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February 2024 - Version 2

SEX WORK NATIONAL POLICE GUIDANCE

This Guidance is subject to review by way of a consultation process, the approximate timetable of which will be to commence the process by 1st April 2024 and to finalise the process and issue any revised Guidance by 1st August 2025.

Foreword

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The commercial sex industry is highly complex, multi-faceted and dynamic in nature. These characteristic intricacies provoke emotive and often polarising debate among society. At one end of the spectrum are those who perceive commercial sex to be inherently exploitative, harmful and a form of male violence against women, and demand that it should be robustly challenged at every level. At the other end of the scale are those who adopt the 'sex as work' standpoint and view a person's involvement in sex work as something of personal choice. For many, however, their perspectives are much more nuanced and reflect various aspects of the different ends of the debate.

With such variation in personal perspectives, it is unsurprising that legislative arrangements are widely debated and heavily contested. The lack of clarity and outdated nature of some national legislation creates uncertainty around how to police sex working within the existing arrangements. This guidance, therefore, intends to aid interpretation of the complexities of sex work, recognise the key indicators/risk factors of adult sexual exploitation, and improve national consistency in policing's approach to sex work, while primarily focusing on enforcing against those who exploit.

The first step in improving policing's response to sex work is to look inwards, reflect and regain public confidence in policing. Following the rape and murder of Sarah Everard by a serving policing officer, the abhorrent behaviours of officers who photographed and shared images of the deceased bodies of sisters Bibaa Henry and Nicole Smallman, and the numerous instances of officers sharing inappropriate and often misogynistic material over social media and messaging platforms, public trust and confidence in policing has understandably diminished.



Feelings of distrust and uncertainty have become most intensely apparent among crimes associated with male violence. Sex workers, by the very nature of their work, are a vulnerable group, particularly so to male violence. It is, therefore, imperative that policing reflects and improves upon its attitudes and behaviours at both the individual and institutional levels to develop a culture that has no place for sexism or misogyny.



Foreword

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To do this, police officers must draw upon the three pillars of the VAWG agenda and apply them to the context of sex work and adult sexual exploitation.

This will involve:

- 1 Building trust and confidence** by demonstrating a consistent commitment to addressing exploitation and crimes against sex workers.
- 2 Relentlessly pursuing perpetrators** of crime by directing efforts towards tackling the most serious offences and adopting a victim-focused approach.
- 3 Creating safer spaces** and recognising the importance of not increasing a person's overall vulnerability by driving them away from something that makes them safer.

Within policing, resources are finite with demand exceeding our capacity to respond. As such, there is an intrinsic need to prioritise and focus efforts on tackling the highest harm offences. The harm reduction compass has been developed within the context of sex working to demonstrate how policing, alongside partners, can improve sex worker safety. It is a tool that aids prioritisation through focusing police attention on tackling adult sexual exploitation and working collaboratively with partners to address the wider vulnerabilities that are often associated with sex working. It does this by identifying where an individual sits on the intersecting axes of interpersonal harm (the level of control exerted over a person), situational harm (an individual's personal circumstances) and community harm (the effect on the wider community), whilst also acknowledging that these levels of harm are dynamic and subject to change.

Through adopting a harm reduction approach, policing can focus on pursuing perpetrators of adult sexual exploitation, and work with Community Safety Partnerships (CSP) to help safeguard and address wider vulnerabilities such as poverty and poor housing, substance misuse and debt/financial hardship. Only through engaging in collaborative, multi-agency working, effective information-sharing and harnessing the expertise/skills of individual organisations/practitioners can sustained harm reduction within the commercial sex industry be realised.



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Glossary

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APP	Authorised Professional Practice
ASU	Arizona State University
ASW	Adult services websites
BDSM	Bondage, domination, sadism and masochism
BWV	Body worn video
CPS	Crown Prosecution Service
CSA	Child sexual abuse
CSE	Child sexual exploitation
CSP	Community Safety Partnership
DBS	Disclosure and Barring Service
DPA	Data Protection Act
DTN	Duty to Notify
ECHR	European Convention of Human Rights
EEK	Early evidence kit
FSW	Female sex work
GBT+	Gay, bisexual, transsexual and more
HRC	Harm Reduction Compass
ISVA	Independent Sexual Violence Advocate
JIT	Joint Investigation Team
LPT	Local Policing Team
MAPPA	Multi-Agency Public Protection Arrangements
MARAC	Multi-Agency Risk Assessment Conference
MSA	Modern Slavery Act
MSHT	Modern slavery and human trafficking
MSM	Men who have sex with men
MSOICU	Modern Slavery and Organised Immigration Crime Unit
MSW	Male sex work
MVAWG	Male violence against women and girls
NCA	National Crime Agency
NPCC	National Police Chiefs' Council
NRM	National Referral Mechanisms
NUM	National Ugly Mugs





