

Open Rights

Report and Accounts

31 October 2021

Open Rights
Contents of the Financial Statements
31 October 2021

	Page
Company Information	1
Annual Report	2
Report of the Directors	4
Accountants' Report	22
Income and Expenditure Account	23
Balance Sheet	24
Notes to Financial Statements	26

**Open Rights
Company Information
31 October 2021**

Directors

James Cronin
Simon Phipps (resigned 9 November 2020)
Owen Blacker (resigned 9 November 2020)
John Elliott (resigned 9 November 2020)
Christian Scarborough
Brian Parkinson
Thomas De Grunwald
Adela Devlin
Azmina Dhrodia
Hannah Little
Anna Fielder (appointed 9 November 2020)
Luisa Porritt (appointed 9 November 2020)

Secretary

James Cronin

Accountants

Urban Ledgers Limited
14 Thornhill Square
London
N1 1BQ

Bankers

Cooperative Bank plc
PO Box 101
1 Balloon Street
Manchester

Company number

5581537

Annual Report

(Year ended 31 October 2021)

Contents

Table of Contents

Contents	2
Report of the Board of Directors	4
Our objectives, mission and activities	4
Introduction	5
Top achievements	7
Immigration Exemption ruled unlawful under the GDPR	7
Court rules UK mass surveillance programme unlawful	7
Cross-cutting issues	8
Brexit and trade agreements	8
UK–Japan trade deal	8
Comprehensive and Progressive Agreement for Trans-Pacific Partnership (CPTPP)	9
The Covid crisis and our response	9
Privacy	10
AdTech	10
UK	10
Europe	11
Litigation	11
Policy and Political Advocacy	11
Public campaigning	11
Data protection	12
Digital identity	12
UK Adequacy Decision	12
GDPR 80.2	11
Data: a new direction	13
Stop Data Discrimination	14
Demanding an independent and effective privacy regulator	14
Data and Democracy	15
Migration, Data, and Digital Rights	16
Free expression	17
Online Safety Bill	17
Defending Anonymity	18
Blocked.org.uk	18

Online surveillance	19
Encryption	19
ORG Scotland.....	19
Scotland’s Digital Rights Agenda	19
Ensuring a fair digital election	20
Defamation Reform Bill.....	20
Grassroots community, membership and activism.....	20

Report of the Board of Directors

The Directors of the company present their annual report for the year ending 31 October 2021.

The Directors would like to thank our members, supporters, donors, and grantors, who made our important work possible. The Directors would also like to thank our staff, volunteers, members of our local groups and Advisory Council for their hard work, support, tremendous knowledge and world-class expertise.

Our objectives, mission and activities

We challenge:

- Threats to privacy by both the government, through the surveillance of our personal communications, and by private companies, which use our personal data in opaque and secretive ways.
- Threats to free speech through the criminalisation of online speech, online censorship and restrictive copyright laws.

We work to protect and extend human rights and civil liberties, which history tells us are often overlooked or eroded during periods of rapid change.

Our activities include public education and awareness raising, constructive engagement in policy-making using our expert research, campaigning and, where necessary, legal interventions

Our values:

- We believe in human rights;
- Our work is based on evidence;
- We are accountable to our supporters and operate with integrity;
- We believe in the importance of empowered people defending digital rights.

Introduction

In December 2020, we celebrated 15 years of Open Rights Group. In 2005, a dedicated group of grassroots activists created ORG to protect the digital rights of people across the UK. Fifteen years later,¹ over 20,000 members and supporters form the beating heart of our vital movement to safeguard human rights in the digital age.

Post-Brexit, the UK is at a critical juncture in respect of digital rights; the need for a movement like ORG has never been more apparent. With the freedom to legislate on digital issues now returned from Brussels, we are facing an unshackled government, which sees regulation and rights as a barrier to “building a world-leading data economy”.² Through 2020 and into 2021, we have started to see the potential impact of the Government’s deregulatory agenda.

The Government pursued damaging trade agreements that liberalise data flows and undermine our privacy rights without appropriate Parliamentary scrutiny. Following four years of discourse

¹openrightsgroup.org/blog/our-movement-turns-15
²<https://www.gov.uk/guidance/national-data-strategy>

and debate, they moved forward with a flawed Online Harms agenda, prioritising content moderation rather than tackling the platform monopolies and business models that monetise and incentivise disinformation, hate and discrimination online. The scale of the Government's assault on our privacy rights has rapidly grown, from proposals under the National Data Strategy³, which rapidly increase the flow of data across Government departments, civil service, the economy and society, to the publication of "Data: a new direction", which outlines the Government's ambition to gut the General Data Protection Regulation (GDPR) and undermine the UK's data protection framework in the name of "innovation".

ORG rose to meet these challenges. In 2021, we secured important legal victories as a result of cases we brought against the Immigration Exemption in the Data Protection Act 2018 and the UK Government's mass surveillance programme. We mobilised our members and supporters across the UK to take direct action in defence of our digital rights, making it clear to Members of Parliament (MPs) that legislative proposals that threaten our fundamental rights do not have public support, and that they will be held to account. We expanded our movement, forging new alliances with human rights and civil liberties groups outside of the digital rights sector. Building on our successful challenge to the Immigration Exemption in the Data Protection Act,⁴ ORG embedded a focus on migration, data and technology within our work and established new partnerships with migrants' rights groups who share our goal of ensuring that systemic forms of oppression against vulnerable and marginalised communities are not embedded in new and emerging technologies.

We continued to raise our concerns about the efficacy of our data protection regulator, the Information Commissioner's Office (ICO). In contrast to other European data protection authorities (DPAs), the ICO failed to take enforcement action against the AdTech industry despite finding significant failures. It refused to take enforcement action against the Conservative Party for racially profiling people during the 2019 General Election⁵. Following the appointment in September 2021 of a new Information Commissioner, John Edwards, ORG will continue to combine constructive engagement with raising public and parliamentary pressure for the ICO to pursue strengthened enforcement measures.

For a number of years, we have maximised the impact of a small, dedicated team. Reflecting today's challenges, we spent 2021 laying the foundations for ORG to grow our team, expand our work and further build our movement of members and supporters. This includes a new three-year strategic plan, which will guide the direction of ORG's work between 2022 and 2025.

Fifteen years on from our founding, our movement has never been more important. We are extremely grateful to our members, supporters, partners, funders, volunteers, staff and advisors who continue to help us in this fight.

