

IT'S A PENALTY
(Formerly HAPPY CHILD INTERNATIONAL FOUNDATION)
(A Charitable Incorporated Organisation)
REPORT AND FINANCIAL STATEMENTS
FOR THE YEAR ENDED 30 SEPTEMBER 2022

Charity No: 1161848

**IT'S A PENALTY
FOR THE YEAR ENDED 30 SEPTEMBER 2022**

CONTENTS

Page

1	Legal and administrative information
2	Report of the Trustees
13	Independent Examiner's Report
14	Statement of Financial Activities
15	Balance Sheet
16	Notes forming part of the Financial Statements

**IT'S A PENALTY
FOR THE YEAR ENDED 30 SEPTEMBER 2022**

Reference and Administrative Information

Registered Charity Number

1161848

Trustees

The Trustees serving during the year and since the year end were as follows:

C Williamson

K Corich

E McAlpine

C McLellan

B Patel

A Akintoye

Appointed 9 November 2021

Management

SL de Carvalho MBE

Principal office

Leatherhead Institute
67 High Street
Leatherhead
KT22 8AH

Independent Examiner

Mr S Robinson
Chartered Accountant
420 Silbury Boulevard
Central Milton Keynes
MK9 2AF

Bankers

Santander
Customer Service Centre
Bootle
Merseyside
L30 4GB

**IT'S A PENALTY
FOR THE YEAR ENDED 30 SEPTEMBER 2022**

Report of the Trustees

Trustees Report

The Trustees present their Annual Report and financial statements of the Charitable Incorporated Organisation for the year ended 30 September 2022. The financial statements comply with the Charities Act 2011, the Trust's Deed and 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) (effective 1 January 2019).

Structure, Governance and Management

Charitable status

It's a Penalty is a Charitable Incorporated Organisation (CIO) governed by its constitution and has charitable status under the Charities Commission Association, Charity Number; 1161848. The CIO was recognised by the Charity Commission on 27 May 2015.

Organisation structure

The Trustees assume responsibility for the day to day management of the CIO and almost all executive roles are undertaken by the Trustees.

The Board of Trustees meets six times each year to discuss current and future projects and to approve decisions such as the appointment of new Trustees and the remuneration of the one key management employee.

Trustee Recruitment and Appointment

The Trustees were recruited with complementary skills and experience in mind from the corporate, public and third sectors. Each bring a contribution of global networking, strategic management, marketing, international development, accountancy.

Katherine Corich is our Chair. She is founder and Global CEO of Sysdoc. Voted UK New Zealander in 2015, Katherine is a global networker and engages her staff in the work of the campaign. Sysdoc is one of the campaign's partners.

Christianne Williamson is a strategic communications expert currently leading a global DFID-funded campaign to end female genital mutilation. Christianne brings expertise in partnership and resource leveraging, having worked in various international development organisations.

Ewen McAlpine, works for Macaulay Search, and provides executive search services to organisations with just objectives. He is a strong networker providing valuable contacts and introductions in the Third and Commercial sectors.

**IT'S A PENALTY
FOR THE YEAR ENDED 30 SEPTEMBER 2022**

Report of the Trustees (cont.)

Structure, Governance and Management (cont.)

Colin McLellan is a Chartered Accountant who, prior to retirement, was Finance Director of MJ Gleeson Group plc.

Bharti Patel is an accomplished and dedicated Human Rights and Social Justice campaigner focusing on every child's right to quality education and to be free from abuse and exploitation in all its forms. Previous roles include CEO of ECPAT UK - Every Child Protected Against Trafficking, Director of SVARAJ - Society for voluntary action Revitalisation and Justice and Director of Low Pay Unit.

Adeola Akintoye is a member of the Association of Certified Accountants and has a Masters degree in Business Information Technology. She has worked in the International Charity sector in leadership positions over the last 24 years and is currently Finance Director of MEDAIR

Trustee Induction and Training

When recruiting new Trustees, the Board ensures that such candidates fully understand the Charity's purposes and aims and possess the necessary skills to carry out their responsibilities.

Risk Management

The Trustees accept that the management of risk is ultimately their responsibility and, having examined the major strategic, business and operational risks which the CIO faces, confirm that appropriate control systems have been established to mitigate such risks, as far as is possible.

Summary of Activities

It's a Penalty is a UK-based NGO with a global output, focused on ending abuse, exploitation and human trafficking worldwide through awareness-raising campaigns, advocacy for legal reform, educational programmes and youth empowerment.

In 2021/22, It's a Penalty had a phenomenal impact with two further campaigns around major sporting events (Super Bowl LVI Campaign (January-February 2022) - Los Angeles, USA; Commonwealth Games (June-August 2022) - Birmingham, UK. In addition to our campaigns, we also greatly expanded the impact of It's a Penalty by continuing work on the additional programmatic areas which contribute to our goal of ending abuse, exploitation and human trafficking on a global scale: CommonProtect, Student Ambassadors Network and Safe to Compete.

Objectives, Activities and Performance for the Public Benefit:

It's a Penalty strives for a world where no human being suffers abuse, exploitation or trafficking. To achieve this goal, our work consists on 4 key strategic programmes:

- Campaigns - raising awareness about human trafficking, exploitation and abuse during major sporting events;
- CommonProtect – advocating for legal reform to improve protection from sexual exploitation and abuse for children throughout the Commonwealth;
- Student Ambassadors Network – educating and raising up UK university students to prevent human trafficking and exploitation;

**IT'S A PENALTY
FOR THE YEAR ENDED 30 SEPTEMBER 2022**

Report of the Trustees (cont.)

