Public Bodies (Overseas Matters) Bill Submission to the Bill Committee, September 2023

Introduction

- The Trades Union Congress (TUC) exists to make the working world a better place for everyone. We bring together more than 5.5 million working people who make up our 48 member unions. We support unions to grow and thrive, and we stand up for everyone who works for a living.
- 2. The TUC is affiliated to the International Trade Union Confederation (ITUC) which has 207 million members in 163 countries and is part of the Global Unions Group made up of the ITUC, Global Union Federations, and the Trade Union Advisory Committee to the OECD.
- 3. The TUC supports an ethical approach to trade, procurement and investment decisions that promotes good jobs, contains effective mechanisms to enforce core International Labour Organisation conventions and protects all public services, personal data and democratic decision making. The TUC has previously argued that this should be reflected in the UK government's approach to trade and investment decisions in regard to where workers' and human rights are systematically abused, including in trade deals with Colombia¹ India² the Gulf States³ and Israel.⁴
- 4. The TUC has focused our international work on four priority countries Brazil, Colombia, Palestine and Turkey which are amongst the worst in the world for workers. According to the International Trade Union Confederation's Global Rights Index,⁵ in Palestine there is no

https://www.tuc.org.uk/researchanalysis/reports/tuc-briefing-uk-andean-trade-agreement

2 UK government should not entertain UK-India trade agreement', available online at:

3 'TUC opposes UK trade talks with Gulf states', available online at: https://www.tuc.org.uk/research-

analysis/reports/tuc-opposes-uk-trade-talks-gulf-states-abusing-human-rights

4 TUC (2022) 'Prospective UK-Israel Free Trade Agreement, Submission to the Department for International Trade',

¹ TUC (2021) 'Briefing on the UK-Andean trade agreement', available online at:

https://www.tuc.org.uk/news/tuc-uk-government-should-not-entertain-uk-india-trade-deal-until-widespread-rightsabuses-are

available at: https://www.tuc.org.uk/research-analysis/reports/prospective-uk-israel-free-trade-agreement 5 ITUC (2023) 'Global Rights Index', available at https://files.mutualcdn.com/ituc/files/ITUC-Global-Rights-Index-2023.pdf

guarantee of rights due to a break down in the rule of law, and in Brazil, Colombia and Turkey, there is no guarantee of rights.

- 5. The TUC believes that the Economic Activity of Public Bodies (Overseas Matters) Bill⁶ could place the UK in breach of its obligations under international law and UN resolutions and would lead to international law being applied inconsistently. The Bill contradicts the government's stated commitment to implement the UN Guiding Principles on Business and Human Rights⁷ (which includes respect for labour rights) by restricting the ability of public bodies to make ethical procurement and investment decisions that involve a territorial consideration. It gives extensive and excessive powers to the Secretary of State and Minister for the Cabinet Office, who act as the enforcement authorities. Furthermore, the Bill undermines democratic decision-making and flexibility around procurement decisions in devolved nations and administrations, and infringes on the right to freedom of expression.
- 6. This Bill will also interfere with the ability of administering bodies of the Local Government Pension Scheme to take into account Environmental, Social and Governance (ESG) risks when making decisions relating to the scheme's investments. This conflicts with legal duties they have to take into account financially material ESG factors, and could expose the fund to financial losses.
- 7. This briefing sets out the TUC's concerns around this legislation and why we believe parliamentarians should oppose the Bill.

State obligations to respect international law and UN Resolutions

- 8. Public bodies/public authorities should be able to make ethical investment and procurement decisions that are consistent with our obligations under international law. This Bill could prevent them from doing this.
- 9. For example, Common Article 1 of the Geneva Convention lays down the obligation on States Parties to:
- 10. "respect and to ensure respect" for the Conventions in all circumstances".8
- 11. Most of the provisions in the Geneva Conventions are recognised as customary law, with some having jus cogens or peremptory status, meaning that they are superior norms of international law, from which no derogation is permitted.⁹

https://ihl-databases.icrc.org/en/ihl-treaties/gci-1949/article-1?activeTab=undefined

⁶ UK Government (2023) 'Economic Activities of Public Bodies (Overseas Matters) Bill', available at: https://publications.parliament.uk/pa/bills/cbill/58-03/0325/220325.pdf

