



**Consumer  
Focus**  
Campaigning for a fair deal

# **Consumer Focus response to Ofgem's consultation on the Smart Metering Installation Code of Practice**

**March 2013**

# About Consumer Focus

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Consumer Focus is the statutory consumer champion for England, Wales, Scotland and (for postal consumers) Northern Ireland.

We operate across the whole of the economy, persuading businesses, public services and policy-makers to put consumers at the heart of what they do. We tackle the issues that matter to consumers, and give people a stronger voice. We don't just draw attention to problems – we work with consumers and with a range of organisations to champion creative solutions that make a difference to consumers' lives.

Following the recent consumer and competition reforms, the Government has asked Consumer Focus to establish a new Regulated Industries Unit by April 2013 to represent consumers' interests in complex, regulated markets sectors. The Citizens Advice service will take on our role in other markets from April 2013.

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# Introduction

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Consumer Focus welcomes Ofgem consulting on the Smart Metering Installation Code of Practice (SMICOP). While we have been involved in the Code working group since 2010, we are the sole consumer representative, and as such our views are not always adopted. We believe that the Code needs to be strengthened, in particular around:

- Emergency, abortive, incomplete and non-standard installations
- Requirements for micro-business customers
- Requirements for vulnerable and low income consumers
- Change of tenancy
- Safety and security
- Appointments (see Questions 2-4)
- Marketing (see Questions 5-7)

We recognise the time pressures on Ofgem to approve SMICOP, however, we seek reassurances that these issues will be addressed, whether in the Code itself, or by wider Department of Energy and Climate Change (DECC) or regulator activity. Consumer Focus recommends that Ofgem reviews the Code before mass roll-out, in particular in the light of new research on the experiences of small business customers and those who are in vulnerable situations and on low incomes.

Our responses to the consultation questions are below. Further detail is also available in our April 2011 response to the consultation on SMICOP<sup>1</sup> and our November 2011 response on the SMICOP licence conditions.<sup>2</sup> We make the following general points:

- 3.4.4 – the research reports mentioned should also be made available to the National Consumer Council – in addition to individual Code Members, the Authority and/or the Programme. While we can request the reports under our statutory information gathering powers it would be simpler if this was included in the Code

## Non-standard installations/emergency installations

Good practice needs to be developed for non-standard, incomplete, abortive and emergency installations. Fixing problems and addressing issues could result in a series of visits to the customer's home, disruption and inconvenience. In particular:

- The customer should not incur any extra cost as a result of installing the Smart Metering System, eg re-siting the meter because the existing space is not big enough or for the hard wiring of displays
- If the installation is unsuccessful the customer should be offered alternative measures, at no extra cost, to help them reduce their energy use eg clip-on display, insulation, tailored advice etc

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<sup>1</sup> <http://bit.ly/WGYcgG>

<sup>2</sup> <http://bit.ly/YZkG6S>

- As with consumers on change of tenancy, customers who receive meters in emergency situations eg damaged meters, unsafe, faulty equipment – should be entitled to receive in-home displays (IHDs) and equivalent levels of support to engage with their new technology. Suppliers need to establish practices for this

We welcome the fact ‘...that processes are maintained for managing abortive or no access Installation Visits, so that the Customer can be made aware that the Installation Visit has failed, the reasons for the failure, what happens next, and what action(s) the Customer can take’. But the onus should be on the supplier to resolve the issue not the customer. Consumers need to be provided with a single point of contact to help resolve issues. Suppliers should commit to respond to and handle smart metering enquiries within pre-stated transparent timeframes.

## Micro-business customers

Consumer Focus does not support the seemingly weaker requirements for non-domestic customers compared to domestic consumers. The requirements for domestic customers around charging, vulnerability, provision of energy efficiency advice, energy data, and standards for training should apply equally to micro-business customers, especially given that there are domestic customers under a non-domestic supply eg those living above a pub or shop.

We continue to advocate that small business customers should be offered some form of real-time feedback mechanism to access their energy consumption information. This is particularly important if they are to access the £1.75 billion energy saving identified in the DECC impact assessment.