Glossary

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OCG	Organised crime groups
PSD	Professional Standards Department
RASSO	Rape and serious sexual offence
ROCU	Regional Organised Crime Unit
SARA	Scan, analyse, respond assess
SARC	Sexual Assault Referral Centre
SPoC	Single Point of Contact
SWLO	Sex Work Liaison Officer
TOEX	Tackling Organised Exploitation
VAWG	Violence against women and girls





Guiding principles

Five guiding principles underpin the development of this guidance. These principles have been refined since the last issue of this guidance. They reflect the importance of both partnership work to improve safety, and also the unique position of policing as the predominant body that takes enforcement action against those who exploit sex workers and vulnerable victims.

Principle 1

The sex industry is complex, often stigmatised, and has many evolving typologies. It is often hidden from the wider public. We recognise this environment is conducive to the abuse or exploitation of those selling sex.

Principle 2

We will engage with sex workers to build mutual trust and confidence and encourage the sharing of information to improve safety. Our role does not include making judgements about personal morality.

Principle 3

We will start from a position that seeks to tackle exploitation, encouraging the reporting of crimes against sex workers and taking enforcement action against criminal perpetrators.

Principle 4

We will seek to maximise safety and reduce vulnerability. We will work with partners to develop a problem-solving approach that tackles these issues.

Principle 5

An evidence-based 'what works' approach will be used to enhance awareness of officers and partners dealing with this complex environment. It will ensure the focus is on vulnerability and safety and a consistent approach across the country.

Key Points

Across law enforcement it is important to standardise the language used in discussion of involvement in the sex industry and associated matters to ensure accuracy, consistency and so that further traumatisation or victimisation can be avoided.

This NPCC guidance recognises the stigma associated with language such as 'prostitute' and 'vice'. In light of this, it will purposefully use the terms 'sex worker' and 'sex working' to encompass the emerging typologies and differentiate those who sell sex and those that are victims of exploitation.

[Click here to see the section on The Nature of Sex Work and the Harm Reduction Compass for linked discussion.](#)

Click here  **Terminology Guide**



Sex work terminology

Terminology Guide

Common Languages	Best Practice	Explanation
Sex trafficking	Human trafficking for sexual exploitation	This more accurately describes arrangement or facilitation or travel of persons for the purposes of sexual exploitation. 'Sex trafficking' removes the human element and is sometimes erroneously used to describe any activity in which sex workers travel.
Prostitution / prostitutes	Sex work / sex workers	Language around prostitution is often perceived as outdated and pejorative among those selling sex. Use of 'prostitution' and its derivatives should be limited to specific legal meanings and offences.
Punters / Johns	Sex buyers	'Sex buyer' more accurately describes the role of the purchaser in the business model of sex work and trafficking.
Pimping websites / sexual exploitation advertising websites	Adult services website	Likening websites to 'pimps' or directly linking them to sexual exploitation implies deliberate involvement in trafficking and suggests that they are solely engaged in advertising linked to trafficking, which has not been evidenced.
Girls	Women sex workers	Girls <u>must</u> only be used to refer to females under the age of 18. Referring to sex workers and adult victims as girls, particularly in public-facing situations, allows conflation of the MSHT and CSA threats.
Pimps	Traffickers	While traffickers are often considered a form of pimp, the term is used to relate to a wide range of facilitators, including those not involved in a Modern Slavery Act offence, such as escort agencies. 'Trafficker' more accurately relates to an individual involved in an offence under S.2 of the Modern Slavery Act, and prevent conflation of terms with facilitators outside of MSA offending.
Punting websites / sex worker review websites	Sex buyer forums	Though all such sites do provide review functionality, they also provide spaces for discussion of issues surrounding sex work.
"Bought and sold for sex"	Provide sexual services (non-trafficked) OR Forced to provide sexual services (where trafficked)	Within sexual exploitation, there is very limited intelligence indicating that ownership or control of victims is transferred in exchange for payment. Where this has occurred, this has been a feature of recruitment into exploitation, rather than at the point of payment for sexual services.