- Safe to Compete – training sports coaches and parents of children in Little Leagues (age 5-12 years) in the USA to prevent abuse and exploitation.

As a member of the UN Global Compact, our work contributes towards the achievement of the UN Sustainable Development Goals: 5.2 - Eliminate all forms of violence against all women and girls in the public and private spheres, including trafficking and sexual and other types of exploitation; 8.7 - Take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers, and by 2025 end child labour in all its forms; 16.2 - End abuse, exploitation, trafficking and all forms of violence against and torture of children.

1. CAMPAIGNS

Harnessing the power of sport to prevent abuse, exploitation and human trafficking, It's a Penalty campaigns around major sporting events to raise awareness on a global scale, educate about the signs to look out for and equip people with ways to report.

Since 2014, we have launched 14 global campaigns headed by high-profile athletes and actors, primarily positioning major sporting events as platforms for worldwide action and change. Each campaign is bespoke and contextualised to each major sporting event and the need in the host country, determined by working in partnership with sporting governing bodies and local NGOs. Educational messages about what human trafficking is, the penalties for offenders, and how to identify and report it reach a global audience through strategic distribution channels including: airlines' in-flight entertainment, hotels and accommodation, airports, local transport, cinemas, TV, and social media.

- Every campaign reaches an average of 180 million people across the world through our strategic channels.
- During each campaign, we have encouraged people to report abuse, exploitation and/or human trafficking, resulting in an average increase of calls to hotlines of 210%.
- To date, our campaigns have protected 17,000 potential survivors abuse, exploitation and human trafficking globally, and prevented thousands more from being victimised.

It's a Penalty believes that prevention and awareness-raising campaigns are an effective way to curtail offences committed, and reduce demand while encouraging individuals, including victims to come forward and make a report.

To prevent abuse, exploitation and human trafficking, in 2021/22 we:

EDUCATED – about the global issues of abuse, exploitation and human trafficking, the penalties for offenders, and the signs of human trafficking - #knowthesigns;
EQUIPPED – sporting fans, tourists and the general public with mechanisms to report these crimes, both whilst at home and abroad;
ENCOURAGED – people and potential victims of human trafficking to make a report.

Super Bowl LVI Campaign (January-February 2022) - Los Angeles, USA

In January/ February 2022, It's a Penalty made an impact globally, and locally in Los Angeles California, reaching a potential 737.5 million people worldwide.

**IT'S A PENALTY
FOR THE YEAR ENDED 30 SEPTEMBER 2022**

Report of the Trustees (cont.)

In collaboration with our founding partner A21, on the 26th of January we launched the Campaign, hosted by our Headline Partner IHG Hotels & Resorts, at Hotel Indigo in Downtown Los Angeles, in collaboration with our other Headline Partners the NFL and Super Bowl Host Committee and Friends at AHLA (American Hotel & Lodging Association), HALA (Hotel Association of Los Angeles) and CHLA (California Hotels & Lodging Association). The Launch event started with welcome remarks by IHG Hotels & Resorts Americas CEO Elie Maalouf and our guest speaker Kathryn S. Schloessman, President & CEO LASEC, host of SUPER BOWL LVI. Followed by messages from California elected officials - U.S. Representative Karen Bass and Attorney General Rob Bonta. On this day 427 hoteliers listened to panel discussions on Hotels Tackling Trafficking and Super Bowl Anti-Trafficking measures. Panel speakers represented our partners such as Motel 6, Hilton, Los Angeles International Airport, the US Institute of Human Trafficking, AHLA and our guest Marriott hotels. To conclude, our founding partner A21 hosted a hotel specific Human Trafficking training with closing remarks from Nick Caine, CEO, A21.

It's a Penalty also held a press conference, hosted by LAX Airport, attended by Dignitaries including Los Angeles Attorney General Rob Bonta, President of LA City Council Nury Martinez, VP Board of Airport Commissioners Val Velasco and LAX CEO Justin Erbacher at Los Angeles International Airport. We also had representatives from our partners Uber, Airbnb, American Airlines and Kevin Malone CEO/ U.S Institute Against Human Trafficking (The HT Alliance). It's a Penalty Campaign digital and printed signage was unveiled in LAX terminals, security checkpoints and public restrooms to educate passengers. The press conference generated 175 pieces of TV coverage and 363 online articles for a potential reach of over 277 million people. This year we also provided a special QR code that allowed people to report suspected cases of Human Trafficking or Child Sexual Exploitation from anywhere in the world.

We work with a talented PR agency called The Brand Amp, based in the US, who help us to prepare a press release, prepare for interviews and ensure maximum coverage. Our press release was picked up by 363 online postings, representing a total of 213.2 million potential audience impressions. In total, our potential media reach was over 490 million people.

LAX is ranked as the 3rd busiest airport both in the U.S. and the world. It's a Penalty's digital signage featuring Chris Godwin and Johnny Hekker has been displayed since January 1st throughout the airport with the hotline number. LAX has reported that a total of 4 million passengers travelled through LAX during the month of January with another 4 million travellers in February for a total potential reach of 8 million + passengers as the signs are still being displayed at LAX until further notice. The LAX airport also put It's A Penalty's Mirror clings in bathrooms throughout the terminals that included QR codes to make reports of Human Trafficking and Sexual Exploitation anywhere in the world via our internal reporting tool found on It's a Penalty website.

Through our airline partners, we had a potential reach of 10.5 million people. American Airlines showed our 30 sec PSA film in-flight on all international and national flights during the months of January and February, and Southwest Airlines showed the campaign film in-flight throughout the months of January and February. Additionally, Southwest shared the film on all digital signs system wide and their internal and external blogs which has a reach of 55,000 employees and a potential reach of over 200,000+ people.

