

Company Registration No: 12052097 (England & Wales)

Foxglove Legal Community Interest Company

Report and Accounts

30 June 2021



Foxglove Legal Community Interest Company
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30 June 2021

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Foxglove Legal Community Interest Company
Company Information
30 June 2021

Directors

C A Crider	(appointed 14 June 2019)
M R Dark	(appointed 14 June 2019)
A R E Curling	(appointed 3 March 2021)

Registered Office

International House
24 Holborn Viaduct
London
EC1A 2BN

Accountants

Urban Ledgers Limited
14 Thornhill Square
London
N1 1BQ

Company Number

12052097

Foxglove Legal Community Interest Company
Report of the Board of Directors
For the Year Ended 30 June 2021

The directors present their report and accounts for the year ended 30 June 2021.

Directors

The following directors held office during the period:

CA Crider	(appointed 14 June 2019)
MR Dark	(appointed 14 June 2019)
ARE Curling	(appointed 3 March 2021)

Statement of directors' responsibilities

The directors are responsible for preparing the report and accounts in accordance with applicable law and regulations. Company law requires the directors to prepare accounts for each financial year. Under that law, the directors have elected to prepare the accounts in accordance with United Kingdom Generally Accepted Accounting Practice (United Kingdom Accounting Standards and applicable law). Under company law the directors must not approve the accounts unless they are satisfied that they give a true and fair view of the state of affairs of the company and of the profit or loss of the company for that period. In preparing these accounts, the directors are required to:

- select suitable accounting policies and then apply them consistently;
- make judgements and estimates that are reasonable and prudent;
- prepare the accounts on the going concern basis unless it is inappropriate to presume that the company will continue in business.

The directors are responsible for keeping adequate accounting records that are sufficient to show and explain the company's transactions and disclose with reasonable accuracy at any time the financial position of the company and enable them to ensure that the accounts comply with the Companies Act 2006. They are also responsible for safeguarding the assets of the company and hence for taking reasonable steps for the prevention and detection of fraud and other irregularities.

Income

Total income during this period was £466,017. Of that income £380,821 was grants from trusts and foundations, £84,846 was donations from members of the public and £350 in speaker fees.

Expenditure

Total expenditure for this financial period was £373,254.

Reserves

We take financial growth and sustainability seriously and have continued to build our organisational reserves during this period in line with our reserves policy and growth plan.

At the end of this financial year we held £84,547 in reserves. Foxglove Legal is still a relatively new and growing organisation and we have set a reserves level target of three months of operating costs.

Foxglove Legal Community Interest Company
Report of the Board of Directors (continued)
For the Year Ended 30 June 2021

Balance Sheet

The Balance Sheet on page 7 of the Accounts shows the financial position of the organisation as at 30 June 2021.

Financial Outlook

We have secured multi-year core grant funding for 2021 and beyond. We are working to increase income from our supporters who give us monthly donations. We anticipate financial growth in the next financial year. We are well placed to meet our current and future commitments. We rely on the support of our grant funders and individuals to whom we wish to express our sincere thanks.

Financial Controls

Foxglove's directors take full financial control and responsibility for the operations and finances of the organisation. The income and expenditure budget is approved by the directors at the beginning of each financial year. Reporting against that takes place at quarterly finance meetings. We have a financial controls policy, an expenses policy, reserves policy and a reserves growth policy for efficient running of the organisation.

Overview of 2020-2021

At the year end, Foxglove employed 5 members of staff, all full time. A number of part-time consultants provided support for different aspects of our work. The year to 30 June 2021 was a successful one for Foxglove Legal with our work supported by a number of foundations, trusts and individual supporters.

Our grant income during this period was from:

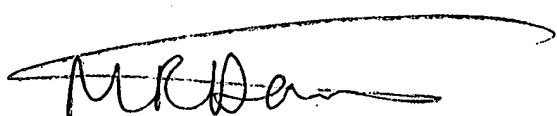
	£
Digital Freedom Fund	14,488
Joseph Rowntree Charitable Trust	53,534
Joseph Rowntree Reform Trust	25,000
Luminate	92,765
Open Society Foundations	78,661
Paul Hamlyn Foundation	27,109
The Baring Foundation	19,600
The Barrow Cadbury Trust	10,000
The European AI Fund	12,535
The Highway One Foundation	10,000
The Network for Social Change	7,130
Unbound Philanthropy	30,000

Foxglove Legal Community Interest Company
Report of the Board of Directors (continued)
For the Year Ended 30 June 2021

Small company provisions

This report has been prepared in accordance with the special provisions relating to small companies within Part 15 of the Companies Act 2006.