⁷ UK Government (2020) 'Implementing the UN Guiding Principles on Business and Human Right', available at: https://www.gov.uk/government/publications/implementing-the-un-guiding-principles-on-business-and-human-rights-may-2020-

update#:~:text=The%20UK%20government%20is%20committed,and%20Human%20Rights%20(%20UNGPs%20). 8 ICRC International Humanitarian Law Databases, Common Article 1 Respect for the Convention, available at:

⁹ International Review of the Red Cross, Volume 91 Number 875 (September 2009), The Geneva Conventions and Public International Law, available at: https://international-review.icrc.org/sites/default/files/irrc-875-geneva-convention-int-law.pdf

- 12. Legal analysis in relation to Common Article 1 and the obligations of third states concludes that, "third States have an international legal obligation not only to avoid encouraging international humanitarian law violations committed by others, but also to take measures to put an end to ongoing violations and to actively prevent their occurrence".¹⁰
- 13. Therefore, public bodies as state institutions, should be free to make ethical decisions that uphold our international legal obligations. This could be through procurement and investment decisions, or divestment of pension funds.
- 14. Clause 1 (2) of the Bill states, "The decision-maker must not have regard to a territorial consideration in a way that would cause a reasonable observer of the decision-making process to conclude that the decision was influenced by political or moral disapproval of foreign state conduct." However, concerns of the UK government about public bodies being influenced by "political or moral disapproval" of foreign states should not override meeting our international obligations.
- 15. In the Bill and Explanatory Notes,¹¹ the terms "political and moral disapproval" are not explicitly defined therefore leading to ambiguity for what this Bill actually means for public bodies. A so-called "reasonable observer" may not have access to all the information, including evidence, that a decision-maker has used to arrive at their decision, and therefore a "reasonable observer" could incorrectly conclude that the decision has been influenced by "political or moral disapproval".
- 16. The reliance on a "reasonable observer" to determine whether the decision-making process has been influenced by political or moral disapproval will lead to subjective decisions on legislation devoid of legal clarity, which could result in costly litigation for public bodies.
- 17. This Bill allows the Secretary of State to make exceptions to the prohibition on state bodies using their procurement or investment powers based on an assessment of international law or human rights within foreign states. However, the Bill excludes Israel, the Occupied Palestinian Territories and the Occupied Golan Heights from being included in any list of exceptions, effectively arguing that judgements based on international law should not be applied within these specific areas.
- 18. The TUC believes that the Bill should be opposed in full. This would allow state actors to take action on the basis of evidence of violations of international law, including those which have been frequently reported within Israel and the Palestinian territories.
- 19. Israel has occupied the Palestinian territories and the Syrian Golan for over 50 years, in violation of international law and numerous UN Resolutions.
- 20. In 2022, The UN Independent International Commission of Inquiry on the Occupied Palestinian Territory, including East Jerusalem, and Israel concluded that "there are

¹⁰ Dormann, K. and Serralvo, J (2015), 'Common Article 1 to the Geneva Conventions and the obligation to prevent international humanitarian law violations' International Review of the Red Cross

¹¹ UK Government (2023) 'ECONOMIC ACTIVITY OF PUBLIC BODIES (OVERSEAS MATTERS) BILL EXPLANATORY NOTES' available at: <u>https://publications.parliament.uk/pa/bills/cbill/58-03/0325/en/220325en.pdf</u>

reasonable grounds to conclude that the Israeli occupation of Palestinian territory is now unlawful under international law due to its permanence and the Israeli Government's defacto annexation policies".¹² Furthermore, in 2022, the UN Special Rapporteur on the OPT concluded that, within those territories "the political system of entrenched rule ... satisfies the prevailing evidentiary standard for the existence of apartheid".¹³

