

**Company Registration Number: 03260840**

**THE NATIONAL COUNCIL FOR CIVIL LIBERTIES**

**EXECUTIVE COMMITTEE'S REPORT AND FINANCIAL STATEMENTS**

**FOR THE YEAR ENDED 31 DECEMBER 2024**

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## THE NATIONAL COUNCIL FOR CIVIL LIBERTIES

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## THE NATIONAL COUNCIL FOR CIVIL LIBERTIES

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### REFERENCE AND ADMINISTRATION DETAILS OF THE COMPANY, ITS EXECUTIVE COMMITTEE AND ADVISORS

FOR THE YEAR ENDED 31 DECEMBER 2024

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<b>Executive Committee</b>	Margaret Ruth Breddal, Interim Chair from 17 September 2024 Dr Tara Lai Quinlan, Chair until 17 September 2024 (resigned 17 September 2024) Letitia Andrewartha * Clive Baldwin (resigned 26 September 2024) Shabna Begum (appointed 17 July 2024, resigned 17 September 2024, appointed 1 March 2025) Colean Camp (appointed 1 March 2025) Abraham Eiluorior Aidan Geary * Nicholas Mercer (resigned 17 July 2024) Qudsia Mirza Suhan Rajkumar (appointed 17 July 2024) Luke Sandford (resigned 24 April 2024) Laura Smith (appointed 17 July 2024, resigned 16 September 2024) David Taylor Patricia Tuitt * Andrew Williams (appointed 17 July 2024, resigned 26 September 2024)  * Nominated and served as trustees of the Civil Liberties Trust during the year.
<b>Company registered number</b>	03260840
<b>Registered office</b>	Liberty House 26-30 Strutton Ground London SW1P 2HR
<b>Company Secretary</b>	Jenny Beardsley (appointed 18 March 2024) Martha Spurrier (resigned 18 March 2024)
<b>Liberty Director</b>	Akiko Hart (from 31 January 2024, Interim Director 5 June 2023 to 31 January 2024) Martha Spurrier (until 31 January 2024)
<b>Independent Auditors</b>	MHA Chartered Accountants and Statutory Auditor 6 <sup>th</sup> Floor 2 London Wall Place London EC2Y 5AU

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## THE NATIONAL COUNCIL FOR CIVIL LIBERTIES

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### REFERENCE AND ADMINISTRATION DETAILS OF THE COMPANY, ITS EXECUTIVE COMMITTEE AND ADVISORS CONTINUED

FOR THE YEAR ENDED 31 DECEMBER 2024

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#### Bankers

Royal Bank of Scotland  
Natwest Group  
1<sup>st</sup> Floor  
440 Strand  
London  
WC2R 0QS

Nationwide Building Society  
Kings Park Road  
Moulton Park  
Northampton  
NN3 6NW

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# THE NATIONAL COUNCIL FOR CIVIL LIBERTIES

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## EXECUTIVE COMMITTEE'S REPORT FOR THE YEAR ENDED 31 DECEMBER 2024

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The Executive Committee present their report and the audited financial statements for the year ended 31 December 2024.

The National Council for Civil Liberties ("Liberty" or "the Company") is registered as a company limited by guarantee no. 03260840; its governing instrument is its Memorandum and Articles of Association. The Executive Committee members are the Directors for company law purposes.

The report and financial statements have been prepared in accordance with the Financial Reporting Standard applicable in the UK and Republic of Ireland (FRS 102) and the Companies Act 2006 and comply with current statutory requirements and the Memorandum and Articles of Association.

Although the Company is not a charity, in many respects its activities are similar to one and therefore in preparing the financial statements to provide a true and fair view, the Executive Committee has had regard to the Statement of Recommended Practice (SORP) "Accounting and Reporting by Charities" applicable to organisations preparing their accounts in accordance with FRS 102

The reference and administration details set out on page 1 and 2 form part of this report

### 1. MISSION AND VALUES

Liberty campaigns for civil liberties and human rights in the UK. Our members have been holding the powerful to account, changing the law and making the news for more than 90 years. Founded in 1934, we are a cross party, non-party membership organisation.

Liberty is ordinary people, standing up to power. We want everyone in the UK to be treated fairly, with dignity and respect. We hold the powerful to account, so rights are protected, and freedom is valued for all. We are independent and unshakeable. Our principles are guided by evidence and expertise – not political agenda, profit or popular opinion. We are not afraid to speak uncomfortable truths or challenge intolerance, injustice or abuse of power wherever we find it – but we always treat people with respect. We inspire and empower others to defend their own rights and the rights of their family, friends and communities. Together, we use our voice in courtrooms, in the news, on the streets and in politics to demand and deliver lasting change to benefit the many and the most vulnerable.

The objects of Liberty are:

1. Liberty shall advance measures and take such steps as it shall deem necessary for the defence and extension of civil liberties and human rights in the United Kingdom and the rights and freedoms recognised by international law. In particular Liberty shall strive to ensure and safeguard the right to:

- a. live in freedom and safe from personal harm;
- b. protection from ill treatment or punishment that is inhuman or degrading;
- c. equality before the law and to freedom from discrimination on such grounds as disability, political or other opinion, race, religion, sex or sexual orientation and marital status;
- d. protection from arbitrary arrest and unnecessary detention, the right to a fair, speedy and public trial, to be presumed innocent until proven guilty, and to legal advice and representation;
- e. a fair hearing before any authority exercising power over the individual;
- f. freedom of thought, conscience and belief;
- g. freedom of speech and publication;
- h. freedom of peaceful assembly and association;
- i. move freely within one's country of residence and to leave and enter it without hindrance;
- j. privacy and the right of access to official information.
- k. other civil and political rights and freedoms guaranteed by the International Bill of Rights and similar instruments to which the UK is or may become a party.

2. Liberty shall be non-party and non-sectarian.

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## THE NATIONAL COUNCIL FOR CIVIL LIBERTIES

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### EXECUTIVE COMMITTEE'S REPORT FOR THE YEAR ENDED 31 DECEMBER 2024

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Liberty's values are:

1. Liberty is an anti-racist, disability-positive, trans affirming organisation. We do not tolerate discrimination on any grounds, including class, economic status, religious belief, nationality, immigration status, sexual orientation, gender identity, race, colour, ethnicity, age and disability. We recognise that discrimination can be direct or indirect and does not require intent. We take the side of the most marginalised, defend minoritised groups, challenge oppressive practices and fight for substantive equality. We are not swayed by political agenda, profit or public opinion. We are not afraid to speak uncomfortable truths and challenge intolerance, discrimination and abuse of power wherever we find it.
2. Our work strives to recognise and counter the structural and historic oppression that pervades society; we consider the power dynamics of any issue or situation, working to rebalance them in favour of minoritised or disempowered groups. We do not use human rights or civil liberties arguments to support actions that would oppress others or suppress rights. We elevate considerations of relative power and collective rights above purist civil libertarianism.
3. We listen to people closest to a problem or issue and recognise that expertise can be gained from lived experience of an issue, from research and academic learning, all of which we take into account. We are committed to creating a positive, supportive, respectful environment where people are free to be themselves.
4. We welcome respectful challenge and feedback, and we undertake to listen, reflect and learn and respond with respect rather than act defensively or with hostility. We know that to succeed in Liberty's mission, and to do good governance, anti-oppression must run through everything we do and we are responsible and accountable for protecting these values. As members of Liberty we must live Liberty's values of dignity and respect and be courageous in championing Liberty's mission internally and externally.

Liberty is now in the second year of its five-year strategic plan for 2023 – 2027 which include the following five strategic objectives:

- Campaign to ensure that the UK's human rights framework is valued, protected and expanded;
- Support rights to protest, free expression and privacy;
- Advocate that social issues are met with rights respecting responses;
- Expand our strong and diverse supporter base, and widen and diversify our income portfolio, ensuring that it is sustainable and provides sufficient growth to meet expenditure plans;
- To further develop internally and build an agile, effective, value driven organisation.

### EXECUTIVE COMMITTEE'S REPORT FOR THE YEAR ENDED 31 DECEMBER 2024

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## 2. ACHIEVEMENTS, PERFORMANCE AND PLANS FOR FUTURE PERIODS

2024 saw a General Election in June. Liberty monitored its expenditure and activity in line with UK Electoral Commission Campaigning Rules. The General Election also led to a pause in Liberty campaigning activity, as the previous Government's legislative agenda came to a halt, and Liberty, alongside sector partners, pivoted to analysing a potential new legislative agenda.

Like many organisations across the sector, 2024 also saw Liberty face the need to undergo a difficult restructure and redundancy process in order to address a financial shortfall in the funding pipeline from 2025 onwards and structure the organisation to continue to achieve its aims in the future. The process saw a fall in permanent average headcount across the year of 7 through a process of redundancy and decisions not to replace roles which fell vacant.

### Strategic Litigation

Liberty's strategic litigation work has furthered Liberty's objectives of defending the right to protest and the right to privacy, Liberty's work on challenging discriminatory and racist policing, and Liberty's work on stopping and/or restricting the use of punitive measures that criminalise people because they are poor.