³<https://www.gov.uk/government/publications/uk-national-data-strategy/national-data-strategy>

⁴<https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/exemptions/immigration-exemption/>

⁵<https://www.openrightsgroup.org/blog/our-movement-turns-15/>

Top achievements

Immigration Exemption ruled unlawful under the GDPR

When the Immigration Exemption became law as part of the Data Protection Act 2018, it threatened the data rights of all UK residents. ORG and the3million⁶ responded by taking the Government to court. We argued before the UK High Court that the exemption, used by the Home Office to deny people access to their personal data, is too broad and imprecise. Administrative errors are notoriously common in immigration cases, but if residents cannot access their own data they have little chance of overturning mistakes.

In October 2019 the High Court ruled against our challenge, but we succeeded in pushing the Home Office to reveal it used the exemption in 60 per cent of immigration-related requests for data.⁷ The Home Office also pledged to inform all future data subjects whenever it uses the exemption. Our supporters helped to raise funding for an appeal, and, on 26 May 2021, the Court of Appeal unanimously found that the Immigration Exemption is incompatible with Article 23 of the GDPR.⁸

“The treatment of immigrants as criminals and suspects is simply wrong. The suffering of the Windrush generation shows that Home Office use of data is poor. The Court has today found that proper safeguards should be put in place to help prevent future abuses and to ensure that people are treated fairly and lawfully.” **Sahdya Darr, Policy Manager**⁹

Court rules UK mass surveillance programme unlawful

In 2013, following Edward Snowden’s disclosure of information about major national mass surveillance programmes, the Open Rights Group teamed up with Privacy International, English PEN, and Dr Constanze Kurz, a German computer scientist, to mount a legal challenge against the UK Government’s mass surveillance of the Internet.

Challenges in the European Court of Human Rights (ECtHR) are a slow process, and ORG’s challenge was eventually joined to two similar challenges which had been launched in the meantime. One of these challenges was brought by ten other human rights organisations, including Amnesty International, Liberty, Privacy International, and the American Civil Liberties Union.

In September 2018 the European Court of Human Rights ruled that the UK’s mass interception programmes breached the European Convention on Human Rights. In May 2021, the Grand Chamber of the ECtHR ruled that the UK Government’s mass surveillance programme violated fundamental rights and established clear new safeguards and oversight for bulk interception programmes.¹⁰ The landmark judgment marks the Court’s first ruling on UK mass surveillance programmes.

⁶<https://www.the3million.org.uk/>

⁷<https://www.openrightsgroup.org/press-releases/controversial-immigration-exemption-used-in-60-of-cases-court-case-reveals/>

⁸<https://www.theguardian.com/uk-news/2021/may/26/eu-citizens-win-right-access-personal-data-held-home-office>

⁹<https://www.openrightsgroup.org/press-releases/immigration-exemption-judged-unlawful-excessive-wrong-by-court-of-appeal/>

¹⁰<https://www.openrightsgroup.org/press-releases/echr-judgment-on-uk-govts-mass-surveillance-program/>

“The Court has recognised that Bulk Interception is an especially intrusive power, and that ‘end-to-end safeguards’ are needed to ensure abuse does not occur. The Court has shown that the UK Government’s legal framework was weak and inadequate when we took them to court in 2013.”
Jim Killock, Executive Director

Cross-cutting issues

Brexit and trade agreements

ORG put a spotlight on the consequences of post-Brexit trade deals for our privacy, data and digital rights.

UK–Japan trade deal

In October 2020, the UK signed its first new free trade agreement independently from the EU, with Japan¹¹. ORG published a briefing¹² highlighting the clauses that prioritise the “free flow of data” between the UK and Japan, and from there to other trade partners, over and above data protection rights. We argued that the UK-Japan trade deal incorporates a democratic deficit weakening privacy¹³ and that the Government is committing to fundamental changes to our data privacy laws without any vote taken by Parliament. Our concerns were reflected in a report released by the Commons’ International Trade Select Committee in November 2020.¹⁴ The Committee recognised the impact of the changes on data protection and other digital matters raised by ORG, and proposed a welcome further inquiry.¹⁵

ORG briefed cross-party parliamentarians, including members of the front-bench Department of Culture, Media and Sport (DCMS) and International Trade teams from both the House of Commons and the House of Lords. MPs from across the House of Commons used our briefings and questions our members and supporters raised in the discussion on the UK-Japan Trade Agreement.

Our Executive Director appeared as an expert witness before the UK Parliament International Trade Committee’s inquiry on Digital Trade and Data.¹⁶ His testimony was reflected in several recommendations published by the Committee on 28 June 2021.¹⁷ Reflecting concerns raised by ORG and a cross-party coalition of MPs in our open letter,¹⁸ the Committee recommended that for future free trade agreements the Government should include an assessment of the impact on the protection of UK residents’ data as well as any effects that future commitments may have on the UK’s ability to maintain its data protection regime. The Committee also recommended an

¹¹<https://www.gov.uk/government/collections/UK–Japan-comprehensive-economic-partnership-agreement>

¹²<https://www.openrightsgroup.org/blog/japan-trade-deal-punches-usa-sized-hole-in-privacy/>

¹³<https://www.openrightsgroup.org/blog/the-democratic-deficit-weakening-privacy-in-the-UK–Japan-deal/>

¹⁴<https://committees.parliament.uk/publications/3549/documents/34421/default/>

¹⁵<https://www.openrightsgroup.org/blog/commons-committee-spells-out-japan-deal-digital-risks/>

¹⁶<https://committees.parliament.uk/oralevidence/1864/pdf/>

¹⁷<https://committees.parliament.uk/publications/6451/documents/70389/default/>

¹⁸<https://www.openrightsgroup.org/press-releases/cross-party-group-of-mps-ask-government-to-spell-out-privacy-risks-in-UK–Japan-trade-agreement/>

“assessment of each agreement’s potential impact on maintaining an Adequacy Decision from the European Commission”.

Comprehensive and Progressive Agreement for Trans-Pacific Partnership (CPTPP)

Following the announcement of an official application to join the CPTPP¹⁹ — a trade agreement between 11 countries, covering 500 million people — ORG launched the second phase of our digital trade campaign in summer 2021, deploying a combination of member and supporter mobilisation, press coverage and public campaigning efforts.

We produced a dedicated digital campaign website²⁰ and released an explainer video series, ‘The Global Privacy Race to the Bottom’,²¹ which has been viewed online over 180,000 times. The video was accompanied by a petition, which secured thousands of signatories calling on the Secretary of State for International Trade to ensure the CPTPP agreement included provisions to protect privacy. ORG members and supporters also sent hundreds of letters to the Secretary of State and their local MPs reinforcing our campaign messages. Our local groups also contributed by drafting joint letters to their MPs and seeking signatories from local ally organisations concerned about trade agreements’ impact on human rights.

