

OPEN RIGHTS ANNUAL REPORT

1 NOVEMBER 2023 TO THE 31 DECEMBER 2024



ABOUT ORG

Open Rights Group (ORG) is a UK based digital campaigning organisation working to protect fundamental rights to privacy and free speech online. We are a grassroots organisation with supporters and local groups across the UK.

We challenge threats to privacy by both the government through the surveillance of our personal communications and private companies, who share our data in uncontrolled and unlawful ways. We challenge threats to free speech through the criminalisation of online speech, online censorship and restrictive copyright laws.

We make sure that the people who are most affected by digital harms, including migrants, people from racialised backgrounds, and people on lower incomes, are at the heart of our campaigns.

openrightsgroup.org

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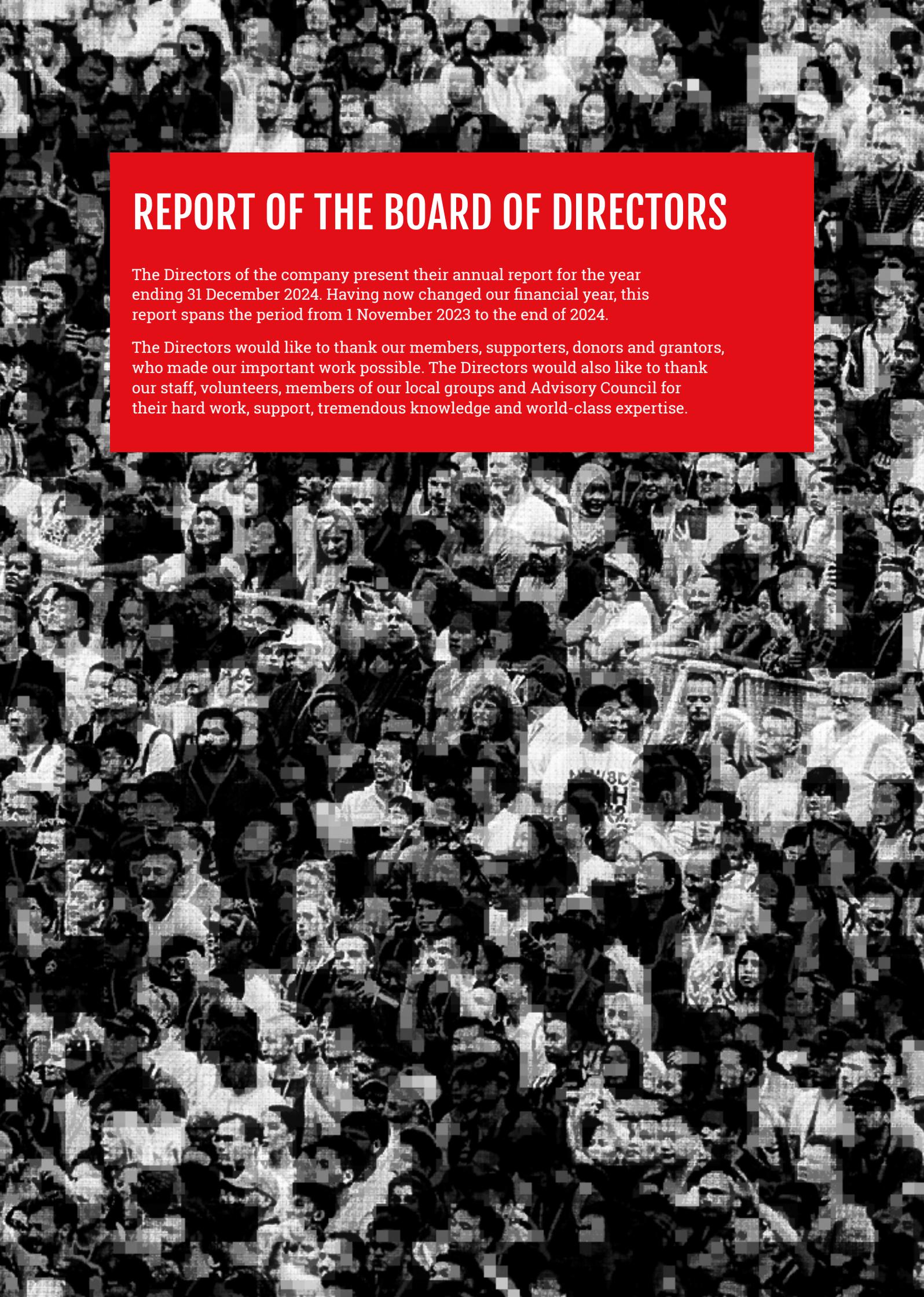
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5581537

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REPORT OF THE BOARD OF DIRECTORS

The Directors of the company present their annual report for the year ending 31 December 2024. Having now changed our financial year, this report spans the period from 1 November 2023 to the end of 2024.

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

The World We Want

We want a world where neither states nor corporations use digital technology to restrict or remove our human rights; and where technology supports justice, rights and freedoms to prevail over the narrow interests of the powerful.

The Problems We Face

Technology is being used to undermine rights by the powerful in ways that further reinforce inequalities. This is creating a society characterised by surveillance, censorship, marginalisation, unfair and discriminatory decision-making and erosion of democracy.

The Impact We Seek

We want to create free and democratic environment where politicians, civil society and the general public are well informed and equipped to ensure that technology is directed to protect and promote human rights and social justice.

The Values that Guide Us

- We believe digital rights are human rights.
- We want to help build an equitable and just society.
- We work collaboratively, building collective knowledge and power.
- We are accountable to our supporters, society and allies, and operate with integrity and transparency, holding ourselves to the standards we expect of others.
- We are flexible, adaptive and evidence-based.

How We Work

We uphold digital human rights such as free expression and privacy. We condemn and work against repressive laws or systems that deny people these rights. We seek impact working to defend rights and correct injustice.