Suppliers are not required to offer small business customers an IHD or access to data for free. This could act as a barrier to them accessing benefits. Initial findings from Consumer Focus’s on-going research have found that:

- IHDs are not normally provided to customers with advanced or smart-type meters (though apparently 2013 will see more of them). A minority of suppliers (smaller suppliers generally) charge for data access
- Web portals seem to be the preferred supplier offering but there are a wide range of charges

Carbon Trust research has reportedly found that that smaller non-domestic users have a higher propensity to reduce gas consumption by responding to information feedback. Indeed non-domestic users have a higher average consumption per premise than domestic users, increasing the value of any percentage saving derived from the use of smart or advanced metering.

Both DECC and Consumer Focus are undertaking qualitative and quantitative research on the experiences of non-domestic customers with advanced and smart meters. This should inform a review of the Code prior to mass roll-out.

## Low income and vulnerable customers

Customers, especially vulnerable and low income ones, should be made aware of social assistance and fuel poverty programmes available, and additional support for particular customer groups including those with impairments.

We continue to advocate that suppliers should provide a customer help line which is not just a ‘non-premium rate number’ but one which is free from landlines and mobile phones. As an interim measure before this is introduced, a call back service should be offered.

This is important as 14 per cent of households only have a mobile phone. These mobile-only customers tend to be disproportionately on low incomes.<sup>3</sup>

Subject to decisions on our 2013/14 workplan, we hope to work with suppliers on developing and piloting an extra help scheme for low income and vulnerable customers. We are happy to share the findings from this, as they become available. This too should form part of the Code review prior to mass roll-out.

Consumer Focus continues to advocate that the location of smart meter is recorded during the installation visit. This is to help prevent customers from being inappropriately switched to prepayment, when it is not safe and reasonably practicable, also to ensure more efficient resolution of problems. We recognise the challenges of this but it continues to be an issue that needs to be addressed and we are unclear how it has been progressed.

## Change of tenancy

We appreciate that change of tenancy issues do not relate to a specific installation visit, but it is important that the needs of these consumers are addressed if the benefits identified in the impact assessment are to be realised. The National Census 2001 estimated that one in eight people (6.3 million householders) move home every year and that our population is becoming increasingly mobile. There could be significant numbers of customers moving into properties with smart meters who have not had one before. Customers should not lose out, if the meter was not installed when they were not living in the property. It is important that new customers moving into a property are:

- made aware of the fact that they have a smart metering system
- offered an IHD when they move in at no upfront cost (the previous tenant may have taken it with them or not had one)
- asked if they have had a smart meter before and are taken through how to use it, with potential supplier differences are explained
- given a follow-up call to check they have got the IHD up and running
- given free access to the support they need to set up and use the display. A home visit should be offered and available where it is clear that the customer has not managed or is not able to set up the display themselves
- given free levels of support which are at least as good as those received during the installation visit – including around energy efficiency advice and information on using the meter in prepay mode

## Safety and security

Installers should give basic guidance on electrical safety and the dangers of carbon monoxide, and the need to regularly have all gas appliances serviced and checked by a Gas Safe Registered engineer, not just 'where appropriate' as stated in 3.3.14/15

The Electrical Safety Council approved checklist should be left with customers along with standardised information on safety (ie not obstructing meter, stacking items around meter). Fire risk from meters is a recurring problem. East Sussex Fire and Rescue Service reported that in one year 35 fires occurred in their area alone. If these figures are extrapolated for the whole of Great Britain, the numbers are not insignificant.

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<sup>3</sup> <http://bit.ly/aE2W5v>, page 338

Their report on this states that: ‘...*due to the nature and circumstances of how and when these fires occur (often at night when people are asleep, combined with the typical location of an electrical intake being within the means of escape from a property), a number of these fires have caused real risk to life, with one incident in requiring multiple rescues via an Aerial Ladder Platform.*’<sup>4</sup>

We seek assurances that there will be a central database for all installers and that following their training and accreditation they will be required to be registered. It is important that any problems with installers are recorded and reported so that other companies do not hire them. This is especially the case as they have access to people’s homes and will be working with vulnerable customers.