The Covid crisis and our response

From the outset, ORG advocated for a privacy-minded approach to counter the emergency powers granted to the Government by Parliament as a result of the Covid-19 pandemic. As countries around the world considered introducing vaccine passports, ORG responded to a Government review²² asking for evidence or comments regarding the possible introduction of a “COVID-status certification”. We built on our successful experience challenging the NHSX App²³ and the deployment of the Test and Trace system to formulate a broad set of recommendations.

In early September, we were invited to consult with the Scottish Government’s Covid certification team on the proposed roll-out of a vaccine passport system, along with other human and digital rights groups.²⁴ While our feedback alone could not, of course, change the outcome of the ensuing vote for passport roll-outs, we hoped that our constructive suggestions on safeguards, precautions, and redress would be taken on board.

¹⁹<https://www.gov.uk/government/news/uk-welcomes-cptpp-nations-invitation-to-begin-accession>

²⁰<https://digitaltrade.openrightsgroup.org/>

²¹<https://digitaltrade.openrightsgroup.org/watch-cptpps-global-privacy-race-to-the-bottom/>

²²<https://www.openrightsgroup.org/publications/open-rights-group-response-to-the-cabinet-office-covid-status-certification-review-call-for-evidence/>

²³<https://www.openrightsgroup.org/campaign/protecting-digital-rights-during-covid-19/>

²⁴<https://www.parliament.scot/chamber-and-committees/official-report/what-was-said-in-parliament/meeting-of-parliament-09-09-2021?meeting=13282&iob=120511>

Privacy

Our work in this area sought to strengthen individuals' privacy rights through using the law to extend privacy rights, directly challenge the most threatening abuses of privacy online, equip individuals with tools to exercise their rights and provide greater transparency with respect to the online advertising industry.

AdTech

Our fight against the widespread and systemic abuse of personal data by the advertising industry made major strides in 2020–2021. ORG planned and delivered litigation and campaign, policy, and political advocacy activities with our partner organisations in both the UK and across Europe.

UK

After the UK privacy regulator inexplicably dropped its investigation into Real Time Bidding (RTB) — a set of technologies and practices used in programmatic advertising that allow advertisers to compete for available digital advertising space in milliseconds — even though it conceded these were unlawful data collection practices, ORG responded with a legal challenge. Thanks to our members and supporters, we raised over £20,000 to challenge the ICO decision to close a complaint filed by our Executive Director, Jim Killock, and Dr Michael Veale (a member of ORG's Advisory Council) against the Internet Advertising Bureau (IAB, the AdTech industry body) and Google. A campaign video²⁵ created to support our fundraising campaign was viewed online over 18,000 times. Our complaint was also covered in several media outlets including TechCrunch,²⁶ Politico²⁷ and Forbes.²⁸

In January 2021, the ICO announced it was reopening its investigation into Real Time Bidding²⁹ and announced it would continue with a series of audits focusing on data management platforms and also issue assessment notices to specific companies. Yet it failed to reopen Jim Killock and Michael Veale's complaint. We argued publicly that the ICO's decision to resume its investigation into the massive data breaches taking place in the online ad industry reinforced our argument that it was wrong to have closed the original complaint.

Our case started in the General Regulatory Chamber but was fast-tracked to a hearing before the Upper Tribunal on 20 July 2021 because of the important legal issues it raised regarding the Tribunal's jurisdiction to rule on whether the ICO had addressed the issues raised in our complaint and thus had reached an "outcome". In July, ORG also made a submission to the Competition and Markets Authority (CMA) "Notice of intention to accept binding commitments offered by Google in relation to its Privacy Sandbox

²⁵ <https://www.youtube.com/watch?v=89t2bKn25GE>

²⁶ <https://tcrn.ch/367RneJ>

²⁷ <https://www.politico.eu/article/legal-challenge-filed-against-uks-handling-of-adtech>

²⁸ <https://www.forbes.com/sites/carlypage/2020/11/05/uk-privacy-watchdog-faces-legal-action-for-quietly-closing-adtech-gdpr-complaint/?sh=2552dc5676d6>

²⁹ <https://ico.org.uk/about-the-ico/news-and-events/news-and-blogs/2021/01/adtech-investigation-resumes/>

Proposals”. While we agree with the CMA's analysis of the issues regarding Google's deployment of “Privacy Sandbox”, we emphasise several issues regarding the substance of Google’s commitments. If left unaddressed, these would ultimately fail to remedy some of the concerns the CMA has raised, namely that Google could exploit its apparent dominant position and distort competition³⁰ for the supply of ad inventory and AdTech services in the UK.

Europe

Litigation

ORG continued to collaborate with a network of partners in Europe to challenge privacy abuses in RTB processing. Together with the Panoptykon Foundation³¹ and the Civil Liberties Union for Europe,³² we coordinated one of the largest ever cross-border complaints concerning online advertising. A total of 23 complaints have now been filed before data protection authorities in 21 countries.³³ This includes 10 new complaints filed in December 2020 by human rights organisations in Cyprus, Croatia, Greece, Malta, Portugal, and Romania. This strategy not only amplified the reach and impact of each individual complaint, but also provided valuable insight into the varying approaches employed by different DPAs across Europe with respect to parallel complaints.

Policy and Political Advocacy

ORG was also busy behind the scenes laying the groundwork for a pan-European campaign to urge policymakers and privacy regulators across the continent to crack down on illegal advertising practices. In April 2021, Open Rights Group, Panoptykon Foundation and the Civil Liberties Union for Europe sent an open letter³⁴ alongside 30 civil society organisations to the European Parliament asking Members to stand up for the ePrivacy Regulation and our online privacy. We followed this in June 2021 with an open letter³⁵ to Members of the European Parliament, co-signed by 35 civil liberties and digital rights organisations.

Trilogue negotiations in respect of the ePrivacy Regulation reopened in May 2021. ORG supported European Digital Rights³⁶ Brussels Office in developing its negotiating position around AdTech issues, identifying three main requests to push for, one of which was a strict consent requirement for online tracking.