- We **DEFINE** harms and abuses through our research and investigation.
- We **PERSUADE** allies and adversaries through our policy advocacy especially in Parliament.
- We **BUILD** alliances with those most directly impacted when rights are undermined.
- We **MOBILISE** with those directly impacted, with our members and supporters across the UK through our public campaigns.
- We **CONFRONT** threats to our fundamental rights through our litigation. We campaign, lobby, go to court – whatever it takes to build and support a movement for freedom, rights and justice in the digital age.

INTRODUCTION

With a general election and the ensuing raft of new legislative measures, all against a background of protests, riots and major geopolitical events, 2023-2024 has been a challenging year for digital rights.

ORG's year opened with the King's Speech in November 2023, in which amendments to the Investigatory Powers Act were proposed. The proposed changes sought to force global tech companies to secure permission from the UK government before making changes to the security features of their products and services. In collaboration with our partners, we submitted a joint briefing to the House of Lords expressing our concern.

The flawed Data Protection and Digital Information (DPDI) Bill continued its journey through Parliament, with the government announcing new amendments at the end of 2023, including giving the Department of Work and Pensions (DWP) powers to force financial institutions to hand over personal information belonging to people who claim benefits from the state. ORG worked extensively on this Bill throughout the first half of the year, working with MPs and Lords, submitting amendments and raising awareness of its implications among different groups set to be adversely impacted by the proposed changes.

As Israel's military offensive in Gaza escalated, the UK witnessed a widespread chilling effect on free speech, with protestors arrested, activists censored online and children and adults referred into the counterterrorism programme Prevent. Following the release of our groundbreaking report¹ on the unaccountable data sharing practices behind Prevent, we continued to campaign against mass surveillance and work with partners to limit the ever-expanding definition of 'extremism' and to defend freedom of expression online. The situation was exacerbated later in the year as

the UK struggled to come to terms with the devastating Southport stabbings and ensuing riots, fuelled by far-right and anti-immigration groups. The political response leveraged the events to put forward further proposals to strengthen counter-terrorism measures and revisit the definition of extremism.

In May, we were forced to react to a number of significant developments within the sector. Firstly, Ofcom published proposals on safeguarding children online that included problematic age-gating measures. Through advocacy, campaigning and consultation responses, we raised concerns about the risks these measures posed to cybersecurity, privacy and freedom of expression.² Weeks later, Meta informed Facebook and Instagram users in the UK about changes to their privacy policy that would allow Meta to harvest individuals' data for its AI development.³ In response, we filed a complaint to the Information Commissioner's Office (ICO), asking the UK regulator to investigate Meta's plans and issue a legally binding order to stop processing UK's personal data to train AI in the absence of valid opt-in consent. In September, however, the ICO gave Meta the go-ahead with its plans, despite its statement that it "has not provided regulatory approval for the processing".⁴

Also in May, Rishi Sunak called a general election for July, arriving far sooner than many political pundits had predicted and surprising even his own MPs. Having engaged our supporters, members and Advisory Council in the development of an ORG manifesto the year before, we were well-positioned to push digital rights up the political agenda. Throughout the campaign period, we worked with candidates

1 <https://www.openrightsgroup.org/publications/prevent-and-the-pre-crime-state-how-unaccountable-data-sharing-is-harming-a-generation/>

2 <https://www.openrightsgroup.org/press-releases/online-safety-proposals-could-cause-new-harms/>

3 <https://mashable.com/article/meta-using-posts-train-ai-opt-out>

4 <https://ico.org.uk/about-the-ico/media-centre/news-and-blogs/2024/09/ico-statement-in-response-to-metas-announcement-on-user-data-to-train-ai/>

from across the country to recognise the impact of increasing digitisation on our rights and to adopt our manifesto pledges, including through our online hustings held in June. Thanks to our members and supporters, we were also able to deepen our understanding of the kind of data collected through canvassing and campaigning and the extent to which political parties respected people's data rights. In this period we also launched two new digital tools helping people maintain better control over how and if parties collected their data.

In November, headlines were dominated by Trump's re-election to the White House. Trump's campaign was characterised by close relationships with tech CEOs, including Tesla CEO and X owner Elon Musk, who secured the position of heading up the "Department of Government Efficiency" (DOGE).⁵ ORG has needed to keep abreast of these trends, including how the alignment between government power and big tech has enabled censorship, greater surveillance and the promotion of dangerous ideologies. As is often the case, where these tactics prove effective in the USA, we can surely expect them to be replicated elsewhere.

Throughout the year, the Home Office was quietly rolling out its proposed eVisa scheme with very little communication. Replacing physical documents, the online-only eVisa will be used to demonstrate someone's eligibility to enter the UK, to work, to access services, and to secure housing rental agreements. Though the scheme was set to launch from January 2025, by early December 2024 the government had announced the full roll-out would be postponed for three months until April,⁶ before postponing again until June.⁷ We have been campaigned against this digital-only approach since

August 2024, releasing a report⁸ into the flaws of the eVisa scheme, gathering and platforming first-hand accounts, and raising issues with the Home Office, MPs and Lords.

As an organisation, ORG has made a number of internal changes over the past 14 months. Firstly, as is made clear by the time-frame of this report, we shifted our financial year to fall in line with the calendar year to streamline many of our internal processes. We have also recalibrated our organisational programmes and priorities ahead of our new strategy period, making our areas of work clearer to external audiences and partners. These steps form part of our broader organisational development plans, strengthening our internal processes and improving our team culture so that ORG is resilient, sustainable and best-positioned to tackle ever-growing threats to our digital rights.

5 <https://www.forbes.com/sites/antoniopequenoiv/2024/11/12/trump-says-elon-musk-will-head-new-department-of-government-efficiency-alongside-vivek-ramaswamy/>

6 <https://www.standard.co.uk/news/politics/evisa-rollout-postponed-home-office-warning-b1197563.html>

7 <https://www.openrightsgroup.org/press-releases/home-office-announces-further-delays-to-the-e-visa-scheme/>

8 <https://www.openrightsgroup.org/publications/e-visas-hostile-and-broken/>

GENERAL ELECTION

In late 2023, knowing that we would be facing a general election by January 2025 at the latest, we started collating ideas for a digital rights manifesto. This manifesto drew on the input we received from over 2,000 of our supporters, members, and Advisory Council to identify the areas of most pressing concern. The end result was six key demands. We offered to meet with the manifesto teams of all the major political parties, with the Liberal Democrat and Green parties agreeing to be briefed on current digital rights issues.

