

The Howard League for Penal Reform

(Incorporating the Howard Centre for Penology)

Report and financial statements

For the period ended 30 June 2024

(Incorporating the Howard Centre for Penology)

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Reference and administrative information

Company Number: 898514 registered in the United Kingdom

Charity Number: 251926 registered in England and Wales

Registered office and operational address: G01 Suite, 46 Bedford Row, London WC1R 4LR

Board members: Board members, who are also directors under company law and the charity trustees as defined by section 177 of the Charities Act 2011, who served during the period and up to the date of this report were as follows:

Nader Alaghband (from April 2024)

Charles Bland

Professor Ben Bradford

Adrian Briggs (until March 2024)

Dr Zubaida Haque

Sally Lewis, Honorary Treasurer (until March 2024)

Christina Line (from April 2024)

Gerry Marshall (until October 2023)

Thalia Maragh (from April 2024)

Alexandra Marks CBE

Professor Fergus McNeill, Chair

Andrew Morris (from April 2024)

John Tress, Honorary Treasurer (from March 2024)

Tomas Thurogood-Hyde

Ian West (from April 2024 to July 2024)

Lord Macdonald KC, Honorary President

Key management personnel

Andrea Coomber KC (Hon.)

Euginia Lolomari

Andrew Neilson

Anita Dockley

Gemma Abbott

Chief Executive

Director of Finance and Operations

Director of Campaigns

Director of Research (Until Nov 2023)

Legal Director

Staff

Lee Brown

Dr Helen Churcher

Poppy Cubbage

Amy Dolley

Steve Gallant

Dr Tim Kerr

Noor Khan

Katie Logue

Sophie Lumsden

Sinead MacCann

Adriana Matrigiani

Rob Preece

Operations Co-ordinator

Research and Project Officer

Legal and Projects Support Officer (until September 2024)

Policy and Public Affairs Officer

Development Support Officer

Membership Officer

Press and Public Affairs Officer

Communications Coordinator

Development Manager

Managing Solicitor

Solicitor

Communications Manager

Ana Rosenthal	Caseworker (Until January 2024)
Claire Salama	Managing Solicitor
Anna Spencer	Solicitor
Ayomide Sotubo	Policy Officer
Ryan Walker	Development Support Officer
Maya Ward-Lowery	Legal and Projects Support Officer

Finance, Audit and Risk Committee members

Ben Elger
Sally Lewis (until March 2024)
Christina Line (from July 2024)
Lucy Robinson
Delbert Sandiford
Tomas Thurogood-Hyde (from July 2024)
John Tress (Honorary Treasurer from March 2024)

Howard Journal of Crime and Justice

Professor Ian Loader, University of Oxford	Editor-in-Chief
Professor Rachel Condry, University of Oxford	Editor
Dr David Green, John Jay College, New York, USA	Editor
Professor Elena Larrauri, Universitat Pompeu Fabra, Barcelona, Spain	Editor
Professor Simon Mackenzie, Victoria University of Wellington, New Zealand	Editor
Anita Dockley, Howard League for Penal Reform	Managing Editor (until Nov 2023)
Dr Mary Rogan, Trinity College Dublin, University of Dublin, Ireland	Book Review Editor
Brenda McWilliams	Publishing Editor

Bankers

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Auditor

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Trustees' annual report

The trustees present their report and the audited financial statements for the 13 month period ended 30 June 2024. The substantive narrative of this report covers the period 1 October 2023 to 30 September 2024; with the update on financial position in respect of going concern and reserves to the end of November 2024.

Reference and administrative information, set out on pages 1 and 2, forms part of this report. The financial statements comply with current statutory requirements, the memorandum, articles of association, and the Statement of Recommended Practice - Accounting and Reporting by Charities: SORP applicable to charities preparing their accounts in accordance with FRS 102.

An introduction from our Chair of the Howard League Board, Fergus McNeill

This has been an extraordinary year for criminal justice in England and Wales. These pages cover a period that started with the fallout from an alleged escape from Wandsworth prison and ended with the onset of an emergency early release scheme to address an acute overcrowding crisis behind bars. In between, there was a general election and a change of government, resulting in the appointment of a new prisons minister – the eighth person to hold the post since the beginning of 2021.

Throughout the year, the prison system has been a constant presence in the news headlines, as more people have become aware of the deplorable conditions and daily injustices that exist within jails asked to do too much, with too little, for too long. Deepening problems, which were largely ignored for decades by all but the most dedicated observers, have moved to the top of the political agenda. In response, the Howard League has stepped forward to make the case for building a more humane and effective response to crime that provides justice to all and helps to make our society more safe.

Drawing on our legal and policy work, and the many letters we receive from our members in prison, our briefing for the new government, *Grasping the nettle*, offered a range of policy options that could deliver a lasting solution to the capacity problem. Our paper, *Sentence inflation: a judicial critique*, signed by five of the most senior former judges in England and Wales, explored how the imposition of ever longer sentences has contributed to the crisis and made suggestions for change that a forthcoming independent review of sentencing might consider.

Our voice is being heard. The government has recognised that we cannot build our way out of the crisis, and two of our proposals from *Grasping the nettle* – the use of Home Detention Curfew as a meaningful alternative to prison and greater use of executive release – are being taken forward. A damp, dark and dilapidated segregation unit in Bedford prison, described as a “disgrace” by inspectors, was closed and replaced after our sustained pressure. Our campaign to end the scandal of imprisonment for public protection (IPP) has made progress, with legislative changes meaning that some people serving the sentence will have their licences automatically terminated at last.

But there is much more to do. The IPP reforms, while welcome, do little to help almost 3,000 people who are still in prison serving the sentence. The number of people in prison on remand has reached a record high. Children are being held in cells for more than 22 hours per day, with reduced opportunities for education and interaction with others. Five more jails – Bedford, Wandsworth, Rochester, Manchester and Winchester – have been made the subject of urgent notifications after inspectors discovered terrible conditions.

This is my sixth, and final, annual review as Chair. I would like to thank everyone who has supported our cause during my time in the role. We've been through a time of change, and stand ready to continue playing our part in changing our broken justice system. I hope that you will consider what role you might play in the work that lies ahead. As we do not receive any funding from government, the generosity of our members helps us to remain an independent voice for change.

Thank you.

Professor Fergus McNeill

Chair

Objectives and activities

The Howard League for Penal Reform is the oldest penal reform charity in the world. We were established in 1866 as the Howard Association, named after John Howard, the first English prison reformer. In 1921, we merged with the Penal Reform League, forming the Howard League for Penal Reform.

In July 2023, our Board agreed a new strategy and theory of change that will take us to 2028.

Over the coming five-year period, we will focus on:

- Public-facing campaigning to challenge the reliance on prison as the answer to crime, both in general and for particular crimes/cohorts of people in prison.
- Working with politicians across parties to build their understanding of the evidence base and of the economic, human and social costs of prison. We will encourage political courage across parties to pursue policy that works.
- Blending strategic litigation with policy work and communications to highlight the problems with the overuse of prison and to challenge injustices and human rights violations in prison.
- Working with judges, parole board members, and the justice professions to bring a better understanding of the impact of sentencing, release and recall decisions and the realities of prison.
- Improving the quality of public information and dialogue around punishment, including by building a community of people who are interested in and engaged with prisons, people in prison, prison leavers and their families. We will mobilise this community to advocate for better policy.

Across all our work we will address racial disparity and include consideration of experiences of women, children and young people and other vulnerable people in the system.

Our thematic priorities include:

- Campaigning on the failure of prison as the answer to crime, generally as well as for particular offence-types and cohorts of people in prison.
- A resolution to the ongoing incarceration and recall of people serving the abolished IPP sentence.
- The injustices wrought by the treatment of secondary parties in joint enterprise murder cases, particularly on people from racialised minorities.
- The overuse of remand and experiences of people on remand.

- The challenges around sentencing, including incarceration for non-violent, lower-level offending, and combating sentence inflation across offence-types, but particularly for serious offences.

Our theory of change is based on the understanding that reducing the overuse of prison and improving the lives of people in prison will require a multifaceted approach. This includes public campaigning, policy advocacy and strategic litigation. Through these activities, we aim to influence public attitudes, enhance political understanding, build accountability and ultimately reform the criminal justice system to deliver a fairer and more effective and less harmful criminal justice system.

Values

The Howard League's Cultural Compass underpin our approach to our work, to each other and to those we work with. Our key values are excellence, learning, accountability, integrity, collaboration, and courage. We regularly reflect on these behaviours and mindsets, ensuring that our values are alive in our daily work.

We are an anti-racist and an anti-discriminatory organisation. We invest in building an inclusive organisation with diverse members, staff and leadership. We ensure that our staff are equipped to challenge racism and discrimination in all its forms, wherever they see or experience it.

Achievements and performance

The charity's main activities across 2023-2024 are described below, according to the key priorities in our strategy.

Key to our success across the year has been building ever more effective cross-team working within the Howard League, with our lawyers, communications and policy people working, with the support of research, towards common organisational goals.

Campaigning – Lifting the lid

At the centre of the Howard League's mission is putting the case for fewer people in prison. To this end, we are consistent in our messaging, to our members and supporters, to journalists and to the public, that sending more people to prison for longer carries significant human and financial costs, and that public money would better be spent investing in housing, education and health services that are proven to cut crime.

We are in the process for applying for dedicated funding for a large campaign on the harms of prison but pending this we have spent much of the past year consolidating key messages and building relationships to better communicate about the impact of prisons. With an increasing focus on prisons, driven through the prison capacity crisis and ever more critical reports of the Chief Inspector of Prisons, our ability to speak to the public about prisons has increased.

We have enjoyed significant reach with the media and press and have spent a substantial amount of time building the capacity of journalists and commentators interested in our issues. This has seen an expansion in both 'reactive' stories about prison, but also longer form journalism, including:

- In November of last year, we appeared on Channel 4 News, interviewed by Jackie Long alongside Prison Officers Association's Mark Fairhurst on the use of PAVA spray in the youth estate.

- In July of this year, we had extensive coverage following Keir Starmer's first press conference and the appointment of James Timpson. This included Chief Executive Andrea Coomber appearing on Times Radio, ITV News, and LBC, and Campaigns Director Andrew Neilson appearing on BBC Politics Live, Sky News, BBC Wales Breakfast, BBC3CR, and BBC Radio Wales; as well as press coverage by PA Media, the Big Issue and the Observer.
- In September, we published the sentencing paper which garnered write ups in the Times, the Financial Times, the Guardian, Russell Webster, the Independent, and the Law Society Gazette, as well as mentions in the Telegraph twice, PA Media twice, and the Guardian. We also had significant broadcast coverage, with Lord Thomas interviewed by Sky News, Times Radio, BBC Radio 4 and 5 News; Lord Phillips on Channel 4; and Andrea on BBC The Context, and LBC.