As part of our awareness campaign, we created educational anti-trafficking kits containing materials with signs to look out for and the National Human Trafficking Hotline number. In total, 1.5k tangible and digital kits were distributed to hotels and motels for staff and management and the general public. 2,500 hang tags were distributed to Uber drivers in Los Angeles, California. Hang tags displayed the hotline number to call if a driver or passenger suspected a criminal activity involving Human Trafficking or Child Sexual Exploitation.

**IT'S A PENALTY
FOR THE YEAR ENDED 30 SEPTEMBER 2022**

Report of the Trustees (cont.)

427 hoteliers participated in a training at Hotel Indigo in DTLA sponsored by our Headline Partner IHG Hotel & Resorts. During this training, hotel staff listened to panel discussions by industry leaders on human trafficking prevention methods in the hotel industry. Attendees heard from local NGOs and Dignitaries locally in Los Angeles. Our founding partner A21 finished the event by providing more intense and detailed training on Human Trafficking and Signs to look out for with real life examples. Every person in attendance received a tangible It's a Penalty anti-trafficking kit.

The It's a Penalty team was invited to contribute to the Hilton staff anti-trafficking training, alongside the Global Director of Intelligence, Gabriel Warren. The presentation, attended by staff across the board - from housekeeping to chefs, to security and front of house staff - included an overview of our campaign and the signs to look out for. 70 attendees at the Hilton training sessions also received tangible It's a Penalty anti-trafficking kits with posters in English and Spanish, hand sanitizers and a missing children's list provided by NCMEC to take back to their respective hotels. We also partnered with Airbnb to raise awareness. Los Angeles Airbnb hosts received digital kits containing posters in English and Spanish.

On January 20, 2022, volunteers joined ZOE International, a Los Angeles organisation whose mission is to reach every person and rescue every child, led by Michael & Carol Hart. Volunteers packed awareness kits that included 11,500 It's a Penalty posters in English and in Spanish, 8,500 hand sanitizers and 1,500 Missing Children lists provided by the National Center of Missing and Exploited Children in the Los Angeles area. Campaign materials were distributed to over 450 hotels and motels across the Los Angeles area. It's a Penalty and its Founding Partner A21 partnered with Zoe International to coordinate the outreach.

For the first time, It's a Penalty as part of The Alliance Against Human Trafficking and Exploitation (A21, USIAHT, Inner City Visions, Knot Today, It's a Penalty) had a booth at the Super Bowl Experience. This was an interactive booth with activities for the kids with squishy mini footballs and over 12,500 flyers with human trafficking awareness information from each of these NGO's was distributed. All organisations collaborated to produce a PSA video that was shown to a potential 80,000 people that attended the Los Angeles Super Bowl NFL Experience. Volunteers from It's a Penalty partners Zoe International and A21 were trained to run the booth. In addition to the above, our direct local impact for the LA Campaign includes:

- 14 missing children identified in Los Angeles.
- 20% increase in reports to the US Human Trafficking Hotline - in the run-up super bowl compared to the same time period the previous year.
- 8 minors who were being sexually exploited in Los Angeles were rescued.
- 494 traffickers and sex buyers were arrested throughout California during the campaign.
- A potential reach of 3 million people followed, shared and viewed the campaign on social media.

During the Super Bowl LVI in Los Angeles, we asked people to answer a short survey on our website (www.itsapenalty.org) to help us understand and assess the difference that the It's a Penalty campaign made in EDUCATING about global issues of tracking and exploitation, and the signs to look out for to identify a crime.

A primary goal of the campaign is to EQUIP the public to report these crimes and ENCOURAGE them to be confident in making that report. Overall, 96% of respondents felt It's a Penalty improved their awareness of the issues of human trafficking and exploitation; 93% of respondents said their knowledge of the signs of these crimes had increased because of It's a Penalty; 93% of respondents felt more equipped to report crimes of trafficking and exploitation after being exposed to the LA Campaign; 100% of respondents felt that It's a Penalty LA

**IT'S A PENALTY
FOR THE YEAR ENDED 30 SEPTEMBER 2022**

Report of the Trustees (cont.)

Campaign increased their confidence or likeliness to report suspected cases of exploitation and trafficking.

2022 Commonwealth Games (July-August 2022) - Birmingham, UK

In 2022, the Birmingham Commonwealth Games presented a fantastic opportunity to raise awareness locally in Birmingham, across the UK and worldwide, and prevent people from becoming victims of human trafficking and exploitation. This was the second It's a Penalty Campaign to run at a Commonwealth Games (the previous being 2018 at Gold Coast), and we aimed to maximise our impact at the Games even further in Birmingham.

The Birmingham Campaign mobilised during the Commonwealth Games in Birmingham to encourage millions of people to help prevent modern slavery and protect survivors throughout the West Midlands, the UK and worldwide.

Our approach for the campaign was to educate people coming into and travelling around Birmingham during the Games on how to spot abuse, exploitation and human trafficking, make them aware of the issue and support available for survivors, and the helpline to call if they suspect themselves or someone they know are being exploited. Due to Birmingham's promotion as a tourist destination in the lead-up-to the Games, working with the travel and tourism industry was essential in order to reach as many people as possible with the key campaign messages. To give the campaign a Commonwealth voice, we worked with sporting ambassadors from across the Commonwealth, including Usain Bolt (Jamaica), Ellie Simmonds (UK) and Cathy Freeman (Australia).

