



Open Rights

Report and Accounts |
31 October 2018 |

Company Information

31 October 2018

Directors

Owen Blacker

James Cronin (Chair)

Tom De Grunwald (appointed 6 August 2018)

John Elliott

Maria Farrell (retired 6 August 2018)

Ben Laurie (retired 6 August 2018)

Harry Metcalfe (retired 6 August 2018)

Alec Muffett

Brian Parkinson (appointed 6 August 2018)

Simon Phipps

Milena Popova (retired 6 August 2018)

Christi Scarborough (appointed 6 August 2018)

Secretary

James Cronin

Executive Staff

Jim Killock Executive Director

Martha Dark Chief Operating Officer (appointed 23 March 2018)

Accountants

Urban Ledgers Limited

14 Thornhill Square

London

N1 1BQ

Bankers

Cooperative Bank plc

PO Box 101

1 Balloon Street

Manchester

Registered company number

05581537

- 1 Directors' Report**
- 14 Accountants' Report**
- 15 Income and Expenditure Account**
- 16 Balance Sheet**
- 17 Notes to the Financial Statements**

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Report of the Board of Directors for the year ended 31 October 2018

The Directors of the company present their annual report for the year ending 31 October 2018.

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

Open Rights Group is a UK based campaigning organisation working to protect the rights to privacy and free speech online. With over 3,000 active supporters, Open Rights Group is a grassroots organisation with local groups across the UK. 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;
- Our work must be accessible and inclusive.

Our 2018 Achievements and Impact

- We **challenged mass government surveillance**¹ and our case proceeded to Europe's highest human rights court.
- We moved to **Judicially Review the Government's inclusion of the Immigration Exemption** in the Data Protection Act². Alongside our partners the 3million we **crowd-funded £40,300**³ to make this happen.
- We ran over **20** digital campaigns, collected **9,354** petition signatures, **7,796** people wrote emails to Members of Parliament, Members of the European Parliament (MEPs) or Members of Scottish Parliament (MSPs), and made **1,826** submissions to public Government consultations. We ran **66** grassroots events organised by **12** local activist groups across the UK.
- We helped ensure the proper scrutiny of **Article 13 in the Copyright Directive**.
- We brought **groundbreaking complaints to challenge 'real-time bidding'** a common practice in the AdTech industry. We believe this practice to be against data protection laws.
- The **UK Supreme Court ruled in favour**⁴ of Open Rights Group's intervention in the Cartier jeweller case. (In this case the jeweller Cartier sought a court order requiring Internet Service Providers to block websites that sold goods infringing their trademarks.) The court ruled that Internet Service Providers were innocent third parties and owe no duty to rights holders.
- In **Scotland**, our work with Members of Scottish Parliament upheld the right to privacy and due process through establishing the requirement for a clear legal framework before **cyber kiosks** could be rolled out across police stations in Scotland.
- ORG supporters wrote over **550 consultation responses** to the Government on their proposals for age verification for online viewing. We made privacy considerations top of their agenda.
- We held a conference - **ORGCon 2017**⁵ which was attended by over 400 people.
- We created, developed and released a public service tool **Data Rights Finder**⁶ to ensure that the public understands their data rights.

1 <https://www.openrightsgroup.org/legal/mass-surveillance-challenge>

2 <https://www.openrightsgroup.org/blog/2018/what-is-at-stake-with-the-immigration-exemption-legal-challenge>

3 <https://www.crowdjustice.com/case/immigrationexemption/>

4 <https://www.openrightsgroup.org/blog/2018/cartier-supreme-court>

5 <https://orgcon.openrightsgroup.org/2017/day-1>

6 <https://www.datarightsfinder.org>

Challenging Mass Surveillance

On 13th September 2018 The European Court of Human Rights ruled that UK mass surveillance was unlawful. This case was originally lodged in 2013 by Open Rights Group, alongside Big Brother Watch, English PEN, and computer science expert Dr Constanze Kurz.

The Court found the UK's mass surveillance programmes, revealed by National Security Association whistleblower Edward Snowden, did not meet the "quality of law" requirement' and were 'incapable of keeping the "interference" to what is "necessary in a democratic society"'⁷. This judgment was the Court's first ruling on UK mass surveillance revealed by Edward Snowden.