Public campaigning

Our #StopStalkerAds campaign³⁷ mobilised individuals across Europe to tweet their representatives in the European Parliament and advocate for new legislation at the EU level to

³⁰ <https://www.openrightsgroup.org/publications/submission-to-the-competition-and-markets-authority-re-google-privacy-sandbox/>

³¹ <https://en.panoptykon.org/>

³² <https://www.liberties.eu/en>

³³ <https://www.openrightsgroup.org/blog/our-fight-against-rtb-gets-bigger/>

³⁴ <https://www.openrightsgroup.org/publications/eprivacy-regulation-an-open-letter-from-30-civil-society-organisations/>

³⁵ <https://www.openrightsgroup.org/publications/eprivacy-regulation-and-privacy-automation-an-open-letter-from-34-civil-society-organisations/>

³⁶ <https://edri.org/>

³⁷ <https://www.stopstalkerads.org/>

strengthen privacy protections. ORG produced a campaign video highlighting our key messages,³⁸ which was viewed over 159,300 times, and a new campaign microsite.

Data protection

Digital identity

ORG responded to the DCMS policy paper on the UK's digital identity and attributes trust framework.³⁹ This consultation followed the call for evidence on digital identity published in 2019, to which ORG also responded,⁴⁰ and builds on the Government's direct and ongoing engagement with civil society groups, including ORG, on digital identity issues.

UK Adequacy Decision

In June 2021, the European Commission adopted the UK Adequacy Decision, which will allow personal data to be transferred from the EU to the UK without additional safeguards.⁴¹ In the months leading up to the decision, ORG argued that the standard of data protection within the UK across various areas meant that the EU could not simply rubber-stamp the UK's data laws.⁴²

We highlighted the UK's Immigration Exemption, which derogates from fundamental rights in the GDPR, the lack of structures for redress against decisions (or indecisions) by the ICO and the UK's well-known bulk surveillance powers as areas that sit at odds with cornerstones of European data protection and human rights standards.⁴³ With the publication of "Data: a new direction," the UK may end up being the only country that lowers its data rights standards, an argument we will continue to advance with partners and policymakers across Europe.

GDPR 80.2

In March, the Government decided not to take up an optional power under Article 80.2 of the GDPR to improve data protection enforcement by allowing organisations like ORG to take complaints about breaches of data protection law to the ICO and on to the courts if necessary without a data subject's consent.⁴⁴ ORG supported the introduction of new enforcement powers,⁴⁵ and over 300 of our supporters responded to the Government's consultation expressing support for the provisions. These submissions represented the vast majority of the 345 responses the Government received. Despite overwhelming evidence from privacy, children's and consumer rights groups on the difficulties for individuals who attempt to take complaints

³⁸<https://www.youtube.com/watch?v=7-ezf6LMvgU>

³⁹<https://www.gov.uk/government/publications/the-uk-digital-identity-and-attributes-trust-framework/the-uk-digital-identity-and-attributes-trust-framework>

⁴⁰<https://www.openrightsgroup.org/publications/response-to-dcms-call-for-evidence-on-digital-identity-september-2019/>

⁴¹https://ec.europa.eu/commission/presscorner/detail/en/ip_21_3183

⁴²<https://www.openrightsgroup.org/blog/europe-cannot-rubber-stamp-the-uks-data-laws/>

⁴³<https://www.openrightsgroup.org/blog/fear-and-loathing-in-the-uk-adequacy-decision/>

⁴⁴<https://www.openrightsgroup.org/blog/the-governments-own-goals-on-data-privacy/>

⁴⁵<https://www.openrightsgroup.org/publications/complete-dcms-response-on-gdpr-derogations/>

forward and first-hand testimony from individuals on the ICO's lack of awareness of and support for such a power, the Government opted against bringing in this power.

There can be no doubt that ORG and our supporters showed the public appetite for such enforcement powers. The Government agreed that there are paths for improving access to rights and complaints to the ICO⁴⁶ such as giving more information online and providing names of organisations that might be able to assist in taking 80.1 complaints. Although we continue to engage in discussion that would improve access to enforcement mechanisms, ORG has taken the initiative to develop its own guidance for civil society looking to utilise the 80.1 system. This work was completed and published during the next reporting period.

Data: a new direction

In September, the Government published “Data: a new direction”, its plan to roll back GDPR privacy protections that prevent data discrimination against everyone from students and workers to migrants and NHS patients. The new framework is part of a journey that ORG has followed closely, starting from the National Data Strategy and continuing on to the Digital Regulation Plan and our analysis of the Taskforce on Innovation, Growth and Regulatory Reform report.⁴⁷

Both prior to and immediately following the publication of this new proposal, ORG produced a series of blog posts outlining our concerns with respect to this emerging threat to our data rights in the UK. We also raised the alarm around recommendations advanced by then Minister of State and the Cabinet Office, Lord Frost, to repeal or amend all retained EU legislation — including the GDPR — without appropriate Parliamentary scrutiny:

- The Government assault on your privacy rights⁴⁸
- Stand up for privacy⁴⁹
- New UK data laws are Government revenge against NHS patients⁵⁰
- Lord Frost says: Bypass Parliament to rewrite EU rules⁵¹
- New UK data laws will harm mothers and children⁵²
- Why on Earth is the Government mucking about with our privacy laws?⁵³
- Government prepares to take back control – of your privacy⁵⁴

⁴⁶<https://www.gov.uk/government/publications/call-for-views-and-evidence-review-of-representative-action-provisions-section-189-data-protection-act-2018/uk-government-response-to-call-for-views-and-evidence-review-of-representative-action-provisions-section-189-data-protection-act-2018#the-governments-response>

⁴⁷<https://www.gov.uk/government/publications/taskforce-on-innovation-growth-and-regulatory-reform-independent-report>

⁴⁸<https://www.openrightsgroup.org/blog/the-government-assault-on-your-privacy-rights/>

⁴⁹<https://www.openrightsgroup.org/blog/stand-up-for-privacy/>

⁵⁰<https://www.openrightsgroup.org/blog/new-uk-data-laws-are-govt-revenge-against-nhs-patients/>

⁵¹<https://www.openrightsgroup.org/blog/lord-frost-says-bypass-parliament-to-rewrite-eu-rules/>

⁵²<https://www.openrightsgroup.org/blog/new-uk-data-laws-will-harm-mothers-and-children/>

⁵³<https://www.openrightsgroup.org/blog/why-on-earth-is-the-government-mucking-about-with-our-privacy-laws/>

⁵⁴<https://www.openrightsgroup.org/blog/government-prepares-to-take-back-control-of-your-privacy/>

- Vandalising your privacy rights⁵⁵

Stop Data Discrimination

In September 2020, we launched a major campaign, Stop Data Discrimination,⁵⁶ mobilising dozens of national organisations and hundreds of ORG activists to oppose “Data: a new direction” and respond to the DCMS consultation. We ran four briefing events,⁵⁷ which together engaged over a hundred organisations from a variety of different civil society sectors. Our campaign videos,⁵⁸ web resources⁵⁹ and activist webinars equipped ORG members and supporters — as well as partners amongst digital rights, human rights and civil liberties’ organisations — to respond to the public consultation, providing evidence of the threat to vulnerable communities and putting popular opposition to this regressive data plan on the public record.