## Energy efficiency advice

3.3.17 says that ‘the Customer is made aware of any additional sources of help and information, including helplines, websites and other appropriate organisations able to offer assistance. This could include any centrally co-ordinated consumer engagement programme (related to smart metering or energy efficiency information, products and services).’ This should also include some reference to *independent* or *impartial* advice.

3.5.2 – ‘Instances are recorded where the Customer has opted not to take an IHD, and where provided’; the installer should also record why the customer has or hasn’t accepted the IHD and if this was set up and demonstrated to them.

There needs to be some kind of control on the quality of energy efficiency advice that installers provide to customers, including consistent messaging. Evidence suggests that face-to-face and one-to-one engagement can be particularly powerful in helping to promote behaviour change. This opportunity should not be squandered. It is important that all customers are guaranteed good quality support regardless of who their supplier is.

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<sup>4</sup> The report is available here: <http://www.cfoa.org.uk/download/18650>

More information on fires at intake equipment is available at <http://www.cfoa.org.uk/11856>

# Answers to specific questions

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## Training

### **Question 1: What are your views on the smart metering-specific accreditation and training requirements that should be set out in the SMICOP?**

We support a universal accreditation standard for both domestic and micro-business customers, not different standards. A variety of standards can cause customer confusion and undermine confidence in the ability of installers and advisers. It is essential that all personnel are appropriately qualified and that both domestic and non-domestic customers have a high-quality experience. While different companies may conduct the training, it is useful to have an umbrella standard.

A number of domestic customers are under non-domestic contracts eg those living above a shop, as part of a church, above a pub. A universal qualification would ensure that installers are appropriately trained to meet these customers' needs, where they encounter them. This cannot always be anticipated.

While much of the installation is 'business as usual', the installation of the Home Area Network, the Wider Area Network and IHD will require new knowledge and skills. Accreditation will need to cover not just the technical installation of the Smart Metering System, but also the soft skills and information needed to meet the needs of all customers, including vulnerable and prepayment customers, and to provide appropriately tailored energy efficiency advice.

The key consumer benefit identified in the Government's Impact Assessment for both domestic and micro-business customers is expected to come from consumers using smart technologies to better manage their energy use and reduce their bills. Further work is needed to ensure the energy efficiency training and subsequent information and support provided to customers is effective.

In our experience micro-business customers, often have the same levels of understanding and needs as domestic householders, justifying similar levels of support.

A universal accreditation would give greater flexibility to installers in terms of where they work and who for, with the associated benefits of a more mobile workforce.

We do not have a view on whether National Skills Academy for Power (NSAP) is the best accreditation standard to adopt or fit for purpose because we have not seen their training programme. We would welcome, greater visibility of the training requirements of NSAP, particularly in relation to the provision of energy efficiency advice, for prepayment customers and those in vulnerable positions. We strongly recommend that Ofgem, if it hasn't already done so, works with appropriately qualified bodies to evaluate the robustness of the NSAP approach.

## Appointments

### Question 2: Is 'greater than two working days' an appropriate and reasonable notice period in the context of clause 2.7.9?

While we have some sympathy with suppliers when customers persistently cancel appointments, Consumer Focus does not believe that customers should be charged, when they reschedule or cancel a home visit. This is particularly the case where it is the first time they have cancelled or they have to incur multiple visits through no fault of their own due to non-standard installations.

Our information request (IR) found that the majority of suppliers do not currently charge.<sup>5</sup> SMICOP should seek to support and extend good practice rather than undermine current positive approaches by effectively legitimising charging.

As noted, consumers will encounter unforeseen circumstances from time-to-time. There are often very valid reasons why customers have to cancel a home visit or may be late eg being called into work, to support family members, or held up travelling.

Charging could be counter-productive – have a negative effect on customer perceptions and engagement, and be more likely to result in barriers to entry. This would add additional costs to the Programme. This could be considered as a charge for roll-out by some.