At the same time, we have launched two issue-based campaigns. The first in response to the Chief Inspector's report of Wetherby Young Offenders Institution (YOI), where, on two consecutive evenings, a teenaged girl was stripped naked by teams of male officers in an effort to remove clothing that she might use to ligature. Since the closure of Rainsbrook STC in late 2021, the Howard League has raised concern about the safety of the small numbers of girls in the youth estate, and particularly around the failure to have a plan for the future of girls in the estate. This campaign received a good amount of attention, running alongside a threat of litigation from our legal team – which was scuppered on the day of our anticipated filing by the announcement of the general election. Our petition secured 2,183 signatures, and received media attention, as well as engaging the interest and concern of ministers.

Later in the year we launched a pre-emptive campaign about the anticipated roll out of PAVA spray in the youth estate. As part of that we created a dedicated page on the website explaining our concerns, and this has given rise to a series of 'public explainers' on our strategic priorities and other key issues. We have seen a large number of journalists, politicians and practitioners sharing our public explainer pages on prison overcrowding, sentence inflation, and PAVA. We are in the process of finalising several other explainers to be published in the coming months.

Addressing the IPP crisis

The ongoing injustice of those people sentenced under the now abolished IPP (and DPP) sentence is a priority for the Howard League. There are two key aspects. First, the fact that over 1,100 IPPs in custody are over tariff – 700 more than 10 years over tariff – and remain unreleased by the Parole Board. The Parole Board processes are slow and people serving the IPP sentence, and indeed those professionals who support their release, often feel that the high threshold for release established in law is impossible for many IPPs to meet in the absence of opportunities in custody and given their psychological profile (which the nature of the IPP sentence arguably contributes to). The second is that many of those who are released are being recalled to prison, often multiple times, for administrative breaches of licence. This group then need to be re-released by the Parole Board, often waiting years for the opportunity to put their case. At the time of writing, recalled IPPs represent the majority of the IPP cohort in prison. Until recently IPPs have had to wait ten years in the community before applying to have their licence terminated, thereby ending the possibility of, and for some the cycle of, recall to prison and release.

Dealing with the IPP crisis is a new priority for the Howard League, though we have always expressed our concern about its operation. Back in 2021 we worked with members of the House of Lords to draft amendments to the Police, Crime, Sentencing, and Courts Bill, proposing that the period to be served on licence before termination be cut to five years. Since 2022, we have developed a close relationship

with UNGRIPP, the leading group of family members of IPPs lobbying for change, and we have received countless letters from our members in prison highlighting the injustices of sentence. Often these letters are from those serving an IPP sentence, very often they are from others highlighting the damage that they witness from others in prison.

In the last year, addressing IPP sentences has taken centre stage in our work. Our Chief Executive, Andrea Coomber, and Managing Solicitor, Claire Salama, sit on the HMPPS IPP Expert Challenge Group, which meets regularly with those who are responsible for the care of IPP prisoners, the Parole Board, psychological experts and civil society, to consider progress for those serving the IPP sentence. We have consistently put the case for better data collection and data sharing about IPP prisoners and strengthened communication with those serving the sentence directly.

With others, we successfully lobbied the Secretary of State for Justice in the last Conservative government on the need to reduce the licence period. We welcomed the changes to IPP licences that came into effect with the Victims and Prisoners Act which included: a reduction of time at which IPPs could have their licence reviewed by the Parole Board from ten years down to three years; the addition of automatic termination after a further two years on licence for those who do not have their licence terminated by the Parole Board; a change to the Parole Board test for presumption of termination and a power of the SSJ to grant executive release to IPPs, as well as a power to disapply a recall for the time to count towards automatic termination.

To support those eligible for termination and in recognition of the small numbers who are legally represented with their termination reviews, we prepared a practical 'how-to' guide for licence termination in collaboration with the Prison Reform Trust, the Prisoners' Advice Service and Dr Laura Janes.

The guide was launched in the summer of 2024, explaining both the rules as they applied at the time and the forthcoming changes. The guide was later updated in September 2024 to reflect the announcement of relevant commencement dates. It has received wide acclaim and has been shared widely, including by HMPPS and the Parole Board and has been uploaded onto the Content Hub on prisoner's in-cell laptops.

Given the complexity of the legislative changes brought in by the Victims and Prisoners Act, our lawyers have also trained 22 volunteers at law firm Peters and Peters LLP to host an advice line to support individuals with queries about the changes. The advice line commenced on 1 October and is planned to run until December 2024. Feedback has been overwhelmingly positive, with one stakeholder referring to it as a 'lifeline' for IPPs.

While changes to the IPP licence are significant, they do little to change the lot of those IPPs who remain in prison, never having been released by the Parole Board. This group is now our focus, in terms of research and influencing, but also litigation. With UNGRIPP and with various lawyers, we will continue to explore the possibility of a systemic legal challenge on the dire psychological impacts of the IPP sentence, as well as routes to appeal individual IPP sentences where extended sentences were not properly considered as alternatives during sentencing.

Joint enterprise secondary parties

'Joint enterprise' is a long-standing and complicated legal doctrine, whereby a number of individuals can be convicted, and sentenced, as if they were the primary perpetrator of a crime. We are particularly concerned about the operation of this doctrine in the context of secondary parties to joint enterprise murder, who are often sentenced to incredibly long sentences, despite having low levels of contribution to the index offence. While there are very significant gaps in data,

recent data from the CPS shows that young Black men are disproportionately caught up in joint enterprise prosecutions. Any visit to the lifer estate bears out this racial disparity. Secondary parties often struggle to understand how they have been convicted 'when I didn't kill anyone', and this sometimes affects their progression through the prison system, up to release by the Parole Board. Despite the landmark *Jogee* judgment of the Supreme Court in 2016, which found that a certain type of joint enterprise convictions represented 'a wrong turn', the 'substantial injustice' test adopted by the Court of Appeal as a threshold for successful appeal has meant that only one person has been released following the *Jogee* judgment. Prison leaders and prison staff and probation officers often tell us that they only learn if someone is a secondary party years into their sentence, and that better information on this profile of prisoner would be helpful in providing advice and support to them.

We are particularly concerned about the highly disproportionate number of men from racialised minorities who appear to be convicted as secondary parties in murder cases, and about the dearth of data about this group.

Over the past year, we have worked with leading joint enterprise campaigning group JENGbA and law firm Travers Smith LLP, and an external IT provider, to digitise JENGbA surveys of people in prison convicted under the doctrine of joint enterprise. These surveys represent the only available data on this group of people, with no distinction between primary and secondary parties being formally captured at the time of conviction or sentence. Once fully digitised, this will present a useful picture about the scope of the problem, as well as providing insights into individuals cases. At the same time, we think that telling the stories of joint enterprise secondary parties is critical. To this end, we have built relationships with groups of joint enterprise prisoners at two prisons outside London, where we are in the process of working with the men to capture their stories, which speak to the injustice of secondary liability.

We have also worked with the pro bono team at DLA Piper to produce a report on how different legal systems across the world apply the criminal law relating to participation in criminal offences. This project compared the application of English law on complicity, in particular the impact of this on the sentencing of secondary parties, with the criminal law in other jurisdictions. The report will provide a helpful reference for our work on joint enterprise and the sentencing of secondary parties.

Remand

The remand population has been at a 50-year high this year, with people on remand accounting for more than a fifth of the total male prison population, and a quarter of all women in prison. The growing population reflects an increase in both the number of people being remanded to custody and the length of time people are spending awaiting trial and sentence as a result of the growing backlog in the criminal courts. Many of those who are remanded do not go on to receive a custodial sentence. Prisons are in crisis and remanded prisoners experience particularly impoverished regimes, with no opportunity to progress while they await trial and/or sentence.

Tackling the overuse of remand goes to the heart of the Howard League's purpose and vision – we want to see a significant reduction in the use of prison and much better conditions and opportunities for those who remain there. To this end, we are bringing together various strands of ongoing work.

We continue to be concerned about the remand of young adults. As reported in last year's annual report, in October 2023 we published a legal guide for remanded young adults as part of a project funded by Barrow Cadbury. At the start of January 2024 copies of the guide were printed and

distributed to 18 prisons holding young adults on remand. With the generous support of the Belpech Charitable Trust, we were able to print and distribute twice as many guides as originally planned.

At the start of 2024 we began a knowledge exchange project in collaboration with City University exploring women's experiences of remand. Activities included a meeting with senior staff at Bronzefield to better understand the impact of remand, and a meeting with women who have had lived experience of being on remand. At the time of writing, we are working with a small group of charities and funders with a view to building a wider research project and campaign on ending the remand of women.

Finally, as part of our work on racial disparities, we are exploring the available data on local authorities and remand in England and Wales. We hope to gain a better understanding of the ethnicity of children on remand in each local authority and how different youth justice services use custodial remand.

Sentencing

If there is one single driver for an overcrowded, ineffective prison population it is 25 years of poor law and practice around sentencing.

Our concern about sentencing lies fundamentally in the failure of governments to level with the public about what prison can and can't achieve, and about the fact that, despite falling crime across the western world, sentences in England and Wales have more than doubled across the board in recent decades. We believe that sentencing policy and practice should be grounded in evidence of what works to hold people safely, cut reoffending and keep the public safe.

The most significant piece of work we have undertaken under this priority has been a high-profile paper published in September 2024 entitled *Sentence Inflation: a Judicial Critique*. The paper was prepared by the Howard League on behalf of the four surviving former Lords Chief Justice of England and Wales – Lord Woolf, Lord Phillips, Lord Thomas and Lord Burnett – and the only President of the Queen's Bench Division to head criminal justice, Sir Brian Leveson. In only 11 pages, it explains that, contrary to the public's understanding, sentences – and accordingly the prison population – have more than doubled since Lord Woolf's Strangeways report in 1991. The paper explains that this increase has been largely driven by legislative interventions which have set minimum tariffs for different kinds of murder convictions which have in turn driven up all other sentences in proportion. It further notes the particular impact of Schedule 21 of the Criminal Justice Act 2003, which applied only to England and Wales, where sentences are now out of all proportion with Scotland and Northern Ireland. The paper details the significant human and financial costs of sentence inflation, including on different groups of people affected such as older prisoners, women, people from racialised minorities, IPPs and those on a two-strike discretionary life sentence. The retired judges call for the upcoming sentencing review to reverse years of sentence inflation, and to examine ways of accelerating the release of those people who are currently serving very long sentences.

The Sentence Inflation paper has had an extraordinary impact. It represented an unprecedented intervention by the five most senior retired judges in this jurisdiction, attracting significant press and media interest, which continues to the time of writing. The impact of the paper is perhaps best illustrated by the fact that in the weeks and months following its publication, mainstream news outlets like the BBC were running stories about 'sentence inflation', a term that had hitherto only been understood by lawyers and judges.

A follow up event, featuring one of the retired judges Sir Brian Leveson, Cambridge academic Professor Nicola Padfield and Dwaine Patterson, a consultant who served a very long indeterminate sentence, was attended by more than 100 people, and was written up by the BBC.