While a success, Open Rights Group viewed the ruling as not completely satisfactory. The Court did not rule out contemporary mass Internet surveillance on principle, seeing it as within the legitimate remit of state power. The ruling also rejected creating stronger safeguards than those prescribed in the Court's previous jurisprudence. Open Rights Group and other Non-Governmental Organisations involved have started the process to appeal the ruling.

Open Rights Group led a digital campaign to encourage supporters to respond to the Government's public consultation on proposals to amend the Investigatory Powers Act. This campaign generated 719 supporter submissions opposing the blanket retention of data in line with the ruling by the Court of Justice of the European Union.

Data Protection

AdTech - Real Time Bidding

In September 2018 Open Rights Group, alongside Johnny Ryan from the web browser Brave and academic Michael Veale of University College London filed complaints to the Irish and UK data protection authorities.⁸

We challenged a common online advertising industry practice that broadcasts the personal data (and special category data) of Internet users. That data is broadcast to a large and uncontrolled number of companies every time an advert is displayed to that user. We filed complaints with the Information Commissioner's Office and the Irish Data Protection Commission.

In summary, an individual's information is "broadcast" as part of the online advertising technology industry's "programmatic behavioural" advertising, when AdTech companies broadcast personal data (including browsing history, and often location and profile categories) about a visitor to a website in order to solicit "bids" for that particular user's attention. There is no control over what happens to this data once broadcast. This is a systematic and ongoing data breach on a web-wide scale.

Our objective was to trigger a European Union-wide investigation in to this practice by data protection authorities, with the ultimate objective of refining this processing with proper and sufficient deference to data subjects' rights.

7 https://wiki.openrightsgroup.org/wiki/10_Human_Rights_Organisations_v_United_Kingdom

8 <https://fixad.tech/september2018/>

Age Verification

In 2017 The Digital Economy Act was passed into law. The Act introduced a duty for websites hosting pornographic content to actively verify that users are above the age of 18.

We welcomed proposals to protect children from harmful content online. Open Rights Group believed the Government had an obligation to ensure any age verification system it mandated must protect the security of its users' identities. Including sensitive personal data by mandating proper security controls and strictly limiting the data collected and stored. The Act did not contain such provisions to secure the privacy and anonymity of users. It also gives The British Board for Film Classification (BBFC) administrative powers to block adult websites, which could lead to high levels of censorship.

Open Rights Group engaged our supporters and members in the Government appointed regulator (BBFC) consultation. Over 550 Open Rights Group supporters submitted responses to the consultation. Open Rights Group also submitted a 22-page consultation response ourselves⁹. This led to modified proposals for a voluntary privacy scheme a proposal that is in our view inadequate, but does at least recognise that privacy is a concern that needs to be addressed.

Data Rights Finder

The Information Commissioner's Office funded our project to develop the website Data Rights Finder with Projects by IF. We believe companies should make their privacy policies understandable and readable. We built Data Rights Finder to show the public the data that financial organisations hold about those using their services. We built a tool that presented a consolidated summary of information within the privacy policy of 40 companies, including the major banks, payment providers, insurance firms, and fintech companies.

This project included policy and research to enable increased understanding and qualitative research on the knowledge of and attitudes to data rights among a small sample of citizens in the UK.

Brexit

Open Rights Group continued to work on securing digital rights within the UK after Brexit. At the beginning of 2018 this meant a strong response to the implementation of the General Data Protection Regulation by the UK. Open Rights Group campaigned on a number of areas including the need for civil society to take complaints on behalf of members of the public where the General Data Protection Regulation (GDPR) had been violated. During this campaign period Open Rights Group shifted its focus on civil society representation to the introduction of an exemption that would remove data subject rights if it would "prejudice" "effective immigration control".

During this period Open Rights Group, as part of an effort to build alliances with affected communities began working with the3million, a grassroots campaign for the rights of European Union citizens living in the United Kingdom. Open Rights Group and the3million campaigned together against the Immigration Exemption while it was part of the Bill. To achieve this we ran a campaign that generated 1,249 supporter emails urging Members of Parliament to remove the "Immigration Exemption" from the Data Protection Act 2018.