In May, Liberty won their Judicial Review against the Government on their attempts to reduce protest rights via the back door. The High Court ruled that the Government acted unlawfully in creating legislation which gave the police 'almost unlimited' powers to restrict protests, and ordered the law to be quashed. In its judgment, the Court found that the then Home Secretary Suella Braverman passed anti-protest measures in June 2023 despite having not been given the power by Parliament to do so. The legislation significantly lowered the threshold of when the police can impose conditions on protests from anything that caused 'serious disruption' to anything that was deemed as causing 'more than minor' disruption.

The Government appealed the decision, and the new Labour government decided to carry on that appeal which was heard at the start of December, with the judgment expected in 2025. The case is widely seen as a landmark legal challenge on defending the right to protest in the UK.

In one part of Liberty's ongoing Investigatory Powers Act (IPA) legal case, the Government conceded and introduced, in the context of bulk hacking, prior independent authorisation when confidential journalistic material is searched for and/or retained. The Government already conceded this safeguard was required for bulk interception but had previously refused to read it across to other bulk powers. This will introduce a very important safeguard for journalists and their sources, especially since bulk hacking is increasingly relied on by intelligence agencies to bypass end-to-end encryption. The Supreme Court has refused permission to appeal in Liberty's wider IPA case. Liberty has therefore applied for the case to be heard at the European Court of Human Rights and this is likely to be heard in 2025 or 2026.

To further Liberty's objectives on discriminatory policing, Liberty has worked with Black Equity Organisation to bring a legal challenge to a trial by the London Mayor's Office for Policing and Crime and the Ministry of Justice, where individuals with a knife crime conviction are being GPS tagged and/or tracked as a licence condition on release from prison. Liberty also supported the Gypsy, Roma and Traveller community by intervening in a legal case brought by an individual supported by Friends, Families and Travellers, an organisation representing the Traveller community, in a case calling out the discriminatory impact of the Policing Crime Sentencing and Courts Act on their communities.

To further our objective to fight the criminalisation of poverty, Liberty also supported a client who was arrested for breaching a dispersal order by the Metropolitan Police and had his possessions destroyed. The Metropolitan Police admitted the use of a dispersal order was unlawful and issued a full apology.

### EXECUTIVE COMMITTEE'S REPORT FOR THE YEAR ENDED 31 DECEMBER 2024

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Looking forward to 2025, the Legal team's objectives include:

- Scoping/bringing legal challenge to section 60 suspicion-less stop and search
- Investigating over policing practices such as the use of databases and data sharing
- Continuing the Serious Disruption case to the Court of Appeal
- Monitoring related proceedings around protest to consider applications to intervene
- Undertaking wider scoping exercise on tech work at Liberty including facial recognition
- Scoping/bringing legal challenges to Public Spaces Protection Order (PSPO) conditions that target homelessness and begging
- Following the restructure and the introduction of a new legal information role within the legal team, creating and disseminating online resources around protest rights, police powers and the decriminalisation of poverty, and delivering training to relevant frontline organisations

### Policy and Campaigns

One of Liberty's key objectives in 2024 was to explore, through partnership work, how the organisation can make the case for the right to protest to different audiences. In September, Liberty published a report with cross-party think tank Demos, who specialise in deliberative research methods and involving people in research and policy-development. With Demos, Liberty designed two nationally representative surveys to benchmark public opinion – one at the start of the research project, one at the end. The work also involved the co-design of a deliberative research process, with 24 participants meeting on four occasions to hear from stakeholders across the protest spectrum – from the police, to people affected both positively and negatively by protest, to Liberty staff campaigning on protest.

The report presented what arguments are most persuasive, and how to move the persuadable middle on protest. The overwhelming majority (83%) of the public support the right to peaceful and non-violent protest. Informed by the research participants, the Demos report concluded with key recommendations that bolster and expand Liberty's position, including commissioning an independent review of protest legislation, repealing the worst parts of the Police, Crimes, Sentencing and Courts Act and the Public Order Act.

Liberty used this report to organise events including at the Labour party conference, engage with MPs, two of whom asked questions about the report's findings in Parliament, and inform evidence to the London Assembly on the policing of protest.

Liberty continued to defend the Human Rights Act and the European Convention on Human Rights through its parliamentary advocacy work. Liberty also refreshed its policy position on the use of facial recognition technology by the police, which will be a key campaign in 2025. Further, the policy and campaigns teams provided briefings on a number of bills including the Criminal Justice Bill, the Economic Activity of Public Bodies Bill, and the Terminally Ill Adults (End of Life) Bill.

Liberty won two campaigning prizes at the Sheila McKechnie Foundation awards for work undertaken in 2023: its work on alternative approaches to serious youth violence, Holding Our Own, as well as the work Liberty undertook with Kids Of Colour to stop the Manchester Police from sending out Carnival banning letters.



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### EXECUTIVE COMMITTEE'S REPORT FOR THE YEAR ENDED 31 DECEMBER 2024

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Looking forward to 2025, the Policy and Campaigns team's objectives include:

- Establishing Liberty as a producer of high quality, evidence-based policy and legal analysis, by publishing reports on key campaign areas and working with academics and think tanks
- Maintaining Liberty's reputation as a collaborative partner, by continuing to attend and facilitate sector coalitions and lending resource and support where needed
- Building political consensus on the need to protect protest rights, by building relationships with new MPs and sharing the impact of the Public Order Act and the Policing Act, as well as injunctions and sentencing
- Strengthening Liberty's evidence base to show the disproportionate impact of policing on racialised communities, by producing and disseminating a research report on the impact of police in schools
- Refreshing and developing a current and pragmatic strategy for Liberty's work on the state use of AI and technology
- Scoping the intersection of climate justice and human rights work and where Liberty might add value, including through building support for UK legislation to protect environmental rights

#### Communications and Engagement

In 2024 Liberty took a digital first approach, testing out new messaging, and working to ensure that the organisation reached wider audiences. Highlights included running a media briefing on key human rights issues for journalists in the run up to the General Election, with sector partners Amnesty International UK, Freedom from Torture, Human Rights Watch and Inclusion London; launching a new video and petition with Amnesty International UK on the regression of protest rights; and a viral TikTok on the new protest amendments. Media coverage during the year included the BBC, ITV, the Times and the Guardian.

Looking forward to 2025, the Communications and Engagement team's objectives include:

- Developing an overarching brand strategy for Liberty, integrated into all other plans and strategies
- Devising and delivering protest and facial recognition campaigns, including polling on facial recognition technology to gauge the public's awareness and understanding, for Liberty to better understand sub-group differences and tailor messaging
- Developing and implementing a new Individual Giving strategy

#### Advice and Information

Following the redundancy and restructure process implemented during 2024, the Human Rights Advice Line was closed, due to the prioritisation of other areas of Liberty's work. The delivery of the human rights training programme for community groups and the online resources work moved to a dedicated role in the Legal team.

In 2024, the Advice and Information team responded to 567 queries, of which 166 were phone queries. The Advice and Information online hub received over 414,000 page views. The most popular pages were the police powers of arrest and 'protest bust cards' pages. 32 workshops and/or training were delivered, with a total of 458 attendees.

### EXECUTIVE COMMITTEE'S REPORT FOR THE YEAR ENDED 31 DECEMBER 2024

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#### Liberty Investigates

Liberty Investigates, Liberty's independently edited investigative journalism unit, focused on protest and discriminatory policing as its two main topics, with some ongoing work on asylum. It made strong progress on its objective to diversify its co-publishing partners, partnering with The Telegraph for the first time, putting concerns about facial recognition searches against the passport database onto the radar of its politically conservative readership; securing a frontpage splash on university protest rights with the tabloid outlet Metro, the UK's most widely circulated newspaper; and partnering with a current affairs periodical for the first time, with their long form feature on asylum accommodation in Prospect magazine. Other publication partners have included inews, The Guardian, The Observer and openDemocracy. Stories have also been pitched to local publications to maximise reach. For example, the asylum seeker suicide story was a three-way investigation with inews and the Birmingham Dispatch. Other local outlets Liberty Investigates worked with or prompted to cover their investigations include the Yorkshire Post and Eastern Daily Press.

Liberty Investigates has demonstrated wider impact by being asked to contribute evidence to the official inquiry into the Channel small boat disaster, as well as the Home Affairs Select Committee on asylum accommodation. A significant impact was also achieved this year from Liberty Investigates' reporting on a young asylum seeker who died by suicide. Through connecting his brother with a solicitor, he has now been granted a judicial review in their efforts to overturn the inquest.

Looking forward to 2025, Liberty Investigates' objectives include:

- Developing expertise and authority on protest
- Securing a broadcast partnership with the second part of the student protest story, and delivering a distribution and impact plan for this project which involves securing coverage in multiple regional and student outlets alongside a national partner
- Developing the next step of the local network focus, with a full blown story pack
- Targeting partnerships with national newspapers Liberty Investigates has not previously worked with
- Reaching younger audiences by partnering with relevant outlets

#### Membership, Individual Giving and Philanthropy

One of Liberty's Development objectives in 2024 was to diversify income streams. A Major Donor Manager was recruited during the course of 2024, and work has started to identify and steward prospects, with two small major donor events held at Liberty's office. Legacy fundraising has been developed, with the team producing a new gifts in wills guide, and setting up a new partnership with Farewill. Relationships with trusts and foundations have been maintained and strengthened.