The paper will form a plank of our submission to the sentencing review in the coming months. It is referenced in our new 'Public Explainer' on sentencing, which provides an invaluable resource for members of the public or the press wanting to better understand why sentencing matters.

Beyond long sentences, we have also been exploring how sentencing decisions take account of neuro-diversity, and issue raised by a number of our members. We are grateful to Akin Group for its preparation of a research paper on the sentencing of people with neurodivergent conditions, which we shared with the Jonathan Hall KC, the Independent Reviewer of Terrorism Legislation.

Public affairs

The Howard League's public affairs work this year was defined by the calling of an early election by the Prime Minister Rishi Sunak for July 2024. In the preceding months, the crisis in prisons was becoming ever more severe, particularly as regards available capacity, but the previous administration appeared to be reluctant to take the radical action required. One avenue for progress was provided by the changes to the IPP licence (see section above) introduced in the Victims and Prisoners Act. Overall, however, the possibility for meaningful reform appeared to be mired in the difficult political situation the administration found itself facing in the run up to a general election.

The election in July brought in a new government with a large parliamentary majority and faced with the alarming prospect of running out of prison cells over the summer. This changed the political dynamic and created a window of opportunity. Within a week of the new government, we published *Grasping the Nettle: Options for a lasting solution to the prisons capacity crisis*. Shortly afterwards, the new Lord Chancellor and Justice Secretary, Shabana Mahmood, announced the introduction of SDS40 – an early release measure that our briefing had called for. Since then other ideas floated in our briefing, including a sentencing review and the expansion of HDC and executive release, have been announced by the Ministry of Justice.

The Howard League published many submissions and parliamentary briefings during the period in review. Submissions were made to the Justice Committee inquiry into the future prison population and estate capacity, to the UN Special Rapporteur on Torture's call for input on issues in prison management, to the London Assembly Health Committee on health impacts of gambling, to the Sentencing Council's consultation on miscellaneous amendments to sentencing guidelines and to the Ministry of Justice's consultation on a Youth Justice Charter. Parliamentary briefings were published on the Victims & Prisoners Bill and the Sentencing Bill, on prisons in Wales, on PAVA in the youth estate, on suicides in prisons, on joint enterprise and on the IPP sentence. Our Chief Executive regularly met with Ministers and Shadow Ministers to discuss the prisons crisis and to lay the groundwork for radical change upon a change of government.

Outreach

Our presence on social media continues to grow. At the end of September, our social media accounts were followed by almost 49,000 users: 34,609 on X (formerly Twitter); 5,740 on Facebook, 5,141 on LinkedIn; 1,341 on Instagram; 425 on YouTube; and 300 on Threads.

In the reporting period, our social media posts across all platforms reached nearly three million users - 2,968,882. Standout months were March (418,000 impressions) and July (475,000 impressions). In March we launched our petition urging ministers to move girls out of Wetherby and put in motion our PAVA campaign. In July, we published *Grasping the nettle*, welcomed the new government and the appointment of James Timpson, and responded to the early release scheme.

The website attracted more than 79,000 users and there were more than 202,000 page views. Popular webpages included the Wetherby petition (3,402 page views), our blogpost on the

changes for IPP sentences in the Victims and Prisoners Act (1,623 views) and our explainer article on prison overcrowding (1,196 views).

At the beginning of the reporting period, we held well-attended fringe events at each of the three main parties annual party conferences. In addition we have held regular public events, with our events attracting 2,544 sign ups.

We have hosted 11 events in total:

- 12 October, Focus on fairness - prosecuting crime in a changing world with Max Hill KC, in person
- 26 October, Spotlights: Vincent Schiraldi on probation, parole and the rise of mass supervision in the US, online
- 9 November, Spotlights: A King's speech special, online
- 28 November, Parmoor Lecture with Andrea Albutt, online and in person
- 5 December, Annual Members' meeting, online
- 31 January, The problem with remand, online and in person
- 7 March, Spotlights: International Women's Day, online
- 25 April, Spotlights: The IPP sentence, online
- 11 June, Spotlights: What are prisons for?, online
- 11 July, Spotlights: What should the next government do to solve the problems in prisons?, online
- 27 September, Spotlights: Sentence inflation, online.

Litigating for change

Over the past year, our legal team has been developing a programme of strategic litigation opportunities that sits alongside the day-to-day legal work that arises through our advice line for children and young people in prison.

As part of the delivery of this strategy, we have been scoping and developing litigation in a number of areas. In addition to ongoing work relating to the threatened introduction of PAVA spray into children's prisons and in respect of the placement of girls in the secure children's estate, as noted above, this includes a focus on overcrowding and poor physical conditions in prisons, and the inappropriate use of segregation in both children's and adult prisons.

PAVA spray

For more than 18 months, consideration has been given by the Ministry of Justice to allowing PAVA, an incapacitant spray which is a prohibited weapon under the Firearms Act 196, to be used by officers in young offender institutions holding children. The Prison Officers' Association has made this a key ask of government. It was originally expected that a decision would be made by the end of the summer 2023 but this was delayed, we understand in part because of correspondence we sent to the then Prisons Minister, Damian Hinds, threatening legal action if PAVA was authorised for use against children. We understand that likely litigation delayed a decision under the previous government. This matter is now with the new government, who understand that we are ready to challenge the use of PAVA in the children's estate if such a decision is taken.

We are also continuing to explore the possibility of challenging the use of PAVA in the adult male estate, given concerns raised in HMIP reports and by young adults calling our advice line about its misuse. An evaluation of the use of force, including the use of PAVA, in the adult estate has been carried out but

the findings have not yet been published (despite this being promised for many months). Our current focus is on getting data to give us a fuller picture of where and against whom PAVA is used, to substantiate our understanding that PAVA is used disproportionately against young, Black, Muslim men and those with disabilities. We are also in discussion with others in the sector who are also doing work in this area to see what can be shared and how best to collaborate – including Maslaha, who have been conducting their own research into the impact of PAVA spray on Muslim prisoners.

Girls

We remain very concerned about the continued placement of girls at Wetherby prison, particularly in light of the recently published report by HMIP following an inspection at HMYOI Wetherby. As noted above, the report described two incidents where a girl was using her clothes to make ligatures and had her clothing forcibly removed by male officers. HMIP reported extremely high levels of self-harm among girls, resulting in very high levels of use of force, and concluded that the prison was not able to meet their needs.

The decision in 2021 to place girls at Wetherby - following the closure of Rainsbrook secure training centre - departed from well-established policy and practice by placing girls in a prison in general, and specifically by placing them in a male prison. It was the publicly stated intention that girls would be placed at Wetherby on an interim basis of up to two years until the secure school opened. However, the secure school is now open and Wetherby remains a placement option for girls. We continue to explore litigation in this regard.

Prison conditions

As part of our work on overcrowding and conditions, we have been in legal correspondence with the government in relation to the segregation unit at Bedford prison, the closure of which had been long promised but much delayed. The unit was squalid and filthy, but it was only following the threat of legal action that it was eventually closed in September 2024. Our legal work in relation to indecent, inhumane conditions elsewhere in the estate continues and we hope to be able to share more information publicly in the coming months.

Segregation

In respect of segregation, in December 2023, the longstanding case of AB was concluded at the ECHR by way of friendly settlement, seven years after it was issued in the High Court (and a breach of Article 8 was conceded). The case concerned a challenge to the ongoing solitary confinement of a child at HMYOI Feltham for over 55 days, with no more than an hour out of his cell a day. The Government finally acknowledged that, in the particular circumstances of this case, there had been a breach of Article 3 of the ECHR, which states: "No one shall be subjected to torture or to inhuman or degrading treatment or punishment." The Government agreed to pay AB £31,500, understood to be one of the largest sums ever paid by the UK in a friendly settlement before the European Court of Human Rights, and a contribution towards our legal costs.

Unfortunately, we know that the practice of separating children from their peers and confining them for significant periods of time to their cells continues today. We are continuing to monitor the situation in children's prisons with a view to further litigation if appropriate. We are also scrutinising the use of segregation across the adult estate, including looking at the inappropriate use of segregation for those with mental ill-health.

Other legal project work

As well as developing strategic litigation opportunities, our legal team has been working on projects aimed at improving the quality of justice experienced by people in custody, including in relation to our organisational priority themes.

Use of video technology for legal education

As reported last year, and with the support of funding from the Big Lottery, we produced an animated video, with design studio Ave, explaining what it means to be released on licence and the process of recall to prison if you breach those conditions. Recall is a common issue that young people calling our legal advice line continue to seek advice about and one that they find confusing.

The video was uploaded to the prison service's intranet, which every prisoner with in one of the nineteen prisons with in-cell technology can access. As of 1 October 2024, the video had been viewed in full almost 3,000 times by those in custody.

Life sentences for children

As part of a project funded by the Legal Education Foundation, through the Justice First Fellowship, we have produced a legal guide for young people who commit murder as children and are serving sentences of detention at His Majesty's Pleasure (an 'HMP sentence'). The guide explains how HMP sentences work, with a focus on the key dates in the sentence. Children in prison now have access to the guide through their laptops and the guide has also been shared with criminal justice and social care professionals. The guide was informed by workshops we held with children and young people serving this kind of sentence in two Young Offenders Institutions in November 2023, which included one of our colleagues who has experience of the HMP sentence. Professionals at the prisons told us that young people spoke very highly of the sessions, with one noting that "I feel that YP with life sentences can be forgotten about in the custodial setting and your visit has made a difference".

Access to Justice for children

In March 2024, we were granted three years of funding by BBC Children in Need to continue to provide our free legal advice service for children in custody, and to better understand the needs of children who are within the remit of our service but who do not call us, in order to increase our ability to support them. This funding followed on from a previous grant from BBC Children in Need, which was used to advise children in custody about their legal rights and entitlements through our access to justice service. As part of this work, in July 2024, we delivered workshops on children's rights for Barnardo's advocates from across the children's custodial estate. An update on the work of our advice line service over the past year is provided below.

Legal advice and representation

The Howard League runs the country's only dedicated advice line for children and young people in custody. Our free and confidential service is available on the "pin" of every person in prison aged 21 and under, and we receive hundreds of requests for legal assistance every year.

In the period ending 30 September 2024, the legal team provided advice and assistance to 255 young people aged 21 and under on 359 matters, including their treatment in custody, adjudications, transfers, and release planning. We also pursued 14 cases, funded by legal aid, to help children and young people with treatment issues in custody, adjudications, and recall and parole. We have also supported people in custody across the estate by making hundreds of safeguarding referrals where needed.

We have been contacted by many young people about their regime, with many seeking advice about being segregated or held in conditions akin to isolation. We have supported these young people in

relation to their particular experiences and circumstances, and are also in correspondence with the Youth Custody Service in relation to their broader separation policy and practices. This work has included securing a change in policy at one YOI so that children will continue to have access to their laptops and phones when they are held in the segregation unit.