When the Act came into force, the3million and Open Rights Group instructed Leigh Day solicitors and started preparing to challenge the inclusion of the Immigration Exemption. The challenge was discussed by the Brexit Select Committee to which the3million gave evidence¹⁰. The two organisations successfully crowdfunded £40,300¹¹ for the challenge to protect against losses. During that time the campaign received support from Shadow Digital Minister Liam Byrne¹².

In August 2018 Open Rights Group and the3million, represented by the firm Leigh Day, launched a judicial review to challenge the inclusion of the Immigration Exemption in the Act. At the end of reporting period the High Court of Justice were still to decide on the merits of the challenge.

⁹ https://www.openrightsgroup.org/assets/files/pdfs/consultations/ORG_BBFC_DEA_Consultation_Response.pdf

¹⁰ <http://data.parliament.uk/writtenevidence/committeeevidence.svc/evidencedocument/exiting-the-european-union-committee/the-progress-of-the-uks-negotiations-on-eu-withdrawal/oral/84806.html#Panel1>

¹¹ <https://www.crowdjustice.com/case/immigrationexemption/>

¹² https://www.huffingtonpost.co.uk/entry/home-office_uk_5b3f9f27e4b07b827cc02136

VIRT-EU Project

Open Rights Group continued its work as part of the VIRT-EU consortium project funded by the European Union's Horizon 2020 Research and Innovation Programme, under grant agreement N°732027. The "Values and Ethics in Innovation for Responsible Technology in Europe" project, aka "VIRT-EU", addresses public concerns around emerging data practices, ethics and privacy.

VIRT-EU intervenes at the point of design through researching the development cultures and ethics of the next-generation Internet of Things innovators to see how they can make ethically consequential decisions about code, hardware and data.

The project aimed to generate a new framework for Privacy, Ethical and Social Impact Assessment, which proactively positions ethical self-assessments in the development process of Internet of Things technologies and we led work on building a toolkit for the practical application of the framework.

Open Rights Group's work during this period included:

- Publishing a paper that provided an overview of ethical tools available in the field of data and technology.¹³ This research informed the work of our partner, the Copenhagen Institute of Interaction Design. They used this work in their creation of a tool which Internet of Things companies can integrate into the design phase of their products. The paper also contributes to our thinking for our forthcoming work developing a Privacy, Ethical, and Social Impact questionnaire that companies can use to assess various types of impact that their product or concept may have.
- Publishing a paper about regulations and standards governing the Internet of Things space.¹⁴
- In November 2018, Open Rights Group released a series of briefings on the effects of Brexit on the Internet of Things and aspects of technology policy.¹⁵ The seven briefings developed under the VIRT-EU grant included information on the Digital Single Market, General Data Protection Regulation, roaming, Intellectual Property, and Network Security. We worked with Monica Horten, a policy expert in the field.

Digital Trade

Open Rights Group encouraged supporters to engage in the UK Government's consultation concerning post-Brexit trade relations with the United States in October 2018.¹⁶ Our action generated 411 responses that urged transparency, democratic oversight, and respect for privacy and free speech in the United Kingdom's future trade negotiations with the United States.

On the 25 April 2018, Open Rights Group gave expert evidence to the House of Lords Select Committee on the European Union on the proposed UK-EU Security Treaty.

Open Rights Group is the only civil society organisation participating in the Intellectual Property Trade Advisory Group (IPTAG) organised by the Department for International Trade in preparation for its trade negotiations, on which it is currently consulting about its general approach. Open Rights Group also joined a global coordination network that is monitoring the developments of the Digital Trade agenda in the World Trade Organisation.

Wales electronic voting

The Welsh Government proposed online voting and running trials, aiming to legislate in Autumn 2018, to bring in a power to coerce authorities into running trials as a backstop. Secondary legislative powers allowing electronic voting trials under the Representation of the People Act 2000 passed to the Welsh Assembly in April 2018, meaning that trials can be run under existing powers. These trials would apply to local government.

Our work during this period was largely focused on engaging Welsh Assembly members. We argued that remote voting is not a secret ballot and creates similar problems to postal voting; that online voting has not led to greater turnout where it has been tried; that there is a need for detailed information, preferably generated by the Electoral Commission or the National Cyber Security Centre and that the technology is not yet mature enough to be anything other than risky.