Under the Guaranteed Standards, we understand that suppliers only have to pay compensation if they cancel their appointment with the consumer within one working day. Some suppliers interpret this as 24 hours-notice. It would be particularly inconsistent therefore, and unfair, if customers have to give double the length of notice and also for these to be working days.<sup>6</sup>

### Question 3: Should the SMICOP specify that suppliers must inform customers during the pre-installation period of any charges that could be applied if the customer were to cancel or reschedule an installation visit?

Yes, definitely, *if* charging continues to be allowed. It would be completely inappropriate not to provide customers with information about the risks. If charging continues, steps will need to be taken to ensure that this is properly communicated.

If charging continues, Ofgem should also take steps to ensure costs are reasonable. Consumer Focus's IR found that charges varied from, the majority of suppliers charging nothing up to £768 depending on the supplier and the time of the installation.<sup>7</sup>

At present, under the Guaranteed Standards, companies must pay £20 compensation to a customer if they miss an appointment related to gas, and £22 for electricity. This is despite the fact that according to the Cost of Waiting Survey, waiting in for the meter man results in loss of earnings, disproportionately impacting those on low incomes who are paid by the hour; results in days taken 'off sick' – a cost to the economy, and inconvenience and annoyance for customers.<sup>8</sup>

The loss of income to businesses could be higher, depending on whether preparation for the visit disrupts business practices or requires the time of particular personnel. Again, there appears to be an inconsistent approach which needs to be addressed.

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<sup>5</sup> See Appendix 1. This is confidential and not for publication.

<sup>6</sup> Suppliers must pay compensation if they fail to offer an appointment within a reasonable amount of time, fail to keep an appointment without giving one working day's prior warning or fail to send someone with the skills or equipment to complete the task.

<sup>7</sup> See Appendix 1.

<sup>8</sup> <http://bit.ly/YnK1lc>



Ofgem should review the level of compensation payments under the Guaranteed Standards and increase the scope so that they cover out of hours appointments on evenings and weekends. It would be particularly unfair if suppliers are allowed to charge for cancellations and rescheduling but customers are not entitled to compensation for the disruption and loss of their time should companies cancel.

2.7.9 states that 'if the Customer requests to cancel or reschedule an Installation Visit, that is accommodated (in line with existing policies and processes)'; further transparency is needed around what are existing practices. We continue to advocate that charges should not be allowed for weekend and evening visits.

**Question 4: Should the SMICOP specify that suppliers must inform customers during the pre-installation period, and before any installation appointment is agreed, that they are entitled to request a timed appointment as defined by the existing requirements of the Electricity (Standards of Performance) Regulations 2010 and the Gas (Standards of Performance) Regulations 2005?**

2.7.10. states that 'The Customer is informed about their rights in relation to the Installation appointment, where relevant'. Consumer Focus believes that all customers should as a minimum be told that they can request a two-hour appointment window and be made aware of their rights to compensation where there are problems. As we understand it, subject to some exceptions,<sup>9</sup> under the current Standards:

- *Suppliers should offer the choice between a morning and afternoon appointment*
- *Consumers are entitled to request an appointment within a specific two-hour window and this should be granted unless 'unreasonable to do so'*
- *Suppliers must pay compensation if they fail to offer an appointment within a reasonable amount of time, fail to keep an appointment without giving one working day's prior warning or fail to send someone with the skills or equipment to complete the task*
- *Suppliers must pay £20 compensation if they miss a gas appointment and £22 if it is related to the electricity supply*
- *If suppliers fail to make the compensatory payment within 10 working days they are required to pay an additional £20 (or £22) to compensate for the initial failure*

There is strong interest among domestic customers in a timed appointment. In our 2011 survey, when we asked those who had had an appointment in the last 12 months, 'Did you request an appointment within a two-hour window?' only 20 per cent had done so, but when asked 'if a two-hour window were an option would you use it?', 78 per cent of respondents said that they would.

We recognise that the time an installation takes may vary quite considerably from dwelling to dwelling which makes estimating the precise arrival time more challenging than in other sectors, such as home deliveries. However, we would like to see the analysis of any cost assessment to be convinced that moving from half day to two-hour appointment windows, is such a financial burden for suppliers, especially given the scheduling systems now available to address the logistical challenges.