- 21. In addition, the International Criminal Court (ICC) has opened an investigation with respect to the Situation in Palestine this will cover crimes alleged to have been committed since 2014.¹⁴ We note that the UK has obligations under the Rome Statute. The TUC is concerned that the UK government is not acting consistently to uphold international law.
- 22. The approach taken to Israel, the Occupied Palestinian Territories and the Occupied Syrian Golan in the Economic Activity of Public Bodies (Overseas Matters) Bill would breach our international legal obligations under UN Security Council Resolution 2334. This Resolution, "Calls upon all States...to distinguish, in their relevant dealings, between the territory of the State of Israel and the territories occupied since 1967." It also reaffirms that "the establishment by Israel of settlements in the Palestinian territory occupied since 1967, including East Jerusalem, has no legal validity and constitutes a flagrant violation under international law and a major obstacle to the achievement of the two-State solution and a just, lasting and comprehensive peace."¹⁵
- 23. Therefore, public bodies should be able to consider matters of territory, when making procurement and investment decisions.
- 24. In 2020, the UN published a database of 112 business enterprises¹⁶ involved in activities in the illegal settlements which raised particular human rights concerns. Public bodies can use this database as part of their due diligence processes to inform their ethical procurement/investment decisions. UN Human Rights Council resolution 31/36¹⁷ establishing the UN Database explicitly urges all States "[t]o ensure that they are not taking actions that either recognize or assist the expansion of settlements or the construction of the wall in the Occupied Palestinian Territory, including East Jerusalem, including with regard to the issue of trading with settlements, consistent with their

16 United Nations (2016) 'Database of all business enterprises involved in the activities detailed in paragraph 96 of the report of the Independent International Fact-Finding Mission to Investigate the Implications of the Israeli Settlements on the Civil, Political, Economic, Social and Cultural Rights of the Palestinian People throughout the Occupied Palestinian Territory, including East Jerusalem : report of the United Nations High Commissioner for Human Rights', available at: https://digitallibrary.un.org/record/1475002?ln=en

17 United Nations (2016) 'Resolution 31/36', available at:

¹² UN (2022) 'Commission of Inquiry finds that the Israeli occupation is unlawful under international law', available at: https://www.ohchr.org/en/press-releases/2022/10/commission-inquiry-finds-israeli-occupation-unlawful-under-international-law

¹³ United Nations (2022) 'Report of the Special Rapporteur on the situation of Human Rights in the Palestinian territories occupied since 1967' (A/HRC/49/87), available at: https://www.ohchr.org/en/hr-bodies/hrc/regular-sessions/session49/list-reports

¹⁴ International Criminal Court (2021) 'Statement of ICC Prosecutor, Fatou Bensouda, respecting an investigation of the Situation in Palestine', available at: https://www.icc-cpi.int/news/statement-icc-prosecutor-fatou-bensouda-respecting-investigation-situation-palestine

¹⁵ UN Security Resolution 2334 (2016), available at: https://www.un.org/webcast/pdfs/SRES2334-2016.pdf

https://ap.ohchr.org/documents/dpage_e.aspx?si=A/HRC/RES/31/36

obligations under international law". This Bill would prohibit state bodies from complying with this resolution.

- 25. Violations of labour and other human rights experienced by Palestinians living under occupation are well documented. These violations, according to UN experts, include lack of freedom of movement, home demolitions, forced evictions, discriminatory planning laws, confiscation of natural resources, excessive use of force and torture.¹⁸
- 26. The TUC calls for an end to the illegal occupation of Palestinian territory and supports genuine efforts towards a just and lasting peace in Israel and Palestine that is consistent with international law and respect for labour and other human rights.

Business and human rights

- 27. The UK government has committed to implementing international standards including the UN Guiding Principles on Business and Human Rights (UNGPs)¹⁹ as well as the commitments made to the Paris Agreement.
- 28. However, this Bill could limit the UK's ability to deliver on these commitments through the restrictions it places on the public bodies being able to make ethical procurement and investment decisions.
- 29. The UNGPs are grounded in State's existing obligations to respect, protect and fulfil human rights and fundamental freedoms.
- 30. And regarding corporate responsibility, the UNGPs state, "The responsibility of business enterprises to respect human rights refers to internationally recognized human rights understood, at a minimum, as those expressed in the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work."²⁰
- 31. Clause 2(2) of the Bill applies to public bodies' decisions relating to the procurement of goods, services and works. In 2021/2022, gross spending on public procurement was £379 billion across the UK.²¹ In dealing with contracts and suppliers, public bodies should be taking into consideration their State obligations, and the responsibilities of companies/suppliers under the UNGPs. However, the Bill would limit public bodies' ability to engage with companies/suppliers to improve respect for human and labour rights in their supply chains, where there are territorial considerations.