Signed on behalf of the board of directors

A handwritten signature in black ink, appearing to read 'MR Dark', with a long horizontal flourish extending to the right.

.....
Approved by M R Dark, Director

3 March 2022

Foxglove Legal Community Interest Company
Accountants' Report
30 June 2021

Accountants' Report to the Directors of Foxglove Legal Community Interest Company

You consider that the company is exempt from audit for the period ended 30 June 2021. You have acknowledged, on the balance sheet, your responsibilities for complying with the requirements of the Companies Act 2006 with respect to accounting records and the preparation of the accounts. These responsibilities include preparing accounts that give a true and fair view of the state of affairs of the company at the end of the financial year and its profit or loss for the financial year.

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

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



Urban Ledgers Limited
14 Thornhill Square
London
N1 1BQ
Date: 22 February 2022

Foxglove Legal Community Interest Company
Income and Expenditure Account
for the year ended 30 June 2021

	2021	2020
	£	£
Income		
Grants - restricted	209,395	99,523
Grants - unrestricted	171,426	-
Consultancy / speaker fees	350	49,349
Donations	84,846	3,879
	<u>466,017</u>	<u>152,751</u>
Expenditure		
Accounting fees	6,424	2,752
Advertising and marketing	1,053	2,445
Bank charges	459	47
Cleaning	442	-
Communications	72,433	286
Consulting	24,010	38,005
Depreciation	1,133	159
Donation processing fees	408	-
Insurance	2,095	2,283
IT software and consumables	3,042	2,462
Legal expenses	7,052	3,370
Office supplies	1,101	82
Pension costs	15,287	1,601
Postage and printing	466	191
Recruitment	3,983	-
Rent and rates	16,344	531
Salaries	206,427	32,190
Service providers	484	578
Staff training	1,178	-
Sub-grants to partners	1,595	45,331
Subscriptions	3,404	524
Telephone and internet	2,692	505
Travel and subsistence	1,742	9,089
	<u>373,254</u>	<u>142,431</u>
Surplus of income over expenditure for the period	<u>92,763</u>	<u>10,320</u>
Corporation tax	16,816	1,720
Reserves for the period	<u>75,947</u>	<u>8,600</u>
Balance brought forward	8,600	0
Balance carried forward	<u><u>84,547</u></u>	<u><u>8,600</u></u>

Foxglove Legal Community Interest Company
Balance Sheet
as at 30 June 2021

	Notes	2021		2020	
		£	£	£	£
Fixed Assets					
Tangible assets	4		5,526		1,268
Current Assets					
Cash at bank and in hand		280,441		225,700	
Prepayments		<u>1,202</u>	281,643	<u>225,700</u>	225,700
Creditors: amounts falling due within one year					
Creditors		6,596		4,963	
Funding received in advance		164,150		206,499	
PAYE and other taxes		9,395		3,714	
Pensions payable		4,225		-	
Corporation tax		16,816		1,720	
Other creditors		<u>1,440</u>		<u>1,472</u>	
			202,622		218,368
Net current assets			79,021		7,332
Net assets			<u>84,547</u>		<u>8,600</u>
Capital and reserves					
Reserves - current period		75,947			
Reserves - bought forward		8,600		8,600	
Reserves			<u>84,547</u>		<u>8,600</u>

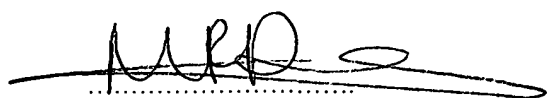
For the period ending 30 June 2021 the company was entitled to exemption from audit under section 477 of the Companies Act 2006 relating to small companies.

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

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

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

Approved by the Board on: 3 March 2022



M R Dark, Director

Foxglove Legal Community Interest Company
Notes to the Accounts
for the year ended 30 June 2021

1 Accounting Policies

Basis of preparation of financial statements

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

2 Comparatives

The comparative amounts shown for 2020 reflect the period from 14 June 2019 to 30 June 2020.

3 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

5 Average number of employees

The average number of employees in the year was 4 (2020: 2).

CIC 34

Community Interest Company Report

For official use
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Please complete in type-script, or in bold black capitals.

Company Name in full

Foxglove Legal Community Interest Company

Company Number

12052097

Year Ending

30 June 2021

(The date format is required in full)

Please ensure the company name is consistent with the company name entered on the accounts.