The nature of sex work

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The scale and extent of sex work in England and Wales is not properly understood. We do not know the number of people selling or exchanging commercial sexual services, nor do we have any reliable measure of the extent to which sex workers are controlled or coerced. Nevertheless, police and partner data indicate that sexual exploitation is a significant driver of modern slavery. Much of this exploitation is facilitated through (lawful) adult services websites (ASWs).

Clearly, some people are subject to activities by third parties, which makes them victims. This can be as obvious as being forced or coerced into providing sexual services or having their activities controlled. Rape and other serious offences can be inflicted over sustained periods of time causing significant and lasting harm. **People who do not consent to the activity they engage in are not to be considered sex workers. They are victims or survivors of sexual exploitation. People who do consent to sexual activity but are subject to control may not be able to give true consent.**

Whilst there is debate on to the extent to which any sex worker operates with true autonomy and self-determination, it is possible to recognise that some sex workers have greater freedom, choice and autonomy than others. These can be categorised into the following:

Survival sex: Those who engage in commercial sex because they see no alternative.

Sex workers: Those who don't necessarily choose to work in the sex industry but by virtue of their circumstances engage in commercial sex because it appears better than the alternatives.

Sexual entrepreneurs: Those who have chosen to engage in commercial sex as a career choice and for whom sex working is not necessarily a temporary arrangement that they seek to exit.

Survival sex is the most likely category that policing will encounter and therefore this guidance will detail understanding around this more.





The nature of sex work

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Dr Natasha Mulvihill (University of Bristol) highlights that the term 'survival sex' has received particular attention in the UK context since the austerity measures imposed by successive governments following the 2008 financial crisis. Through a combination of social factors such as the cuts to support services for those in need and cuts to benefits for groups such as those with disabilities, single parents and the unemployed, as well as discrimination and bullying in the workplace experienced by women and by trans people, some have moved towards selling sex to get by financially.

Use of the term has continued to increase in response to cuts to Universal Credit in 2019 and the advent of the COVID-19 pandemic. For example, in 2019, the House of Commons Work and Pensions Committee conducted an inquiry and report specifically on Universal Credit and 'survival sex'.

The term serves to highlight how long-term poverty, experiences of homelessness, insecure employment, and the cost-of-living crisis can influence an individual's engagement in the sex industry. It draws attention to a lack of resources to meet immediate survival needs; it emphasises the structural constraints within which choices are made; and it underscores the vulnerability to exploitation or violence this can expose the individual to.

In short, the definition could be seen as 'selling or exchanging sex for food, shelter, drugs, to pay bills or safety'.

Additionally, there is a gendered dimension to 'survival sex', as highlighted by Mulvihill and by the Work and Pensions Committee 2019 report, which stated it is 'overwhelmingly, but not exclusively, women who engage in 'survival sex'.

For those wanting more detail on the nature and prevalence of sex work, please see the below report.

Click here 

[View Report](#)





The nature of sex work

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Possible signs that may indicate survival sex is occurring

- Bed for the night/insecure housing/hostel/sofa surfing/no fixed abode/'sex for rent'
- Signs of coercion or lack of control of any income
- Signs of control/abuse from partners/sex buyers/family (current or previous)
- Food poverty/use of food banks
- Problematic drug/alcohol use (theirs or their partner's)
- Pay an electric/gas bill
- Only option to survive financially* (no right to remain, zero hours contracts, no CV or gaps in CV, may be a carer)

* This could be perceived and/or structural

Questions to think through in your work

- To what extent is the individual in 'survival' mode?
- Is exploitation being normalised in this case?
- What support does the individual want?
- Are you equipped to signpost to a wide variety of support services?
- Don't give up so easily on engagement, trust needs to be built and maintained
- Avoid using this as another label or telling the individual, 'Well you are in survival sex so you must x, y and z'.





The nature of sex work

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Risk, harm and managing safety

- Whilst violence is a common experience, NOT ALL sex workers experience this in their work.
- There are ongoing concerns among the sex work community over safety compromised by policing and proposals to further criminalise the sex industry

Think about the potential consequence of your interactions
e.g. safety, mistrust, displacement of activity to more
unsafe spaces, disengagement with support agencies.

How does your interaction make sex workers safer?