¹⁸ Israeli annexation of parts of the Palestinian West Bank would break international law – UN experts call on the international community to ensure accountability (2020) United Nations Office Human Rights Office of the High Commissioner

¹⁹ UK Government (2020) 'Implementing the UN Guiding Principles on Business and Human Right', available at: https://www.gov.uk/government/publications/implementing-the-un-guiding-principles-on-business-and-human-rights-may-2020-

update#:~:text=The%20UK%20government%20is%20committed,and%20Human%20Rights%20(%20UNGPs%20). 20 Ibid

²¹ House of Commons Library (2022) 'Procurement statistics', available at:

https://researchbriefings.files.parliament.uk/documents/CBP-9317/CBP-9317.pdf

- 32. Clauses 1 (2-4) of the Bill are poorly drafted and are likely to lead to confusion regarding what is or is not permitted in relation to the UK's commitment to implementing the UNGPs.
- 33. 1 (2) The decision-maker must not have regard to a territorial consideration in a way that would cause a reasonable observer of the decision-making process to conclude that the decision was influenced by political or moral disapproval of foreign state conduct.
- 34. 1 (3) A "territorial consideration" is a consideration that relates specifically or mainly to a particular foreign territory.
- 35. 1 (4) "Foreign state conduct" means the conduct or policy of a foreign state authority.
- 36. Therefore, a public body could be in breach of the law if it decided not to purchase products from the 'territory' of Xingjiang based on allegations of the use of Uyghur forced labour and evidence of possible international crimes²² if a "reasonable observer" concluded it had been influenced by political or moral disapproval. Similarly, a public body could be prohibited from refusing to invest in a fund that was linked to Myanmar because of moral or political concerns. The Council of Global Unions has called for renewed global efforts to restore democracy and for official recognition of Myanmar's National Unity Government. The brutal repression carried out by the junta since the coup has included the killing and the arbitrary detention of trade union representatives.²³ The Bill could be interpreted as prohibiting "any relevant decisions based on moral or political disapproval of a foreign government".²⁴
- 37. Part 2 of the Bill (Exceptions for certain types of consideration) includes labour related misconduct (4) and states that "Section 1 does not prevent regard to a consideration so far as it relates to labour-related misconduct." However, there is a predominant focus on modern slavery and trafficking, leaving a gap in relation to other areas of labour exploitation.
- 38. While the Bill focuses on procurement and investment decisions, and does not use the term boycott, the government's impact assessment for the Bill states, "The Bill will ban public bodies from imposing boycotts of suppliers on the basis that they are from certain countries and territories or are affiliated with certain countries or territories." It will also ban public bodies from considering country or territory of origin when making an investment.²⁵

²² UN (2022) 'OHCHR Assessment of human rights concerns in the Xinjiang Uyghur Autonomous Region, People's Republic of China', available at: file:///C:/Users/SSukhram.TUC/Downloads/22-08-31-final-assesment.pdf 23 ITUC (2023) 'Myanmar: second anniversary of military coup', available at: https://www.ituc-csi.org/myanmar-second-anniversary-of-coup

²⁴ Hermer, R. KC. (2023) 'Opinion on the Economic Activities of Public Bodies (Overseas Matters) Bill', available at: https://www.matrixlaw.co.uk/news/richard-hermer-kc-publishes-opinion-on-economic-activity-of-public-bodies-overseas-matters-bill/

²⁵ Department for Levelling Up, Housing and Communities (2023) 'Economic Activity of Public Bodies (Overseas Matters) Bill, Impact Assessment', available at: https://publications.parliament.uk/pa/bills/cbill/58-03/0325/EAPB_IA_15-03-23.pdf

- 39. The UK government and public bodies have obligations under international law to consider territories when making procurement decisions. For example, UN Security Council Resolution 2334²⁶ obligates the UK to distinguish, in their relevant dealings, between the territory of the State of Israel and the territories occupied since 1967.
- 40. This Bill gives no consideration to what is expected of states when businesses are operating in conflict affected areas. The UNGPs highlight the increased risk of gross human rights abuses in conflict affected areas and say that States should help ensure that business enterprises operating in those contexts are not involved with such abuses.
- 41. The Bill is broad in scope and could additionally prevent public bodies from taking decisions that support commitments under the Paris Agreement. Public bodies should be able to make ethical decisions related to fossil fuel investments/divestment and support the decarbonising of our economy in the transition to net zero.