With the surprise announcement of a General Election in May, we were more ready than most to engage with candidates and mobilise our supporters. We launched and promoted our Digital Rights 24 manifesto,⁹ raising awareness of our six key digital rights issues, on which we campaigned to secure buy-in from candidates across the political spectrum.

To build on this work, ORG ran an analysis of the parties' manifestos,¹⁰ comparing their priorities and addressing what ORG saw as their shortcomings. Our analysis found that many policies and changes advocated in the manifestos, across the board, had significant implications for privacy, due process and free expression that were rarely acknowledged. We shared this analysis with our followers on social media platforms and to over 40,000 contacts on our email list.

In late June, we hosted a digital hustings¹¹ with Viscount Camrose from the Conservatives, who had been leading the Data Protection and Digital Information Bill for them in the Lords, and Lord Clement-Jones, the Liberal Democrat lead on digital issues in the Lords, as well as representatives from most of the major parties. The event was supported by a number of other UK civil society groups and was attended

by 123 people live and viewed a further 400 times on YouTube. We also ran an action with candidates from across the country, asking them to pledge not to use harmful language that scapegoated migrants during the election.

To support our manifesto, we secured access to a tool that shared with potential voters the contact details of candidates in their constituency in the UK. This allowed us to create an action for our supporters and members to contact the candidates standing in their area and ask them to protect digital rights in the next Parliament. Nearly 500 people used this tool to contact their candidates. We also mobilised our supporters to discuss digital rights issues with candidates, canvassers and party activists on their doorstep, highlighting the importance of digital rights in a local context. This action was promoted across social media and in our newsletters, as well as through an Instagram video that reached an 81% female audience and resulted in over 2,000 clicks. This same tool also helped ORG develop new relationships with candidates ahead of the formation of the new government, something which we have leveraged beyond the election in our more recent work.

⁹ <https://www.openrightsgroup.org/press-releases/org-publishes-digital-rights-priorities-for-next-government/>

¹⁰ <https://www.openrightsgroup.org/blog/what-we-learnt-from-the-manifestos/>

¹¹ <https://www.youtube.com/watch?v=-gFkZQaxt5A>

PLATFORM POWER

Despite the need for robust safeguards in an increasingly digital world, the UK is shifting away from the European model of data protection towards deregulation. Throughout this period, ORG has continued to fight to advance protections, holding government, regulators and big corporations to account in order to protect our online ecosystem and human rights more broadly.

Data Protection and Digital Information Bill

In late 2023 and early 2024, we continued to mount opposition to the DPDI Bill. We argued that the DPDI Bill eroded key protections that citizens have over their data, giving more control instead to governments and corporations. Its controversial proposals included expanding exemptions for data-sharing, use and reuse; increasing automated decision-making; and allowing the government visibility of the bank accounts of people receiving benefits, including the state pension. We also raised concerns about the Bill's impact of the UK-EU adequacy agreement, potentially threatening data sharing, and therefore trade and security, between the UK and the EU.

In February 2024 we hosted a briefing event for members and supporters on the Data Protection and Digital Information Bill that we livestreamed to our YouTube channel.¹²

We worked across civil society to mobilise opposition to this Bill, both in the UK and with partners in the EU. In April 2024, the Committee on Civil Liberties, Justice and Home Affairs (LIBE Committee) of the European Parliament intervened in a letter to the Chair of the European Committee in the House of Lords.¹³ We also worked extensively with groups that have traditionally been excluded from conversations on digital rights, such as migrant and racialised

communities, to help raise awareness of the latent harms in the Bill. This helped broaden the coalition of actors calling for protection, not dilution, of their rights.

In May, the DPDI Bill was dropped as a result of the dissolution of parliament prior to the General Election. The fact that the Bill was ultimately dropped was a direct result of constant two years of campaigning to prevent it. Without the friction caused by civil society's opposition, the government would have been able to pass the Bill with greater ease and speed, allowing them to undermine our rights, expand surveillance, and weaken the Information Commissioner's Office.

Data Usage and Access Bill

Though the DPDI Bill was not passed, a watered-down iteration of it was introduced in October 2024 in the Data Use and Access (DUA) Bill. The DUA Bill is a marked improvement on its predecessor, but ultimately rehashes many of its harmful provisions.

As before, we campaigned tirelessly to ensure that our data is protected. Among our key concerns with the DUA Bill is that it restricts our ability to challenge automated decision-making in life-changing decisions, including firing workers, calculating wages, deciding on visa and benefits applications. We are also concerned by its provisions that allow for greater data-sharing, that weaken accountability for police accessing databases and that erode the independence of the ICO and our existing data protection rights.

Alongside the Ada Lovelace Institute, ORG co-chaired a civil society working group of UK based organisations with an interest in data and privacy issues. This group worked together to produce a number of joint briefings on the bill, discuss advocacy strategies, and worked with parliamentarians to table amendments to the Bill.

¹² <https://www.youtube.com/watch?v=0Qllerftlb8&t=1s>

¹³ <https://www.openrightsgroup.org/press-releases/europe-warns-of-threat-to-adequacy-agreement/>

In December 2024, we organised a joint letter¹⁴ to the Secretary of State for Science, Innovation and Technology around the new provisions for automated decision-making in the DUA Bill. The signatories work in the areas data policy, policing, racial justice, employment, health, disability rights, welfare and criminal justice, where automated systems are increasingly being deployed to make decisions, which can have a profound impact on an individual's life. Alongside this letter, we launched a petition, signed by over 1,300 people, calling for the protection of our right to challenge automated decisions. Over 350 of our supporters wrote to their MPs about the wider provisions in the Bill, which we outlined in a briefing¹⁵ that was also sent to parliamentarians. During the committee stages of the House of Lords, ORG worked with Lord Clement-Jones to ensure a number of amendments we helped to draft around the independence of the ICO and Police access to Records were tabled,¹⁶ ensuring these important issues formed part of the Parliamentary Debate. In Committee Stage in the House of Lords, ORG's work, including our report on the ICO, was cited during debates.¹⁷ Our concerns also featured in news reports by Sky, ComputerWeekly, TechCrunch, The Register and other tech media.¹⁸

AI regulation

ORG has been working on the data protection and privacy regulation that underpins AI systems for 20 years and we have been involved in a number of challenges and campaigns around AI regulation. While there is a focus on AI in policing and immigration in our other programmes, we also engage in policy and advocacy actions where AI and automated decision-making impacts society more broadly.