Patterns of engagement and moving between settings/services

- Understand the choice of settings (online/street) and services offered (direct/indirect)
- Whether the seller is working independently or there is a third party involved
- Acknowledge that engagement may be affected by previous exposure to exploitation and self perception of personal safety
- Understand that people can be very mobile, and that continued contact is hard to establish

Click here



Information Links





The nature of sex work

Information Links

M. and Jobe, A. and Bilton, C. and Stockdale, K. and Kath, and Hannah, and Community co-researchers, (2017)

[Peer Talk : hidden stories. A participatory research project with women who sell or swap sex in Teesside.](#), Project Report. A Way Out, Stockton-on-Tees.

Mulvihill, N. (2019)

[Is it time to drop the term 'prostitution' from policy discourse?](#) Journal of Gender-Based Violence, vol 3 no 3, 385-393.

House of Commons Work and Pensions Committee Report (2019)

[Universal Credit and "survival sex", Second Report of Session 2019-20, HC 83.](#)

East London Project research

[Publications - The East London Project](#)

Research by academics at Bristol University

[Identify fourteen settings and services for prostitution and sex work:](#)

- 1.Bar-based sex work and hostess bars
- 2.BDSM, kink and fetish
- 3.Brothels, parlours, saunas
- 4.Erotic and exotic dance
- 5.Erotic massage
- 6.Escort: independent
- 7.Escort: agency
- 8.Pornography, glamour and erotica
- 9.Sex parties
- 10.Street and outdoor sex work
- 11.Sugar arrangements
- 12.Telephone, text-based, TV-based, Live voyeurism
- 13.Therapeutic services
- 14.Webcamming

This ever-changing list demonstrates there are many forms of sex work. It is important to distinguish between direct and indirect sex work – not everyone identifies as a sex worker but may exchange or sell sexual services.

The links above provide some insight into what research has been conducted in this space, however, it is important to note that this is not an exhaustive list. Additional research on sex working and the wider commercial sex industry is available.





Wider forms of online sex work

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In 2018, the [Beyond the Gaze](#) project established some key features of the UK sex industry:

Much of the sale of sexual services is mediated online – attracting male, female and trans people.

Selling sexual services online is generally safer, enabling more checks of customers to be made and security to be managed.

New forms of crime have become common – these are digitally facilitated through emails, text, and online media.

This can include stalking, harassment, unwanted contact and other harmful activities such as ‘doxing’ (misuse of images/content) and ‘outing’.

Most sex workers who experience a crime do not report to police, reflecting a lack of trust and fear of criminalisation.

Those that do report have very mixed responses from police.

Webcamming and online service:

Selling of sexual services online – rather than in-person - through, for example, web-camming has risen in popularity, especially among younger adults.

Individuals may work for themselves or through an ASW platform. Content may be streamed live or pre-recorded videos uploaded.

The Online Safety Bill will influence how this evolving space is regulated in the future.

The rise of subscription sites (such as Only Fans) means that more younger adults are entering sexualised work, many of whom work alone and with little support or understanding of their rights, or networks of support.

Online-only workers can be exposed to harms, particularly in relation to blackmail, outing, as well as physical unwanted contact and the misuse of their images and content.





Wider forms of online sex work

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Some individuals advertising these online services on adult services websites may be exploited by third parties

ASW is the recognised abbreviation for adult services websites. An ASW is any advertising platform which run adverts for sexual services.

There are dozens of platforms which can be classed as ASWs. Some advertise other services and goods for sale which are household items and non-sexual. Others are dedicated to the sexual services sector. If a large well known selling site also has a personal section offering sexual services, then this type of website may also be referred to as an ASW. Adverts can be free or paid for by individuals advertising themselves or organisers advertising several individuals. It is not uncommon for an individual to advertise on several platforms or under several different profiles.

Whilst there are different legislative approaches across the world, UK policing and its law enforcement partners are committed to working with ASWs as a key partner to make the industry safer, spot exploitation and increase good practice. This occurs through a national working group, contributed to by the NPCC portfolio for sex working.

Safeguarding measures required by ASWs vary from company to company. Some have very robust measures to ensure the person advertised is an adult and not exploited. Other companies have very few safeguarding measures. ASWs differ in their approach to what text is permitted: some ban the use of certain words (e.g 'bareback') while others actively promote the use of words that may appear risky. Some websites only run adverts which have recently been paid for, while others do not weed out old adverts. This makes scanning for vulnerability in a systematic manner across multiple platforms significantly challenging. Getting to know the nuances of each ASW is key to assessing potential risks.