Infringements on the right to freedom of expression

- 42. This Bill curtails the right to freedom of expression. Clause 4 of the Bill Related prohibition on statements, disallows decision makers to publish a statement indicating that they intend to act in a way that contravenes Section 1 of the Bill. Therefore, decision makers would not be able to express political or moral disapproval that could relate to procurement and investments. This acts as a gagging clause and would hinder democratic debate.
- 43. The explanatory notes to the Bill indicate that one of its aims is to curtail boycott campaigners from influencing decision makers. However, former UN Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression, David Kaye, notes that Article 19 (2) of the International Convention on Civil and Political Rights "protects all forms of expression and the means of their dissemination", including all forms of political debate, such as boycott.²⁷ The TUC defends the right to freedom of expression.

Pensions

- 44. Under the Bill, if a Local Government Pension Scheme conducts due diligence and finds, for example, that it is invested in a company that is operating in an occupied territory and complicit in human rights violations, it may not be able to divest if a "reasonable observer" concluded that the decision was influenced by political or moral disapproval of foreign state conduct. This could result in the pension fund being complicit in human and labour rights abuses as well as there being a risk identified and not acted on.
- 45. In this way, the Bill will create conflicts with the legal duties that already fall on LGPS administering authorities to act in the best interest of the scheme's members. A legal

²⁶ UN Security Resolution 2334 (2016) https://www.un.org/webcast/pdfs/SRES2334-2016.pdf 27 Kaye, D (2019) 'Mandate of the Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression', available at:

https://spcommreports.ohchr.org/TMResultsBase/DownLoadPublicCommunicationFile?gld=24338

opinion sought by the Local Government Association states that, although an administering authority is not a trustee, it does still owe a fiduciary duty to members and employers.²⁸

46. This fiduciary duty requires administering authorities to take into account financially material environmental, social and governance (ESG) factors when making decisions over investments. Financial materiality includes the potential for investee companies to lose value as a result of reputational damage or litigation where they are found to have contravened international law in ways outlined above. Since 2016 investment regulations introduced by the then Department for Communities and Local Government have required administering authorities to publish investment strategies that include details of how they take ESG factors into account.²⁹<u>https://ukc-word-</u>

edit.officeapps.live.com/we/wordeditorframe.aspx?ui=en-GB&rs=en-

US&wopisrc=https%3A%2F%2Fthetuc-

my.sharepoint.com%2Fpersonal%2Fssukhram_tuc_org_uk%2F_vti_bin%2Fwopi.ashx%2 Ffiles%2F5e006b8d57d546779e9224e1138ce738&wdpid=6a6f89d2&wdenableroaming=1 &wdfr=1&mscc=1&wdodb=1&hid=7B30D6A0-8057-7000-2404-

BC4CA4397CCC.0&uih=sharepointcom&wdlcid=en-

GB&jsapi=1&jsapiver=v2&corrid=f251b062-5f1e-ea87-afd0-

062b27f5e93e&usid=f251b062-5f1e-ea87-afd0-

062b27f5e93e&newsession=1&sftc=1&uihit=docaspx&muv=1&cac=1&sams=1&mtf=1& sfp=1&hch=1&hwfh=1&dchat=1&sc=%7B%22pmo%22%3A%22https%3A%2F%2Fthet uc-

my.sharepoint.com%22%2C%22pmshare%22%3Atrue%7D&ctp=LeastProtected&rct=Nor mal&wdorigin=Other&instantedit=1&wopicomplete=1&wdredirectionreason=Unified_Sin gleFlush - _ftn2 Where these strategies lead to investment decisions that fall within this Bill's definition of not being in line with UK foreign defence policy, LGPS funds will be forced into decisions that contravene their fiduciary duties and expose the fund to financial risk.