In December 2023, we worked on a campaign against the DWP as it sought powers to access people's bank accounts to run AI algorithmic scanning for fraud. This campaign contained a number of highly successful pieces of content, including a TikTok video that had 194K views,¹⁹ and a series of graphics we created around the issue. These proposals ended up being dropped from the DPDI Bill, but have subsequently returned in the Public Authorities (Fraud, Error and Recovery) Bill 2025.

In May 2024, Meta emailed Facebook and Instagram users in the UK to inform them of changes to their privacy policy that were due to come into effect, allowing the company to use individuals' information for its AI development.²⁰ The global tech company claimed it would "rely on the legal basis called legitimate interests" to use individuals' information in this way. In addition, while Meta told users they had the right to object, it did not commit to honouring objections as a matter of course. In response, five staff members at ORG, who are all Meta users, submitted a complaint to the ICO about Meta's plans to take users' information to train AI without their consent. In the complaint, they asked the UK regulator to investigate Meta's plans and issue a legally binding order to stop processing personal data in the UK to train AI in the absence of valid opt-in consent. Our complaint was referenced by a number of media outlets, including Politico, Forbes, CNN, The Evening Standard, The Register and other tech outlets.²¹

Months later, in September, Meta said it was resuming its plans²² in the UK after engaging "positively" with the ICO, who issued a statement²³ claiming that the company had "made changes to its approach, including

14 <https://www.openrightsgroup.org/app/uploads/2024/12/ADM-joint-letter.pdf>

15 <https://www.openrightsgroup.org/publications/briefing-data-use-and-access-bill-hl/>

16 <https://www.openrightsgroup.org/publications/dua-bill-org-statements-of-support-and-rationale/>

17 [https://hansard.parliament.uk/lords/2024-12-16/debates/90BA207A-2205-4E76-9383-CBA8B39F0599/Data\(UseAndAccess\)Bill\(HL\)](https://hansard.parliament.uk/lords/2024-12-16/debates/90BA207A-2205-4E76-9383-CBA8B39F0599/Data(UseAndAccess)Bill(HL))

18 <https://techcrunch.com/2024/10/24/uk-revives-plan-to-reform-data-protection-rules-with-an-eye-on-boosting-the-economy/>

19 <https://www.tiktok.com/@openrightsgroup/video/7309527249521331489>

20 <https://www.openrightsgroup.org/press-releases/org-complaint-to-ico-about-meta-privacy-policy-changes/>

21 https://www.theregister.com/2024/07/16/campaign_group_complains_to_uk/

22 <https://about.fb.com/news/2024/09/building-ai-technology-for-the-uk-in-a-responsible-and-transparent-way/>

23 <https://ico.org.uk/about-the-ico/media-centre/news-and-blogs/2024/09/ico-statement-in-response-to-metas-announcement-on-user-data-to-train-ai/>

making it simpler for users to object to the processing and providing them with a longer window to do so". The ICO has allowed Meta to go ahead with its plans, despite its statement that it "has not provided regulatory approval for the processing".

Engagement with the ICO

Throughout this period, our efforts to improve the DPDI Bill captured many of our concerns around the ICO. We drafted amendments and worked with parliamentarians to table them in both the House of Commons and the House of Lords. The aim of these amendments was to strengthen the independence and effectiveness of the UK data protection authority, and bolster the public's right to remedy.

In November 2024, ORG published its 'Alternative ICO Annual Report', an analysis of the ICO's responses to companies and organisations breaching data protection law.²⁴ Highlighting case studies identified throughout the year, the report paints a picture of a regulator that is overly cautious on enforcement, regularly putting government and corporate interests before the needs of the public. Moreover, very little data protection work was done in the private sector regarding 'complex' data protection issues such as profiling or the use of AI, and the ICO barely issued any fines to public sector organisations, even in cases where individuals faced real-life harms due to their data breaches. There have been over 400 views of the report on our site, and it was reported by Freevacy, a specialist privacy, data protection and artificial intelligence training provider.²⁵ The key findings of the report were read out in the Lords debates on the DUA Bill, explaining how ineffective the ICO has been.

Adtech

In February 2024, ORG submitted complaints to the ICO and its French counterpart, the Commission Nationale de l'informatique et des libertés (CNIL), about LiveRamp, an online advertising and data broking company.

Throughout 2022 and 2023, we investigated LiveRamp's approach to online advertising, which is being presented as a viable alternative to traditional tracking cookies. Far from addressing critics' concerns over tracking cookies, LiveRamp's profiling system is in many ways more intrusive. Not only does LiveRamp still process personal data without a valid legal basis, but its profiling system now combines online and offline identifiers (such as name, email, phone numbers, home addresses etc.), linking people's browsing habits to their real identity. LiveRamp's system operates in the background, and it is difficult to observe even for technical experts. This makes these systems less transparent and less accountable for individuals who are being profiled without their knowledge.

Alongside, we filed a representative complaint in France targeting LiveRamp, with the support of staff members from La Quadrature du Net. Our strategy leverages a mirrored complaint in France to demonstrate how weak the judgments can be from the UK's ICO. Our hope is that a stronger response from CNIL in France will help to set a strong standard, against which the ICO's response will be demonstrably lacking.

The complaint received a good level of coverage on specialist websites, including in ComputerWeekly, The Register and Computing.co.uk.²⁶ In particular, the coverage by marketing and regulatory risk industry press may help to deter data brokers from following similar approaches: these articles have platformed the opposition to invasive tracking, thus raising awareness of the potential reputational and financial risk associated with these practises.