As the main method of advertising sexual services, ASWs are not only used by lawful sex workers who operate legally and with autonomy, but also by criminals and organised crime groups who seek to exert control over the individuals advertised for sexual services.

The content of an advert does not always accurately reflect the individual who is being advertised. This could be for marketing purposes, to draw in more customers, or to conceal a safeguarding issue.

ASWs hold data which can assist criminal investigations.





Wider forms of online sex work

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A large number of ASWs are run by companies based outside the UK. Most will, however, respond to Data Protection Act (DPA) or Information Powers Act (IPA) requests, and some are also willing to provide evidential statements. Most of the sites have easy to locate contact e-mail addresses. A criminal or intelligence-based investigation should view ASW data as a significant opportunity to progress inquiries.

The data held can include:

Contact details, ranging from phone numbers to e-mail addresses and IP addresses

Account history which can sometimes show how an advertised profile has moved around the country or countries

Verification data (sometimes requested to prove the age of the person advertised)

Financial data used to pay for the advert

Changes to the advert over time

Photos used within the advert

Links to other adverts connected by identical payments or phone numbers.

It is good practice for police forces to scan ASWs for vulnerability and signs of exploitation before conducting safeguarding visits.

This is recognised as appropriate professional police practice and those engaged in this should be experienced or have been mentored to carry out this process. In addition, data scraping tools enable forces to identify connections and patterns between adverts across various ASWs.





Professional standards

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The use of sex workers is now incompatible with the role of a police officer or police staff member.

This position statement recognises that the role of policing within society is unique in its requirement to display impartiality. Restriction of police employees' private lives is codified within police regulations where officers are curtailed from engaging in certain activities (for example officers cannot become licensees or stand for election in a political office). It is imperative that the police build trust and confidence by retaining their impartiality and delivering upon their Safeguarding responsibilities on behalf of the public.

When police officers or staff make use of services offered by sex workers there is an obvious significant risk that this is highly likely to undermine public trust. For that reason, police officers and staff should not procure or attempt to procure physically provided commercial sexual services or other services. To do so would compromise their professional position.

Given the fluid definition of what amounts to a sexual service each case should be dealt with on its own merit, but the following guidance should be considered (this is not a definitive list but a starting point). Officers and staff employed by the police should not:

- Visit brothels for the purposes of procuring a sexual service.
- Obtain services from on-street sex workers.
- Undertake any activity which could give rise to concerns about their ability to discharge their professional duties with impartiality.
- Undertake any activity which could give rise to concerns that their values were not aligned to those of the police service (for example in respect of addressing misogyny or failing to Safeguard).
- Engage in any activity involving the provision of commercial sexual services which may expose them to increased risk of corruption by virtue of blackmail or risk loss of existing vetting clearance.
- Engage in social media discourse relating to sex work that may bring the police service into disrepute.





Professional standards

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This curtailment of activity in the private lives of our workforce is necessary to address the risk posed to undermining public confidence and to individual employees themselves. It is very unlikely that an officer or staff member would be able to adequately assess the vulnerability or welfare of the sex worker, including the identification of human trafficking/CSE indicators. This may in turn lead to criminal allegations under S.53A of the Sexual Offences Act.

The sex work industry has many well documented close links to organised criminality. Officers and staff may well be placed in the position of being expected to turn a blind eye' to other criminality such as drug taking and the unlicensed service of alcohol. Historically the use of sex workers has led to an increased risk of force system misuse to research individual sex workers or locations.

Furthermore, accessing the services of sex workers brings with it an associated risk of blackmail. Whilst this is not unique to policing, the risk is tangibly increased due to the unique role, powers and access a police employee holds. Officers and staff may well be compromised in their ability to impartially deal with calls for service associated with a sex worker, associates or other customers.

In all circumstances, the conduct of a police employee accessing physically provided sexual services will necessitate a disciplinary investigation along with a review of the employee's vetting status.





Harm reduction compass

The harm reduction compass is a tool that allows policing and our partners to develop pathways to address harm and vulnerability holistically, combining law enforcement with social justice- and community-based approaches. This descriptive framework will allow policing to focus its effort upon tackling exploitation and serious sexual offences.