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<sup>9</sup> These standards apply to any visit to a domestic property, either when a consumer has requested a visit or when a supplier has informed the consumer that one needs to take place. We understand there are some exceptions to these which apply in extreme circumstances, for example in the event of extensive power-cuts, or weather conditions rendering a consumer's property inaccessible.

Telecoms companies for example manage to offer timed appointments despite satellite and broadband installations being relatively complex.

Ofgem should consider the cost burden to consumers of waiting in when making any evaluation. The *Cost of Waiting* 2011 report, for example, found that the cost of staying in for goods and services to be delivered to consumers is conservatively £1.25 billion in lost wages, with more than 7 million Britons having taken unpaid leave in the last year to wait for an engineer or delivery. 76 per cent of Britons waited 3.6 times a year for cable/satellite TV, internet, utilities, retail home deliveries or other mobile workforce-related in-home services in the past year. Wait times averaged 4.3 hours and according to the respondents, the annual cost of waiting per individual was estimated at £177.11.<sup>10</sup>

Our experience is that customer awareness of their rights is low; call centre staff are often unaware of the Standards and how payments are made so greater transparency is needed<sup>11</sup>.

In our 2011 survey, 19 per cent of consumers who had had an appointment with their supplier in the last 12 months said that their supplier had not arrived at the agreed time. In addition, even when prompted, 60 per cent of customers did not know they were entitled to compensation when a supplier missed an appointment.<sup>12</sup>

The Appointments section of the Code needs to be strengthened. In addition:

- 2.7.1 states that ‘the Customer receives notification prior to the Installation Visit (by whatever method the Member deems most appropriate)’ but there is no minimum prior notice period. We are therefore concerned that suppliers may only give same day notification, if they happen to be in the area. Early drafts of the SMICOP required suppliers to give ‘adequate notice’ to customers. Under the Guaranteed Standards 4 (EGS4 – Regulation 12) we understand that two days’ notice is required before a home visit. We seek clarification that this minimum will apply and how it will work alongside other safeguards such as provision of information around effective switching, seeking consent on marketing, and data privacy
- There is also no requirement on the supplier to try and make a timed appointment, even for vulnerable customers. We are aware that some suppliers are considering sending postcards to customers saying they will be in their area to carry out a home visit in a given week or month. We believe that this presents a particular risk in terms of bogus callers and distraction burglary. It also could result in the customer being less prepared for the installation visit and therefore less receptive to advice given. All reasonable steps should be taken to make a timed appointment with vulnerable customers in particular
- We continue to advocate that, where possible, installers notify the customer as a courtesy ahead of their arrival on the day of installation, when the supplier is close to arriving eg by text or phone call. This will mean that the customer is not required to wait in

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<sup>10</sup> <http://bit.ly/YnK1lc>

<sup>11</sup> <http://bit.ly/Zz1b6c>

<sup>12</sup> In December 2011 Consumer Focus asked consumers ‘Do you think you are entitled to any compensation if your energy supplier misses an appointment?’, only 40 per cent of consumers responded yes, with the rest responding either ‘no’ or that they didn’t know. This indicates that awareness among the public of their rights regarding appointments, and most likely other Guaranteed Standards is relatively low. See *End of the Road* report below.

## Marketing

### **Question 5: Should the SMICOP require suppliers, when they are seeking prior consent from a domestic customer to engage in face-to-face marketing at the installation visit, to tell these customers explicitly that they have no obligation to receive such marketing?**

Yes, this would seem appropriate given the importance of this protection and suppliers poor track record on related doorstep selling. While a sale – ‘a purchase or commitment to purchase (eg by contract) a good or service’ – is not permitted during the installation visit, there is arguably a fine line between the customer experience of a sales presentation with a view to generate a lead and a sale in the legal sense. Face-to-face marketing could still leave customers feeling pressurised and intimidated in their own homes.