To ensure that our campaign fit the local need in Birmingham and came alongside existing anti-human trafficking efforts in the region, we partnered with local frontline NGOs the West Midlands Anti Slavery Network, West Midlands Violence Reduction Partnership and Faith Alliance, and UK-wide charity Missing People. We also worked with the endorsement of United by Birmingham 2022. With the help of our expert partners, we were able to distribute our campaign materials across the West Midlands and beyond, including in-flight on international airlines (British Airways and Emirates), motorway service stations, Birmingham airport, train stations, trams, hotels and in hospitality venues. In total, the potential reach of the Birmingham Campaign was a phenomenal 57,746,897 people on-the-ground in the UK and worldwide.

During the Birmingham Campaign, for the first time ever, It's a Penalty displayed huge signs outside of Moto motorway services. This was a brand new form of reaching people with our campaign messaging, and proved very successful. We were able to do this due to Moto generously donating their advertising space to the campaign, which was very encouraging for us. Motorway service stations have been identified in previous news outlets as a key space in which lorries that illegally move human trafficking survivors in dangerous conditions have been found. For this reason, we felt it hugely important to show our campaign materials to the public at service stations. In total, a potential 1,463,823 people were reached throughout the UK as a result of this collaboration with Moto.

Engaging the local community, empowering survivors and reaching those at risk of abuse, exploitation and trafficking was of critical importance. Thanks to our partnership with community organisations such as the West Midlands Violence Reduction Partnership's Faith Alliance, NetworkFour and PitsStop, over 2500 It's a Penalty campaign posters and business cards were distributed to and displayed at 370 events and venues, including pubs, bars and restaurants, hotels, places of worship and information centres across Birmingham city centre and surrounding areas.

Throughout the Birmingham Campaign, It's a Penalty and our partners shared impactful social media content about the campaign activities, human trafficking and exploitation in Birmingham,

**IT'S A PENALTY
FOR THE YEAR ENDED 30 SEPTEMBER 2022**

Report of the Trustees (cont.)

the West Midlands, and the Commonwealth, the signs to look out for and reporting helpline information. Digital toolkits containing the campaign film, list of missing people in the West Midlands, posters and social media campaigns were also shared with partners, friends and supporters.

Working with our partners Airbnb, It's a Penalty delivered in-person training on human trafficking awareness, the signs to look out for, and reporting information to 45 Airbnb hosts from across Birmingham ahead of the Commonwealth Games. Airbnb also distributed It's a Penalty's informative campaign materials to 115 more hosts online. It's a Penalty also assisted our global partner Hilton, who additionally hosted the campaign launch event in Birmingham, with training on human trafficking, the signs to look out for and how to make a report to hotel managers in the run-up to the start of the Commonwealth Games. In total, 396 Hilton staff were trained, including teams from Front Desk, Housekeeping, Maintenance, Security, Food and Beverage, and Conference and Events. During the campaign, as a result of this collaboration, It's a Penalty posters and informative business cards were also displayed in 6 Hilton hotels throughout the West Midlands reaching members of staff, back-of-house teams and guests.

During the Birmingham Campaign, 998 potential victims of modern slavery in the UK indicated to Unseen's Modern Slavery and Exploitation Helpline. In the West Midlands, 23 potential victims of modern slavery were identified by the Helpline in the West Midlands.

As an additional campaign activity, It's a Penalty was honoured to partner with Missing People during our Birmingham Campaign to raise awareness of people who have gone missing in the West Midlands and may be at risk of exploitation. Our joint campaign posters containing a QR code linking to our informative custom webpage were displayed on 36 large screens throughout train stations for 17 days spanning over July and August. The posters were displayed in 5 stations throughout Birmingham: Birmingham New St, Leamington Spa, Birmingham Moor St, Birmingham Snow Hill, and the University reaching a potential 7,154,495 people. 22 people that Missing People appealed for were found safe and well during the Campaign period. Additionally, 191 posters of missing people appeals were downloaded from the Missing People website - widening the reach and publicity of their work.

Following the conclusion of the Birmingham 2022 Commonwealth Games Campaign, we asked people to answer a short survey on our website (www.itsapenalty.org) to help us understand and assess the difference that the It's a Penalty campaign made in educating about global issues of abuse, exploitation and human trafficking, the signs to look out for to identify a crime, reporting helpline information, and increasing their confidence in making a report. 93% of respondents felt It's a Penalty improved their awareness of the issues of abuse, exploitation and human trafficking; 86% of respondents said their knowledge of the signs of these crimes had increased because of It's a Penalty; 88% of respondents felt more equipped to report crimes of abuse, exploitation and human trafficking after being exposed to the Birmingham Campaign; and 81% of respondents felt that It's a Penalty Birmingham Campaign increased their confidence or likeliness to report suspected cases of exploitation and trafficking.

As part of our survey we asked for people to submit comments about the campaign and how it benefited them. Here are some of their comments: "Each time I read over the signs of human trafficking, they become more embedded into my thought process."; "I am reminded to be more aware of my surroundings and those I am crossing paths with when I read if you see something say something."; "This helps to know how to report suspected cases with every little bit of wisdom & knowledge that helps along the way."

**IT'S A PENALTY
FOR THE YEAR ENDED 30 SEPTEMBER 2022**

Report of the Trustees (cont.)

2. COMMONPROTECT

The sexual exploitation and abuse of children, including online, is reaching epidemic levels. No country is immune. Current gaps in laws mean that millions of children throughout the Commonwealth are legally unprotected from abuse by nationals and travelling offenders.