We issued a judicial review in March 2024 on behalf of a child who was being repeatedly restrained and injured at a child's prison. Our case challenged the lack of scrutiny and investigation into these restraints, and the failure of the prison to make appropriate adjustments to our client's treatment in light of his disabilities. Prior to the case being heard, we were able to reach resolution with the government, with a promise of a series of meaningful accommodations for our client. We remain focused on the frequent and disproportionate use of force against children and young people across the estate.

We have supported numerous callers with issues relating to adjudications, often relating to the relevant prison's failure to enable the young person to effectively participate in the adjudication process on account of additional needs and/or disabilities. In many cases the findings of guilt have been quashed as a consequence of our interventions. We have also issued judicial review proceedings in relation to the operation of a blanket practice of holding independent adjudications virtually, instead of having the option of holding them face-to-face, and await the Court's decision as to next steps. The Government's lawyers have already conceded that the 28 additional days awarded to the client are to be rescinded.

We have continued to advise and support children and young people with complaints, including to prisons and to the Independent Prisoner Complaint Investigations (IPCI), which is part of the Prisons and Probation Ombudsman. One complaint to the IPCI on behalf of a client who had force used against them, including during a strip search, resulted in several recommendations being made to the Governor to improve governance and assurance processes when force is used and strip searches are conducted at the relevant prison.

Over the period, we have received enthusiastic and positive feedback from clients and from young people who used our access to justice service. Every young person who provided feedback said that they would recommend the Howard League to others. One young person commented, "amazing people, went above and beyond to help me I would say they care about helping people first and foremost". Another told us, "I couldn't thank Howard League enough for the help they have given me through my whole sentence, I don't know what position I would be in if they didn't help me".

As well as providing this valuable support to children and young people who contact us, our legal advice service also provides us with first-hand information about, and a greater understanding of, the issues affecting the custodial estate, both for children and adults. This informs and enriches our broader organisational work, including in relation to priority areas and strategic litigation.

Strengthening the charity

Membership

Membership distinguishes the Howard League from other charities in the sector and has two primary functions. As a fundraising stream, it offers dependable unrestricted income to support our work. It also builds a network of supporters, often engaging substantively with our work and enhancing the strength and authority of our voice.

We have made a concerted effort to increase numbers of members in prison, now having more than 500 such members, more than doubling this cohort in the past year. We have engaged with prison members through word of mouth, prison newspaper columns, mailings, and prison visits. In the past

year, we have also built a relationship with National Prison Radio – funded by the Belpech Charitable Trust – which has considerably expanded the audience for our work.

Members in prison receive regular communications on our work, including any information on policy or legislative changes that may affect them. We also keep our members informed about our campaigns and public perceptions of prisons. We encourage members to be advocates for change and ask others in the prison to join. A key focus for us is to hear about what is happening inside prisons, so we can gain insight and knowledge on current issues facing people in prison. Through our work, we want to change perceptions and build public understanding of the realities of prison.

It is also important to us to work with the families of people in prison, to ensure that their voices and experiences are part of our work, we currently have 1,600 members who have a family member in prison.

Our members outside of prison are key to our aims of persuading the public of the need for penal reform. The communications team has improved the digital offerings to both members and supporters, with monthly email updates, a greatly expanded social media presence, and an expanded series of events to engage our members and supporters.

With these measures now in place, we will be assessing and improving the membership package in the coming months, both to ensure the membership's fundraising potential, and to have passionate advocates to fulfil our goal of a societal shift in thinking on punishment.

Fundraising

This year, we have continued to strengthen our development function by building relationships with trusts and foundations, generating a pipeline of funders and supporting our new development board.

Trusts and foundations play a critical role in supporting the work of the Howard League. Over the year, we have received a number of grants, including multi-year grants, from trusts and foundations, both as restricted and unrestricted income.

We received new unrestricted grants or donations from:

- Sigrid Rausing Trust (£15,000)
- Firebird Foundation (£30,000; multiyear for three years)
- AB Charitable Trust (£50,000)
- Treebeard Trust (£30,000)
- Bromley Trust (£20,000)
- Millward Family Trust (£5,000)
- Tolkein Trust (£30,000)

We received restricted grants from:

- Millward Family Trust – Legal advice line (£5,000)

We continued to receive a number of restricted multi-year grants for existing projects, details of which are provided. These were:

- Children in Need – Legal advice line (£22,000)
- Esmée Fairbairn Foundation – racial disparity in youth justice (£80,000, the final year of three year project)
- Legal Education Foundation – Justice First Fellowship (£25,770; final instalment of two year's funding)

We also received unrestricted support from: *The Constance Faulds Crawford Trust (£2,000); Barrow Cadbury (£1,000); Children in Need (£500); Gilbert & Eileen Edgar Foundation (£500) The Hanley Trust (£1,000); Esmée Fairbairn Foundation (£24,000); Jolanta and Max Neufeld Charitable Trust (£10,000); Oakdale Trust (£3,000); WF Trust (£500); William A Cadbury Charitable Trust and William P Bancroft Charitable Trust (£1,000).*

We received £66,670 in legacy gifts over the period.

Approach to Fundraising

The Howard League for Penal reform employs a Development Manager who leads on all our fundraising activities and line manages the Development Officer and Membership Officer. Our focus and successes in relation to fundraising has been from Trust and Foundations, and our wide range of members and donors. Any fundraising events are organised by our Development team. The Howard League for Penal Reform does not use external professional fundraisers or involve commercial participators. There has been a significant amount of positive feedback about our events including our fundraising activities and we are pleased to report that there have been no complaints about fundraising activity this year.

We are committed to providing the best possible standards for all our members and supporters. Our fundraising activities are carried out respectfully and we are a member of the Fundraising Regulator (FR) working within their agreed guidelines. We pledge to be compliant with the General Data Protection Regulation (GDPR), and at all times we respect the wishes of our members and supporters about how they are contacted, offering them frequent opportunities to change these preferences, which are recorded on our database.

Finances

Historically, the Howard League's financial year has run from June to May. We have taken the opportunity to reset our financial year to a more standard July to June financial year. Accordingly, these accounts cover 13 months, rather than 12 months.

For the period ended 30 June 2024, the Howard League recorded a net deficit, before other recognised gains and losses, of (£778,130). Our unrealised losses on investments were (£3,908). There was an upward movement on the revaluation of the fixed asset, 1 Ardleigh Road, by £600,000.

The financial picture is also influenced substantially by the fact that in 2022-2023, our accounts recognised legacies worth £611,573, which did not materialise until the year 2023-2024.

While the period-end position shows low levels of cash, the period immediately following the end of this financial period saw the receipt of a number of sizeable multi-year grants, on which the charity was waiting. This, combined with the sale of the property after period-end, has restored the charity to a healthy cash position in 2024-25.

Income

Total income received in 2023/2024 decreased by 32% to £928,952 (2023: £1,371,156). Our income figures in the 2023 were somewhat distorted by the recognition of a large legacy, which did not actually materialise until this financial period.

Details of our income this period are:

Donations and legacies £214,825

Charitable activities £682,470

Trading activities £14,631

Investments £ 7,057

Others £9,969

Expenditure

Staff costs

Staff costs account for 84% of the total costs of the organisation. During the period, the total average headcount was 22 (2023: 24).

Costs of generating funds

The cost of generating funds makes up 7% of our overall expenditure, an increase this period from £100,619 to £120,110. This includes fundraising salary costs and overhead costs based on staff time attributable to the fundraising function.

Principal risks and uncertainties

As part of the governance review, the Howard League adopted a new risk register. Risk is monitored regularly by the Senior Management Team and the Board; with the Finance, Audit and Risk Committee also having review of risk on its agenda.

At present, the main risks identified on the register are data protection; safeguarding; income generation; public perception and the inability of the organisation to influence government policy. For each risk, the Board has set its risk appetite and factors in mitigation are in place. There is regular review against performance.

Reserves policy

Both the Board and the Howard League's supporters recognise that the organisation operates in a policy environment that requires a long-term commitment if it is to achieve its mission. The nature of our work relies on high quality and timely product from staff. Therefore, it is the view of the Board that the Howard League needs a reserves level that will enable it to continue to attract the highest level of staff expertise and, in so doing, meet its long-term commitments to its supporters and beneficiaries. The reserves policy was discussed by the board and the policy was approved by the board.

A formal policy on reserves was agreed at the 23 January 2024 meeting of the Board of Trustees. The Board has set a reserves policy which requires:

- Reserves be maintained at a level which ensures that The Howard League for Penal Reform core activity could continue during a period of unforeseen difficulty.
- A proportion of reserves be maintained in a readily realisable form. The calculation of the required level of reserves is an integral part of the organisation's planning, budget and forecast cycle. It takes into account:

- Risks associated with each stream of income and expenditure being different from that budgeted.
- Planned activity level.
- Organisation's commitments.

For 2023-2024, the Board agreed that the target level of reserves should be in the region of six months' operational expenditure. At the end of the financial period, reserves were low, though a decision had been taken to sell the Howard League's building, allowing for replenishment of the general reserves. The building was successfully sold on 29 November 2024 for £2.4m. The excess of cash received over and above the required level of reserves will be invested in a property fund to cover the future accommodation costs of the charity .

Going concern statement

This year has seen a continued shift in the charity's approach to funding as the charity has sought to generate fresh funding from a variety of new sources with a view to create a more diversified and flexible funding base that is aligned with the charity's strategy.

To that end, the organisation has:

- Developed a pipeline of trusts and foundations grants with potential income value of over £1.8m;
- Set up a programme of major donor fundraising;
- Held the first meetings of a new volunteer-led Development Board tasked with securing multi-year gifts to support our core work;
- Continued to improve our reporting systems for engaging with members, including through the implementation of Raiser's Edge .

The Board has also dedicated considerable time to discussions of risk and financial management this year, including multiple discussions of risk appetite and the risks associated with the transformation of our approach to fundraising. The charity now benefits from an expert and engaged Finance, Audit and Risk Committee (FARC). The FARC was established in 2022 to provide closer oversight of our reserves, cashflows, and annual budgets (while recognising that ultimate responsibility for financial oversight remains with the Trustees). Finally, the Trustees have adopted a new Reserves Policy.

In the current financial period, the board decided to put the freehold property at Ardleigh Road on the market, with a view to securing office space in a more central location which better meets the needs of the staff. The sale was completed on 29 November 2024, at a value of £2.4m. Proceeds from the sale will be used to meet immediate financial obligations, to replenish reserves to meet the Reserves Policy, and to defray the future accommodation costs of the charity.

Given this, and considering the charity's reserves position, budget for 2024-25, and 12-month cashflow forecasts as at the date of signing these accounts, the Trustees consider the Howard League to be a going concern.