Consumer Focus’s *End of the Road* report<sup>13</sup> provides evidence for this. It found that: four fifths (82 per cent) of consumers had a negative view about any form of doorstep sales visit; more than two thirds (68 per cent) of customers said they were not comfortable with visits by their energy supplier to read or exchange their meter to be used to sell other energy products and services; and almost two thirds (63 per cent) wanted written permission to be sought before a sales presentation was carried out. The three biggest reasons for lack of trust in this area given by consumers were:

- Not wanting to be pressured into buying products in their own home (41 per cent)
- General distrust of their energy suppliers (25 per cent)
- Feeling intimidated by the sales process (16 per cent)

Consumer confidence in roll-out could be irreparably harmed if safeguards are not robust enough.

In addition to the safeguards provided we think that suppliers should give equal weight to highlighting where customers can go to find out more about their products and services, and where they can go to get independent advice. It needs to be made explicit that they are one of a number of providers. It must be just as easy to get independent information as supplier information eg provide a phone number, email, address for both.

Ofgem needs to work with suppliers on the development of their customer journeys in relation to smart metering and carry out monitoring to ensure that customers are giving informed and explicit consent to accept face to face marketing.

### **Question 6: Should the SMICOP require suppliers, when obtaining prior consent from a domestic customer to engage in face-to-face marketing at the installation visit, to notify the customer of the types of products and services that may be discussed during a marketing conversation? For example, a supplier seeking to market both energy tariffs and energy efficiency products would need to specify that both types of product may be offered.**

Yes, this is appropriate, particularly given the proportion of customers, outlined above, who are not comfortable with visits by their energy supplier to read or exchange the meter, being used for a sales presentation.

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<sup>13</sup> <http://bit.ly/uWVeLY>

In practice a lot of information is likely to be imparted to the customer during the pre-installation call and letter. Any steps that can make it explicit to the customer that they will be subject to a sales presentation, and increases understanding about what this entails, are welcome.

Consumer Focus continues to advocate that the products that customers have to pay for, should be restricted to those relating to the objectives of the smart meter Programme – notably energy efficiency. The marketing of other items such as telecommunications services, home security systems and boiler insurance, should not be allowed. This risks undermining customer confidence and gives incumbent suppliers an unfair competitive advantage off of the back of a Government-mandated programme. Some customers may think that co-branded materials mean the Government is endorsing products and services offered.

3.8.1 says that *'consent must be obtained from the Customer prior to the Installation Visit (for chargeable products and services only). Consent can be secured by any appropriate, recordable method that allows a freely given and specific indication of the Customer's wishes, eg by telephone, text, in writing, or electronically (web-form or email)'*. We query what the minimum time limit is between consent for marketing being granted and the installation visit taking place. For example, could consent be obtained face to face in the morning and the installation carried out in the afternoon? What safeguards are in place to prevent customers from feeling pressurised to accept this sales pitch?

3.8.2 states *'the Marketing discussion is ended immediately at the Customer's request or if the Customer clearly indicates that it is inconvenient, unwelcome or inappropriate'*; we suggest Ofgem removes 'clearly'.

### **Question 7: Should the SMICOP require suppliers to maintain an auditable record of instances where a customer requests that the supplier contacts them at a future date to conduct marketing or sales activities?**

Yes, this is an important part of overall monitoring needed to ensure safeguards are effective. Suppliers need to be able to identify any installers who are responsible for problems and take timely action to resolve issues. In addition we strongly advocate that personnel involved in the installation visit are remunerated in a way that focuses on the quality of the installation and the customer experience, not lead generation or sales.

### **Question 8: Do you have any views on whether it is practicable for additional information to be included in the SMICOP on the costs to suppliers of fulfilling the code requirements around monitoring and compliance?**

We recognise that some smaller suppliers in particular are concerned about a lack of definitive information regarding the costs to them of implementing the SMICOP. However, we question whether reliable estimates could be provided in practice. Members are responsible for implementing and maintaining suitable management and record-keeping processes to evidence compliance with provisions in the Code. We assume that costs will vary from supplier to supplier depending on the processes they put in place, and the overall administration costs will change over time as roll-out progresses.



## **Consumer Focus response to Ofgem's consultation on the Smart Metering Installation Code of Practice**

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