A report was commissioned on Individual Giving and the recommendations will be taken forward in 2025. The focus will be on moving from an acquisition-first model to a conversion one, segmenting audiences, and ensuring that individual giving asks are responsive to external events and internal work. Membership engagement work included asked members and supporters to write to their Prospective Parliamentary Candidates (PPCs) asking them to sign a pledge to commit to the organisation's three key campaign demands. 14,000 emails were sent to PPCs and nearly 200 PPCs responded. Of these, over 70 went on to be elected to Parliament, meaning Liberty could begin parliamentary outreach with many new MPs knowing they were Liberty allies.

During the course of 2024, the Membership and Individual Giving team moved to the Communications and Engagement team, to streamline and strengthen Liberty's communications to different stakeholders.

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## THE NATIONAL COUNCIL FOR CIVIL LIBERTIES

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### EXECUTIVE COMMITTEE'S REPORT FOR THE YEAR ENDED 31 DECEMBER 2024

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Looking forward to 2025, the Philanthropy team's objectives include:

- Sourcing new, different and wider funding streams, including securing new grants from Trusts and Foundations, developing Major Donor and legacy fundraising, as well as challenge fundraising
- Developing infrastructure to support effective Major Donor connections and engagement
- Identifying and engaging new prospects to build a larger, sustainable pipeline
- Creating more efficient ways of making applications and reporting
- Developing a return on investment approach to the philanthropy work

The Board is committed to providing the best possible standards for all our supporters. Our fundraising activities are carried out respectfully and we are a member of the Fundraising Regulator and have worked within their agreed guidelines during the year. We have comprehensive donor due diligence processes in place. No fundraising complaints were received during the year and a complaints policy for handling complaints is in place. The organisation does not use external professional fundraisers or involve commercial participators and we respect the wishes of our supporters around how they wish to be contacted, offering them frequent opportunities to change these preferences which are stored within our systems.

We pledge to be compliant with the General Data Protection Regulation (GDPR), and at all times we respect the wishes of our supporters about how they are contacted, offering them frequent opportunities to change these preferences, which are recorded on our databases.

### 3. FINANCIAL REVIEW

The outturn for the year ended 31 December 2024 was a positive net movement in funds of £202,569 (2023 – negative £10,799) comprising a reduction in the unrestricted fund of £75,528 and an increase in restricted funds of £278,097. The reduction in unrestricted funds was driven by the one off costs associated with the internal restructure (explained above), and the increase in restricted funds largely resulted from an increase in grant income, received from the Civil Liberties Trust, following higher voluntary income received by the Trust, that was restricted towards Liberty's future activities.

Total income in 2024 amounted to £4,338,632, an increase of 15% from £3,779,183 in 2023. As explained above, the increase in income is due to significantly higher grant income received from the Civil Liberties Trust. Grant Income from all Trusts and Foundations continued to be the primary source of income towards funding Liberty's activities, amounting to £3,213,839 for the year, received from the Civil Liberties Trust and other funding bodies that support the work undertaken at Liberty. The Board give its sincere appreciation for the value of this support, and these funding sources are analysed in more detail at Note 3 to the accounts. Other primary income sources included subscriptions from our valued membership, which at £764,813 (2023: £779,085) showed a slight fall in comparison to 2023 following many years of growth in this area. Donations and legacies increased to £271,441 in 2024 (2023 - £61,872) following higher legacy income, a source of income that is erratic by its nature (see note 4 to the accounts).

Expenditure increased by 9% in 2024 compared to the prior year. This increase was generally reported across Liberty's principal areas of activity, and was particularly associated with staff costs in addition to more general inflationary pressure. The staff costs of the restructure were largely offset by in-year staff cost savings as a result of reduced headcount from the summer onwards, however additional support and wellbeing costs amounted to £84,655 (2023 - £Nil). This and further costs of staff reorganisation is particularly evident within support costs as reported at notes 6 and 7 to the accounts, where a detailed breakdown of how costs were incurred against all activities is analysed.

The Balance Sheet includes £2,642,811 of net current assets, consisting mainly of both unrestricted and restricted funds held as cash reserves and short term debtors.

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## THE NATIONAL COUNCIL FOR CIVIL LIBERTIES

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### EXECUTIVE COMMITTEE'S REPORT FOR THE YEAR ENDED 31 DECEMBER 2024

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Whilst the outturn for 31 December 2024 was positive, this was driven by unexpected one-off donations. The 2025 pipeline of income is significantly reduced after the loss of longer-term grant funding with further significant gaps identified in 2027 onwards. The budgeted deficits for 2025 onwards have been significantly reduced through the restructure and redundancy process but significant funding targets remain.

#### ***Reserve Policy and Going Concern***

The Executive Committee considers there is a need to hold unrestricted free reserves to cover financial risks and opportunities faced by the organisation. Unrestricted free reserves are defined as unrestricted funds, after having deducted the fixed asset reserve and designated funds. The unrestricted free reserves at the end of 2024 are £2.22 million (2023 £2.25 million).

The Executive Committee reviews Liberty's Reserves Policy annually by considering the key financial risks and opportunities faced by the organisation. In reviewing this for the current year, the Executive Committee consider that reserves levels should be set to cover the following areas:

- 1) Working capital requirements and unexpected costs (£0.5m-£0.7m)
- 2) Identifiable key financial risks which include, in year and future unsecured funding targets and the risk of loss of key funders. (£1m-£1.4m)
- 3) Funds held to cover future costs of unidentified opportunities. £0.2m-£0.3m

As such, the overall reserves target range for 2025 is £1.7m to £2.4m and Liberty's current level of reserves falls within this target range.

The Executive Committee has reviewed the budgets and forecasts for 2025 and 2026, including reserves and secured income and consider there to be sufficient funding to prepare these financial statements on a going concern basis.

### EXECUTIVE COMMITTEE'S REPORT FOR THE YEAR ENDED 31 DECEMBER 2024

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#### *Principal risks and uncertainties*

Identified risks are listed in a register which outlines the nature of each individual risk and rates them between acceptable, adequate, tolerable and unacceptable. A risk management approach is agreed for each listed risk. Ratings are reviewed regularly and progress against the implementation of mitigation strategies is actively monitored.

The key risks identified are as follows.

- Financial Uncertainty and Risk

Following the restructure and redundancy process implemented during 2024 which was successful in reducing the overall cost base, Liberty is aiming to achieve a near breakeven position for the 2 subsequent years, however this will be dependent on successfully increasing income. Key financial uncertainty and risk over the next period surround Liberty's ability to diversify its income sources, to meet income targets, and to reduce key funder reliance. These risks are being addressed through various new strategies, including building major donation income, continued investment in and development of the legacy pipeline, deeper and more relevant engagement across our supporter base, and seeking to attract a broader pool of funders for newer and innovative areas of our work. Income generation risk in the short term is mitigated by Liberty's reserves policy. The Executive Committee monitors income generation at each of its meetings to enable it to respond in a timely manner.

- Risks related to the external environment

The key external risks facing the organisation are public perception and the political environment. Whilst the election of the Labour government in the summer has remove the immediate threat of changes to the Human Rights Act, an increasingly hostile and divided political environment increases the risk of unfavourable public perception around key areas of Liberty's work seeking to defend those groups who are most marginalised. This risk continues to be mitigated by detailed horizon scanning and the development of wider and strong relationships across parliament. Further new partnership work is supporting a strengthened approach and a new media strategy is being developed to support the maintenance of a strong external profile and approach.

- Risks surrounding governance structures

Liberty has a complex governance structure and key risks surround its ability to ensure that its governance functions are able to be widely reflective of its member base, wider supporter base and values. In addition, the complexity of these structures, in comparison to the organisation's size, are resource intensive and detract from the organisation's ability to deliver key areas of work. To evaluate the extent of risks in this area, and to inform any suggested changes to governance and engagement structures, and to streamline processes, a governance review is planned for 2025.

- Risk related to internal challenges

Following a difficult restructure during 2024, key internal risks for the organisation involve rebuilding the organisation as it adapts to those changes. Further key risks surround Liberty's existing policies, procedures and training which need to be brought into alignment with the current needs of the organisation and to focus strongly on staff and manager development. Key mitigation strategies in place for 2025 include a detailed process to look at the full range of internal and external policies and practices through a renewed anti-oppression lens. Further, a process to renew, review and update all staff related policies will be undertaken and continued time and resource will be invested in upskilling managers through training and support.

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## THE NATIONAL COUNCIL FOR CIVIL LIBERTIES

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### EXECUTIVE COMMITTEE'S REPORT FOR THE YEAR ENDED 31 DECEMBER 2024

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#### ***Volunteers***

Liberty is supported by volunteers who contribute their experience and expertise to Liberty's sub committees. The volunteers are not Executive Committee members. It is estimated that the collective time provided by Sub Committee volunteers during 2024 was 60 hours (2023: 24 hours).

During 2024 1,260 hours (2023: 1,820 hours) of volunteer support was provided on our Advice and Information phone lines until the service was closed as part of the organisational restructure in autumn 2024.