Working in collaboration with governments, civil society organisations, child rights champions and Commonwealth institutions, CommonProtect is the Commonwealth-wide movement to end impunity for child sexual exploitation and abuse (CSEA), improve access to justice for survivors and ensure better child protection. Our ultimate goal is for there to be a comprehensive legal framework in place in each Commonwealth country which criminalises CSEA in every form, no matter where the offender is from or where in the world the offence takes place.

In March 2022, we held an online panel to mark Commonwealth week, build a Commonwealth call to action ahead of the Commonwealth Heads of Government Meeting (CHOGM) in June, and announce the upcoming CommonProtect report. The theme of the panel was the role of the Commonwealth in protecting children from sexual exploitation and abuse. Panel participants included representatives from: the Commonwealth Secretariat, Commonwealth Lawyers Association, Commonwealth Parliamentary Association, Commonwealth Organisation for Social Work and the Commonwealth Human Rights Initiative

In May 2022, launched the CommonProtect report with an online event featuring several partners and an expert panel, planned over a series of months prior to the publication date. The CommonProtect report analyses the laws and systems in place in 21 Commonwealth countries to protect children from sexual exploitation and abuse, and make recommendations for governments and other stakeholders to take action in order to improve the prosecution, prevention and protection from these forms of violence. The report was produced over a two-year period in partnership with Trust Law, the Commonwealth Lawyers Association, Sysdoc, CMS and Clayton Utz, as well as 21 lawyers and researchers in the focus countries. Spotlight piece contributors to the report included: ICMEC, ECPAT, WeProtect, IFRC, Commonwealth Lawyers Association, Dr. Michael Salter, Human Dignity Trust, Commonwealth Human Rights Initiative & Walk Free Foundation, UNICEF, Commonwealth Organisation of Social Work and the Council of Europe's Lanzarote Committee.

The report found there is still a long way to go towards ensuring that every child in the Commonwealth is safe from exploitation and abuse: Millions of children do not currently have the full protection of the law against all forms of sexual exploitation and abuse; Children's access to justice is hampered by law enforcement and prosecution rates, societal stigma, under-reporting, and the limited capacity of protective services; Not only must legal change be brought about to better protect children from CSEA, the improvement of enforcement, reporting, prosecution, protection and prevention are also key.

The report and executive summary establishes the evidence base for the CommonProtect programme and will be used as a key advocacy material moving forward. In July 2022, our partners Clayton Utz hosted a Australia-based launch event to promote the report and its findings, involving regional experts on CSEA and representatives from leading child protection organisations, law enforcement and legal experts.

Following the publication of the report, a key priority was implementing a strategy in order to influence the agenda at the Commonwealth Heads of Government Meeting in June 2022 to include the protection of children from sexual exploitation and abuse. As a result of our efforts and those of other stakeholders and partners, we were able to succeed in including the issue into two key statements from the meeting. As a result of the outcomes of CHOGM 2022, we have been developing and implementing our high-level advocacy strategy, with the support of

**IT'S A PENALTY
FOR THE YEAR ENDED 30 SEPTEMBER 2022**

Report of the Trustees (cont.)

our partner Atlas Free, to continue spotlighting child protection to be on the agenda for discussion and action in Commonwealth spaces.

The year 2021/2022 has also involved building a social media presence and voice on child protection issues for CommonProtect, networking with other organisations and establishing It's a Penalty as a leading authority on protecting children from CSEA, as well as maintaining and developing relationships and partnerships with key organisations.

3. STUDENT AMBASSADORS NETWORK

It's a Penalty's Student Ambassador Network is a programme to raise a community of student activists in the UK. This programme is designed to provide future change-makers with a space to embrace creativity, enhance employability and champion a social justice initiative to complement academic learning and skills. The Programme combines conventional campaigning techniques - from building support on their campuses and in their communities to influencing people in authority. On joining the Student Ambassador Network, they become part of a national network of young changemakers to bring about the social transformation we all want to see locally and globally.

The Student Ambassador Network (SAN) programme empowers university students with the knowledge, confidence, networks and skills to become ambassadors of change against abuse, exploitation and human trafficking. The programme includes four core courses covering: Human trafficking training, Bystander training and Consent training developed by Marshall eLearning and Coventry University and Campaign planning developed by Campaign Bootcamp. In total, the training takes approx. 6 hours and students don't have to complete it all in one go. Following the training, the students engage with the community through various activism projects. The majority of students undertaking the programme host campus events, promote discussion and empower participants to know the signs of human abuse, exploitation and human trafficking and how to report it; promote responsible procurement; become a conscientious consumer; write and share articles and educational content on social media. Students also undertake fundraising events as part of the programme. Throughout the process, students are mentored and supported by the Student Ambassador Network team.

The year 2021/22 has seen the continued development of the SAN programme, including expanding the number of universities the programme is implemented at and building new complementary projects. In total, 151 students have signed up to the programme in the last academic year, and a series of lectures and seminars were delivered in the academic year to 220 students who were exposed to training and awareness of modern slavery. To date, the Student Ambassador Network has been run in Birmingham City University, Cardiff Met University, Edinburgh University, Goldsmiths University, Hull University, Portsmouth University, St Mary's University Surrey University and Sussex University.

As part of the SAN programme, in 2022, we produced a Modern Slavery: County Lines awareness film in partnership with West Sussex police. The film was promoted across our social media and used as a key awareness-raising piece about county lines exploitation and how to prevent it.