Police should take a criminal justice approach to identified exploitation, whilst our partners will be encouraged to take a social justice approach to reducing situational harm. This [article](#) provides a clear operational justification for decision making regarding what responses are needed given the situations occurring, offering a framework for partnerships and interventions. (Article: Sanders, T., Vajzovic, D., Brooks-Gordon, B., & Mulvihill, N. (2021). Policing vulnerability in sex work: the harm reduction compass model. *Policing and Society*, 31(9), 1100-1116).

In short, the police should focus their finite resources upon tackling exploitation and provide support to others in addressing situational harm.

This diagram depicts levels of interpersonal harm (for example coercive behaviour between individuals or organised exploitation by OCGs) which can range along a scale of higher harm to lower harm. Additionally, individuals can be subject to harm as a result of their personal circumstances (for example mental health issues, economic vulnerability, addiction etc.) Again, this level of harm can be described as ranging from higher to lower situational harm.

Having established these descriptive axes, the NPCC endorses an approach that changes the language used to describe sexual abuse of people connected to the sex industry.

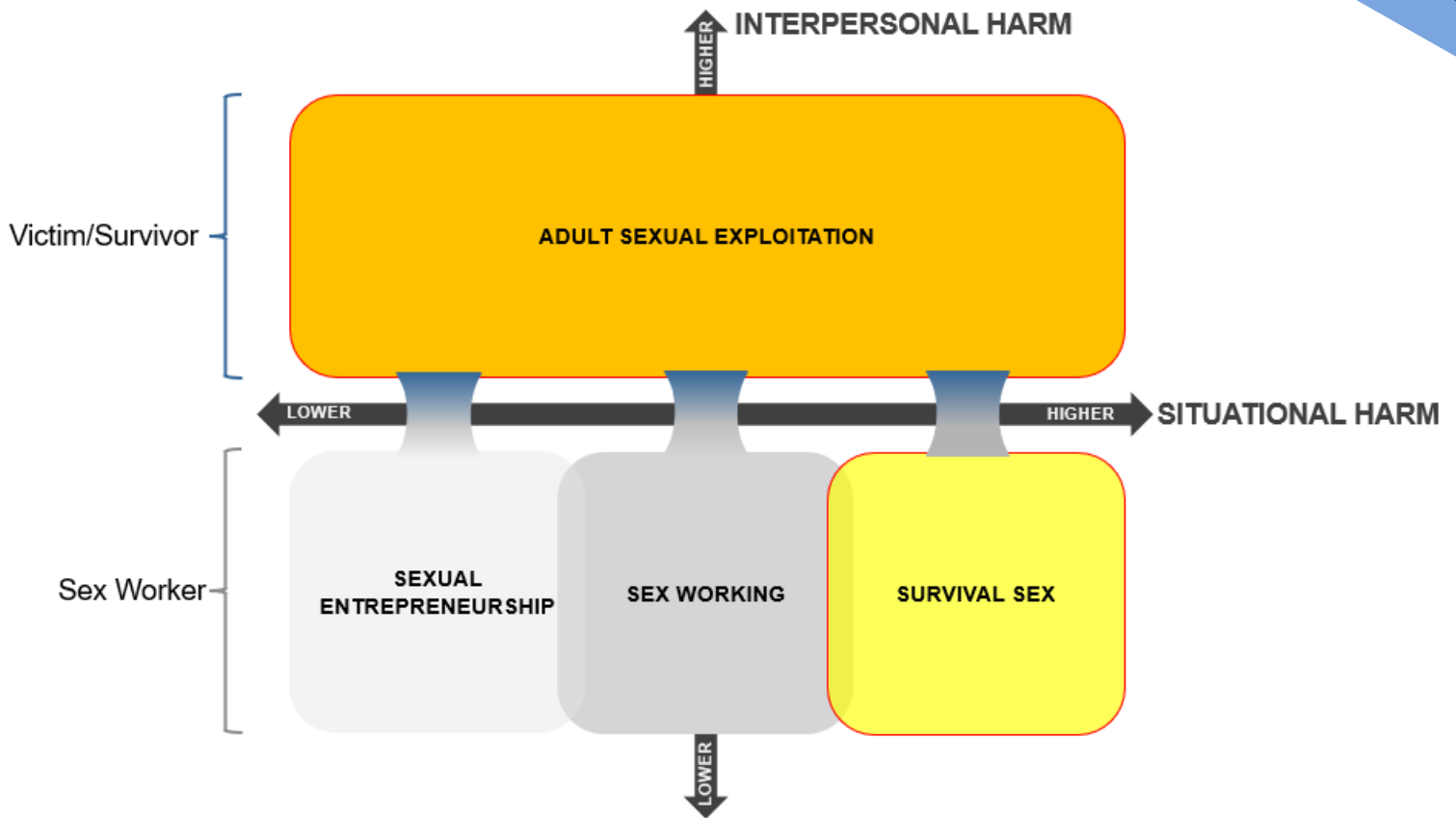
Whether someone is involved in sex work or not should not be a consideration in determining whether they have been subject to coercive interpersonal harm. For that reason, it is advocated that where someone is subject to sexual exploitation, we use the language of 'victim' or 'survivor of sexual exploitation' in preference to descriptions of exploitative sex work e.g. ('sex worker who has been raped').