We are further supported by pro bono professional legal advice provided free of charge on various areas of strategic litigation, policy issues and campaigns totalling £35,955 in 2024 and shown in note 3.

The Executive Committee is hugely grateful for all of the support provided by volunteers during the year.

#### ***Pay Policy for Key Management Personnel***

Liberty considers its Key Management Personnel to comprise the Executive Committee and the Senior Leadership Team. During the year, the Senior Leadership Team (SLT) was made up of the Director, Advocacy Director (Director of External Relations from September 24), Communications Director (until May 2024), Finance & Operations Director and the Head of People and Culture (until October 2024).

Executive Committee members are not remunerated. The SLT are employed staff members and pay is set by the Director, informed by benchmarking. The Director's salary is set by the Executive Committee and informed by benchmarking. The benchmarking is reviewed at regular intervals with the next review being scheduled for 2026.

The Executive Committee consider the affordability of an annual pay award from 1 January each year informed by, but not necessarily equivalent to, annual inflation as measured by the Consumer Price Index, including Housing (CPIH) as at the preceding September. Pay award decisions are dependent on the budget plan and only made subject to affordability considerations.

## **4. STRUCTURE, GOVERNANCE AND MANAGEMENT**

The Company is the operational entity linked to a separate unincorporated association with essentially the same objects which was established in 1934. The members of the unincorporated association elect the Policy Council. The Policy Council in turn appoints the majority of the members of the Executive Committee which, under the Articles of Association of the Company, are the Company's Members and Committee of Management, a Board of Directors for company law purposes.

In 2017, as revised in 2023, the constitution of the unincorporated association was amended to allow the Executive Committee to co-opt members into its number in order to fill skills gaps or to ensure diversity. The maximum number of co-opted members is six and elected members must under normal circumstances remain the majority of members. The unincorporated association informs Liberty policy but has no transactions, assets or liabilities, and all members' subscriptions are paid to the Company. Unless otherwise stated, references to Liberty in this report and in the financial statements refer to the Company.

The Company works closely with The Civil Liberties Trust ('the Trust'), a charitable company no. 1024948. A substantial amount of the work undertaken by the Company is aligned with the charitable objectives of the Trust, and for which the Company receives a grant from the Trust. The Company also leases premises from the Trust. The Company can appoint a minority of Trustees, and nominate a minority of members, to the Trust which, in turn, can appoint a representative to the Executive Committee.

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## THE NATIONAL COUNCIL FOR CIVIL LIBERTIES

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### EXECUTIVE COMMITTEE'S REPORT FOR THE YEAR ENDED 31 DECEMBER 2024

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The Executive Committee is responsible for approving operational plans and budgets, and for appointing the Director. The Director is responsible for management of day-to-day operations and is supported by an SLT.

Members of the Company guarantee to contribute an amount not exceeding £1 to the assets of the Company in the event of winding up. The total number of such guarantees at December 2024 was 8 (2023: 12). The members of the Executive Committee are the only members of the Company, but this entitles them only to voting rights and they have no beneficial interest in the Company.

The Executive Committee meet up to 6 times per year. In addition to these meetings, the business of the organisation is discussed in detail by three Sub Committees: A Finance Sub Committee, a Governance Sub Committee and a Culture and Wellbeing Sub Committee. Each Sub Committee comprises of a majority of Executive Committee members but Sub Committees also co-opt specialist support from non-Executive Committee members. All Sub Committees have formal terms of reference in place. In addition to the three Sub Committees the work of Liberty Investigates is overseen by an Editorial Advisory Board which for 2024 was Chaired by a member of the Executive Committee. Sub Committees meet between 3 and 6 times per year.

Most new Executive Committee members join the Board at its July meeting and there is a comprehensive induction process in place for new Board members. This includes being provided with key governance documents and policies including the financial statements, induction meetings with key members of SLT, the Head of Finance, and members of the Board as well as the provision of training for any identified development needs.

All Executive Committee members undertake an annual performance review conducted by the Chair or Vice Chair.

#### **Auditors**

MHA was re-appointed as Liberty's auditors during the year. The Executive Committee agreed to undertake a formal tender process during 2025 and auditors for the 2025 financial year will be appointed following the AGM in May.

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## THE NATIONAL COUNCIL FOR CIVIL LIBERTIES

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### EXECUTIVE COMMITTEE'S REPORT FOR THE YEAR ENDED 31 DECEMBER 2024

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#### Statement of responsibilities of the Executive Committee

Executive Committee members who are directors of Liberty for the purposes of company law, are responsible for preparing the Executive Committee report and the financial statements, in accordance with applicable law and United Kingdom Accounting Standards (United Kingdom Generally Accepted Accounting Practice).

Company law requires the Board to prepare financial statements for each financial year which give a true and fair view of the state of affairs of the Company and of the incoming resources and application of resources, including the income and expenditure, of the Company for that period. In preparing these financial statements, the Board is required to:

- Select suitable accounting policies and then apply them consistently;
- Make judgements and estimates that are reasonable and prudent;
- State whether applicable UK Accounting Standards and statements of recommended practice have been followed, subject to any material departures disclosed and explained in the financial statements; and
- Prepare the financial statements on the going concern basis unless it is inappropriate to presume that the charity will continue in operation.

The Executive Committee is responsible for keeping adequate accounting records that disclose with reasonable accuracy at any time the financial position of the Company and enable them to ensure that the financial statements 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.

In so far as the Executive Committee are aware:

- There is no relevant audit information of which the Company's auditor is unaware;
- The Executive Committee has taken all steps that they ought to have taken to make themselves aware of any relevant audit information and to establish that the auditor is aware of that information.

The Executive Committee is responsible for the maintenance and integrity of the corporate and financial information included on the Company's website. Legislation in the United Kingdom governing the preparation and dissemination of financial statements may differ from legislation in other jurisdictions.

#### Directors' Indemnities

Subject to the provisions of the Companies Act 2006 every Director or other officer of the Company shall be indemnified out of the assets of the Company against any liability incurred in acting in such capacity in successfully defending any proceedings, whether civil or criminal, against them. Subject to certain customary exceptions, a member of the Executive Committee may benefit from indemnity insurance purchased at the Company's expense to cover the liability of Directors in respect of any negligence, default, breach of trust or breach of duty in relation to the Company.



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## THE NATIONAL COUNCIL FOR CIVIL LIBERTIES

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### EXECUTIVE COMMITTEE'S REPORT FOR THE YEAR ENDED 31 DECEMBER 2024

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#### Preparation of the report

In preparing this report, the Directors have taken advantage of the small companies' exemptions provided by section 415A of the Companies Act 2006.

Approved by order of the Members of the Executive Committee and signed on its behalf by:

.....  
**Ruth Breddal**  
Interim Chair  
Date:

**INDEPENDENT AUDITOR'S REPORT TO THE EXECUTIVE COMMITTEE OF THE  
NATIONAL COUNCIL OF CIVIL LIBERTIES**

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**Opinion**

We have audited the financial statements of The National Council of Civil Liberties (the 'company') for the year ended 31 December 2024 which comprise the Statement of Financial activities, the Balance Sheet, the Statement of Cash Flows and notes to the financial statements, including a summary of significant accounting policies. The financial reporting framework that has been applied in their preparation is applicable law and United Kingdom Accounting Standards, including Financial Reporting Standard 102 The Financial Reporting Standard applicable in the UK and Republic of Ireland (United Kingdom Generally Accepted Accounting Practice).

In our opinion the financial statements:

- ***give a true and fair view of the state of the company's affairs as at 31 December 2024, and of its profit/loss for the year then ended;***
- ***have been properly prepared in accordance with United Kingdom Generally Accepted Accounting Practice; and***
- ***have been prepared in accordance with the requirements of the Companies Act 2006.***

**Basis for opinion**

We conducted our audit in accordance with International Standards on Auditing (UK) (ISAs (UK)) and applicable law. Our responsibilities under those standards are further described in the Auditor's responsibilities for the audit of the financial statements section of our report. We are independent of the company in accordance with the ethical requirements that are relevant to our audit of the financial statements in the UK, including the FRC's Ethical Standard, and we have fulfilled our other ethical responsibilities in accordance with these requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

**Conclusions relating to going concern**

In auditing the financial statements, we have concluded that the Executive Committee's use of the going concern basis of accounting in the preparation of the financial statements is appropriate.

Based on the work we have performed, we have not identified any material uncertainties relating to events or conditions that, individually or collectively, may cast significant doubt on the Company's ability to continue as a going concern for a period of at least twelve months from when the financial statements are authorised for issue.

Our responsibilities and the responsibilities of the Executive Committee with respect to going concern are described in the relevant sections of this report.

**INDEPENDENT AUDITOR'S REPORT TO THE EXECUTIVE COMMITTEE OF THE  
NATIONAL COUNCIL OF CIVIL LIBERTIES**

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**Other information**

The other information comprises the information included in the Executive Committee's Report other than the financial statements and our Auditor's report thereon. The Executive Committee are responsible for the other information contained within the Executive Committee's Report. Our opinion on the financial statements does not cover the other information and, except to the extent otherwise explicitly stated in our report, we do not express any form of assurance conclusion thereon.