²⁴ <https://www.openrightsgroup.org/publications/ico-alternative-annual-report-2023-24/>

²⁵ <https://www.freevacy.com/news/open-rights-group/org-publishes-analysis-of-icos-annual-report-dua-bill-briefing/5924>

²⁶ <https://www.computerweekly.com/news/366572197/Open-Rights-Group-accuses-LiveRamp-of-unlawful-data-processing>

Data and democracy

With research for our report into the political parties' misuse of data underway, focussing on the data protection infrastructure of the canvassing apps run by each major party, we capitalised on the election to gather more evidence through our supporters. In June, we launched two online tools: an updated Subject Access Requests (SARs) tool, so that people could access the information that political parties held on them, and an opt-out tool, requesting removal from political parties' databases. This was the first time any political campaign had created a tool to make it easy for people to opt-out of political parties processing their data. Both tools simplified the process of exercising rights enshrined in the GDPR by supplying the correct wording and automatically emailing the relevant authority at each party, requiring only photo ID and current voting address.

We promoted these tools over social media and our newsletter, enabling over 1,200 people to request their data from parties, and a further 700 to opt-out completely. Over 100K people viewed these adverts across Facebook and Instagram. Additionally people requesting information from political parties were encouraged to share their findings with us, enabling us to monitor the data fields political parties were using to categorise and target voters.

Online Safety Act

During the period of this report, OFCOM were in the process of consulting on how to implement the Online Safety Act. ORG submitted a consultation response to OFCOM's consultation on protecting people from illegal harms online.²⁷ We also issued press releases to alert other organisations that this consultation was occurring.²⁸

In December 2024 a number of media outlets including The Telegraph, ComputerWeekly and New Scientist ran stories about small sites closing under the Online Safety Act. ORG was cited and quoted in a number of these articles.²⁹ We also covered this story on our own social media platforms, receiving 124K views on the issue.³⁰

There was also continued press and media interest around the issue of age verification, on which we continued to brief tech journalists to ensure they understood the issues.

Blocked.org.uk

Mobile and broadband Internet Service Providers (ISPs) have created filters to stop under-18s from seeing online content that is intended for adults. Unfortunately, filters block many harmless websites by mistake – even sites that are aimed at children. Often website owners are unaware that this is happening.

Our Blocked.org.uk tool continued 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 helped users file requests to get sites unblocked. During the period this report covers, 54,345 people viewed the Blocked website. This represents around 50% of the volume of traffic openrightsgroup.org received.

27 <https://www.ofcom.org.uk/online-safety/illegal-and-harmful-content/protecting-people-from-illegal-content-online>

28 <https://www.openrightsgroup.org/press-releases/online-safety-proposals-could-cause-new-harms/>

29 <https://www.telegraph.co.uk/business/2024/12/17/hundreds-of-websites-to-shut-down-under-chilling-internet/>

30 <https://www.tiktok.com/@openrightsgroup/video/7449771574938406176>

Encryption

Throughout this period, we continued our work raising awareness of the important role played by end-to-end encryption. As part of an advocacy group organised by the messaging app Signal, in November 2023 we met with academics and civil society to conduct stakeholder mapping and devise campaigning strategies to fight for encrypted messages.

Throughout 2024, alongside tech companies and privacy groups, we participated in consultations, and lobbied government around the Investigatory Powers Amendment Bill, raising concerns that it could force tech companies to apply to the Home Office prior to introducing updates that improve the security and privacy of their products. The Home Office could then serve notices preventing the updates from being applied.

We issued a joint briefing alongside Big Brother Watch, Liberty and Privacy International, which was cited in numerous articles about Apple's concerns that the UK could secretly veto privacy tools.³¹ This proved to be prescient when it was leaked that Apple had received such a secret notice at the start of 2025.

MIGRANT DIGITAL JUSTICE PROGRAMME

Since 2020, ORG has been working at the intersection of digital rights and migration. Working alongside migrant rights organisations, ORG seeks to build capacity and strengthen the digital rights expertise in the sector, while raising the concerns of migrants within traditional tech and digital rights spaces. As an organisation, we work to expose and challenge the digitisation of the UK government's hostile environment policy in legislation and practice.

Developing our Network

Over the past 14 months, ORG has continued to grow its network of migrant rights partners and now works with nearly 50 such organisations. As in earlier years, this network flexes around different needs, working in different configurations depending on the priorities of our partners, whether their focus is on AI in Home Office decisions, the digitalisation of immigration, or the digital hostile environment. We have been carving out a role, in addition to our expertise in digital rights, as a facilitator of these smaller networks: as and when organisations reach out to us for support on specific issues, we have been putting them in touch with each other to allow for greater collaboration and knowledge sharing.

We continue to empower organisations and community groups with training. In 2024, we devised training on making Subject Access Requests (SARs) to equip communities to demand data held on them by political parties, the police and other institutions. 11 organisations proactively requested the training and we delivered three in the run up to the election to over 20 people, with 100% of respondents finding the training useful, accessible and stating they would recommend it to others. We also created a new video training workshop to empower migrants to tell their own stories, rather than relying on sympathetic media. Attendees were women looking to share their lived

31 <https://www.bbc.co.uk/news/technology-68128177>

experience of the immigration system in the UK, and each received free equipment, and training in narrative framing and editing, in order to create and share videos about their experiences beyond the workshop. Participants reported feeling more confident sharing their stories on their own terms and said the training relieved the stress around sharing their stories online.

Immigration Exemption

In December 2023, the Court of Appeal found that the Immigration Exemption in the Data Protection Act 2018 was unlawful.³² The Home Office uses the exemption to deny migrants access to their own data in 66% of cases. In its judgment, the Court told the government that it needs to set out safeguards in legislation to allow for Parliamentary scrutiny and gave the Government three months to fix its legislation.

The case formed part of litigation which was brought by ORG in coalition with the3million, the organisation representing EU citizens in the UK, first filed in 2019 before the High Court. Since its inception in 2018, six judges have found the Immigration Exemption unlawful.