The consultation concluded during the next reporting period and further campaign activities will be covered in the next report.

Demanding an independent and effective privacy regulator

Having voiced our concerns regarding the ICO’s response to the Covid-19 pandemic and its disappointing handling of our AdTech complaint, ORG published our analysis of failures in the ICO’s enforcement strategy in the two years following the May 2018 adoption of the GDPR.

In November 2020, ORG participated in the ICO consultation on its draft Statutory Guidance. We argued that the ICO’s carrot-and-stick approach – seeking to educate and promote voluntary compliance first, with enforcement following only if and when necessary – had, in practice, enabled organisations to delay or avoid enforcement against their illegal practices.

After the ICO posted a vacancy for its top job,⁶⁰ ORG raised the alarm around undue Government influence with respect to the new Information Commissioner’s appointment.⁶¹ We mobilised a cross-party group of MPs to submit a letter to the Secretary of State for DCMS⁶² arguing that the impression had been made that, “DCMS is seeking an Information Commissioner whose policy views match its own, rather than a regulator that will seek to enforce the law as Parliament has written it”. Our mobilisation efforts were subsequently referenced during the House of Commons DCMS Select Committee appointment hearing for the new Information Commissioner, John Edwards.

⁵⁵<https://www.openrightsgroup.org/blog/vandalising-your-privacy-rights/>

⁵⁶<https://www.openrightsgroup.org/campaign/stop-data-discrimination/>

⁵⁷<https://www.youtube.com/watch?v=ht7vJQREik4>

⁵⁸<https://www.youtube.com/watch?v=pS72Y6lwVA8&feature=youtu.be>

⁵⁹<https://www.openrightsgroup.org/data-a-new-direction-consultation-guidance/>

⁶⁰<https://publicappointments.cabinetoffice.gov.uk/appointment/information-commissioner-2/>

⁶¹<https://www.openrightsgroup.org/blog/wanted-corporate-lobbyist-to-take-over-the-ico>

⁶²<https://www.openrightsgroup.org/press-releases/cross-party-group-of-mps-warn-govt-about-unduly-influencing-regulators-appointment/>

Data and Democracy

We continued to build upon a part of ORG’s work on data and democracy which began in 2019, when 600 ORG staff and supporters sent data subject access requests (DSARs) to all the UK’s main political parties via our subject access request tool. Following the publication of our report “Who Do They Think You Are?”,⁶³ ORG was featured in Sky News,⁶⁴ the BBC,⁶⁵ OpenDemocracy⁶⁶ and The Register.⁶⁷

Through this work we identified two core concerns. First, that the political parties had a poor system for dealing with requests for personal data. Second, that the political parties seemed to place no meaningful limit on the profiling or processing of personal data that they believe they can undertake.

Having pursued formal mediation with the parties, ORG coordinated a letter to the Leader of the Labour Party with Lord Puttnam, the Chair of the House of Lords’ Democracy and Digital Technologies Committee on the subject of the Labour Party’s data processing policies.

On 11 December 2020, the eve of the anniversary of the 2019 General Election, represented by the data rights firm AWO⁶⁸, ORG submitted complaints to the ICO on behalf of data subjects on the processing of personal data by the Labour Party, the Conservative and Unionist Party and the Liberal Democrats.⁶⁹ The complaints drew directly upon the findings of our 2019 data and democracy campaign. We argued that the data subjects’ experience shows that the political parties are treating anything that helps them achieve their political goals — whether invasive profiling or failing to deploy sufficient resources to comply with subject access requests — as necessary or otherwise lawful. For this reason, our complaints requested that the ICO ensure that a proper test of necessity is applied by the parties to their data processing activities.

The ICO responded to our complaint in June 2021. Our case was successful in highlighting numerous shortcomings in the scope of personal data collection by the political parties and in altering their behaviour. We were able to suppress processing by the political parties, which is a significant development. Disappointingly, the ICO failed to establish a meaningful limit on the profiling or processing of personal data in election campaigning. The ICO noted that its Guidance to Political Parties on Campaigning “leaves it for controllers to justify the necessity of their processing”.⁷⁰ In so doing it failed to meet its statutory obligations. In March 2021, the ICO published its new “Guidance for the use of personal data in political campaigning”.⁷¹ ORG had already contributed to its consultation⁷² and upon publication

⁶³ <https://www.openrightsgroup.org/campaign/who-do-they-think-you-are/>

⁶⁴ <https://news.sky.com/story/political-parties-engaged-in-systemic-abuse-of-personal-data-complaint-alleges-12158632>

⁶⁵ <https://www.bbc.co.uk/news/technology-54915779>

⁶⁶ <https://www.opendemocracy.net/en/opendemocracyuk/conservative-party-racially-profiled-10-million-voters/>

⁶⁷ <https://www.theregister.com/2020/11/12/uk-conservative-party-used-peoples/>

⁶⁸ <https://www.awo.agency/>

⁶⁹ <https://www.openrightsgroup.org/blog/org-takes-political-parties-to-privacy-watchdog/>

⁷⁰ Case Reference Number IC-81087-L0R2. ICO Response and Outcome to Complaint, Page 4. (ICO, 3.6.2021)

⁷¹ <https://ico.org.uk/for-organisations/guide-to-data-protection/key-dp-themes/guidance-for-the-use-of-personal-data-in-political-campaigning-1/>

⁷² <https://www.openrightsgroup.org/publications/org-response-to-ico-consultation-on-draft-framework-code-of-practice-for-use-of-personal-data-in-political-campaigning/>

produced an analysis of remaining areas of concern.⁷³ Crucially, the guidance does not provide greater clarity on the limits of profiling or processing of personal data, one of the most controversial electoral activities.

The ICO's failure to provide clarity about the interpretation of data protection principles in this context is particularly alarming given the findings of its own audit of UK political parties, which was published in November 2020.⁷⁴ The most concerning revelation is that the Conservative and Unionist Party racially and religiously profiled 10 million voters⁷⁵ in a manner which the Information Commissioner herself later admitted was likely to be unlawful.⁷⁶ Although in previous analyses ORG had found fault with the profiling practices of both Labour and the Liberal Democrats, the scale and the nature of profiling shown by the ICO's investigation is truly shocking.