Our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or our knowledge obtained in the audit or otherwise appears to be materially misstated. If we identify such material inconsistencies or apparent material misstatements, we are required to determine whether there is a material misstatement in the financial statements themselves. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact.

We have nothing to report in this regard.

**Opinions on other matters prescribed by the Companies Act 2006**

In our opinion, based on the work undertaken in the course of the audit:

- the information given in the Executive Committee's Report for the financial year for which the financial statements are prepared is consistent with the financial statements; and
- the Executive Committee's Report has been prepared in accordance with applicable legal requirements.

**Matters on which we are required to report by exception**

In the light of our knowledge and understanding of the company and its environment obtained in the course of the audit, we have not identified material misstatements in the Executive Committee Report.

We have nothing to report in respect of the following matters in relation to which the Companies Act 2006 requires us to report to you if, in our opinion:

- adequate accounting records have not been kept, or returns adequate for our audit have not been received from branches not visited by us; or
- the financial statements are not in agreement with the accounting records and returns; or
- certain disclosures of Executive Committee's remuneration specified by law are not made; or
- we have not received all the information and explanations we require for our audit; or
- the Executive Committee were not entitled to prepare the financial statements in accordance with the small companies' regime and take advantage of the small companies' exemptions in preparing the Executive Committee's report and from the requirement to prepare a Strategic Report.

**INDEPENDENT AUDITOR'S REPORT TO THE EXECUTIVE COMMITTEE OF THE  
NATIONAL COUNCIL OF CIVIL LIBERTIES**

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**Independent Auditor's Report to the Executive Committee of The National Council of  
Civil Liberties (continued)**

**Responsibilities of the Executive Committee**

As explained more fully in the Statement of Executive Committee's, the Executive Committee (who are also Directors of the Company for the purposes of company law) are responsible for the preparation of the financial statements and for being satisfied that they give a true and fair view, and for such internal control as the Executive Committee determine is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, the Executive Committee are responsible for assessing the company's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the Executive Committee either intend to liquidate the charitable company or to cease operations, or have no realistic alternative but to do so.

**Auditor's responsibilities for the audit of the financial statements**

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an Auditor's Report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs (UK) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

Irregularities, including fraud, are instances of non-compliance with laws and regulations. We design procedures in line with our responsibilities, outlined above, to detect material misstatements in respect of irregularities, including fraud. The specific procedures for this engagement and the extent to which these are capable of detecting irregularities, including fraud is detailed below:

- Obtaining an understanding of the legal and regulatory frameworks that the entity operates in, focusing on those laws and regulations that had a direct effect on the financial statements;
  - Enquiry of management and those charged with governance to identify any instances of fraud or suspected instances of fraud;
  - Enquiry of management and those charged with governance around actual and potential litigation and claims;
  - Enquiry of management about any instances of non compliance with laws and regulations;
  - Reviewing the control systems in place and testing the effectiveness of the controls;
  - Performing audit work over the risk of management override of controls, including testing of journal entries and other adjustments for appropriateness;
  - Evaluating the business rationale of significant transactions outside the normal course of business;
  - Reviewing accounting estimates for bias;
  - Reviewing minutes of meetings of those charged with governance; and
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**INDEPENDENT AUDITOR'S REPORT TO THE EXECUTIVE COMMITTEE OF THE  
NATIONAL COUNCIL OF CIVIL LIBERTIES**

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- Reviewing financial statement disclosures and testing to supporting documentation to assess compliance with applicable laws and regulations.

**Independent Auditor's Report to the Executive Committee of The National Council of Civil Liberties (continued)**

Because of the inherent limitations of an audit, there is a risk that we will not detect all irregularities, including those leading to a material misstatement in the financial statements or non-compliance with regulation. This risk increases the more that compliance with a law or regulation is removed from the events and transactions reflected in the financial statements, as we will be less likely to become aware of instances of non-compliance. The risk is also greater regarding irregularities occurring due to fraud rather than error, as fraud involves intentional concealment, forgery, collusion, omission or misrepresentation.

A further description of our responsibilities for the audit of the financial statements is located on the Financial Reporting Council's website at: <https://www.frc.org.uk/Our-Work/Audit/Audit-and-assurance/Standards-and-guidance/Standards-and-guidance-for-auditors/Auditors-responsibilities-for-audit/Description-of-auditors-responsibilities-for-audit.aspx>. This description forms part of our auditor's report.

**Use of our report**

This report is made solely to the company's members, as a body, in accordance with Chapter 3 of Part 16 of the Companies Act 2006. Our audit work has been undertaken so that we might state to the company's members those matters we are required to state to them in an auditor's report and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the company and the company's members as a body, for our audit work, for this report, or for the opinions we have formed.

**Stuart McKay BSc FCA DChA (Senior Statutory Auditor)**

for and on behalf of

**MHA MacIntyre Hudson**

Statutory Auditor

London, United Kingdom

Date:

MHA are eligible to act as auditors in terms of section 1212 of the Companies Act 2006. MHA is the trading name of MHA Audit Services LLP, a limited liability partnership in England and Wales (registered number OC455542).

The National Council for Civil Liberties

Statement of Financial Activities (Incorporating Income and Expenditure Account) for the year ended 31 December 2024.

		Unrestricted funds 2024 £	Restricted funds 2024 £	Total funds 2024 £	Unrestricted funds 2023 £	Restricted funds 2023 £	Total funds 2023 £
	Note						
<b>Income from:</b>							
Donations and legacies	3	265,541	5,900	271,441	61,872	-	61,872
Activities:							
Grant income	4	715,321	2,498,518	3,213,839	907,053	1,911,755	2,818,808
Membership and Engagement		764,813	-	764,813	779,085	-	779,085
Legal and advice work		36,054	-	36,054	79,213	-	79,213
Other trading activities		632	-	632	518	-	518
Bank interest receivable	5	51,853	-	51,853	39,687	-	39,687
<b>Total income</b>		<b>1,834,214</b>	<b>2,504,418</b>	<b>4,338,632</b>	<b>1,867,428</b>	<b>1,911,755</b>	<b>3,779,183</b>
<b>Expenditure on:</b>							
Activities:	6						
Grants and Fundraising		104,042	389,377	493,419	67,303	360,226	427,529
Membership and Engagement		392,376	173,218	565,594	347,694	149,768	497,462
Legal		305,788	410,929	716,717	251,295	334,075	585,370
Policy and campaigns		248,131	573,202	821,333	315,955	516,963	832,918
Communications		473,431	402,494	875,925	507,107	321,467	828,574
Advice and information		143,141	163,461	306,602	149,249	152,792	302,041
Liberty Investigates		232,981	113,640	346,621	257,735	50,813	308,548
<b>Total expenditure</b>		<b>1,899,890</b>	<b>2,226,321</b>	<b>4,126,211</b>	<b>1,896,338</b>	<b>1,886,104</b>	<b>3,782,442</b>
<b>Net income/(expenditure) before taxation</b>		<b>(65,676)</b>	<b>278,097</b>	<b>212,421</b>	<b>(28,910)</b>	<b>25,651</b>	<b>(3,259)</b>
Taxation	16	(9,852)	-	(9,852)	(7,540)	-	(7,540)
<b>Net movement in funds</b>		<b>(75,528)</b>	<b>278,097</b>	<b>202,569</b>	<b>(36,450)</b>	<b>25,651</b>	<b>(10,799)</b>
<b>Reconciliation of funds:</b>							
Total Funds brought forward	17	2,416,406	138,424	2,554,830	2,452,856	112,773	2,565,629
Net movement in funds		(75,528)	278,097	202,569	(36,450)	25,651	(10,799)
<b>Total funds carried forward</b>		<b>2,340,878</b>	<b>416,521</b>	<b>2,757,399</b>	<b>2,416,406</b>	<b>138,424</b>	<b>2,554,830</b>

The Statement of Financial Activities includes all gains and losses recognised in the year. All income and expenditure derive from continuing activities.

The notes on pages 23 to 40 form an integral part of these financial statements.

**Balance Sheet**  
**As at 31 December 2024**

	<b>Note</b>	<b>2024</b> <b>£</b>	<b>2024</b> <b>£</b>	<b>2023</b> <b>£</b>	<b>2023</b> <b>£</b>
<b>Fixed assets</b>					
Tangible assets	12		<u>114,588</u>		<u>157,927</u>
<b>Current assets</b>					
Debtors: Amounts falling due within one year	13	1,297,810		581,730	
Cash and cash equivalents at bank and in hand	21	<u>1,643,275</u>		<u>2,419,607</u>	
		2,941,085		3,001,337	
Creditors: Amounts falling due within one year	15	<u>(298,274)</u>		<u>(604,434)</u>	
<b>Net current assets</b>			<u>2,642,811</u>		<u>2,396,903</u>
<b>Total net assets</b>			<u>2,757,399</u>		<u>2,554,830</u>
<b>Funds</b>					
Restricted Funds	17		416,521		138,424
Unrestricted Funds	17		<u>2,340,878</u>		<u>2,416,406</u>
<b>Total Funds</b>			<u>2,757,399</u>		<u>2,554,830</u>

The directors acknowledge their responsibilities for complying with the requirements of the Companies Act with respect to accounting records and the preparation of accounts. These accounts have been prepared in accordance with the provisions applicable to small companies subject to the small companies regime and in accordance with FRS102 SORP.