13 <https://www.openrightsgroup.org/policy/virt-eu/overview-of-ethical-tools>

14 <https://www.openrightsgroup.org/policy/virt-eu/an-overview-of-eu-regulations-affecting-internet-of-things>

15 <https://www.openrightsgroup.org/policy/virt-eu/iot-and-brexit-briefings/>

16 <https://action.openrightsgroup.org/preserving-digital-rights-ukus-trade-negotiations>

Scotland

Electronic voting consultation

Throughout February 2018, Open Rights Group ran a consultation response campaign on the Scottish Government's proposals to run trials of electronic voting. An online action page was created for supporters to respond to the consultation directly. The action generated 79 responses. Open Rights Group held a civil society briefing event and briefing event in Holyrood, sponsored by Patrick Harvie, a Green Party Member of the Scottish Parliament.

During this time Stewart Stevenson of the Scottish Nationalist Party held a member's debate in the Scottish Parliament supporting the Government's proposals. This led to the creation of an "email your MSP" action being established. This action generated 36 messages to MSPs to inform them to speak up in the debate. Three speeches during the member's debate cited the briefing from Open Rights Group and an additional five speeches skeptical of electronic voting referenced contact from a constituent.¹⁷

The outcome of the Scottish Government consultation was published on 12 October 2018¹⁸. The consultation produced 741 responses (made up of 727 individuals and 14 organisations) on the electronic voting question. Responses to the key questions were:

If Internet or mobile voting was available would you choose that over postal or polling place voting?



If Internet or mobile voting was available would you be more likely to vote?



Both electronic voting questions were answered in the negative. However some may interpret the 35% who would be more likely to vote as a significant portion of a population to consider, though the measure and question lacks precision. The consultation showed that consultation responses and Open Rights Group's work had made a qualitative difference, using the three-part test that Open Rights Group used in its briefing, which stated that elections required the population to be assured that the electoral process was verifiable, secure, and anonymous. Open Rights Group held meetings with different groups after the consultation, including the team working on this issue for the Scottish Government and Disability Equality Scotland. The work provided an evidence-base to a successful funding opportunity from the Joseph Rowntree Reform Trust on maintaining and improving the trust and integrity of the democratic process in the digital age.

17 http://www.parliament.scot/parliamentarybusiness/report.aspx?r=11401&mode=html#iob_103632

18 <https://www.gov.scot/publications/electoral-reform-consultation-analysis/pages/8/>

Biometrics Commissioner

In September and October 2018 Open Rights Group ran a campaign supporting the creation of a Biometric Commissioner for Scotland. In 2017 Open Rights Group had contributed to the work of the Independent Advisory Group on the use of Biometrics by Police Scotland. Open Rights Group was one of the only civil society groups to make a significant contribution to the work of the Group and was cited in the report. The report itself led the Scottish Government to announce a Biometric Data Bill in their Programme for Government in September 2018 to enhance oversight of biometric data used for the purposes of justice and community safety.¹⁹

Open Rights Group ran a consultation response action. We received 66 responses. Open Rights Group released and promoted explainer videos across Twitter receiving 15,000 impressions and 60 link click-throughs that took the viewer to Open Rights Groups consultation response page.

The campaign was supported by two events in Edinburgh and Glasgow where presentations by experts in the field of biometrics in Scotland presented their research and discussed the proposal.

Digital Identities

Open Rights Group maintained its presence in the digital identity debate in Scotland as a member of the Online Identity Expert Group. Open Rights Group attended three meetings—maintaining throughout the need for privacy principles to be core to the success of this programme. This has led to the establishment of a new working group to be established that will help update and maintain the relevance of the Scottish Government's Privacy and Identity Management Principles.

Cyber Kiosks

The Justice Sub-Committee on Policing examined Police Scotland's proposed roll-out of forensic cyber kiosks in police stations across Scotland. Open Rights Group was invited to contribute to the Stakeholder Working Group. Duncan Campbell, forensics expert and Open Rights Group Advisory Council member has been contributing to the work of the group while Open Rights Group has been in open correspondence with the Justice Sub-Committee on Policing. Open Rights Group contributed two written submissions to the Sub-Committee and held meetings with Convenor John Finnie and members of the Sub-Committee Margaret Mitchell, Liam McArthur and Daniel Johnson, all members of the Sub-Committee. Liam McArthur cited Open Rights Group in discussions with Police Scotland in the November evidence session, which reviewed the position that setting up cyber kiosks would require a new legislative framework to be established.