Public benefit

For nearly 160 years, the Howard League has been advocating for prisons to be used as a punishment of last resort, and for the better treatment of people in prison. This is not just for the

benefit of people in prison but recognises that society is made safer when penal policy is evidence-based and humane.

Direct beneficiaries of our work include: people living in prisons (on remand, post-conviction and post-sentence) and their families, including the children and young people who call our advice line and who have received representation from our legal team; people working in and running prisons; people who come into contact with police officers and who face court; people facing sentences; academics and students specialised in penal policy; practising lawyers, magistrates and judges; those providing support and supervision in the community including probation and community care workers; members of both houses of parliament across parties and civil servants engaged in penal policy. Direct beneficiaries also include the public at large, including victims of crime, who benefit both from our direct communication about penal policy and the state of prisons, and from a criminal justice system that keeps them safe.

The benefits of our work are demonstrated through: successful outcomes for children and young people who call our advice line and are clients of our legal work; the press and media picking up stories based on our work; the adoption of our recommendations in government penal reform initiatives; the referencing of our contributions to government consultations; the adoption of our suggested amendments to legislation; the acceptance of our arguments in third-party interventions in court judgments; academics positively engaging with the issues on which we are working; and greater understanding among the public and decision-makers of penal policy.

The Board has referred to the guidance contained in the Charity Commission's general guidance on public benefit when reviewing the charity's aims and objectives and in reviewing the strategy at its annual away day. The Board has considered how planned activities will contribute to the aims and objectives that have been set for the organisation. While some activities are available only to members, most of our work is available to the public free of charge. The Howard League website provides accessible information on our work to the public at large, including an increasing number of 'explainers' about aspects of penal reform.

The trustees confirm that they have paid due regard to the public benefit guidance published by the Charity Commission in deciding the aims, objectives and activities of the charity.

The Board considers that the Howard League's activities are of public benefit in at least the following ways:

- provision of independent research and analysis to external bodies, including the senior judiciary, government and politicians across the political spectrum to assist in formulating law, policy and practice related to penal policy matters, which can have significant benefit for people in the UK;
- dissemination of research and information about penal policy directly to Howard League members, the press and media outlets, and others including: people in prison, people working in prison, judges, barristers, solicitors, chartered legal executives, students, advisers to governments and non-governmental organisations, who are then better able to advise public and private bodies about penal policy issues; and,
- offering lectures and other events on penal policy issues that are open to the public to attend, to inform them about important issues which may affect their daily lives.

Plans for the future, from Chief Executive, Andrea Coomber

This Trustees Annual Report covers another year of transition for the Howard League. In July 2023, the Board adopted a new Strategy and accompanying Theory of Change, and the past year has seen the new strategy bed in across the organisation. It has presented challenges to the way we have worked, as exciting as these have been.

The context for our work has changed with a recent change of government. The previous government had tried to downplay the extent of the crisis in prisons; there are no votes in prisons in an election year. From day one, the new government has had to recognise that years of retrenchment of public spending and political neglect of the criminal justice system has meant that the penal system as it currently stands needs a rethink. They have been forced to release people early from prison, at 40% rather than 50% the way through their sentence, and the Secretary of State for Justice has publicly stated that the crisis is not one which they can build their way out of.

The coming year will see us build on the work on cross-organisational priorities that have been established in the past year. For example, the recent announcement of the Sentencing Review will provide us with a once-in-a-generation opportunity to bring down the drivers of an ever-higher prison population, and will undoubtedly absorb a lot of our work and focus in the coming year. We will soon have the full set of digitised data from the JENGbA surveys, which will provide a foundation for our work on secondary parties to joint enterprise, and we are in the process of setting up a retired senior judge-led expert group to determine a lasting solution to the IPP crisis.

Arguably the most significant change in my leadership of the Howard League has been the change in focus of our legal work, from an exclusive focus on providing legal advice and representation to children and young people in prison, to building a portfolio of litigation which challenges poor policy, procedures and practice across the estate. While to date the threat of our litigation seems to have been enough to change practice and reverse approaches, I expect that the coming year will see us launch actions against government around various aspects of prison management and prison conditions. This litigation will be ably supported by our campaigns and communications functions.

And behind the scenes, the biggest challenge of the coming year relates to securing the financial future of the charity. There is, I think, a feeling among our supporters and others in the sector, that the ubiquity of the Howard League means that it doesn't have to worry about funding. Nothing could be further from the truth. The new strategy is grounded very much in us setting our strategic priorities – all of which are focused on penal reform – and fundraising for that work. This is a new approach for the charity, and we need to build relationships with most institutional funders from scratch. The coming year will also see us launch an ambitious major donor and corporate appeal in advance of our 160th anniversary in 2026. Increasingly we have a good story to tell – high profile interventions, real influence on priorities in the prison service, and influence with government – it is time to have all of this work properly funded.

As ever, I am hugely grateful to the extraordinary staff at the Howard League and to the board, particularly its soon-to-depart Chair Fergus McNeill, who has been an amazing support in a difficult transition. I am also thankful for our amazing members and supporters. Our membership base is growing – in prison, but also beyond it. Our members really do provide authority for our voice, and we are committed to building our membership into a volunteer army for change.

Andrea Coomber KC (Hon.)

Structure, governance and management

Staffing

The key changes in staff in the past year have involved our Research Director, Anita Dockley leaving us after many years of service, in November 2023. Our legal caseworker, Ana Rosenthal also left us in January 2024. One of our legal administrators, Poppy Cubbage, left us in September 2024.

The nature of the Howard League's work can be challenging and upsetting. To support staff, and to nurture a healthy organisation, we have engaged an experienced group clinical practitioner, Patrick Mandikate, to work with staff on a fortnightly basis. He is wonderful and makes staff feel safer and supported.

We are hugely grateful to Nina Williams and her colleagues at Charles Russell Speechlys LLP for their advice and guidance to our human resources function.

Remuneration policy for key management personnel

The Howard League for Penal Reform is committed to ensuring a proper balance between:

- (i) paying our staff and others who work for us so that we attract and retain the best people for the job,
- (ii) and careful management of our charity funds. In so doing, we will ensure the greatest effectiveness in delivering our charitable objectives and meeting the needs of our beneficiaries. The Finance, Audit and Risk Committee (FARC) reports directly to the Board, they consider remuneration matters annually, usually ahead of the new financial period. However, remuneration matters may also be considered at other meetings if ad hoc issues arise during the year. The Chief Executive attends all meetings but leaves when his/her remuneration is discussed.

The annual formal considerations of the Committee are to:

- Consider and recommend to the Board any cost-of-living increases usually from 1 July annually which may be applicable to all staff.
- Ensure that remuneration is set at a level which is appropriate for a charity that wishes to pay sufficient, to attract, retain and motivate senior managers of the necessary quality and calibre to run the charity successfully in the long-term interests of present and future beneficiaries.

Governance

We are a registered charity and a company limited by guarantee, incorporated in England and Wales. As our constitutional documents were adopted in 1967, the Board has reviewed the charitable objects, and secured permission from the Charity Commission to update them. The new objects – which much better reflect our values and aspirations, while being faithful to our history – was adopted as part of updated Articles of Association at the 2023 AGM in December.

As part of the governance review, all policies and procedures are being checked and updated. We are grateful to Erica Handling and to Dechert LLP for their support with this process.

The governance structure

The Board members of the Howard League are directors of the company for the purposes of the Companies Act and are charity trustees as defined by section 177 of the Charities Act. All Board Members give their time voluntarily and receive no benefits from the charity. The Board is responsible for the overall governance of the Howard League.

The Chief Executive, Andrea Coomber, is responsible for leadership and management of the charity, meeting regularly with the Chair of the Board, Fergus McNeill, and consulting other Board members as required.

The Howard League is managed by the Senior Management Team, comprised of Gemma Abbott (Legal Director), Andrew Neilson (Campaigns Director); and Euginia Lolomari (Director of Finance and Operations) who work alongside Andrea. Euginia meets regularly with the Treasurer, John Tress, to review and discuss financial performance and challenges.

Operation of the Board

Board members are appointed at the AGM and there must be a minimum of three members and a maximum of 12; we currently have 10 in post. The Board meet in regular session four times per year, where they consider overall strategy, operational performance and the financial situation. They also have an annual Away Day for strategy development.

The Howard League generally recruits Board members from within our membership. Board members are appointed at the AGM for a three-year term. In line with recommendations of the UK Charity Governance Review of 2016, the proposed revised articles of association will see the introduction of two term limits for Board members, with the Chair and Treasurer serving for four years.

Board places are advertised in advance of the Annual General Meeting at which members are appointed. Board members have the power to appoint any person at any time to the Board to fill a vacancy, although this person will stand down and be re-elected at the next Annual General Meeting.

All new Board members are inducted by the Chair and Chief Executive, invited to meet with staff, and are provided with an induction pack which includes the Charity Commission guidance on the responsibilities of Trustees, the Charity Governance Code and copies of the articles of association, latest strategy, annual review, accounts and organisational structure.

All Board members are encouraged to attend training sessions offered by our auditor on the roles and responsibilities of trustees and the dates of these training sessions are circulated on a regular basis.

Finance, Audit and Risk Committee

Set up in mid-2022, the Finance, Audit and Risk Committee comprises of two Board members – including the Honorary Treasurer – and three members of the Howard League with relevant expertise. The current members are John Tress (Hon. Treasurer), Ben Elger, Christina Line (trustee), Lucy Robinson, Delbert Sandiford and Tomas Thurgood-Hyde (trustee).

The Committee meet four times a year, with the Chief Executive and Director of Finance and Operations also attending. Among other things, the Committee's role is to:

- review the detailed draft annual budget and recommend its approval to the Board;

- monitor in-year financial performance via receipt of regular management accounts and monitor the overall financial position via regular cash and investment reports;
- review the statutory accounts and Trustees' Annual Report and recommend them to the Board;
- review and act upon, where appropriate, the findings from the annual audit as detailed in the post audit report;
- review the relationship with the auditor and ensure that independence and objectivity is maintained;
- review and maintain an up-to-date risk register;
- ensure organisational policies that are important to the financial health of the charity are relevant and up to date (e.g. reserves, trading, whistleblowing, disaster recovery policies);
- review remuneration and fair pay;
- act as a sounding board and provide advice and guidance to the Chief Executive and Director of Finance and Operations in meeting their responsibilities; and
- monitor the performance of finance and discuss and review any proposals for significant structural and operational changes.

The Council

While not part of the formal governance structure, the past year has seen the introduction of a Council to advise the Board and staff. Reflecting our values of accountability, integrity, courage, collaboration, learning and excellence, in the summer of 2023 the Board establish an advisory council (the Council) to guide and support the work of the organisation.

The Council met in November 2023 and June 2024, providing weighty challenge and input across the range of the Howard League's work. Beyond the meetings themselves, Council members have facilitated meetings for us, have supported substantive pieces of work, have spoken at events and have actively expanded our network of supporters and partners. We are hugely grateful to them for their time and insights.