The financial statements set out on pages 20 to 22 were approved by the Directors and signed on their behalf by:

**Ruth Breddal**

Interim Chair

Date : 23 April 2025

The notes on pages 23 to 40 form an integral part of these financial statements.

**Statement of Cash Flows**  
**For the year ended 31 December 2024**

		<b>2024</b>	<b>2023</b>
	<b>Note</b>	<b>£</b>	<b>£</b>
<b>Cash flows from operating activities</b>			
Net cash used in operating activities	20	<u>(801,544)</u>	<u>375,290</u>
<b>Cash flows from investing activities</b>			
Investment income	5	51,853	39,687
Purchase of tangible fixed assets	12	<u>(26,641)</u>	<u>(19,438)</u>
<b>Net cash provided by/(used in) investing activities</b>		<u>25,212</u>	<u>20,249</u>
<b>Change in cash and cash equivalents in the year</b>	22	<b>(776,332)</b>	395,539
Cash and cash equivalents at the beginning of the year		<b>2,419,607</b>	2,024,068
<b>Cash and cash equivalents at the end of the year</b>	22	<u><b>1,643,275</b></u>	<u>2,419,607</u>

The notes on pages 23 to 40 form an integral part of these financial statements.



## 1. Statutory information

The National Council for Civil Liberties is a private company limited by guarantee and is incorporated in England and Wales with company number 03260840.

The registered office address is Liberty House, 26-30 Strutton Ground, London, SW1P 2HR.

## 2. Accounting policies

### 2.1. Basis of preparation

Although the Company is not a charity, in many respects its activities are similar to one and therefore in preparing the financial statements to provide a true and fair view, the Executive Committee has had regard to the Financial Reporting Standard applicable in the UK and Republic of Ireland (FRS 102) - (Charities SORP FRS 102), The Financial Reporting Standard applicable in the UK and Republic of Ireland (FRS 102) and the Companies Act 2006

Assets and liabilities are initially recognised at historical cost or transaction value unless otherwise stated in the relevant accounting policy or note.

In applying the financial reporting framework, the Executive Committee have made a number of subjective judgements, for example in respect of significant accounting estimates. Estimates and judgements are continually evaluated and are based on historical experience and other factors, including expectations of future events that are believed to be reasonable under the circumstances. The nature of the estimation means the actual outcomes could differ from those estimates. Any significant estimates and judgements affecting these financial statements are detailed within the relevant accounting policy below.

The Company meets the definition of a public benefit entity under FRS 102.

### 2.2. Going Concern

The Executive Committee have considered the level of funds held and the expected level of income and expenditure for at least 12 months from approving these financial statements. The Executive Committee consider that there are no material uncertainties about the Company's ability to continue as a going concern.

The Executive Committee do not consider that there are any sources of estimation uncertainty at the reporting date that have a significant risk of causing a material adjustment to the carrying amounts of assets and liabilities within the next reporting period.

### 2.3. Income

Income, including donations, is recognised when the Company has entitlement to the funds, any performance conditions attached to the income have been met, it is probable that the income will be received and that the amount can be measured reliably. All income is stated net of VAT where applicable.

Income from grants is recognised when the Company has entitlement to the funds, any performance conditions attached to the grants have been met, it is probable that the income will be received, and the amount can be measured reliably and is not deferred. Where grants are received with an implicit or explicit restriction as to the timing of the activities funded, the income is recognised in accordance with that restriction

For legacies, entitlement is taken as the earlier of the date on which either: the Company is aware that probate has been granted, the estate has been finalised, and notification has been made by the executor(s) to the Company that a distribution will be made, or when a distribution is received from the estate. Receipt of a legacy, in whole or in part, is only considered probable when the amount can be measured reliably, and the Company has been notified of the executor's intention to make a distribution. Where the Company is aware of the granting of probate, and the criteria for income recognition have not been met, then the legacy is treated as a contingent asset and disclosed if material.

Income received in advance of the provision of a specified service is deferred until the criteria for income recognition are met.

Legal income is recognised at the earlier of the date at which it is received or the date at which the amount to be received can be reasonably estimated and its receipt is probable. This means in practice that legal income is recognised as it is earned using a 'work-in progress' estimate.

Membership subscriptions are recognised on a cash received basis.

Interest on funds held on deposit is included when receivable and the amount can be measured reliably by the Company; this is normally upon notification of the interest paid or payable by the bank.

### 2.4. Donated goods, services and facilities

Donated professional services and donated facilities are recognised as income when the Company has control over the item or received the service, any conditions associated with the donation have been met, the receipt of economic benefit from the use by the Company of the item is probable and that economic benefit can be measured reliably. In accordance with the Charities SORP (FRS 102), volunteer time is not recognised.

Donated professional services were included in 2024, however a comparable amount was not available for 2023. The 2023 value is not believed to be material.

On receipt, donated gifts, professional services and donated facilities are recognised on the basis of the value of the gift to the Company which is the amount the Company would have been willing to pay to obtain services or facilities of equivalent economic benefit on the open market; a corresponding amount is then recognised in expenditure in the period of receipt.

## **2.5. Expenditure and Irrecoverable VAT**

Expenditure is recognised once there is a legal or constructive obligation to make a payment to a third party, it is probable that settlement will be required and the amount of the obligation can be measured reliably. Expenditure is classified under the following activity headings:

- Expenditure on raising funds
- Strategic Litigation
- Membership and fundraising
- Policy and Campaigns
- Communications
- Advice and Information
- Investigations

Irrecoverable VAT is charged as a cost against the activity for which the expenditure was incurred.

Governance costs are the costs associated with the governance arrangements of the organisation. These costs are associated with constitutional and statutory requirements and include any costs associated with the strategic management of the Company's activities.

## **2.6. Support costs**

Expenditure is allocated to the particular activity where the cost relates directly to that activity. Shared costs which contribute to move that one activity and support costs which are not attributable to a single activity are apportioned between those activities on a basis consistent with the use of resources. All support costs are allocated on the basis of staff time spent.

## **2.7. Taxation**

The company is classed as a not-for-profit campaigning organisation. The Company is currently liable to corporation tax on its investment income only.

## **2.8. Foreign Currencies**

Monetary assets and liabilities denominated in foreign currencies are translated into sterling at the rates of exchange ruling at the reporting date. Transactions in foreign currencies are translated into sterling at the rate ruling on the date of the transaction. Exchange gains and losses are recognized in the Statement of Financial Activities.

NOTES TO THE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2024

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**2.9. Tangible fixed assets and depreciation**

Items of equipment are capitalised where the purchase price exceeds £800. Depreciation costs are allocated to activities on the basis of the use of the related assets in those activities. Assets are reviewed for impairment if circumstances indicate their carrying value may exceed their net realisable value and value in use.

Depreciation is provided at rates calculated to write down the cost of each asset to its estimated residual value over its expected useful life which is typically between 5 and 8 years. Liberty holds a 7 year lease for its property which comes to an end in June 2026 and as such fixtures and fittings that form an integral and immoveable element of the premises are depreciated over the remaining part of the lease. The depreciation rates in use are as follows:

Leasehold premises	
Improvements	2-7 years
Computer equipment	5 years
Fixture and fittings	5-8 years

**2.10. Debtors**

Trade and other debtors are recognised at the settlement amount due after any trade discount offered. Prepayments are valued at the amount prepaid net of any trade discounts due.

**2.11. Cash and cash equivalents at bank and in hand**

Cash and cash equivalents at bank and in hand includes cash and short-term highly liquid investments with a short maturity of twelve months or less from the date of acquisition or opening of the deposit or similar account.

**2.12. Creditors and provisions**

Creditors and provisions are recognised where the Company has a present obligation resulting from a past event that will probably result in the transfer of funds to a third party and the amount due to settle the obligation can be measured or estimated reliably. Creditors and provisions are normally recognised at their settlement amount after allowing for any trade discounts due.

**2.13. Financial Instruments**

The Company only has financial assets and financial liabilities of a kind that qualify as basic financial instruments. Basic financial instruments are initially recognised at transaction value and subsequently measured at their settlement value

**2.14. Fund Accounting**

General funds are unrestricted funds which are available for use at the discretion of the Executive Committee in furtherance of the general objectives of the Company and which have not been designated for other purposes.

Restricted funds are to be used for specific purposes as laid down by the donor. Expenditure which meets these criteria is charged to the fund.

**2.15. Contingent assets**

A contingent asset arises where an event has taken place that gives the Company a possible asset whose existence will only be confirmed by the occurrence or otherwise of uncertain future events not wholly within its control.

Contingent assets are not recognised in the Balance Sheet but are disclosed in the Notes.

### 3. Income from donations and legacies

	Unrestricted Funds £	Restricted Funds £	Total 2024 £	Total 2023 £
Donations	2,292	5,900	8,192	5,043
Legacies	227,294	-	227,294	56,829
Donated Services - professional fees	35,955	-	35,955	-
<b>Total</b>	<b>265,541</b>	<b>5,900</b>	<b>271,441</b>	<b>61,872</b>

A comparative figure for donated services received in 2023 is not available.