As a result of working collaboratively during the Birmingham Campaign, the West Midlands Anti-Slavery Network and It's a Penalty have teamed up to create a West Midlands Slavery Free Campus Alliance to promote slavery-free university campuses across the region. The Alliance will analyse university structures and make key recommendations for universities to

**IT'S A PENALTY
FOR THE YEAR ENDED 30 SEPTEMBER 2022**

Report of the Trustees (cont.)

tackle modern slavery, promote evidence-based targeted prevention and intervention techniques to educate students and staff on exploitation, build students' confidence and knowledge of their rights in the work environment, and address the risk of modern slavery across university activities and processes.

4. SAFE TO COMPETE

Safe to Compete is a national initiative based in the US launched by It's a Penalty and The National Center for Missing & Exploited Children (NCMEC) to prevent abuse, exploitation and trafficking of young children as they learn to compete in youth sports. With Safe to Compete, It's a Penalty aims to foster an environment in youth sports where children are safe from these forms of violence.

Youth sports present a great platform through which to raise awareness and protect children. High profile cases of young athletes being abused whilst competing have drawn attention to the issue of child protection in sports all over the world. Safe to Compete's focus is to address gaps in knowledge, skills and action amongst parents, caregivers and coaches in order to improve every child's protection from these forms of violence.

In partnership with NCMEC, in the year 2021/22, we continued work to promote and develop the programme across the US. The microsite for Safe to Compete was launched in Spring 2022, which includes key information on the abuse, exploitation and trafficking of children, training courses for parents, caregivers and coaches, and ways to make a report. In addition, we filmed and launched 3 Public Service Announcements (PSAs) featuring Safe to Compete ambassadors Hunter Dozier (Major League Baseball Player for Kansas City Royals), Evan Kravetz (Major League Baseball Player for Cincinnati Reds) and Chris Godwin (Wide Receiver with Tampa Bay Buccaneers and Super Bowl Champion).

Financial Review

It's a Penalty enjoyed another good year in terms of financial support - particularly for Super Bowl LVI in Los Angeles and the recently created Student Ambassador Network. Further Pro Bono work of £428,164 was also received. A surplus of £22,665 was achieved in the year and Unrestricted Reserves of £64,307 are carried forward into the year to 30th September 2023.

Reserves policy

The CIO currently has no Restricted Reserves and an Unrestricted General Reserve of £64,307 at 30 September 2022 a figure that exceeds three months "core" costs. Fundraising efforts will continue to ensure that this level of Reserves is maintained.

Plans for Future Periods

The principal campaigns with which It's a Penalty will be involved in are the Arizona Super Bowl, the FIFA Women's World Cup in Australia and New Zealand and the F1 Las Vegas Grand Prix.

**IT'S A PENALTY
FOR THE YEAR ENDED 30 SEPTEMBER 2022**

Report of the Trustees (cont.)

Trustees' Responsibilities Statement

The Trustees 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).

The law applicable to charities in England & Wales requires the Trustees to prepare financial statements for each financial year which give a true and fair view of the state of affairs of the Charity and of the incoming resources and application of resources of the Charity for that period. In preparing these financial statements, the Trustees are required to:

- select suitable accounting policies and then apply them consistently;
- observe the methods and principles in the Charities SORP 2019 (FRS102);
- make judgements and estimates that are reasonable and prudent;
- state whether applicable accounting standards have been followed, subject to any material departures disclosed and explained in the financial statements;
- prepare the financial statements on the going concern basis unless it is inappropriate to presume that the Charity will continue in operation.

The Trustees are responsible for keeping proper accounting records that disclose with reasonable accuracy at any time the financial position of the Charity and enable them to ensure that the financial statements comply with the Charities Act 2011, the Charity (Accounts and Reports) Regulations 2008 and the provisions of the Trust Deed. They are also responsible for safeguarding the assets of the Charity and hence for taking reasonable steps for the prevention and detection of fraud and other irregularities.

The Report of the Trustees was approved by written procedure amongst Trustees on 21-12-2022 and signed on their behalf by:



.....
E McAlpine

**IT'S A PENALTY
INDEPENDENT EXAMINER'S REPORT FOR THE
YEAR ENDED 30 SEPTEMBER 2022**

I report to the Trustees on my examination of the accounts of It's a Penalty (the CIO) for the year ended 30 September 2022.

Responsibilities and basis of report

As the Charity Trustees of the CIO you are responsible for the preparation of the accounts in accordance with the requirements of the Charities Act 2011 ('the Act').

I report in respect of my examination of the CIO's accounts carried out under section 145 of the 2011 Act and in carrying out my examination I have followed all the applicable Directions given by the Charity Commission under section 145(5)(b) of the Act.

Independent examiner's statement

I confirm that I am qualified to undertake the examination because I am a member of the Institute of Chartered Accountants in England and Wales, which is one of the listed bodies.

I have completed my examination. I can confirm that no material matters have come to my attention in connection with the examination giving me cause to believe that in any material respect:

1. Accounting records were not kept in respect of the CIO as required by section 130 of the Act; or
2. The accounts do not accord with those records; or
3. The accounts do not comply with the applicable requirements concerning the form and content of accounts set out in the Charities (Accounts and Reports) Regulations 2008 other than any requirement that the accounts give a 'true and fair' view which is not a matter considered as part of an independent examination.

I have no concerns and have come across no other matters in connection with the examination to which attention should be drawn in this report in order to enable a proper understanding of the accounts to be reached.