Free Expression

Open Rights Group was invited to attend the House of Lords and give evidence to the Communications Committee on possible future paths for internet regulation.²⁰ A written submission was also made.

The Digital Charter

Open Rights Group's local groups across the UK held a series of ten public events about threats to free speech posed by the Government's Digital Charter. Open Rights Group's concerns included proposals for harsh fines on social media companies that fail to takedown extremist content within two hours because they will increase reliance on algorithmic filters to control what we see and say online.

Open Rights Group conducted a digital campaign to encourage supporters to respond to the Government's public consultation on an initiative within the Digital Charter known as the Internet Safety Strategy. This campaign generated 322 supporter submissions calling for transparency and empowering citizens with the tools to keep themselves safe online.

The Blocked Project:

Blocked.org.uk is Open Rights Group's project dedicated to introducing transparency and accountability to Internet filtering by testing and logging blocked and censored Internet content. Internet Service Providers provide filters that would block content that is deemed to be unsuitable for under 18s. In reality, filters block wide-ranging content, including sites that are specifically designed to give help and support to young people.

Open Rights Group continued to run the website blocked.org.uk, which allows anyone to check whether a website is blocked by the main ISPs' filters. To date, 24,304,557 million sites have been tested and we have built a tool that will allow people to check sites according to genre and location and easily report them to ISPs for correction. The evidence gathered by this reporting tool helps us to increase transparency about the impact of filters.

Cartier v BT & Others

On 13 June 2018 the UK Supreme Court ruled in favour²¹ of Open Rights Group's intervention in the Cartier jeweller case. (In this case the jeweller Cartier sought a court order requiring Internet Service Providers to block websites that sold goods infringing their trade marks.

The unanimous decision in this case meant Internet Service Providers and consumers would not bear the costs of blocking trademark-infringing sites, with the onus instead on rights-holders to fund the blocks they request. This followed a long-standing legal principle, that as Internet Service Providers are effectively innocent bystanders they should not have to pay to meet the needs of others. This helps shift the focus of debate away from the idea that Internet Service Providers are 'causing' unlawful behaviour, profiting from it or facilitating it.

Copyright

Open Rights Group worked to ensure that the implications to the UK of the Copyright Directive being discussed at the European Union level were understood and considered; Open Rights Group has been active in every stage of the debate. We raised concerns about extreme regulation of Internet content such as memes, which are seen as a form of copyright when shared across social media. The motions were passed by the European Committee on Legal Affairs (JURI Committee).

We partnered with Copyright 4 Creativity, EDRi and Mozilla for a collaborative campaign. We worked to mobilise supporters and people via social media that attracted the attention of the press, the technology industry and leading MEPs.

Open Rights Group produced digital campaigns at three key junctures of the legislative process urging people to write and call Members of the European Parliament and to over 1,000 of Open Rights Group's supporters did so. We partnered with campaigning organisation 38 Degrees which resulted in Open Rights Group gaining over 400 new supporters and over 1,900 people signing our petition.²² The digital campaign was complemented by an Open Rights Group staff lobbying trip to Strasbourg to meet directly with UK MEPs.

Open Rights Group also administered a petition on the 38 Degrees platform and generated 1,925 signatures calling on UK MEPs to exclude Article 13 from the EU Copyright Directive.

20 <https://parliamentlive.tv/Event/Index/6f01a43e-dabe-4178-bffb-89fe2824ab07>

21 <https://www.openrightsgroup.org/blog/2018/cartier-supreme-court>

22 <https://you.38degrees.org.uk/petitions/stop-article-13-s-censorship-machine>

Public Events and Community Groups

A total of 66 public events across the UK were held to support Open Rights Group's national campaigns and to foster community and awareness among people concerned about digital rights. Events ranged from public outreach stalls, film screenings and panel discussions to tech workshops, campaign events and planning meetings. Events were held by Open Rights Group's local groups in Aberdeen, Birmingham, Bristol, Cambridge, Glasgow, Edinburgh, Leeds, London, Manchester, the Northeast, Norwich and Oxford.