[HRC Diagram](#)



Harm reduction compass



Key Points

The HRC should be used in order to:

- Assist police forces and other law enforcement agencies to prioritise operational activity. Police should prioritise working against adult sexual exploitation and other criminal offences ahead of cases of lower interpersonal harm.
- The four-point typology of the HRC can be used to engage with other stakeholders and partner agencies to focus activity and jointly develop a whole system approach, recognising the specialisms of policing, Public Health and NGO's operating in this sphere. A police and criminal justice approach will not help reduce the vulnerability of someone engaged in survival sex. The HRC should be used to differentiate the typologies and ensure the correct agency is leading on reducing the particular vulnerability.





Sex work SPoC role

Each force across England and Wales should have a single point (SPoC) and a peer network aligned regionally (see table). SPoCS are identified by forces and often sit at Inspector or staff equivalent levels. In many cases it may be appropriate for this role to be managed within the Protecting Vulnerable People or Modern Slavery portfolios.

The SPoC is responsible for disseminating best practice guidance and is a route into forces for any requests or concerns raised. They are also the dedicated contact for third party requests into the force.

The SPoC is not responsible for overseeing investigations, but does act as a conduit for information flow.

The NPCC lead will maintain a list of SPoCs and can act as a link between stakeholders and forces. The list will be updated and re-circulated quarterly. The NPCC lead will coordinate activity across the network through a series of regional and national meetings.

Timetable of Activity for National Network

Month	Meeting
July	Regional SPoC Meeting - Regions to chair
November	National Meeting of Regional Chairs
January	National SPoC Conference for all forces and partner organisations to attend
March	Regional SPoC Meeting - Regions to chair
May	National Meeting of Regional Chairs



List of Forces by Region



Sex work SPoC list

Region	Forces
North West	<ul style="list-style-type: none"> • Cumbria • Cheshire • Lancashire • Greater Manchester • Merseyside • North Wales
North East	<ul style="list-style-type: none"> • Northumbria • Cleveland • Durham
Yorkshire & Humberside	<ul style="list-style-type: none"> • Humberside • North Yorks • South Yorks • West Yorks
South Wales	<ul style="list-style-type: none"> • Dyfed-Powys • Gwent • South Wales
East Midlands	<ul style="list-style-type: none"> • Derbyshire • Leicestershire • Lincolnshire • Northamptonshire • Nottinghamshire
West Midlands	<ul style="list-style-type: none"> • Staffordshire • West Midlands • West Mercia • Warwickshire
Eastern	<ul style="list-style-type: none"> • Bedfordshire • Cambridgeshire • Essex • Hertfordshire • Kent • Norfolk • Suffolk
South East	<ul style="list-style-type: none"> • Thames Valley • Sussex • Surrey • Hampshire
London and National Bodies	<ul style="list-style-type: none"> • Metropolitan • City of London • National Crime Agency • Police Service of Northern Ireland
South West	<ul style="list-style-type: none"> • Avon & Somerset • Devon & Cornwall • Dorset • Gloucestershire • Wiltshire





Hate crime approach to crimes against sex workers

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The adoption of the hate crime approach to crimes against sex workers has contributed to an improved relationship between sex workers and the police, and a shift to protection-focused policing with the inclusion of sex workers in hate crime policy across three forces in 2023 (see Sanders, Scoular and Campbell 2022). Led by Merseyside since 2006, this approach has now been adopted by North Yorkshire and Cambridgeshire Police Forces who are seeing a shift in policing culture and attitudes.