**Steve Robinson FCA
Chartered Accountant
Silbury Court
420 Silbury Boulevard
Central Milton Keynes
MK9 2AF**

Date: 22 December 2022

IT'S A PENALTY

STATEMENT OF FINANCIAL ACTIVITIES INCLUDING INCOME AND EXPENDITURE ACCOUNT FOR THE YEAR ENDED 30 SEPTEMBER 2022

	Notes	Un- Restricted General	Restricted Funds	Total 2022	Total 2021
		£	£	£	£
<u>Income</u>					
Income from Generated funds					
Donations and grants	2	746,222	-	746,222	938,027
Total Income		<u>746,222</u>	<u>-</u>	<u>746,222</u>	<u>938,027</u>
<u>Expenditure</u>					
Charitable Activities					
Expenditure on charitable activities	3	566,078	-	566,078	839,578
Cost of Raising funds					
Expenditure on raising funds	4	131,798	-	131,798	50,492
Other Expenditure					
Support costs	5	25,681	-	25,681	20,317
Total expenditure		<u>723,557</u>	<u>-</u>	<u>723,557</u>	<u>910,387</u>
Transfer between Funds		-		-	-
Net movement in funds		22,665	-	22,665	27,640
Balance at 1 October 2021		41,642	-	41,642	14,002
Balance at 30 September 2022		<u>64,307</u>	<u>-</u>	<u>64,307</u>	<u>41,642</u>

All of the above results are derived from continuing activities.

All gains and losses recognised in the period are included above.

The split of comparative funds is shown in note 13.

The notes on pages 16 to 22 form part of these financial statements.


IT'S A PENALTY

BALANCE SHEET AS AT 30 SEPTEMBER 2022

	Notes	2022		2021	
		£	£	£	£
Fixed Assets					
Intangible assets	7		-		-
Current Assets					
Debtors	8	-	-	-	-
Cash at bank and in hand		75,723		75,990	
		<u>75,723</u>		<u>75,990</u>	
Creditors: amounts falling due within one year	9	<u>(11,416)</u>		<u>(34,348)</u>	
Net current assets			<u>64,307</u>		<u>41,642</u>
Net assets			<u>64,307</u>		<u>41,642</u>
Represented by:	10/11				
Unrestricted funds			64,307		41,642
Restricted funds			<u>-</u>		<u>-</u>
Total Charity Funds			<u>64,307</u>		<u>41,642</u>

P

The financial statements were approved by the Trustees on 21 December 2022 and were signed on their behalf by:



 C McLellan

Trustee

The notes on pages 16 to 22 form part of these financial statements.

**IT'S A PENALTY
FOR THE YEAR ENDED 30 SEPTEMBER 2022**

NOTES TO THE FINANCIAL STATEMENTS

1. Accounting policies

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) (effective 1 January 2019) - (Charities SORP (FRS 102)).

It's a Penalty meets the definition of a public benefit entity under FRS 102. Assets and liabilities are initially recognised at historical cost or transaction value unless otherwise stated in the relevant accounting policy note(s).

The Trustees have taken advantage of the exemption in Charities SORP (FRS102) from including a cashflow statement in the financial statements on the grounds that the organisation is small.

Income

Donations and Grants

Income from donations and grants is included in incoming resources when received. Income is then deferred when a condition which is placed upon the Charity's entitlement to it has not yet been completed.

Donations receivable for the general purposes of the Charity are credited to general unrestricted funds. Donations for purposes restricted by the wishes of the donor are taken to restricted funds.

Intangible income in the form of valuable good or services donated to the Charity at some actual expense to the donor are included in the Statement of Financial Activities when the benefit is quantifiable and measurable.

Expenditure

Expenditure is included in the Statement of Financial Activities on an accruals basis, inclusive of any VAT which cannot be recovered.

Intangible Assets and Amortisation

Intangible assets are stated at cost less accumulated amortisation and any accumulated impairment losses. Amortisation is provided at rates calculated to write off the cost less estimated residual value of each asset over its expected useful life, as follows:

Website Development	3 years straight line
---------------------	-----------------------

**IT'S A PENALTY
FOR THE YEAR ENDED 30 SEPTEMBER 2022**

NOTES TO THE FINANCIAL STATEMENTS (Cont'd)

Fund accounting

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

Designated funds comprise unrestricted funds that have been set aside by the Trustees for particular purposes. The aim and use of each designated fund is set out in the notes to the financial statements.

Restricted funds comprise funds donated for specific purposes. The aim and use of each fund is set out in the notes.

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.

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.

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.

Financial instruments

The CIO only has financial assets and financial liabilities of a kind that qualify as basic financial instruments. Basic financial instruments are initially recognised at transaction value and subsequently measured at their settlement value with the exception of bank loans which are subsequently measured at amortised cost using the effective interest method.

**IT'S A PENALTY
FOR THE YEAR ENDED 30 SEPTEMBER 2022**

NOTES TO THE FINANCIAL STATEMENTS (Cont'd)

1. Going concern

At the time of approving the financial statements, the Trustees have a reasonable expectation that the CIO has adequate resources to continue in operational existence for the foreseeable future. The charity has adequate resources to continue in operational existence for the foreseeable future. Thus the Trustees continue to adopt the going concern basis of accounting in preparing the financial statements.

2. Donations and grants

	2022 £	2021 £
Institutional income	300,058	277,854
Trust income	18,000	10,000
Other income	428,164	650,173
	<u>746,222</u>	<u>938,027</u>

Unrestricted Income from donations and grants was £746,222 (2021: £938,027) of which £Nil (2021: £Nil) was restricted.

Other income includes £428,164 (2021: £650,173) relating to donations in kind principally provided for professional services contributing to advancing our advocacy agenda.

Included within institutional income is an amount of £nil (2021: £nil) relating to donations in kind received by the Charity.