Following the judgment, ORG and the3million met with representatives of the Home Office to discuss appropriate changes to the legislation. As is to be expected, while the resulting changes brought about by the Government did address the court's concerns, they still fell short of a meaningful engagement with the arguments we raised during the hearing and our subsequent meeting with them. We shared our briefing paper with MPs and Lords to engage support from both the Houses of Parliament.

We received media coverage about this case,³³ and our press releases on the topic received over 1,000 views, while our messaging over social media received over 55,000 views.

Campaigning against the eVisa Rollout

Thanks to the relationships we built and the work we had already carried out under our Challenge the Checks project and adjacent work on digitalisation, we were able to launch a report into eVisas in the summer of 2024.³⁴ Our report flagged concerns about systemic errors we found with the digital-only and online-only proof of status, as well as with the poor roll-out and lack of transparency of the scheme. Namely, as users will not have access to a physical or saved digital proof of status, they are susceptible to data errors, glitches, system crashes and the instability of internet connections. This is particularly acute for those with poor digital literacy, those who face language barriers, or those who lack the means to buy the latest mobile devices: a necessity for setting up the required account.

Our report was covered extensively by media outlets, including The Guardian³⁵ and The Times. We also ran a webinar, Will the e-visa scheme lead to another Windrush scandal?, which was attended or watched on demand by 600 people.³⁶ Both the webinar and media coverage prompted dozens of individuals to get in touch with us about the issues they have been experiencing with the scheme. Several spoke about feeling that they were alone in having problems until they read about our report. We helped these individuals to find support with their cases where possible, referring them to other organisations, raising concerns with the Home Office and encouraging them to email their MP. Their experiences have helped us to better understand the scheme and to uncover new flaws, which we have shared with the Home Office. We have also facilitated interviews, where appropriate, between impacted migrants and journalists, which contributed to further prominent media coverage in The

³² <https://www.judiciary.uk/judgments/the-3million-v-secretary-of-state-for-the-home-department/>

³³ <https://www.forbes.com/sites/emmawoollacott/2023/03/21/uk-government-in-court-over-use-of-migrants-personal-data/?sh=3b362a631821>

³⁴ <https://www.openrightsgroup.org/press-releases/broken-e-visa-scheme-could-lead-to-digital-windrush-scandal/>

³⁵ <https://www.theguardian.com/uk-news/2024/sep/18/uks-new-evisa-scheme-could-create-digital-windrush-scandal>

³⁶ <https://www.youtube.com/watch?v=VKOFYV9Dvcg>

Guardian,³⁷ The Times,³⁸ The Independent,³⁹ The Daily Mail,⁴⁰ The Express,⁴¹ and The National.⁴² We also produced several videos sharing the stories of those who have been adversely impacted by the scheme.

There have been nearly 1,500 unique visits to the eVisa report page on our website, and over 730 unique visits to our campaign page. Over 700 people have written to their MP to express their concerns about the scheme. The report and subsequent media coverage has allowed us to engage with the Home Office, with whom we have met twice, as well as MPs, Lords and other decision-makers – including Dawn Butler MP, who wrote to Seema Malhotra, Minister for Migration and Citizenship about the scheme after meeting with ORG and reading our report. This activity was supplemented by our campaigning efforts at the Labour, Liberal Democrat and Green party conferences in September, where we gave out flyers and engaged with delegates. Our work has been crucial in securing further delays for the full rollout of the scheme until the end of May 2025, buying time for much needed scrutiny and improvements.⁴³ ⁴⁴

As part of the eVisa campaign, we have been exploring litigation options with legal partners. This has required the submission of several FOI requests and collaboration with other migrant rights organisations, as well as legal partners. This will likely be the next step for us in 2025. Whatever information we are able to uncover, we will continue to share this with the migrant rights community more broadly to foster better understanding of the system and support other ongoing litigation.

“As one of the individuals impacted by the [eVisa] scheme—unable to generate an eVisa—it was [...] your organization who provided relentless support during that time. That experience left a profound impression on me, and I am inspired by ORG’s dedication to protecting digital rights.”

ORG Supporter

37 <https://www.theguardian.com/uk-news/2024/oct/06/people-who-have-lived-in-uk-for-decades-fear-being-locked-out-by-evisas>

38 <https://www.thetimes.com/uk/politics/article/travellers-denied-entry-to-uk-as-new-evisa-system-falters-0jmqbq5sw>

39 <https://www.independent.co.uk/news/uk/home-news/evisa-uk-immigration-status-help-b2678643.html>

40 <https://www.dailymail.co.uk/news/article-14159259/foreign-nationals-use-expired-documents-prove-right-work-britain.html>

41 <https://www.express.co.uk/news/uk/2004065/travellers-uk-evisa-system-fail>

42 <https://www.thenationalnews.com/news/uk/2025/01/22/uks-evisa-system-troubles-block-entry-for-foreign-travellers/>

43 <https://www.msn.com/en-gb/politics/government/foreigners-to-use-expired-documents-to-prove-right-to-live-in-britain/ar-AA1vhSJl>

44 <https://www.gov.uk/guidance/online-immigration-status-evisa?>

Challenge the Checks

Our collaboration with Migrants at Work and the Migrants' Rights Network came to its conclusion in 2024. Thanks to our coalition's research, we gathered a good body of evidence on issues with Digital Identity Document Validation Technology (IDVT), particularly around opaque agreements with third party providers. The research found that no companies that applied to be identity service providers (IDSPs) had ever been refused, nor had any company ever lost their certification. One of the main IDSPs, Yoti, sponsors the All Party Parliamentary Group (APPG) on Digital Identity, suggesting a lack of accountability. We also established, through an FOI to the Home Office, that there are such high levels of requests to amend or correct data held on individuals that they were unable to keep track of them all, let alone promptly take action on each.