ORGCon 2017

On 17 November 2017 Open Rights Group held the United Kingdom's biggest digital and human rights conference, ORGCon. Over 500 people attended. The event included a diverse range of workshops, seminars and talks.

Structure, Governance and Management

Open Rights Group is a company limited by guarantee and was incorporated on the 2 October 2005. Open Rights Group is governed by its Memorandum and Articles of Association, a copy of which is available upon request. We are a non-profit organisation.

Governance and Decision Making

Open Rights Group is a membership organisation. We aim to be accountable to our members where possible. Between December 2017 and February 2018 Open Rights Group held an Open Rights Group member election to appoint three board members. Open Rights Group members voted for Christi Scarborough, Tom de Grunwald and Brian Parkinson. The board appointed them as Directors in August 2018.

Board members Ben Laurie, Maria Farrell, Harry Metcalfe and Milena Popova retired as board members on 6 August 2018.

Open Rights Group's board meets four times per year. While the Board sets our policy and strategy, day-to-day management of the organisation is delegated to the Executive Director.

Advisory Council

Open Rights Group welcomed new experts in our issues to the Advisory Council in 2018²³. Our Advisory Council continued to be a collection of individuals with expertise in technology, the law and legal matters, campaigning or policy, all of whom voluntarily gave Open Rights Group advice on a range of different issues throughout this period. The Advisory Council does not have formal authority to govern the organisation.

Staff Team

Jim Killock led the staff team during this period. In addition, four other directors managed the work of the organisation. Javier Ruiz (Policy Director), Matthew Rice (Scotland Director), Myles Jackman (Legal Director) and Martha Dark (Chief Operating Officer).

In December 2017 the board decided to appoint a Chief Operating Officer to support Jim Killock in leading the organisation. Martha Dark was appointed in March 2018.

Financial Notes

Financial Controls:

The income and expenditure budget is approved by the Board of Directors at the beginning of each financial year. The Executive Director and the Chief Operating Officer report to the Board of Directors at the quarterly board meetings. In 2018 Open Rights Group developed and implemented a reserves policy, a staff handbook and a finance and expenses policy for efficient running of the organisation.

Overview

At the end of 2018 Open Rights Group employed 9 members of staff: 3 part time and 6 full time. A number of part-time consultants provided support for different aspects of our work.

The year to 31 October 2018 was a successful one for Open Rights Group with our work supported by a number of foundations, trusts, individual supporters and organisations.

Our major grants were from:

Joseph Rowntree Reform Trust Ltd

£13,291

Open Society Foundations

£55,211

VIRT-EU

£52,266

Information Commissioner's Office

£34,169

The Handshake Foundation

£35,866

Income

Total income during this period was £476,000 compared with £388,360 in the previous year, an increase of approximately 23%. This increase was as a result of increased grant income and public event income for ORGCon. Donations from our members and supporters during this period saw a slight decrease from £230,037 in 2017 to £227,695 in 2018. We have grown business membership from £6,732 to £26,584 as a result of the scheme we launched in 2016.

We operate at a reasonably small core expense so we are well placed to withstand any temporary reduction in income without having to reduce our organisational activities.

Expenditure

Total expenditure for 2018 was £451,468 compared with £425,253 in the previous year, an increase of approximately 6%. This was in line with our increased grant funded activities.

Balance Sheet

The Balance Sheet on page 16 of the Accounts shows the financial position of the organisation as at 31 October 2018.

Financial Outlook

We have secured grant funding for 2019 and our financial position remains stable and strong and we are well placed to meet our current and future commitments. We rely on the support of our grant funders, individual and corporate supporters to whom we wish to express our sincere thanks. We view 2019 positively and we have a large portion of secured income and a proactive management plan to respond in advance to any changes in the forecast.

Reserves

At the end of 2018 we held £52,000 in reserves. This was a growth from the end of 2017 which had a reserve of £27,468. Open Rights Group intends to increase those further between the end of the financial year 2018 and 2021. Open Rights Group has set a reserves level target for 2021 of £79,000. This figure is in line with recommendations from an external advisor and is approximately two months of operating costs.