Migration, Data, and Digital Rights

ORG expanded its support for the migrants' rights sector's unique data and technology environment. Together with Privacy International, we surveyed and mapped needs and capacities among 30 migrants' rights groups and immigration lawyers to address data and technology issues in their work.⁷⁷ The findings formed the basis for a co-working methodology designed to establish long-term collaborative working partnerships with migrants' rights groups across the UK.

Through 2020–2021, ORG ran four briefing sessions for migrants' rights groups on the impact on migrants' rights of the Immigration Exemption, the National Data Strategy, the National Fraud Initiative's data-matching powers and the "Data: a new direction" proposals.

We produced in-depth policy analysis and tailored briefings for partners to use in debate and consultations around national digital policy issues. This work included coordinating an open letter to the Secretary of State for DCMS outlining our shared concerns about how the National Data Strategy will affect migrants and refugees.⁷⁸ ORG, along with other privacy advocates and migrants' rights groups, wrote to the Head of the National Fraud Initiative (NFI) to successfully request that a consultation deadline for the NFI data matching powers and new Code of Data Matching Practice be extended in order to enable more groups to respond. We forwarded our letter to the Minister for the Cabinet Office and published our analysis of the proposals, which took into account the wider context of the Government's stated desire to increase the collection

⁷³<https://www.openrightsgroup.org/blog/blindspots-in-new-guidance-on-use-of-data-in-campaigning/>

⁷⁴<https://ico.org.uk/about-the-ico/news-and-events/news-and-blogs/2020/11/uk-political-parties-must-improve-data-protection-practices/>

⁷⁵<https://www.openrightsgroup.org/blog/10000000-voters-racially-profiled-by-conservatives/>

⁷⁶<https://www.openrightsgroup.org/press-releases/icos-elizabeth-denham-confirms-illegal-racial-voter-profiling-by-the-conservative-party/>

⁷⁷<https://www.openrightsgroup.org/publications/immigration-data-and-technology-needs-and-capacities-of-the-immigration-sector/>

⁷⁸<https://www.openrightsgroup.org/publications/open-letter-impact-of-national-data-strategy-on-migrants-and-refugees/>

and sharing of personal data, and what this could mean for privacy, civil rights and civil liberties.⁷⁹

In June 2021, we were invited by the Migrants' Rights Network (MRN) to speak at an All-Party Parliamentary Group on Race and Community event on the case of Highly Skilled Migrants and unlawful data-sharing between the Home Office and other government departments, which foreshadows potential expansion of data sharing through the National Data Strategy and the NFI data matching powers. ORG also produced a blog post for Free Movement to raise awareness of the NFI proposals and how they are likely to affect migrants.⁸⁰ ORG reacted to an exclusive story in The Independent⁸¹ that uncovered the fact that a website targeting asylum seekers had been set up by the Home Office.⁸² We made a complaint to the ICO and requested that the Home Office conduct an internal review. We also engaged with migrants' rights groups to encourage them to make their own complaints to the ICO.

With the publication of "Data: a new direction", ORG mobilised our partners in the migrants' rights sector through our Stop Data Discrimination campaign. In October, we ran a briefing event⁸³, moderated by Stephen Timms MP, for 36 sector representatives on what the proposals could mean for migrants' rights and how their organisations could engage with the consultation using tools and resources ORG had produced.

Free expression

Online Safety Bill

ORG focused public and political attention on dangerous flaws that threaten freedom of expression within the draft Online Safety Bill.⁸⁴ We published a series of blog posts and videos exposing the risk that the Bill could block popular sites like Wikipedia and Reddit, its threat to the privacy of personal messages through scanning and censorship, and the Orwellian powers it grants ministers over the definition and control of online speech.

ORG joined allies from Big Brother Watch, the Adam Smith Institute, Article 19, Global Partners Digital, and Index on Censorship to launch the #SaveOnlineSpeech campaign⁸⁵ to demand that the Online Safety Bill protect freedom of expression. The Save Online Speech Coalition launch was accompanied by an open letter to Oliver Dowden, the Minister for Digital, asking him to support the campaign's aims.

⁷⁹<https://www.openrightsgroup.org/publications/open-rights-group-response-to-the-consultation-on-the-national-fraud-initiative-data-matching-powers-proposals/>

⁸⁰<https://freemovement.org.uk/new-data-matching-powers-are-a-threat-to-migrant-communities/>

⁸¹<https://www.independent.co.uk/news/uk/home-news/english-channel-crossings-home-office-website-b1894092.html>

⁸²<https://www.openrightsgroup.org/blog/afghans-targeted-by-fake-home-office-website/>

⁸³Recording available at <https://www.youtube.com/watch?v=Wq0I2jTFA6s&feature=youtu.be>

⁸⁴<https://bills.parliament.uk/bills/3137>

⁸⁵<https://saveonlinespeech.org/>

We continued to show leadership in Parliamentary discussion and roundtables around the draft Bill. Our advocacy and outreach focused on principles and consequences, in contrast to the focus on specific companies and individuals demonstrated by the Bill’s authors. ORG’s strategy forced many audiences to ask difficult questions about what the scope of this Bill requires. ORG engaged frequently with civil society, the tech sector and business groups on campaign and policy strategies.

Our media outreach also continued at full speed, including comments and articles in The House, TechCrunch, Politico, Wired, and other high-profile outlets. In the aftermath of the racial abuse sent on social media to England’s Euro 2020 footballers, ORG contributed to coverage in Sky News,⁸⁶ IPro,⁸⁷ GBNews⁸⁸ and Politico,⁸⁹ as well as through our blog.⁹⁰

In July ORG launched a preliminary campaign to challenge threats to free expression and encryption within the draft Online Safety Bill. This consisted of a series of blog posts with accompanying animated graphics, which our supporters shared over 2,700 times on social media. The blogs and graphics carried a pledge to stop state censorship of online speech which has garnered over 1,400 signatories so far. This campaign was paused in August and resumed again in September. We ran a public petition challenging online censorship, which attracted 3,653 signatories, including a vast number of new contacts to ORG.

During party conference season, our Executive Director also participated in a high-profile fringe event at the Conservative Party Conference on the Online Safety Bill.⁹¹ ORG submitted written evidence to the DCMS Subcommittee Inquiry into Online Safety and Online Harms and the Draft Online Safety Bill Joint Committee. Many of the concerns ORG raised were reflected in the Joint Committee’s report,⁹² which will be covered in next year’s report.