When the policy was changed so that IDVT checks only applied to British and Irish passport holders, we shifted the scope of the project to focus on share codes, ensuring that the project supported the most marginalised communities. We secured testimonies from experts explaining the flaws in the share code system and received survey responses from people with lived experience of the systems detailing the challenges they faced. This work has greatly deepened the coalition's understanding of the technologies employed, and their flaws, as well as strengthening the awareness of these issues with our legal partners and across other digital rights organisations. This has been aided by a number of opportunities to discuss the Right to Work checks and explain our findings at conferences, roundtables and panels, including at party conferences in 2023 and 2024, and through our co-created resources, explainers and articles.⁴⁵

⁴⁵ <https://migrantsrights.org.uk/projects/past-campaigns/challenge-the-checks/>

PRE-CRIME

We have developed our Pre-Crime pilot into one of our main programmes, opposing the use of digital "innovations" in law enforcement and counter-terrorism that do little to address the underlying social problems. Working in collaboration with a network of racial, social and criminal justice organisations, we investigate and challenge the ways in which data are leveraged as indicators of future crimes.

Investigating the Digital Harm of the Prevent Duty

Over the past year and a half, we have been working to evidence the harms of the data sharing practices that sit behind the UK's counter-terrorism programme, Prevent. Our research leveraged interviews with academics and civil society, as well as responses to FOI requests, including one which was poorly redacted and inadvertently confirmed long-held suspicions around how referral data is shared. Working with The Observer,⁴⁶ we revealed our findings to show that the data of Prevent referees were being shared with airports, ports and immigrations services. This took on further significance later in the year when a number of ORG staff took part in Q&As at screenings of the film Phantom Parrot, which explored the government's powers to access people's phones at borders.

Using this research, ORG published its report on Prevent in February 2024.⁴⁷ This report details, for the first time, how data is being acquired, retained and shared by Prevent. Focussing on the journey of an individual's data once it is in the Prevent pipeline, it documents how referrals, many of whom are children, are stored within a national Prevent database for a minimum of six years and for up to 100 years, even when marked "no further action". Prevent referrals are not charged with an offence, yet their lives are subject to scrutiny and their rights infringed,

⁴⁶ <https://guardian.pressreader.com/article/281522230882608>

⁴⁷ <https://www.openrightsgroup.org/press-releases/new-report-reveals-widespread-data-sharing-and-retention-of-prevent-referrals-including-childrens-data/>

with children denied college places, families stopped at airports when going on holiday and people refused rental opportunities. This incursion is compounded when the Prevent referral does not go through the multi-agency Channel process but is instead managed under a police-led partnership (PLP) process, where national security exemptions can be applied to limit rights to rectification, access and removal. Sitting within this covert space, there is no oversight or parliamentary scrutiny of data sharing, processing and storage, and therefore no transparency or access to justice.

ORG has brought this expertise on the digital harms to a new coalition of organisations working to challenge Prevent, led by Amnesty and Prevent Watch. Over the year, we worked together to push against the expanded definition of ‘extremism’ originally put forward by Michael Gove MP, raising the impact it would have on Prevent referrals and free expression more broadly. We also warned against the expansion of Prevent in response to individual cases, such as the Southport murders. Through external communications, coalition discussions and collective action, we continue to challenge the expansion of counter-terrorism powers.

In 2024, we also worked with Amnesty, NEON, Prevent Watch, The Runnymede Trust and Maslaha to develop a Prevent messaging guide.⁴⁸ Rather than using traditional human rights language to talk about Prevent, the guide focuses on how people feel when they are safe and free to express themselves, practice their religion and create trusted relationships. It seeks to explore how advocates and campaigners can speak to the public about Prevent and build support for scrapping the policy. Building on the success of this guide, we are now exploring how the principles of it can be expanded and adapted to speak more broadly about so-called “predictive” policing, artificial intelligence and data-based pre-emptive systems.

#SafetyNotSurveillance Coalition on AI

In the run up to the 2024 General Election, we set up a coalition focussing on the impact of AI and data-driven surveillance on racial and social justice. The #SafetyNotSurveillance (#SNS) coalition first met in June to discuss priorities, approaches, and stakeholders, ultimately deciding to mirror the success of the #ProtectNotSurveil coalition in shaping the EU AI Act.

Having co-created objectives and recommendations, the coalition submitted a joint letter to the new Home Secretary in July.⁴⁹ The letter calls for an outright ban on predictive policing systems which use AI, data and algorithms to identify, profile and target individuals, as well as demanding limits and safeguards for all other data-based, automated and AI systems in policing. In the wake of this letter, we have engaged a number of MPs on the issue and have attended events in Parliament to build opposition where we can.

The #SNS coalition has now grown to over 30 active members, including Prevent Watch, Kids of Colour, AIUK, and Bristol CopWatch. We held the first in-person meeting in November 2024 to pull together a strategy and project timeline for the next year, working across the two priorities of community engagement and advocacy with decision-makers. As part of the strategy for 2025, we will deliver workshops in communities to evidence harm and mobilise opposition, run a public-facing campaign and deliver pieces of research into novel areas of predictive policing.

⁴⁸ <https://www.amnesty.org.uk/files/2025-01/Prevent%20messaging%20v6.pdf>

⁴⁹ <https://www.openrightsgroup.org/press-releases/artificial-intelligence-safety-not-surveillance-coalition-calls-for-ban-on-predictive-policing/>

Grassroots community, membership and activism

Training

At the start of 2024, ORG delivered its first workshop helping young people from over-policed communities to understand their digital rights. Held in Manchester, in collaboration with Kids of Colour, M13 Youth Project, HideAway, 4Front and 42nd Street, this workshop aimed to educate and empower youth workers on the data rights of the young people they support. This included sharing information on how to submit SARs and challenge data abuses by institutions, as well as understanding the harms caused by those abuses. 100% of attendees found the workshop had helped their understanding of data harms and how to challenge abuses.

We ran two online training sessions for our advocacy volunteer training session, one in January 2024 and another in September 2024. This programme helps to equip ORG volunteers and members with advocacy skills that they then use to engage elected representatives.