Statement of responsibilities of Board members

The Howard League's Board members (who are directors of Howard League for the purposes of company law and the charity trustees as defined by section 177 of the Charities Act 2011) are responsible for preparing the Trustees' Annual 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 charitable company and of the incoming resources and application of resources, including the income and expenditure, of the charitable company for that period. In preparing these financial statements, the Board is required to:

- Select suitable accounting policies and then apply them consistently;
- Observe the methods and principles in the Charities SORP;
- 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.

Board members are responsible for keeping adequate accounting records that disclose with reasonable accuracy at any time the financial position of the charitable company and enable them to ensure that the financial statements comply with the Companies Act 2006, the Charities and Trustee Investment (Scotland) Act 2005 and the Charities Accounts (Scotland) Regulations 2006 (as amended). They are also responsible for safeguarding the assets of the charitable company and hence for taking reasonable steps for the prevention and detection of fraud and other irregularities.

In so far as the Board is aware:

- There is no relevant audit information of which the charitable company's auditor is unaware;
- The Board 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 Board are responsible for the maintenance and integrity of the corporate and financial information included on the charitable company's website. Legislation in the United Kingdom governing the preparation and dissemination of financial statements may differ from legislation in other jurisdictions.

Members of the charity guarantee to contribute an amount not exceeding £1 to the assets of the charity in the event of winding up. The Board are members of the charity, but this entitles them only to voting rights. The Board have no beneficial interest in the charity.

Auditor

Sayer Vincent LLP serves as the charity's auditor.

The Trustee's annual report has been approved by the Board on 17 January 2025 and signed on their behalf by

Fergus McNeill

Board member and Chair

Opinion

We have audited the financial statements of The Howard League for Penal Reform (Incorporating the Howard Centre for Penology) (the 'charitable company') for the thirteen months ended 30 June 2024 which comprise the statement of financial activities, balance sheet, statement of cash flows and notes to the financial statements, including significant accounting policies. The financial reporting framework that has been applied in their preparation is applicable law and United Kingdom Accounting Standards, including FRS 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 charitable company's affairs as at 30 June 2024 and of its incoming resources and application of resources, including its income and expenditure for the period then ended
- Have been properly prepared in accordance with United Kingdom Generally Accepted Accounting Practice
- 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 charitable 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 trustees' 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 Howard League for Penal Reform (incorporating the Howard

Independent auditor's report

To the members of

The Howard League for Penal Reform (Incorporating the Howard Centre for Penology)

Centre for Penology)'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 trustees with respect to going concern are described in the relevant sections of this report.

Other Information

The other information comprises the information included in the trustees' annual report other than the financial statements and our auditor's report thereon. The trustees are responsible for the other information contained within the annual 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 course of 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 this gives rise to 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 trustees' annual report for the financial period for which the financial statements are prepared is consistent with the financial statements; and
- The trustees' annual report has been prepared in accordance with applicable legal requirements.

Matters on which we are required to report by exception

In the light of the knowledge and understanding of the charitable company and its environment obtained in the course of the audit, we have not identified material misstatements in the trustees' annual 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 trustees' remuneration specified by law are not made; or
- We have not received all the information and explanations we require for our audit; or
- The directors 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 trustees' annual report and from the requirement to prepare a strategic report.

Responsibilities of trustees

As explained more fully in the statement of trustees' responsibilities set out in the trustees' annual report, the trustees (who are also the directors of the charitable 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 trustees 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 trustees are responsible for assessing the charitable 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 trustees 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 extent to which our procedures are capable of detecting irregularities, including fraud are set out below.

Capability of the audit in detecting irregularities

In identifying and assessing risks of material misstatement in respect of irregularities, including fraud and non-compliance with laws and regulations, our procedures included the following:

- We enquired of management, which included obtaining and reviewing supporting documentation, concerning the charity's policies and procedures relating to:
 - Identifying, evaluating, and complying with laws and regulations and whether they were aware of any instances of non-compliance;
 - Detecting and responding to the risks of fraud and whether they have knowledge of any actual, suspected, or alleged fraud;
 - The internal controls established to mitigate risks related to fraud or non-compliance with laws and regulations.
- We inspected the minutes of meetings of those charged with governance.
- We obtained an understanding of the legal and regulatory framework that the charity operates in, focusing on those laws and regulations that had a material effect on the financial statements or that had a fundamental effect on the operations of the charity from our professional and sector experience.
- We communicated applicable laws and regulations throughout the audit team and remained alert to any indications of non-compliance throughout the audit.
- We reviewed any reports made to regulators.
- We reviewed the financial statement disclosures and tested these to supporting documentation to assess compliance with applicable laws and regulations.
- We performed analytical procedures to identify any unusual or unexpected relationships that may indicate risks of material misstatement due to fraud.
- In addressing the risk of fraud through management override of controls, we tested the appropriateness of journal entries and other adjustments, assessed whether the judgements made in making accounting estimates are indicative of a potential bias and tested significant transactions that are unusual or those outside the normal course of business.

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 is available on the Financial Reporting Council's website at: www.frc.org.uk/auditorsresponsibilities. This description forms part of our auditor's report.

Independent auditor's report

To the members of

The Howard League for Penal Reform (Incorporating the Howard Centre for Penology)

Use of our report

This report is made solely to the charitable 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 charitable 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 charitable company and the charitable company's members as a body, for our audit work, for this report, or for the opinions we have formed.

Jonathan Orchard (Senior statutory auditor)

04 February 2025

for and on behalf of Sayer Vincent LLP, Statutory Auditor

110 Golden Lane, LONDON, EC1Y 0TG

The Howard League for Penal Reform (Incorporating the Howard Centre for Penology)

Statement of financial activities (incorporating an income and expenditure account)

For the 13 months ended 30 June 2024

		13 months to June 2024			12 months to May 2023		
	Note	Unrestricted £	Restricted £	Total £	Unrestricted £	Restricted £	Total £
Income from:							
Donations and legacies	2	214,825	–	214,825	763,106	–	763,106
Charitable activities							
Campaigns, policy & research	3	285,000	85,000	370,000	84,000	80,000	164,000
Events, conferences & publications	3	118	–	118	68,193	–	68,193
Legal services for young people	3	63,183	55,270	118,453	36,380	144,321	180,701
Membership income	3	193,899	–	193,899	149,705	–	149,705
Other trading activities	4	14,631	–	14,631	13,369	–	13,369
Investments	5	7,057	–	7,057	32,082	–	32,082
Other		9,969	–	9,969	–	–	–
Total income		788,682	140,270	928,952	1,146,835	224,321	1,371,156
Expenditure on:							
Raising funds	6	120,110	–	120,110	100,619	–	100,619
Charitable activities							
Campaigns, policy & research	6	686,630	105,585	792,215	497,590	385,716	883,306
Events, conferences & publications	6	51,800	–	51,800	137,102	–	137,102
Legal services for young people	6	557,104	44,124	601,228	356,841	195,163	552,004
Membership	6	141,729	–	141,729	108,317	–	108,317
Total expenditure		1,557,373	149,709	1,707,082	1,200,469	580,879	1,781,348
Net expenditure before (losses) on investments		(768,691)	(9,439)	(778,130)	(53,634)	(356,559)	(410,193)
Net (losses) on investments		(3,908)	–	(3,908)	(21,308)	–	(21,308)
Net expenditure for the period / year before other recognised gains and losses		(772,599)	(9,439)	(782,038)	(74,942)	(356,559)	(431,501)
Gains on revaluation of fixed assets		600,000	–	600,000	400,000	–	400,000
Net movement in funds	17	(172,599)	(9,439)	(182,038)	325,058	(356,559)	(31,501)
Reconciliation of funds:							
Total funds brought forward		2,582,611	90,164	2,672,775	2,257,553	446,722	2,704,275
Total funds carried forward		2,410,012	80,725	2,490,737	2,582,611	90,164	2,672,775

All of the above results are derived from continuing activities. There were no other recognised gains or losses other than those stated above. Movements in funds are disclosed in Note 17 to the financial statements.

The Howard League for Penal Reform (Incorporating the Howard Centre for Penology)

Balance sheet

As at 30 June 2024

Company no. 00898514

	Note	As at 30 June 2024 £	As at 31 May 2023 £
Fixed assets:			
Tangible assets	12	2,423,910	1,829,223
		<u>2,423,910</u>	<u>1,829,223</u>
Current assets:			
Investments	13	–	419,930
Debtors	14	149,173	478,756
Cash at bank and in hand		91,933	15,905
		<u>241,106</u>	<u>914,591</u>
Liabilities:			
Creditors: amounts falling due within one year	15	(174,279)	(71,039)
		<u></u>	<u></u>
Net current assets		<u>66,827</u>	<u>843,552</u>
Total net assets		<u>2,490,737</u>	<u>2,672,775</u>
The funds of the charity:	17		
Restricted income funds		80,725	90,164
Total unrestricted funds		<u>2,410,012</u>	<u>2,582,611</u>
Total charity funds		<u>2,490,737</u>	<u>2,672,775</u>

Approved by the trustees on 17 January 2025 and signed on their behalf by

Fergus McNeill
Chair

Statement of cash flows

For the 13 months ended 30 June 2024

Reconciliation of net (expenditure) / income to net cash flow from operating activities

	13 months to 30-Jun-24 £	12 months to 31-May-23 £
Net (expenditure) for the reporting period (as per the statement of financial activities)	(182,038)	(31,501)
Depreciation charges	5,313	26,007
Losses on investments	3,908	21,308
Gain on revaluation of fixed assets	(600,000)	(400,000)
Dividends and interest from investments	(7,057)	(32,082)
Decrease / (increase) in debtors	329,583	(400,294)
Increase / (decrease) in creditors	103,240	(92,252)
Decrease/(increase) in cash held by investment broker pending reinvestment	-	(150,768)
Net cash provided by operating activities	(347,051)	(1,059,582)

	Note	2024 £	2023 £
Cash flows from operating activities			
Net cash provided by operating activities		(347,051)	(1,059,582)
Cash flows from investing activities:			
Dividends and interest from investments		7,057	32,082
Proceeds from sale of investments		416,022	953,193
Purchase of investments		-	(29,994)
Net cash provided by investing activities		423,079	955,281
Change in cash and cash equivalents in the period		76,028	(104,301)
Cash and cash equivalents at the beginning of the period		15,908	120,205
Cash and cash equivalents at the end of the period		91,933	15,905

1 Accounting policies

a) Statutory information

The Howard League for Penal Reform (incorporating the Howard Centre for Penology) is a charitable company limited by guarantee and is incorporated in the United Kingdom.

The registered office address is 1 Ardleigh Road, London, N1 4HS.

b) Basis of preparation

The financial statements have been prepared in accordance with Accounting and Reporting by Charities: Statement of Recommended Practice applicable to charities preparing their accounts in accordance with 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 trustees 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.

c) Public benefit entity

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

d) Going concern

The Trustees have reviewed the going concern position (as set out in the Trustees' Report), and consider it appropriate for these Financial Statements to be prepared on the going concern basis.

e) Income

Income is recognised when the charity 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.