### 4. Analysis of grants receivable

	Unrestricted Funds £	Restricted Funds £	Total 2024 £	Total 2023 £
The Civil Liberties Trust	-	2,320,329	2,320,329	1,742,141
Luminate	406,571	-	406,571	406,717
The Oak Foundation	215,000	-	215,000	215,000
Open Society Foundation	-	-	-	161,556
Legal Education Foundation	-	100,000	100,000	100,000
Paul Hamlyn Foundation	50,000	-	50,000	50,000
INCLO	-	44,716	44,716	35,958
Trust for London	25,000	-	25,000	25,000
Digital Freedom Fund	-	23,473	23,473	8,656
Unbound Philanthropy	18,750	-	18,750	51,584
Other grants	-	10,000	10,000	22,196
<b>Total</b>	<b>715,321</b>	<b>2,498,518</b>	<b>3,213,839</b>	<b>2,818,808</b>

The total grants receivable by Liberty differs from the grants payable shown in the accounts of The Civil Liberties Trust by £60,000 (2023: £Nil) due to a commitment made by the Civil Liberties Trust to funding in 2026 which will be recognised in Liberty in 2026.

### 5. Income from investments

	Unrestricted Funds £	Restricted Funds £	Total 2024 £	Total 2023 £
Bank interest receivable	51,853	-	51,853	39,687
<b>Total</b>	<b>51,853</b>	<b>-</b>	<b>51,853</b>	<b>39,687</b>

## 6. Resources Expended

	Direct Staff Costs £	Direct Costs £	Support Costs (note 7) £	Total 2024 £	Total 2023 £
<b>Costs of raising funds</b>					
Grants and Fundraising	251,088	42,727	199,604	<b>493,419</b>	427,529
<b>Total costs of raising funds</b>	<u>251,088</u>	<u>42,727</u>	<u>199,604</u>	<u><b>493,419</b></u>	<u>427,529</u>
<b>Activities</b>					
Membership and Engagement	232,770	145,187	187,637	<b>565,594</b>	497,462
Legal	377,095	76,355	263,267	<b>716,717</b>	585,370
Policy and campaigns	502,043	47,886	271,404	<b>821,333</b>	832,918
Communications	449,968	118,880	307,077	<b>875,925</b>	828,574
Advice and information	184,885	2,050	119,667	<b>306,602</b>	302,041
Liberty Investigates	180,982	22,039	143,600	<b>346,621</b>	308,548
<b>Total costs of activities</b>	<u>1,927,743</u>	<u>412,397</u>	<u>1,292,652</u>	<u><b>3,632,792</b></u>	<u>3,354,913</u>
<b>Total Resources Expended</b>	<u><u>2,178,831</u></u>	<u><u>455,124</u></u>	<u><u>1,492,256</u></u>	<u><u><b>4,126,211</b></u></u>	<u><u>3,782,442</u></u>

## 6. Resources Expended (continued) - prior year

	Direct Staff Costs	Direct Costs	Support Costs (note 7)	Total 2023
	£	£	£	£
<b>Costs of raising funds</b>				
Grants and Fundraising	267,320	17,129	143,080	427,529
<b>Total costs of raising funds</b>	<u>267,320</u>	<u>17,129</u>	<u>143,080</u>	<u>427,529</u>
<b>Charitable Activities</b>				
Membership and Engagement	222,344	169,091	106,027	497,462
Legal	375,434	35,563	174,373	585,370
Policy and campaigns	505,815	53,706	273,397	832,918
Communications	486,509	96,073	245,992	828,574
Advice and information	186,142	6,916	108,983	302,041
Liberty Investigates	181,201	21,477	105,870	308,548
<b>Total costs of charitable activities</b>	<u>1,957,445</u>	<u>382,826</u>	<u>1,014,642</u>	<u>3,354,913</u>
<b>Total Resources Expended</b>	<u><u>2,224,765</u></u>	<u><u>399,955</u></u>	<u><u>1,157,722</u></u>	<u><u>3,782,442</u></u>

## 7. Analysis of support costs

	<b>Total 2024 £</b>	<b>Total 2023 £</b>
Staff Costs	<b>757,060</b>	513,525
Depreciation	<b>69,980</b>	84,003
Premises costs	<b>190,952</b>	158,544
Office costs	<b>302,149</b>	290,849
Legal costs and specialist advice	<b>63,283</b>	14,248
Legal costs and specialist advice related to restructure	<b>46,641</b>	-
Governance costs (see note 8)	<b>62,191</b>	96,553
<b>Total</b>	<u><u><b>1,492,256</b></u></u>	<u><u>1,157,722</u></u>



8. Governance Costs	Total 2024 £	Total 2023 £
Auditor's remuneration - audit of the financial statements (including irrecoverable VAT)	18,232	16,552
Auditor's remuneration - preparation of the financial statements (including irrecoverable VAT)	-	3,269
Auditor's remuneration - other costs (including irrecoverable VAT)	1,077	975
AGM	9,262	7,344
Council and Executive Committee costs	6,608	5,452
Legal and other professional fees	27,012	62,961
<b>Total</b>	<b>62,191</b>	<b>96,553</b>

## 9. Staff costs

	2024 £	2023 £
Wages and salaries	<b>2,543,381</b>	2,363,861
Social security costs	<b>261,282</b>	261,909
Pension costs	<b>131,228</b>	112,520
	<u><b>2,935,891</b></u>	<u><b>2,738,290</b></u>

Included in the staff costs above are termination benefits, including pay in lieu of notice, of £334,198 (2023: £37,052). There were no outstanding commitments at the year end.

The average number of persons employed by the Company during the year was as follows:

	2024 No.	2023 No.
Employees	<u><b>42</b></u>	<u><b>48</b></u>

The number of employees whose employee benefits (excluding employer pension costs) exceeded £60,000 was:

	2024 No.	2023 No.
In the band £60,001-£70,000	<b>2</b>	6
In the band £70,001-£80,000	<b>1</b>	-
In the band £80,001-£90,000	<b>1</b>	-
In the band £90,001-£100,000	-	2
In the band £110,001-£120,000	<b>1</b>	-

In 2024 the Company considers the Executive Committee, the Director, Director of External Relations (previously Advocacy Director), Communications Director (until May 2024), Head of People and Culture (until October 2024) and the Finance & Operations Director to be its Key Management Personnel. In 2023 the company considered the Executive Committee, the Director, the Advocacy Director, Communications Director, the Development Director (until October 2023), the Head of People and Culture (from July 23) and the Finance & Operations Director to be its Key Management Personnel

The total amount of employee benefits (including gross pay, employers national insurance contributions and employers pension contributions) received by Key Management Personnel was £443,589 (2023 - £574,371).

The disclosures relating to employees benefits that exceeded £60,000 and Key Management Personnel do not include termination benefits.

## 10. Pension commitments

The Company operates a defined contribution pension plan for its employees. The amount recognised as an expense in the period was £131,228 (2023 - £112,520). At the year end, there were outstanding contributions of £20,000 included in Other creditors (2023 - £Nil).

## 11. Executive Committee remuneration and expenses

During the year, no member of the Executive Committee received any remuneration or other benefits (2023 - £Nil). During the year ended 31 December 2024, expenses totalling £4,240 were reimbursed or paid directly to 5 Executive Committee Members for travel and subsistence costs (2023 - £4,845 to 8 Executive Committee Members).

## 12. Tangible fixed assets

	Leasehold Premises Improvements	Computer Equipment	Fixtures and fittings	Total
	£	£	£	£
Cost				
As at 1 January 2024	134,370	481,474	60,865	676,709
Additions	7,950	18,691	-	26,641
Disposals	-	(12,292)	-	(12,292)
As at 31 December 2024	142,320	487,873	60,865	691,058
Depreciation				
As at 1 January 2024	33,482	432,435	52,865	518,782
Charge for the year	39,356	28,624	2,000	69,980
On disposals	-	(12,292)	-	(12,292)
As at 31 December 2024	72,838	448,767	54,865	576,470
Net Book Value				
As at 31 December 2024	69,482	39,106	6,000	114,588
As at 31 December 2023	100,888	49,039	8,000	157,927

### 13. Debtors

	Total 2024 £	Total 2023 £
<b>Due during one year</b>		
Trade debtors	-	90
Amounts receivable from Civil Liberties Trust	881,342	454,918
Other debtors	270,977	20,006
Prepayments and accrued income	145,491	106,716
<b>Total</b>	<b>1,297,810</b>	<b>581,730</b>

### 14. Clients' bank account

The Company maintains a designated client bank account to hold funds on behalf of clients for legal cases. At the year-end, the balance in the account was £32,500 (2023 - £8,717). Since the funds do not belong to the Company, the balance and associated transactions have not been recognised in these financial statements.