- 47. Fiduciary duties also provide a framework for trustees, or other administering authorities of pension schemes, to take non-financial factors into account where they have good reason to think members would support their decision.
- 48. This Bill also appears to be in conflict with the government's wider goal of strengthening the risk management of social factors by UK pension funds. This has included a Department for Work and Pensions call for evidence 'Consideration of social risks and opportunities by occupational pension schemes' which led to the creation of a minster-led taskforce to support pension scheme engagement with social factors in ESG investing.
- 49. On launching this taskforce, then pensions and financial inclusion minister Guy Opperman said:

²⁸ Nigel Griffin KC, 'Duties of administering authorities under the Local

Government Pension Scheme', March 2014 - <u>https://lgpsboard.org/images/PDF/Publications/QCOpinionApril2014.pdf</u> 29 The Local Government Pension Scheme (Management and Investment of Funds) Regulations 2016 -<u>https://www.legislation.gov.uk/uksi/2016/946/contents/made</u>

- 50. "Financially material social factors also pose risks and provide opportunities to schemes' investments, and our taskforce will help ensure that focus on social factors continues to grow among pension schemes and throughout the investment chain."³⁰
- 51. By putting impediments in the way of some schemes carrying out their fiduciary duty to consider social factors in certain cases, this Bill will undermine these attempts to improve the governance of UK pension schemes.

Undermining democratic decision-making in devolved nations and administrations

- 52. This Bill applies to England, Wales, Northern Ireland and Scotland (subject to subsection (2). It gives the Secretary of State and Minister for the Cabinet Office new powers in relation to areas which devolved national government have the authority to determine their own ethical procurement policies, therefore again disregarding the democratic powers held by the national devolved governments of Wales, Scotland and Northern Ireland.
- 53. For example, the Welsh Government has extensive policy³¹ in relation to human rights and procurement. And a briefing by the Scottish Government notes that "Currently, the Scottish Ministers have the ability to the extent permitted by procurement legislation to consider the country or territory of origin or other territorial considerations in a way that indicates political or moral disapproval of a foreign state, when making decisions about procurement or investment...... The Bill will unduly restrict, if not entirely remove, this ability and, therefore alter the executive competence of the Scottish Ministers. The Bill would further limit and caveat the executive competence of Scottish Ministers by making it unlawful, under punishment of fine subject to interest, to even state they would have acted differently or otherwise, were it not for the provisions of the Bill."³²
- 54. The TUC has long argued for a more strategic and intelligent approach to public procurement that levers the purchasing power of the public sector in support of employment standards, jobs, skills and economic development. We believe that public procurement is inextricable from Government's obligations to respect international labour conventions and human rights and international law.
- 55. The current version of the procurement bill currently in parliament allows scope for strategic local and regional priorities to be taken into account alongside national priorities during procurement. This is a key means to exercise the powers conferred by devolution,

³⁰ DWP 'New taskforce to support pension scheme engagement with social factors in ESG investing', July 2022 https://www.gov.uk/government/news/new-taskforce-to-support-pension-scheme-engagement-with-social-factors-inesg-investing

³¹ Welsh Government (2021) 'Ethical employment in supply chains: code of practice, guidance and training', available at: https://www.gov.wales/ethical-employment-supply-chains-code-practice-guidance-and-training

³² Scottish Government (2023) 'Economic Activity of Public Bodies (Overseas Matters) Bill' available at:

https://www.parliament.scot/bills-and-laws/legislative-consent-memorandums/economic-activity-of-public-bodies-overseas-matters-bill

enact local democracy as well as enabling local politicians, sub-national governments and local authorities to harness procurement as a key means to deliver on their good work strategic priorities and commitments.

- 56. The procurement bill also places an obligation on contracting authorities to ensure that procurement adheres to the key principle of 'public benefit'. The government has stressed that 'public benefit' goes further than financial / cost considerations of a procurement, also encompassing economic, social, ethical, environmental considerations and public safety.
- 57. Therefore, we are concerned that this Bill undermines the flexibility given to commissioning authorities which looks set to be core to the new procurement regime, and undermines the government's own efforts to establish a more expansive view of the 'public benefit' of public procurement.

Conclusion

58. State bodies must be able to make decisions that are compliant with their obligations under international law. This Bill would severely restrict their ability to meet those duties. The trade union movement has a proud tradition of standing up for human rights, labour rights, and peace. We urge Members of Parliament to reject this Bill.

For further information or to speak to a member of our team, please contact Matt Dykes, Public Affairs Manager TUC on 07903 862 028 / mdykes@tuc.org.uk