3. Expenditure on charitable activities

	Unrestricted	Restricted	2022	2021
It's a Penalty Campaign	£	£	£	£
Salaries & NI	53,536	-	53,536	54,081
Consultants	129,175	-	129,175	91,265
Design & Artwork	17,084	-	17,084	16,806
Website	3,073	-	3,073	1,312
Promotion	-	-	-	-
Social Media Development	48,638	-	48,638	33,942
Filming & Production	45,171	-	45,171	6,300
Travel & Accommodation	19,889	-	19,889	-
Legal Expenses	249,512	-	249,512	635,872
Total	<u>566,078</u>	<u>-</u>	<u>566,078</u>	<u>839,578</u>

**IT'S A PENALTY
FOR THE YEAR ENDED 30 SEPTEMBER 2022**

NOTES TO THE FINANCIAL STATEMENTS (Cont'd)

Expenditure includes £428,164 (2021: £650,173) relating to donations in kind for professional services contributing to advancing our advocacy agenda.

4. Expenditure on raising funds

	Unrestricted £	Restricted £	2022 £	2021 £
Advocacy Lobbying	12,337	-	12,337	21,378
Advocacy Fundraising	29,069	-	29,069	29,114
Printing	90,392	-	90,392	-
	<u>131,798</u>	<u>-</u>	<u>131,798</u>	<u>50,492</u>

5. Other Expenditure

	Unrestricted £	Restricted £	2022 £	2021 £
Support Costs				
Office Rent	-	-	-	2,474
Accountancy	9,000	-	9,000	8,000
Travel & Refreshments	8,211	-	8,211	4,275
Other Costs	5,870	-	5,870	4,068
Governance costs				
Independent Examiner's Fee	2,600	-	2,600	1,500
	<u>25,681</u>	<u>-</u>	<u>25,681</u>	<u>20,317</u>

6. Staff numbers and expenses

There was no Trustees' remuneration during the financial year and trustee expenditure of £nil was reimbursed (2021: £nil).

The average number of persons employed by the CIO during the year was:

	2022 No.	2021 No.
Average staff head count	1	1
Staff costs (for the above persons)		
Wages and salaries	75,000	75,000
Social security costs	4,605	5,134
Pension	3,000	3,000
	<u>82,605</u>	<u>83,134</u>

One employee received emoluments of more than £60,000 per annum as disclosed above.

**IT'S A PENALTY
FOR THE YEAR ENDED 30 SEPTEMBER 2022**

NOTES TO THE FINANCIAL STATEMENTS (Cont'd)

7. Intangible Assets

	Website £	Total £
Cost		
Brought forward	6,000	6,000
Additions	-	-
Carried forward	<u>6,000</u>	<u>6,000</u>
Amortisation		
Brought forward	6,000	6,000
Charge for the year	-	-
Carried forward	<u>6,000</u>	<u>6,000</u>
Carrying value		
At 30 September 2021	<u>-</u>	<u>-</u>
At 30 September 2022	<u>-</u>	<u>-</u>

8. Debtors

	2022	2021
	£	£
Trade Debtors	-	-
Accrued Income	-	-
Total	<u>-</u>	<u>-</u>

9. Creditors: amounts falling due within one year

	2022	2021
	£	£
Trade Creditors	9,011	7,111
Taxation and Social Security	1,955	2,465
Accruals	450	24,772
Total	<u>11,416</u>	<u>34,348</u>

**IT'S A PENALTY
FOR THE YEAR ENDED 30 SEPTEMBER 2022**

NOTES TO THE FINANCIAL STATEMENTS (Cont'd)

10. Analysis of net assets between funds

	Unrestricted Funds £	Restricted Funds £	Total 2022 £	Total 2021 £
Fund balances at 30 September 2022 are represented by:				
Tangible fixed assets	-	-	-	-
Current assets	75,723	-	75,723	75,990
Creditors due within one year	(11,416)	-	(11,416)	(34,348)
	<u>64,307</u>	<u>-</u>	<u>64,307</u>	<u>41,642</u>

11. Analysis of charitable funds

	Un- Restricted Funds £	Restricted Funds £	Total Funds £
Brought forward at 30 September 2021	41,642	-	41,642
Income	746,222	-	746,222
Expenditure	(723,557)	-	(723,557)
Balance at 30 September 2022	<u><u>64,307</u></u>	<u><u>-</u></u>	<u><u>64,307</u></u>

**IT'S A PENALTY
FOR THE YEAR ENDED 30 SEPTEMBER 2022**

NOTES TO THE FINANCIAL STATEMENTS (Cont'd)

12. Related parties

During the year It's a Penalty paid a share of rent and telephone costs of £Nil (2021: £3,684) for a shared office space, to its sister Charity Happy Child International.

It's a Penalty received £12,000 (2021 - £11,000) in donations from Sysdoc Ltd in which K Corich is a director.

13. Comparative Statement of Financial Activities

	Un- Restricted General £	Restricted Funds £	Total 2021 £
<u>Income</u>			
Income from Generated funds			
Donations and grants	938,027	-	938,027
Total Income	<u>938,027</u>	<u>-</u>	<u>938,027</u>
<u>Expenditure</u>			
Charitable Activities			
Expenditure on charitable activities	839,578	-	839,578
Cost of Raising funds			
Expenditure on raising funds	50,492	-	50,492
Other Expenditure			
Support costs	20,317	-	20,317
Total expenditure	<u>910,387</u>	<u>-</u>	<u>910,387</u>
Transfer between funds	-	-	
Net movement in funds	27,640	-	27,640
Balance at 1 October 2020	14,002	-	14,002
Balance at 30 September 2021	<u>41,642</u>	<u>-</u>	<u>41,642</u>