**15. Creditors: Amounts falling due within one year**

	<b>Total 2024 £</b>	Total 2023 £
Trade creditors	<b>61,323</b>	40,397
Corporation tax	<b>9,852</b>	7,540
Other taxation and social security	<b>50,324</b>	68,776
Other creditors	<b>28,410</b>	30,750
Accruals and deferred income	<b>148,365</b>	456,971
<b>Total</b>	<b><u>298,274</u></b>	<u>604,434</u>

	<b>Total 2024 £</b>	Total 2023 £
<b>Deferred income</b>		
Deferred income at 1 January	<b>406,571</b>	168,140
Resources deferred during the year	<b>71,250</b>	406,571
Amounts released from previous years	<b>(406,571)</b>	(168,140)
<b>Deferred income at 31 December</b>	<b><u>71,250</u></b>	<u>406,571</u>

Deferred income relates to grant income received that relates to the next financial year in accordance with the accounting policy on income. See Note 2.3.

## 16. Corporation tax

The Company is only liable for corporation tax on its bank interest income and the tax charge for the year was £9,852 (2023 - £7,540). From 1 April 2023, the UK corporation tax main rate increased to 25% for profits over £250,000, while a 19% small profits rate applies to profits under £50,000. Profits between £50,000 and £250,000 are taxed at 25% with marginal relief, resulting in an effective rate between 19% and 25%. For the year ended 31 December 2023, profits before 31 March were taxed at 19%, while those after 1 April faced a higher marginal rate, making the effective tax rate higher than the prior year.

<b>17. Statement of funds</b>	Balance at 1 January 2024	Income	Expenditure	Transfers in/out	Balance at 31 December 2024
<b>Statement of funds- current year</b>	£	£	£	£	£
<b>Unrestricted funds</b>					
<b>Designated funds</b>					
Fixed Asset reserve	157,927	-	(69,980)	26,641	114,588
	<u>157,927</u>	<u>-</u>	<u>(69,980)</u>	<u>26,641</u>	<u>114,588</u>
<b>General funds</b>					
General fund	2,258,479	1,834,214	(1,839,762)	(26,641)	2,226,290
<b>Total Unrestricted funds</b>	<u>2,416,406</u>	<u>1,834,214</u>	<u>(1,909,742)</u>	<u>-</u>	<u>2,340,878</u>
<b>Restricted funds</b>					
<b>Other charitable campaigning work</b>					
The Civil Liberties Trust	138,424	2,320,329	(2,052,232)	-	406,521
Legal Education Foundation	-	100,000	(100,000)	-	-
INCLO	-	44,716	(44,716)	-	-
Digital Freedom Fund	-	23,473	(23,473)	-	-
Other funding sources	-	15,900	(5,900)	-	10,000
	<u>138,424</u>	<u>2,504,418</u>	<u>(2,226,321)</u>	<u>-</u>	<u>416,521</u>
<b>Total funds</b>	<u><u>2,554,830</u></u>	<u><u>4,338,632</u></u>	<u><u>(4,136,063)</u></u>	<u><u>-</u></u>	<u><u>2,757,399</u></u>

## 17. Statement of funds (continued)

### Statement of funds-prior year

	Balance at 1 January 2023 £	Income £	Expenditure £	Transfers in/out £	Balance at 31 December 2023 £
<b>Unrestricted funds</b>					
<b>Designated funds</b>					
Fixed Asset reserve	223,329	-	(84,003)	18,601	157,927
	<u>223,329</u>	<u>-</u>	<u>(84,003)</u>	<u>18,601</u>	<u>157,927</u>
<b>General funds</b>					
General fund	2,229,527	1,867,428	(1,819,875)	(18,601)	2,258,479
<b>Total Unrestricted funds</b>	<u>2,452,856</u>	<u>1,867,428</u>	<u>(1,903,878)</u>	<u>0</u>	<u>2,416,406</u>
<b>Restricted funds</b>					
<b>Other charitable campaigning work</b>					
The Civil Liberties Trust	112,773	1,742,141	(1,716,490)	-	138,424
Legal Education Foundation	-	100,000	(100,000)	-	-
INCLO	-	35,958	(35,958)	-	-
Trust for London	-	25,000	(25,000)	-	-
Other funding sources funder z	-	8,656	(8,656)	-	-
	<u>112,773</u>	<u>1,911,755</u>	<u>(1,886,104)</u>	<u>0</u>	<u>138,424</u>
<b>Total funds</b>	<u><u>2,565,629</u></u>	<u><u>3,779,183</u></u>	<u><u>(3,789,982)</u></u>	<u><u>0</u></u>	<u><u>2,554,830</u></u>

## 17. Statement of funds (continued)

### Fixed Asset Reserve

The Executive Committee has established the fixed asset reserve to reflect funds which are tied up in tangible fixed assets and therefore not available for other purposes. A transfer was made between the unrestricted general funds and the fixed asset reserve to represent fixed asset additions purchased and any gains/losses on disposal of fixed assets using general funds.

### Restricted Fund

Restricted funds reflect grants, donations or fundraising activities which contained restrictions on how they could be expended.

The Civil Liberties Trust makes a number of separate grants to Liberty's charitable activities, and the majority of these are towards core campaigning and associated work. Restricted funds carried forward at year end included a strategic litigation fund of £300,000, £60,000 towards the development and expansion of income generation, £30,620 secured through crowdfunding towards Liberty's Legal Information Service and £15,901 to fund professional legal training.

The Legal Education Foundation provided £100,000 of grant funding towards protecting the Human Rights Act and 'what comes next', The International Network of Civil Liberties Organisations (INCLO) provided £44,716 of dedicated funding towards Liberty's work on both protest rights and surveillance, and the Digital Freedom Fund granted further funds towards Liberty's work on the Investigatory Powers Act and surveillance. Other restricted funding consisted of several grants and donations, with £10,000 carried forward against our collaborative work with frontline and community organisations.

## 18. Analysis of net assets between funds

### Analysis of net assets between funds- current year

	Unrestricted funds 2024 £	Restricted funds 2024 £	Total funds 2024 £
Tangible fixed assets	114,588	-	114,588
Current assets	2,524,564	416,521	2,941,085
Creditors due within one year	(298,274)	-	(298,274)
<b>Total</b>	<b>2,340,878</b>	<b>416,521</b>	<b>2,757,399</b>



## 18. Analysis of net assets between funds (continued)

### Analysis of net assets between funds- prior year

	Unrestricted funds 2023 £	Restricted funds 2023 £	Total funds 2023 £
Tangible fixed assets	157,927	-	157,927
Current assets	2,846,913	154,424	3,001,337
Creditors due within one year	(588,434)	(16,000)	(604,434)
<b>Total</b>	<u>2,416,406</u>	<u>138,424</u>	<u>2,554,830</u>

## 19. The Civil Liberties Trust

The Company is grant-funded by a registered charity called The Civil Liberties Trust ('CLT' or 'the Charity') and at the year-end there was an amount receivable of £881,342 (2023 - £454,918) from the Charity (see Note 13). The Company can appoint a minority of Trustees of the Charity, which in turn can appoint a representative to the Executive Committee. Executive Committee members that also served as Trustees of the CLT during the year were Letitia Andrewartha, Aidan Geary and Patricia Tuitt.

CLT owns the freehold property and charges rent to the National Council for Civil Liberties under a rental agreement. In May 2019, the Charity Commission authorised CLT to lease this property to the National Council for Civil Liberties for a term of seven years at an annual peppercorn rent of £1.

During the year, the National Council for Civil Liberties charged CLT £Nil (2023 - £Nil) for services performed by its employees on behalf of CLT. The Civil Liberties Trust has no employees and relies on the National Council for Civil Liberties staff for fundraising and secretarial support. The estimated value of donated services provided to the Civil Liberties Trust for the period was £117,300 (2023 - £113,810).

## 20. Reconciliation of net movement in funds to net cash flow from operating activities

	Note	2024 £	2023 £
Net income/expenditure for the year (as per Statement of Financial Activities)		<u>202,569</u>	<u>(10,799)</u>
<b>Adjustments for:</b>			
Depreciation charges	12	69,980	84,003
Investment income	5	(51,853)	(39,687)
Loss on sale of fixed assets		-	837
(Increase)/Decrease in debtors	13	(716,080)	227,031
Increase/(decrease) in creditors	15	(306,160)	113,905
<b>Net cash provided by operating activities</b>		<u><u>(801,544)</u></u>	<u><u>375,290</u></u>

## 21. Analysis of cash and cash equivalents

	2024 £	2023 £
Cash and cash equivalents at bank and in hand in hand	1,643,275	2,419,607
<b>Total cash and cash equivalents</b>	<u><u>1,643,275</u></u>	<u><u>2,419,607</u></u>

## 22. Analysis of changes in net debt

	At 1 January 2024 £	Cash flows £	At 31 December 2024 £
Cash and cash equivalents at bank and in hand	2,419,607	(776,332)	1,643,275
<b>Total</b>	<u><u>2,419,607</u></u>	<u><u>(776,332)</u></u>	<u><u>1,643,275</u></u>

## 23. Related party transactions

During the period ending 31 December 2024, the sum of £6,600 was paid (2023 - £1,650) to Geordiedav Productions Ltd, a company of which Executive Committee member David Taylor is a Director, for the provision of line management to the Liberty Investigates team. At 31 December 2024 £550 (2023 - £550) was due but not yet paid to Geordiedav Productions Ltd, and is included within creditors due within one year.

Other than the above and Key Management Personnel and Executive Committee remuneration disclosed in Notes 9 and 11, there have been no related party transactions during the year.