Income from government and other grants, whether 'capital' grants or 'revenue' grants, is recognised when the charity 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.

For legacies, entitlement is taken as the earlier of the date on which either: the charity is aware that probate has been granted, the estate has been finalised and notification has been made by the executor(s) to the charity 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 charity has been notified of the executor's intention to make a distribution. Where legacies have been notified to the charity, or the charity 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.

f) Donated services

Donated professional services and donated facilities are recognised as income when the charity 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 charity 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 so refer to the trustees' annual report for more information about their contribution.

g) Investment income and interest receivable

Investment income and interest on funds held on deposit is included when receivable and the amount can be measured reliably by the charity; this is normally upon notification of the income due from the bank or investment manager.

1 Accounting policies (continued)

h) Fund accounting

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.

Unrestricted funds are donations and other incoming resources received or generated for the charitable purposes.

Designated funds are unrestricted funds earmarked by the trustees for particular purposes.

i) 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:

- Costs of raising funds relate to the costs incurred by the charitable company in inducing third parties to make voluntary contributions to it, as well as the cost of any activities with a fundraising purpose
- Expenditure on charitable activities includes the costs of furthering the purposes of the charity and their associated support costs

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

j) Allocation of support costs

Resources expended are allocated to the particular activity where the cost relates directly to that activity. However, the cost of overall direction and administration of each activity, comprising the salary and overhead costs of the central function, is apportioned on the following basis which are an estimate, based on staff time, of the amount attributable to each activity.

• Campaigns, policy & research	25%
• Events, conferences & publications	20%
• Legal services for young people	25%
• Membership income	10%
• Support costs	10%
• Governance costs	10%

Where information about the aims, objectives and projects of the charity is provided to potential beneficiaries, the costs associated with this publicity are allocated to charitable expenditure.

Support costs are re-allocated to each of the activities on the following basis which is an estimate, based on staff time, of the amount attributable to each activity

• Campaigns, policy & research	60%
• Events, conferences & publications	5%
• Legal services for young people	20%
• Membership income	10%
• Raising funds	5%

Governance costs are the costs associated with the governance arrangements of the charity. These costs are associated with constitutional and statutory requirements and include any costs associated with the strategic management of the charity's activities. These costs are split equally between the 5 activities listed above.

k) Operating leases

Rental charges are charged on a straight line basis over the term of the lease.

Notes to the financial statements

For the 13 months ended 30 June 2024

1 Accounting policies (continued)

l) Tangible fixed assets

Items of equipment are capitalised where the purchase price exceeds £1,000. 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.

Where fixed assets have been revalued, any excess between the revalued amount and the historic cost of the asset will be shown as a revaluation reserve in the balance sheet.

Depreciation is provided at rates calculated to write down the cost of each asset to its estimated residual value over its expected useful life. The depreciation rates in use are as follows:

● Office equipment	10 per cent per annum
● Library books	15 per cent per annum
● Computers	50 per cent per annum

The trustees have adopted a policy of reporting freehold land and buildings at market value. The last full valuation was carried out on 14 December 2023. In May 2024 the property was offered for sale, an offer was accepted for the sum of £2,400,000 and contracts exchanged on 29 July 2024, with completion on 29 November 2024.

An annual impairment review on the property and other fixed assets is undertaken to determine if circumstances indicate that the recoverable value of assets is materially lower than their value in the accounts. Any impairments identified are written off as extra depreciation through the statement of financial activities.

m) Listed investments

Investments are a form of basic financial instrument and are initially recognised at their transaction value and subsequently measured at their fair value as at the balance sheet date using the closing quoted market price. Any change in fair value will be recognised in the statement of financial activities. Investment gains and losses, whether realised or unrealised, are combined and shown in the heading "Net gains/(losses) on investments" in the statement of financial activities. The charity does not acquire put options, derivatives or other complex financial instruments.

n) Accrued legal work income (WIP)

Income is recognised on casework earned and due ("work in progress" or "WIP") according to the time booked on the matter multiplied by the relevant legal aid or interpartes rate.

o) 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.

p) Cash at bank and in hand

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

q) Creditors and provisions

Creditors and provisions are recognised where the charity 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.

r) Financial instruments

The charity only has both basic and non-basic financial assets and financial liabilities. Basic financial instruments are initially recognised at transaction value and subsequently measured at their settlement value. Non-basic financial instruments are measured at fair value with any gain or loss going to the statement of financial activities.

s) Pensions

All staff are auto enrolled in a work place defined contribution pension scheme contributing 10% of gross salary.

Notes to the financial statements

For the 13 months ended 30 June 2024

2 Income from donations and legacies

	Unrestricted £	Restricted £	2024 Total £	Unrestricted £	Restricted £	2023 Total £
Donations	148,155	–	148,155	151,533	–	151,533
Legacies	66,670	–	66,670	611,573	–	611,573
	214,825	–	214,825	763,106	–	763,106

The charity has been notified of a further potentially significant legacy where probate has been granted, but which does not meet the criterion of measurement before the period-end. It is not possible to accurately assess the potential value of this legacy, which had not been received by 1 December 2024.

3 Income from charitable activities

	Unrestricted £	Restricted £	2024 Total £	Unrestricted £	Restricted £	2023 Total £
Sigrid Rausing Trust	15,000	–	15,000	–	–	–
Firebird Trust	30,000	–	30,000	–	–	–
AB Charitable Trust	50,000	–	50,000	–	–	–
Treebeard	30,000	–	30,000	–	–	–
Bromley Trust	25,000	–	25,000	–	–	–
Esmée Fairbairn	–	80,000	80,000	24,000	80,000	104,000
Tolkien Trust	30,000	–	30,000	30,000	–	30,000
Annon Charitable Trust	–	5,000	5,000	–	–	–
Millward Charitable Trust	5,000	–	5,000	–	–	–
Henri Rossi	100,000	–	100,000	20,000	–	20,000
Allen & Overy	–	–	–	10,000	–	10,000
Sub-total for campaigns, research & policy	285,000	85,000	370,000	84,000	80,000	164,000
Income from sales of publications	118	–	118	–	–	–
Events and Conferences	–	–	–	68,193	–	68,193
Sub-total for Events, conferences & publications	118	–	118	68,193	–	68,193
The Lottery	–	–	–	–	63,743	63,743
Barrow Cadbury	–	500	500	–	20,500	20,500
The Legal Education Trust	–	25,770	25,770	–	22,244	22,244
BBC Children in Need	–	22,000	22,000	–	27,084	27,084
Millward Charitable Trust	–	5,000	5,000	–	10,000	10,000
Legal services for young people	63,183	2,000	65,183	36,380	750	37,130
Sub-total for Legal services for young people	63,183	55,270	118,453	36,380	144,321	180,701
Membership subscriptions	131,719	–	131,719	113,498	–	113,498
Income tax recoverable on subscriptions /donations	62,180	–	62,180	36,207	–	36,207
Sub-total for Membership income	193,899	–	193,899	149,705	–	149,705
Total income from charitable activities	542,200	140,270	682,470	338,278	224,321	562,599

Notes to the financial statements

For the 13 months ended 30 June 2024

4 Income from other trading activities

	Unrestricted £	Restricted £	2024 Total £	Unrestricted £	Restricted £	2023 Total £
Royalties for publications	14,631	–	14,631	13,369	–	13,369
	<u>14,631</u>	<u>–</u>	<u>14,631</u>	<u>13,369</u>	<u>–</u>	<u>13,369</u>

5 Income from investments

	Unrestricted £	Restricted £	2024 Total £	Unrestricted £	Restricted £	2023 Total £
Income from stocks and shares	4,843	–	4,843	31,102	–	31,102
Interest receivable	2,214	–	2,214	980	–	980
	<u>7,057</u>	<u>–</u>	<u>7,057</u>	<u>32,082</u>	<u>–</u>	<u>32,082</u>

Notes to the financial statements

For the 13 months ended 30 June 2024

6a Analysis of expenditure (current year)

	Cost of raising funds £	Campaigns, research & policy £	Events, conferences & publications £	Legal service for young people £	Membership £	Governance costs £	Support costs £	2024 Total £
Staff costs (Note 8)	93,888	587,878	26,060	502,466	68,382	52,902	109,764	1,441,340
Other staff costs	-	309	-	2,159	-	-	3,700	6,168
Travel & Subsistence	-	5,158	-	2,532	-	2,030	352	10,072
Publication costs	-	450	-	4,940	1,372	-	762	7,524
Publicity & dissemination	195	12,052	-	-	-	-	2,622	14,869
Professional/Consultancy fees	-	38,802	-	11,791	35,206	1,750	-	87,549
Investment managers fees	287	-	-	-	-	-	-	287
Office and other expenses	-	474	-	2,709	-	-	22,006	25,189
Premises expenses	-	-	-	7,975	-	-	35,747	43,722
Miscellaneous expenses	-	29	-	371	-	92	1,499	1,991
Equipment purchase	-	-	-	-	-	-	-	-
Irrecoverable VAT	-	-	-	-	-	-	2,747	2,747
Equipment maintenance	-	-	-	7,457	-	-	30,143	37,600
Bank Charges	-	-	-	-	-	-	5,936	5,936
Audit & accountancy	-	-	-	-	-	16,775	-	16,775
Depreciation	-	-	-	-	-	-	5,313	5,313
	94,370	645,152	26,060	542,400	104,960	73,549	220,591	1,707,082
Support costs	11,030	132,354	11,030	44,118	22,059		(220,591)	-
Governance costs	14,710	14,709	14,710	14,710	14,710	(73,549)	-	-
Total expenditure 2024	120,110	792,215	51,800	601,228	141,729	-	-	1,707,082

Notes to the financial statements

for the year ended 31 May 2023

6b Analysis of expenditure (prior year)

	Cost of raising funds £	Campaigns, research & policy £	Events, conferences & publications £	Legal service for young people £	Membership £	Governance costs £	Support costs £	2023 Total £
Staff costs (Note 8)	66,821	577,116	39,385	413,734	37,459	30,274	105,167	1,269,956
Other staff costs	-	34,313	-	1,855	-	-	17,125	53,293
Travel & Subsistence	-	16,224	-	2,275	-	1,301	575	20,375
Publication costs	-	1,653	-	165	37,335	-	269	39,422
Publicity & dissemination	201	22,881	66,155	770	-	-	3,180	93,187
Professional/Consultancy fees	-	79,744	-	39,619	-	-	34,136	153,499
Investment managers fees	2,035	-	-	-	-	-	-	2,035
Office and other expenses	-	-	-	2,749	-	-	20,405	23,154
Premises expenses	-	-	-	8,132	-	-	23,497	31,629
Miscellaneous expenses	-	4,798	-	76	1,961	160	2,974	9,969
Equipment purchase	-	1,214	-	-	-	-	376	1,590
Irrecoverable VAT	-	-	-	-	-	-	5,133	5,133
Equipment maintenance	-	-	-	5,547	-	-	27,146	32,693
Bank Charges	-	-	-	-	-	-	7,131	7,131
Audit & accountancy	-	-	-	-	-	12,275	-	12,275
Depreciation	-	-	-	-	-	-	26,007	26,007
	69,057	737,943	105,540	474,922	76,755	44,010	273,121	1,781,348
Support costs	22,760	136,561	22,760	68,280	22,760	-	(273,121)	-
Governance costs	8,802	8,802	8,802	8,802	8,802	(44,010)	-	-
Total expenditure 2023	100,619	883,306	137,102	552,004	108,317	-	-	1,781,348
Total expenditure 2022	73,004	900,370	75,235	471,571	121,437	-	-	