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.

By order of the Board:



James Cronin, Director

26th July 2019

Open Rights Financial Statements

31 October 2019

Accountants' Report

You consider that the company is exempt from audit for the year ended 31 October 2018. 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 and loss for the financial year.

In accordance with your instructions, we have reviewed 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 the information and explanations given to us.

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



Urban Ledgers Limited

14 Thornhill Square
London
N1 1BQ
26th July 2019

Income and Expenditure Account

For the year ended 31 October 2018

	NOTES	2018 £	2017 £
INCOME			
Gifts and Donations		8,918	18,943
Business Membership		26,584	6,732
Contracts		750	19,197
Grants	7	190,803	105,820
Reimbursed Expenses		50	4,864
Supporter Donations	4	227,695	230,037
Miscellaneous Income		-	2,757
Public Event Income		21,200	-
Interest income		-	10
TOTAL INCOME		476,000	388,360
EXPENDITURE			
Accounting and Other Professional Fees		9,653	6,458
Associations and Memberships		3,387	5,655
Bank Charges		648	486
Bookshop and Merchandise		1,362	692
Contractors and Specialists		12,380	63,492
Depreciation		3,192	827
Donation Processing Charges		13,232	13,348
External Communications		1,422	34,123
General Campaigning		7,501	2,209
Grants Made		19,364	-
Insurance		2,295	833
Membership Incentives		-	7,080
Office Supplies		2,382	3,334
ORGCon		20,823	7,494
Other Expenditure		628	181
Postage and Printing		973	413
Public Event Costs		5,014	5,376
Rent and Rates		21,939	23,353
Salaries		282,677	214,260
Service Providers		20,861	18,095
Staff Recruitment		75	1,516
Staff Training		888	1,233
Travel and Subsistence		19,939	11,377
Volunteer Costs		525	1,226
Website		308	2,192
TOTAL EXPENDITURE		451,468	425,253
Surplus /(deficit) of Income over Expenditure for the year		24,532	(36,893)
Balance brought forward		27,468	64,361
Balance carried forward		52,000	27,468

Balance Sheet

As at 31 October 2018

	NOTES	2018 £	2017 £
FIXED ASSETS			
Tangible Assets	5	6,602	8,657
CURRENT ASSETS			
Prepayments		18,770	12,909
Accrued Revenue		248	-
Deposits		1,541	1,541
Staff Loans	6	513	3,290
Grants Receivable		5,727	1,480
Other Debtors		2,466	2,527
Cash at bank and in hand		316,392	177,560
TOTAL CURRENT ASSETS		345,657	199,307
CREDITORS: AMOUNTS FALLING DUE WITHIN ONE YEAR			
Creditors		8,284	13,926
Funding received in advance		231,886	159,126
Donation Crowdfunding		40,300	-
Other creditors		19,789	7,444
TOTAL LIABILITIES		300,259	180,496
NET CURRENT ASSETS		45,398	18,811
NET ASSETS		52,000	27,468
CAPITAL AND RESERVES			
Accumulated Funds	2	52,000	27,468
TOTAL CAPITAL AND RESERVES		52,000	27,468

For the year ending 31 October 2018 the company was entitled to an 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 the 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-Entity Regime.

Approved by the board on 26th July 2019



James Cronin, Director

Notes to the Financial Statements

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 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. Corporation Tax

It is our understanding that corporation tax is not payable by Open Rights as it is a not for profit Company.

4. 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.

5. Tangible Fixed Assets

Depreciation has been provided at the following rate in order to write off the assets over their useful economic lives: Equipment: 33% straight line.

6. Staff Loans

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

7. Grant Income

	2018 £	2017 £
Joseph Rowntree Reform Trust Ltd	13,291	11,723
Open Society Foundations	55,211	21,055
Open Society Foundations: Don't Spy on Us	-	23,783
Stiftung Open Society	-	36,517
Esmée Fairbairn Foundation	-	5,896
VIRT-EU	52,266	6,846
Information Commissioner's Office	34,169	-
The Handshake Foundation	35,866	-
	190,803	105,820

8. Number of Employees

During the year ending 31 October 2018 the average number of employees was 10. In 2017 the average was 8.5 employees.