Defending Anonymity

After a petition calling for ID requirements to open a social media account triggered a debate in Parliament, in March hundreds of ORG members and supporters reminded their MPs that anonymity underpins free expression, press freedom and the safety of minority groups vulnerable to online abuse. ORG also shared our analysis of the importance of anonymity.⁹³

Blocked.org.uk

Our Blocked.org.uk tool continues to help users find out if a website is blocked by their Internet service provider, by mobile content filters or by a court-ordered block. Our service also helps users file requests to get sites unblocked.

We completed a project to train volunteers to review and classify a backlog of over 2,000 ISP reports generated by users of blocked.org.uk, with reports double-checked for accuracy. This

⁸⁶<https://news.sky.com/story/why-is-it-so-difficult-to-stop-abuse-on-social-media-12354192>

⁸⁷<https://www.itpro.co.uk/marketing-comms/social-media/360190/bcs-calls-for-social-media-platforms-to-verify-users>

⁸⁸<https://www.gbnews.uk/gb-views/we-cant-stop-racism-by-censoring-legal-speech-online/112228>

⁸⁹<https://www.politico.eu/article/uk-social-media-big-tech-clampdown-football-racism-online-hate/>

⁹⁰<https://www.openrightsgroup.org/blog/racists-must-be-prosecuted-not-moderated/>

⁹¹<https://www.adamsmith.org/events/online-safety-amp-free-speech>

⁹²<https://committees.parliament.uk/committee/534/draft-online-safety-bill-joint-committee/publications/>

⁹³<https://www.openrightsgroup.org/blog/saveanonymity-together-we-can-defend-anonymity/>

work will help contribute to future reporting on UK Internet regulation. We also began reaching out to partners across Europe for Netblocks EU⁹⁴ and succeeded in getting several disconnected probes back online.

Online surveillance

Encryption

Our work in defending end-to-end encryption is one of the pillars of our Online Safety Bill campaign. In November 2020, ORG signed a joint civil society statement expressing concerns over proposals in the Online Safety Bill which would undermine encryption. We published a series of blog posts detailing threats to encryption in the Online Safety Bill, including one outlining to MPs the ways in which encryption keeps their constituents safe.

In September 2021, we released a video and a series of animated graphics about the Bill's threats to encryption, which were viewed over 20,000 times across social media.

ORG Scotland

Scotland's Digital Rights Agenda

The spring 2021 Scottish Parliamentary elections were an opportunity to reflect on the wider digital rights agenda in Scotland. Ahead of the elections, ORG Scotland ran a survey to identify and assess the key areas of concern for our members and supporters in the devolved rights context. Policing and surveillance, freedom of expression online and digital identity and privacy emerged as key focus areas. ORG produced a policy tracker to assess where the major political parties stood on each of these issues, as well as a series of recommendations for further action.

In the lead-up to polling day, ORG released detailed analysis of key issues in respect of Scotland's digital rights agenda:

- Scottish Elections: The Digital Rights Agenda⁹⁵
- Scottish Elections: Privacy and Digital Identity⁹⁶ Scottish Elections: Policing and Surveillance⁹⁷
- Scottish Elections: Freedom of Expression Online⁹⁸

ORG collaborated with Amnesty International Scotland to organise Scotland's first-ever Human and Digital Rights hustings on 20 April.⁹⁹ The event was run online and broadcast via Facebook and YouTube. Moderated by Debora Kayembe, Rector at the University of Edinburgh, and Dr

⁹⁴<https://www.netblocks.eu/>

⁹⁵<https://scotland.openrightsgroup.org/blog/scottish-elections-the-digital-rights-agenda/>

⁹⁶<https://scotland.openrightsgroup.org/blog/scottish-elections-privacy-and-digital-identity/>

⁹⁷<https://scotland.openrightsgroup.org/blog/scottish-elections-policing-and-surveillance/>

⁹⁸<https://scotland.openrightsgroup.org/blog/scottish-elections-freedom-of-expression-online/>

⁹⁹Transcript available here: <https://scotland.openrightsgroup.org/publications/transcript-org-and-amnesty-scotland-joint-human-and-digital-rights-hustings-20-april-2021/>

Angela Daly, from the University of Strathclyde Law School and a member of ORG Scotland's Advisory Council, the hustings engaged representatives from Scotland's five major political parties. Based on input from our members, ORG put questions to the candidates on topics such as the Human Rights Act, the use of digital surveillance by Police Scotland and online abuse.

“Collaborating with Open Rights Group to co-host the Human and Digital Rights hustings was an important piece of work in broadening engagement from both the public and candidates, and encouraging both groups of stakeholders to take a holistic view of how policy impacts on rights domestically in all areas of day to day life.” Liz Thomson, Campaigner Amnesty Scotland.¹⁰⁰

Ensuring a fair digital election

ORG was one of 11 founding members of the Fair Play Pledge campaign,¹⁰¹ which called for political parties and candidates to commit to: campaign openly; financial fair-play; campaign respectfully; respect privacy; and to champion, defend and enhance our democracy.

The pledge was publicly signed by both the Scottish Labour Party and the Scottish Liberal Democrats, alongside 31 Members of the Scottish Parliament (MSPs) candidates from across the major political parties who individually signed the pledge. ORG Scotland was the main organisation in Scotland holding parties to the principles of the Fair Play Pledge.

Defamation Reform Bill

The Scottish Government included amendments in the Defamation Reform Bill¹⁰² that ORG worked on with MSPs to counter the removal of statements from websites before any judgment is taken on whether they are defamatory.¹⁰³ The amendments mean content can remain up during proceedings, avoiding prejudicial take-downs and better balancing freedom of expression online and protection of reputation.

Grassroots community, membership and activism

ORG local groups and activists across the UK continued to navigate the pandemic by hosting strictly online events and meet-ups. 11 events took place including discussions around facial recognition, the Online Safety Bill, and surveillance and the right to identity.

¹⁰⁰<https://scotland.openrightsgroup.org/blog/scotlands-digital-rights-agenda-beyond-the-elections/>

¹⁰¹<https://www.electoral-reform.org.uk/tag/fair-play-pledge/>

¹⁰²<https://scotland.openrightsgroup.org/campaign/modernising-defamation-law-in-scotland/>

¹⁰³<https://scotland.openrightsgroup.org/blog/one-final-push-to-modernise-defamation-law-in-scotland/>

The Supporter Council continued its monthly gatherings and gained several new members. The new local group ORG Stoke-on-Trent was created, whilst ORG Edinburgh added two new organisers and laid the groundwork for a Digital Rights Society at the University of Edinburgh.