Notes to the financial statements

For the 13 months ended 30 June 2024

7 Net expenditure for the period

This is stated after charging:

	2024 £	2023 £
Depreciation	5,313	26,007
Operating lease rentals:		
Equipment	7,111	5,589
Auditor's remuneration (excluding VAT):		
Audit	16,775	12,275
	<u>16,775</u>	<u>12,275</u>

8 Analysis of staff costs, trustee remuneration and expenses, and the cost of key management personnel

Staff costs were as follows:

	2024 £	2023 £
Salaries and wages	1,190,725	1,034,900
Social security costs	131,590	115,113
Employer's contribution to defined contribution pension schemes	119,025	119,943
	<u>1,441,340</u>	<u>1,269,956</u>

The following number of employees received employee benefits (excluding employer pension costs) during the period between:

	2024 No.	2023 No.
£60,001 – £70,000	1	–
£70,001 – £80,000	1	1
£80,001 – £90,000	2	2
£90,001 – £100,000	–	–
£100,001 – £120,000	–	1
£130,000 – £140,000	1	–

The total employee benefits including pension contributions and employers national insurance of the key management personnel were £530,281 (2023: £469,758)

Total termination costs in the period were £nil (2023: £54,571).

The charity trustees were not paid or received any other benefits from employment with the charity in the period (2023: £nil). No charity trustee received payment for professional or other services supplied to the charity (2023: £nil).

Trustees' expenses represents the payment or reimbursement of travel and subsistence costs totalling £1,188 (2023: £1,528) incurred by 2 (2023: 3) members relating to attendance at meetings of the trustees.

Notes to the financial statements

For the 13 months ended 30 June 2024

9 Staff numbers

The average number of employees (head count based on number of staff employed) during the period was as

	2024 No.	2023 No.
Raising funds	2	2
Campaigns, policy & research	8	8
Events conferences & publications	1	1
Legal services for young people	7	9
Membership	1	1
Support	2	2
Governance	1	1
	<u>22</u>	<u>23</u>

10 Related party transactions

Aggregate donations from related parties were £0 (2023: £nil).

There are no other related party transactions to disclose for 2024 (2023: none).

There are no donations from related parties which are outside the normal course of business and no restricted donations from related parties.

11 Taxation

The charitable company is exempt from corporation tax as all its income is charitable and is applied for charitable purposes.

12 Tangible fixed assets

	Freehold property £	Computers £	Office Equipment £	Library books £	Total £
Cost or valuation					
At the start of the period	1,800,000	42,015	69,602	2,018	1,913,635
Revaluation	600,000	–	–	–	600,000
Disposals	–	–	–	–	–
At the end of the period	<u>2,400,000</u>	<u>42,015</u>	<u>69,602</u>	<u>2,018</u>	<u>2,513,635</u>
Depreciation					
At the start of the period	–	42,015	40,380	2,017	84,412
Charge for the period	–	–	5,313	–	5,313
At the end of the period	<u>–</u>	<u>42,015</u>	<u>45,693</u>	<u>2,017</u>	<u>89,725</u>
Net book value					
At the end of the year	<u>2,400,000</u>	<u>–</u>	<u>23,909</u>	<u>1</u>	<u>2,423,910</u>
At the start of the year	<u>1,800,000</u>	<u>–</u>	<u>29,222</u>	<u>1</u>	<u>1,829,223</u>

The historical cost of the freehold is £650,000. An offer on the property was received in 2024 of £2,400,000 and accepted. The trustees consider this indicates the fair value of the property at period-end. The property was sold on 29 November 2024.

Notes to the financial statements

For the 13 months ended 30 June 2024

13 Listed investments

	2024 £	2023 £
Fair value at the start of the period	419,930	1,213,669
Additions at cost	–	29,994
Disposal proceeds	(416,022)	(953,193)
Cash	–	150,768
Net (loss) on investments	(3,908)	(21,308)
	–	419,930
Fair value at the end of the period	–	419,930

Investments comprise:

	2024 £	2023 £
UK Common investment funds	–	227,868
Shares listed on the London Stock Exchange	–	41,294
Cash	–	150,768
	–	419,930

14 Debtors

	2024 £	2023 £
Other debtors	52,722	405,465
Accrued Legal work income	48,509	49,629
Disbursements	4,725	18,495
Accrued income	43,217	5,167
	149,173	478,756

15 Creditors: amounts falling due within one year

	2024 £	2023 £
Loan	100,000	–
Trade creditors	21,345	18,166
Taxation and social security	30,920	33,149
Accruals	22,014	19,724
	174,279	71,039

The loan of £100,000 was agreed in January 2024 with an initial interest-free period of 6 months followed by interest at 5% per annum and fully repayable within one year of receipt of funds.

Notes to the financial statements

For the 13 months ended 30 June 2024

16a Analysis of net assets between funds (current period)

	General unrestricted £	Designated property funds £	Restricted £	Total funds £
Tangible fixed assets	23,910	2,400,000	–	2,423,910
Net current assets	(13,898)	–	80,725	66,827
Net assets at 30 June 2024	10,012	2,400,000	80,725	2,490,737

16b Analysis of net assets between funds (prior year)

	General unrestricted £	Designated property funds £	Restricted £	Total funds £
Tangible fixed assets	29,223	1,800,000	–	1,829,223
Net current assets	753,388	–	90,164	843,552
Net assets at 1 July 2023	782,611	1,800,000	90,164	2,672,775

17a Movements in funds (current period)

	At 1 June 2023 £	Income & gains £	Expenditure & losses £	Transfers £	At 30 June 2024 £
Restricted funds:					
Legal work (Adviceline)	–	29,000	(13,854)	–	15,146
Big Lottery – Legal work	4,000	–	(4,000)	–	–
Sentencing– young adults	–	500	(500)	–	–
The Legal Education Trust	–	25,770	(25,770)	–	–
Prison Radio Association	–	5,000	(5,000)	–	–
Crime & problem gambling	6,827	–	(6,827)	–	–
Racial disparity research	79,337	80,000	(93,758)	–	65,579
Total restricted funds	90,164	140,270	(149,709)	–	80,725
Unrestricted funds:					
Designated property funds:					
Property fair value reserve fund	1,150,000	600,000	–	–	1,750,000
Property historic cost fund	650,000	–	–	–	650,000
Total designated property funds	1,800,000	600,000	–	–	2,400,000
Total designated funds	1,800,000	600,000	–	–	2,400,000
General funds	782,611	788,682	(1,561,281)	–	10,012
Total unrestricted funds	2,582,611	1,388,682	(1,561,281)	–	2,410,012
Total funds	2,672,775	1,528,952	(1,710,990)	–	2,490,737

Notes to the financial statements

For the 13 months ended 30 June 2024

17b Movements in funds (prior year)

	At 1 June 2022 £	Income & gains £	Expenditure & losses £	Transfers £	At 1 July 2023 £
Restricted funds:					
Legal work (Adviceline)	-	37,834	(37,833)	-	1
Big Lottery – Legal work	54,842	63,743	(114,585)	-	4,000
Sentencing– young adults	-	20,500	(20,500)	-	-
The Legal Education Trust	-	22,244	(22,244)	-	-
Reducing arrests of women	2,500	-	(2,500)	-	-
Crime & problem gambling	319,143	-	(312,317)	-	6,826
Racial disparity research	70,237	80,000	(70,900)	-	79,337
Total restricted funds	446,722	224,321	(580,879)	-	90,164
Unrestricted funds:					
Designated property funds:					
Property fair value reserve fund	750,000	400,000	-	-	1,150,000
Property historic cost fund	650,000	-	-	-	650,000
Total designated property funds	1,400,000	400,000	-	-	1,800,000
Strategic fund	620,704	-	(620,704)	-	-
Total designated funds	2,020,704	400,000	(620,704)	-	1,800,000
General funds	236,849	1,146,835	(601,073)	-	782,611
Total unrestricted funds	2,257,553	1,546,835	(1,221,777)	-	2,582,611
Total funds	2,704,275	1,771,156	(1,802,656)	-	2,672,774

Notes to the financial statements

For the 13 months ended 30 June 2024

17 Movements in funds (continued)

Purposes of restricted funds

Legal work (Adviceline)

Specialist adviceline for young people in custody.

Prison radio association

To promote the work of the Howard League for Penal Reform in prisoners on Prison Radio, working in collaboration with Prison Radio Association.

Sentencing – young adults

A review of sentencing judgments for young adults.

Reducing arrests of women

Programme for reducing arrests of women.

Crime and Problem Gambling

This is a 3 year commission to look into the between problem gambling and crime, it commenced in January 2019. Due to the pandemic period the commission will conclude in March 2023.

The Legal Education Trust

Matched funding for Justice First Fellowship for caseworker in the Legal team 2 years started January 2020 and completed February 2024, with 2 trainees over the 4 years.

Big Lottery – Legal work

Participation work delivered by the legal team over 3 years – started March 2020

Racial disparity research

This is a 3 year project started May 2022 funded by Esmee Fairbairn to investigate the racial disparity in the youth justice estate.

Property

The value of the original restricted donation towards the purchase of the office. See transfers between funds note below.

Property historic cost fund

The value of the original historic cost of the property.

Property fair value reserve

Demonstrates the gain on the property revaluation compared to its historic cost.

Strategic fund

This fund was designated by the trustees to strengthen the Howard League position through a period of recession and uncertainty, and to fund income shortfall. Decisions to use this fund were agreed by the board on the basis of strategic principles set down during the budgeting process.

Notes to the financial statements

For the 13 months ended 30 June 2024

18 Operating lease commitments

The charity's total future minimum lease payments under non-cancellable operating leases is as follows for each of the following periods

	Equipment 2024 £	2023 £
Less than one year	7,111	5,589
One to five years	3,760	10,871
	<u>10,871</u>	<u>22,104</u>

19 Legal status

The charity is a company limited by guarantee and has no share capital. The liability of each member in the event of winding up is limited to £1.

20 Post balance sheet events

The charity's property on Ardleigh Road was sold after the year-end with completion on the 29 November 2024.