This template illustrates what the Regulator of Community Interest Companies considers to be best practice for completing a simplified community interest company report. All such reports must be delivered in accordance with section 34 of the Companies (Audit, Investigations and Community Enterprise) Act 2004 and contain the information required by Part 7 of the Community Interest Company Regulations 2005. For further guidance see chapter 8 of the Regulator's guidance notes and the alternate example provided for a more complex company with more detailed notes.

(N.B. A Filing Fee of £15 is payable on this document. Please enclose a cheque or postal order payable to Companies House)

PART 1 - GENERAL DESCRIPTION OF THE COMPANY'S ACTIVITIES AND IMPACT

In the space provided below, please insert a general account of the company's activities in the financial year to which the report relates, including a description of how they have benefited the community.

Foxglove Legal Community Interest Company (Foxglove) was founded in 2019. We exist to make the use of technology fair for everyone. We support legal cases and campaign. We had the following focus areas during this period:

1. **Algorithmic justice** – to encourage UK public bodies use data in a way that is open, fair and legal.
2. **Platform power and tech worker justice** - to challenge abuses of power by Big Tech companies and support tech workers.
3. **Abusive exports** – to investigate the export of harmful technologies, such as biometric surveillance equipment from the UK, overseas.

Our Activities and Impact

Area of Work 1: Algorithmic Justice

We investigated algorithms in the public sector and supported the following legal challenges:

1. The Home Office Visa Streaming Algorithm

We supported the Joint Council for the Welfare of Immigrants (JCWI) to bring a judicial review challenge to a Home Office algorithm used since 2015 to sort and grade visa applicants. The algorithm used a visa applicant's nationality as a criterion to assess an applicant's risk level. We supported JCWI to file a judicial review using the Equality Act. Before the case was heard, in August 2020, the Home Office agreed to discontinue the algorithm and redesign the system.

2. The A-Level Grading Algorithm

In summer 2020, the pandemic meant UK students were unable to sit exams. The exam regulator, Ofqual, used an algorithm to assign grades. The algorithm downgraded 40% of all students' grades from teachers' predictions. We supported student Curtis Parfitt-Ford to bring a judicial review challenging the algorithm. Ofqual later eliminated the algorithm and instead assigned the grades student's teachers predicted.

3. The Covid-19 Datastore

We supported partners openDemocracy to bring a judicial review challenging the government's failure to consult the public before the extension and expansion of Palantir's contract for the Covid-19 datastore without engaging the public. In response, the government committed not to use the datastore for non-Covid matters without public consultation.

4. General Practice Data for Planning and Research (GDPR)

GDPR was a plan to centralise the health records of every patient registered with a GP in England. The centralised health records were to be made available for planning and research, including for commercial purposes. Yet, details of which companies, for what purposes, and what safeguards applied remained unclear. The government permitted the public to opt out – but insufficiently publicised the scheme. Foxglove built a coalition of the National Pensioners Convention, Doctors Association UK, Just Treatment, The Citizens, openDemocracy and David Davis MP. We supported this group to inform the government that the steps taken were unlawful, and unless rectified, the group would initiate proceedings. At the end of this reporting period, GDPR had been paused by two months and we awaited details about the next steps.

Government by Disappearing Message

Senior ministers and officials are using disappearing message apps like WhatsApp and Signal to carry out government business. These apps allow messages to be automatically deleted after they've been read. We were concerned this lack of transparency was a risk to democratic accountability and the future of the historical record.

We supported our partners All The Citizens to launch a judicial review challenge to the government's message retention policies under the Freedom of Information Act and the Public Records Act 1958. This case is ongoing.

Area of work 2: Platform Power and Tech Worker Justice

We aimed to improve workplace conditions for tech workers and to build a movement for a digital economy and public square that serves everyone.

We partnered with unions and gave evidence to a parliamentary hearing about working conditions of Facebook content moderators with the Irish Committee on Trade, Enterprise and Employment. Irish Tánaiste Leo Varadkar TD also met with content moderators whom we support, who raised their concerns about unsafe and unfair working conditions.

We partnered with Global Action Now, Duncan McCann from the New Economics Foundation to support a case challenging the profiling, targeting, and serving of targeted advertisements to children on YouTube. At the end of this reporting period this case was ongoing.

Area of work 3: Abusive Exports

We investigated the export of biometric surveillance technologies from the UK to elsewhere in the world. Together with partners, we investigated two European exports of facial recognition and biometric surveillance technology, mapped technology in use and sought advice about legal routes from EU lawyers.