Social Media

Many organisations left the social media platform X in 2024, particularly following the racist riots in the summer, which many felt were enabled by the platform. ORG remained on X in 2024 because we believe we still have audiences there. However, we have built new communities on TikTok and BlueSky, and developed our communities on Mastodon and Reddit, should we need to revise our position later.

Events

Throughout 2024 a number of ORG groups and volunteers helped to host a series of screenings of the documentary Phantom Parrot.⁵⁰ Released in 2023, Phantom Parrot is a documentary film that documents the ordeal of Muhammad Rabbani when he was arrested at the UK border and his electronic devices were seized under Schedule 7 of the Terrorism Act. These screenings were hosted in collaboration with the film's creators and provided the opportunity for attendees to learn more about the UK's counter terrorism surveillance scheme.

In 2024 we also hosted and participated in events to raise awareness of digital rights. In May, our West Yorkshire group ran an event at the University of Leeds entitled 'Do you know where your data goes?'. This event was supported by Dr Edina Harbinja and Dr Miranda Mowbray who spoke as members of our Advisory Council. In November, we participated in a guest lecture at the University of Salford's digital society course, engaging the next generation of academics, and digital rights campaigners.

During political party conference season we held a number of leafleting events outside of the Green Party, Liberal Democrat and Labour Party conferences that members and supporters attended.

Approved by the board on: 02/09/2025


Christian Scarborough, Director

⁵⁰ https://en.wikipedia.org/wiki/Phantom_Parrot



OPEN RIGHTS ACCOUNTANTS' REPORT 31 DECEMBER 2024

Accountants' Report to the Directors of Open Rights

You consider that the company is exempt from audit for the period ended 31 December 2024. 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. As advised by the Company Officers, based on previous communications with HMRC, the accounts have been prepared on the basis that the company has exempt status for corporation tax purposes.

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.

Urban Ledgers Limited
124 City Road London
EC1V 2NX

Date: 02/09/2025

PROFIT AND LOSS ACCOUNT

for the period ended 31 December 2024

	NOTES	PERIOD END 31/2124 £	YEAR END 31/10/23 £
INCOME			
Gifts and donations income		2,341	(13,483)
Business membership		8,557	7,547
Grants	6	586,163	570,902
Supporter donations		188,899	172,613
Internal fund income		60,546	-
Public event income		-	40
Cycle to work scheme		280	-
Bank interest received		305	-
Profit/(Loss) on asset sales		29	(114)
		847,119	737,505
EXPENDITURE			
Accounting and other professional fees		9,784	5,680
Associations and memberships		7,563	6,060
Bank charges		821	383
Contractors and specialists		7,491	9,546
Depreciation		5,852	5,223
Donation processing charges		5,929	9,711
Foreign exchange losses/(gains)		(0)	551
General campaigning		91,690	94,846
Grants made		-	9,778
Insurance		1,913	2,268
Office supplies and telephony		4,459	3,498
ORGCon and public event costs		130	159
Other expenditure		1,771	1,146
Postage and printing		1,103	976
Rent and rates		4,473	2,674
Salaries		605,182	515,637
Service providers		30,955	26,941
Staff recruitment		7,002	4,206
Staff training		4,253	9,107
Strategic litigation		17,317	2,655
Strategy and planning		25,975	20,907
Travel and subsistence		10,554	6,277
Website costs		183	330
		844,393	738,557
Surplus of income over expenditure for the year		2,727	(1,052)
Balance brought forward		143,061	144,113
Balance carried forward		145,788	143,061

BALANCE SHEET

as at 31 December 2024

	NOTES	31/12/24 £	231/10/23 £
FIXED ASSETS			
Tangible Assets	4	4,012	8,701
CURRENT ASSETS			
Prepayments		16,002	7,272
Staff loans	5	-	23
Grants receivable		300	2,100
Other debtors		-	-
Cash at bank and in hand		620,929	706,657
		637,231	716,052
CREDITORS: AMOUNTS FALLING DUE WITHIN ONE YEAR			
Creditors		10,192	10,807
Funding received in advance		460,870	551,760
Other creditors		24,392	19,125
		495,455	581,692
Net Current Assets		141,777	134,360
Net Assets		145,788	143,061
CAPITAL AND RESERVES			
Profit and loss account		145,788	143,061
ACCUMULATED FUNDS			
		145,788	143,061

For the period ended 31 December 2024 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 provisions applicable to companies subject to the small companies regime.

Approved by the Board on:

Christi Scarborough
Christian Scarborough, Director

NOTES TO THE ACCOUNTS

for the period ended 31 December 2024

1 Accounting policies

Basis of preparation of financial statements

The accounts have been prepared under the historical cost convention and in compliance with FRS102 Section 1A as it is applicable to the financial statements for the period. There were no material departures from the reporting standard.

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:

Office Equipment: 33% straight line

	OFFICE EQUIPMENT £	CYCLE SCHEME £	TOTAL £
COST OR VALUATION			
At 1 November 2023	28,268	-	28,268
Additions	1,204	280	1,484
Disposals	(1,006)	-	(1,006)
At 31 December 2024	28,466	280	28,746
DEPRECIATION AND IMPAIRMENT			
At 1 November 2023	19,567	-	19,567
Charge for the year	5,765	87	5,852
Disposals	(685)	-	(685)
At 31 December 2024	24,647	87	24,734
NET BOOK VALUE			
At 31 December 2024	3,819	193	4,012
At 31 October 2023	8,701	-	8,701

5 Staff Loans

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

	2024	2023
Average number of employees during the year	11	10

6 Grant income

	2024 £	2023 £
Luminate Big Tech and Data Protection	27,723	-
ISOC Encryption 2024	6,502	-
Digital Freedom Fund	27,486	33,491
Duck Duck Go	19,992	19,966
Internet Society	-	16,305
Investment Fund	-	18,259
Joseph Rowntree Reform Trust Ltd	19,275	38,498
Oak Foundation	144,763	122,441
Open Society Foundation:	179,770	187,723
Paul Hamlyn Foundator	70,923	59,605
ESRC Digital Good	2,976	-
Reset	86,752	74,614
	586,163	570,902