ORG Scotland put out a call for volunteers to send a new round of subject access requests via our web tool to determine how political parties in Scotland handled personal data during the May 2021 Scottish Parliamentary Elections. OG analysed the responses and compared the results with findings on the handling of data during the 2019 General Election.

ORG local groups began a new project to comprehensively map their local MPs and politicians, ally organisations and media outlets to support future activism in their areas. ORG Norwich, ORG Brighton and ORG Edinburgh subsequently submitted open letters to their local MPs, co-signed by community activist organisations, academic institutions and individuals, voicing opposition to provisions within the CPTPP which threaten privacy. Later, ORG Glasgow also submitted an open letter to Glasgow MPs raising concerns about privacy threats within “Data: a new direction”.

**Open Rights
Accountants' Report
31 October 2021**

Accountants' Report to the Directors of Open Rights

You consider that the company is exempt from audit for the year ended 31 October 2021. You have acknowledged, on the balance sheet, your responsibilities for complying with the requirements of the Companies Act 2006 with respect to accounting records and the preparation of the accounts. These responsibilities include preparing accounts that give a true and fair view of the state of affairs of the company at the end of the financial year and its profit or loss for the financial year.

In accordance with your instructions, we have prepared the accounts which comprise the Profit and Loss Account, the Balance Sheet and the related notes from the accounting records of the company and on the basis of information and explanations you have given to us.

The accounting records and explanations provided appear to be reasonable, however we have not carried out an audit or any other review, and consequently we do not express any opinion on these accounts.

A handwritten signature in black ink, appearing to be 'A. Mills'.

Urban Ledgers Limited
14 Thornhill Square
London
N1 1BQ
Date: 27 July 2022

**Open Rights
Income and Expenditure Account
for the year ended 31 October 2021**

	Note	2021 £	2020 £
Income			
Gifts and donations income		6,616	10,312
Business membership		4,365	9,252
Contracts		-	5,600
Grants	6	327,679	349,766
Reimbursed expenses		-27	872
Supporter donations		190,255	195,224
Public event income		-	193
Interest income			
		<u>528,889</u>	<u>571,219</u>
Expenditure			
Accounting and other professional fees		17,772	18,590
Associations and memberships		4,759	6,725
Bad debts		-	-
Bank charges		604	307
Bookshop and merchandise		-	1,109
Contractors and specialists		6,000	6,988
Depreciation		1,914	3,412
Donation processing charges		10,601	11,183
External communications		-	-
Foreign exchange variance		1,636	36
General campaigning		65,255	81,346
Grants made		6,248	27,753
Insurance		1,669	1,113
Office supplies		872	1,872
ORGCon and public event costs		680	4,373
Other expenditure		5,225	46
Postage and printing		1,551	799
Rent and rates		1,724	6,212
Salaries		292,215	299,936
Service providers		11,543	9,667
Staff recruitment		1,020	2,478
Staff training		2,946	4,339
Strategic litigation		62,477	39,110
Travel and subsistence		414	6,819
Website costs		825	36,827
		<u>497,949</u>	<u>571,040</u>
Surplus of income over expenditure for the year		30,940	179
Balance brought forward		52,592	52,413
Balance carried forward		<u>83,532</u>	<u>52,592</u>

**Open Rights
Balance Sheet
as at 31 October 2021**

	Notes	2021		2020	
		£	£	£	£
Fixed Assets					
Tangible assets	4		4,420		3,030
Current Assets					
Prepayments		4,468		10,065	
Deposits		-		-	
Staff loans	5	101		101	
Grants receivable		1,600		4,404	
Other debtors		248		20	
Cash at bank and in hand		249,219		309,767	
			<u>255,636</u>		<u>324,357</u>
Creditors: amounts falling due within one year					
Creditors		11,803		1,732	
Funding received in advance		147,470		227,524	
Donation crowdfunding		-		33,395	
Other creditors		<u>17,251</u>		<u>12,144</u>	
			176,524		274,795
Net current assets			79,112		49,562
Net assets			<u>83,532</u>		<u>52,592</u>
Capital and reserves					
Profit and loss account			83,532		52,592
Accumulated Funds			<u>83,532</u>		<u>52,592</u>

For the year ending 31 October 2021 the company was entitled to exemption from audit under section 477 of the Companies Act 2006 relating to small companies.

No members have required the company to obtain an audit of its accounts for the year in question in accordance with section 476 of the Companies Act 2006.

The directors acknowledge their responsibility for complying with the requirements of the Act with respect to accounting records and for the preparation of accounts.

These accounts have been prepared in accordance with the micro-entity provisions of the Companies Act 2006 and FRS 105, The Financial Reporting Standard applicable to the Micro-entities Regime.

Approved by the Board on:

A handwritten signature in black ink, appearing to read "James Cronin". The signature is fluid and cursive, with a long horizontal stroke at the end.

.....
James Cronin, Director

**Open
Rights
Notes to the Accounts
for the year ended 31 October 2021**

1 Accounting Policies

Basis of preparation of financial statements

The accounts have been prepared under the historical cost convention and in accordance with the Financial Reporting Standard for Smaller Entities (effective April 2008).

2 Surplus income and the Accumulated Fund

As a not for profit company, all income is dedicated to its object of raising general awareness of digital rights matters and is credited to an accumulated fund to be used for future projects. As a company limited by guarantee and without share capital, income cannot be distributed to shareholders.

3 Supporter Donations

Regular supporter donations are treated on a cash basis, i.e. are treated as pertaining to the month in which they are received.

4 Tangible Fixed Assets

Depreciation has been provided at the following rates in order to write off the assets over their useful economic lives:

Equipment: 33% straight line

5 Staff Loans

Staff loans are extended typically for the purchase of season tickets, and are repaid by equal deductions from the employees' salaries.

6 Grant Income	2021	2020
	£	£
Joseph Rowntree Reform Trust Ltd	16,589	58,657
Luminate	18,980	65,910
Open Society Foundations	89,267	95,936
VIRT-EU	6	14,598
Information Commissioner's Office	14,562	-
The Handshake Foundation	-	59,280
Exemption Litigation	39,951	-
Highway One Trust	-	1,667
Digital Freedom Fund	29,773	16,169
Digital Trade Alliance	2,733	-
Investment Fund	35,000	-
Reset	16,621	20,969
PIA Income	5,530	-
Internet Society	19,775	-
Legal Education	2,000	1,000
London Trust Media	650	3,380
Paul Hamlyn Foundation	34,108	4,335
Unbound Philanthropy	2,135	7,865
	<u>327,679</u>	<u>349,766</u>