We would like to thank our entire community of supporters, advisors, donors, and staff team for their part in making this year such a success.

(Please continue on separate continuation sheet if necessary.)

PART 2 – CONSULTATION WITH STAKEHOLDERS – Please indicate who the company's stakeholders are; how the stakeholders have been consulted and what action, if any, has the company taken in response to feedback from its consultations? If there has been no consultation, this should be made clear.

The company's stakeholders are our supporters, partners, and beneficiaries. We engaged and consulted our stakeholders at regular intervals throughout the year. This included:

Our supporters: the views and opinions of our community are important to us, and we will always ask our supporters for their input and feedback. We asked our supporters which tech-justice issues felt the most urgent and which of our campaigns and cases they most related to, and why. Over 800 of our supporters provided their input to two surveys during this reporting period and we used their insights to inform our work and strategy.

Our partners: all our work is done in partnership with other non-profits, community organisations, charities and/or individuals. Our partnerships mean we can engage larger platforms and new audiences on these issues, skill share and bring different perspectives in the course of our work. We collaborated with and worked closely with all partners to co-develop our projects, cases, campaigns, and strategies.

Our advisors: Foxglove's Advisory Council is made up of technical, campaign and policy experts who give us advice on a range of issues. We consulted the Advisory Council on our work, projects, and cases at regular intervals throughout the year to ensure stakeholders' views were integrated into the running of the organisation.

(If applicable, please just state "A social audit report covering these points is attached").

PART 3 – DIRECTORS' REMUNERATION – if you have provided full details in your accounts you need not reproduce it here. Please clearly identify the information within the accounts and confirm that, "There were no other transactions or arrangements in connection with the remuneration of directors, or compensation for director's loss of office, which require to be disclosed" (See example with full notes). If no remuneration was received you must state that "no remuneration was received" below.

Foxglove directors Cori Crider and Martha Dark were employed for the full financial year. Foxglove director Allegra Curling's employment with Foxglove commenced on 24 December 2020. The directors were remunerated as follows:

- Cori Crider (total amount of salary including pension): £69,669.17
- Allegra Curling (total amount of salary including pension): £37,645.87
- Martha Dark: (total amount of salary including pension): £69,669.17

As employees the directors received a company pension contribution of 5% between 1 July 2020 and Dec 2020. We amended our organisational pension policy in January 2021. From January 2021 to 30 June 2021 all employees, including directors received a company pension contribution of 10%. Pension contributions are included in the above figures.

There were no other transactions or arrangements in connection with the remuneration of directors, or compensation for the director's loss of office, which we are required to disclose.

PART 4 – TRANSFERS OF ASSETS OTHER THAN FOR FULL CONSIDERATION – Please insert full details of any transfers of assets other than for full consideration e.g. Donations to outside bodies. If this does not apply you must state that “no transfer of assets other than for full consideration has been made” below.

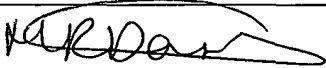
No transfer of assets other than for full consideration has been made.

(Please continue on separate continuation sheet if necessary.)

PART 5 – SIGNATORY (Please note this must be a live signature)

The original report must be signed by a director or secretary of the company

Signed



(DD/MM/YY)

Date

09 / 03 / 2022

Please note that it is a legal requirement for the date format to be provided in full throughout the CIC34 report.

Applications will be rejected if this information is incorrect.

Office held: Director

You do not have to give any contact information in the box opposite but if you do, it will help the Registrar of Companies to contact you if there is a query on the form. The contact information that you give will be visible to searchers of the public record.

Martha Dark	
PO BOX	
Foxglove, International House, 24 Holborn Viaduct, London, England, EC1A 2BN	
Tel +44 (0)207 183 5926	
DX Number	DX Exchange

When you have completed and signed the form, please attach it to the accounts and send both forms by post to the Registrar of Companies at:

For companies registered in England and Wales: Companies House, Crown Way, Cardiff, CF14 3UZ
DX 33050 Cardiff

For companies registered in Scotland: Companies House, 4th Floor, Edinburgh Quay 2, 139 Fountainbridge, Edinburgh, EH3 9FF DX 235 Edinburgh or LP – 4 Edinburgh 2

For companies registered in Northern Ireland: Companies House, 2nd Floor, The Linenhall, 32-38 Linenhall Street, Belfast, BT2 8BG

(N.B. Please enclose a cheque for £15 payable to Companies House)