A full-time Police Sex Work Liaison Officer (SWLO) came into post within Merseyside Police. The PSWLO is located in the Protecting Vulnerable Persons Unit, within Central investigations. This is because this is where the majority of street sex working occurs and the higher volume of crimes occur. The unit covers all hate crime investigations. The SWLO has no role in enforcement, is a Detective experienced in investigating hate crimes and is a subject matter expert. Their duties include:

- Community relations and development, carrying out liaison work with sex workers and organisations working with sex workers to build trust and encourage in reporting.
- Investigating crimes against sex workers.
- Coordinating and monitoring crimes against sex workers.
- Training & awareness raising across the force and nationally.
- Promoting the approach both across the force and externally.
- Policy and systems development around sex work and hate crime.
- Liaison with sex work support projects and others working with sex workers across Merseyside.





Hate crime approach to crimes against sex workers

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What are the benefits of using the hate crime approach?

Prioritises safety and safeguarding.

Keeps crimes against sex workers on the agenda.

Educative and awareness raising function amongst police about the victimisation/ vulnerabilities of sex workers.

Encourages a more coordinated approach to crime against sex workers and wider sex work policing.

Improved victim support for sex workers: the role of a specialist independent advisor for sex workers.

Utilises an established framework and methods familiar to police officers. Focuses the mind from report to court.

Can lead to increased reporting of crimes by sex workers to the police.

Methods used to encourage community confidence and hate crime reporting (such as third party reporting and outreach services for hate crime communities).

Improving investigations and increasing prosecutions of those offenders who target sex workers.

The main advantages of the approach from a policing perspective were; it prioritises safety and safeguarding, keeps crimes against sex workers on the agenda, has an educative and awareness raising function about the victimisation of sex workers and the discrimination they face, encourages a more coordinated approach to crime against sex workers and wider sex work policing, improves victim support for sex workers, utilises an established framework using methods familiar to police officers, leads to increased reporting of crimes by sex workers to the police, improves investigations of crimes against sex workers and increases prosecutions of those offenders who target sex workers.

A detective investigating all cases demonstrates the focus and seriousness that Merseyside Police attach to such crimes.





Hate crime approach to crimes against sex workers

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Communication to the sex work community

In their refresh of the hate crime approach Merseyside Police were keen to reach out to all sex workers including a large online sector of sex workers, creating online promotional material to raise awareness of the hate crime approach and to build trust amongst online sex workers. Other police forces have used the hate crime approach to communicate around safety, protection and dignity.

From hate crime police in Merseyside Police: (currently a policy under review)

Since 2006 Merseyside Police has adopted the approach that crimes committed against Sex Workers would be treated as Hate Crime. This recognises the fact that violent and other crimes against sex workers are often shaped by discrimination, attitudes of hostility and prejudice. As such, it requires an approach that encourages Sex Workers to come forward and report crimes in the knowledge that Merseyside Police will take their report seriously and investigate them. The National Hate Crime Guidance (College of Policing 2014) supports the inclusion of non-monitored hate crime groups beyond the five monitored strands. This will require recording on niche as a Hate Crime and the appropriate support being given to that person, in the same way we do for a person subject to any other type of Hate Crime.

The five strands of monitored Hate Crime are the minimum categories that police officers and staff will record. There are, however, many other groups in society who have been targeted with hostility and crime. It is essential that the focus on the monitored strands is not used to deny the existence of other Hate Crimes e.g. Sex Workers. The College of Policing Hate Crime Operational Guidance 2014 makes it clear that groups beyond the five monitored strands could be included in local policy and the same type of response applied as to other Hate Crimes. Indeed, Merseyside's innovative inclusion of Sex Workers is identified as an example of this.





Hate crime approach to crimes against sex workers

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All questions on the standard operating procedure (SOP) must be asked and the log endorsed with responses by the informant clearly outlining the type of Hate Crime i.e. Disability, Race, Religion, Sexual Orientation, Gender Identity (Trans) or Sex Worker and whether the victim gives consent for their personal details to be shared with appropriate support services.

The five strands of monitored Hate Crime are the minimum categories that police officers and staff will record. There are, however, many other groups in society who have been targeted with hostility and crime. It is essential that the focus on the monitored strands is not used to deny the existence of other Hate Crimes e.g. Sex Workers. The College of Policing Hate Crime Operational Guidance 2014 makes it clear that groups beyond the five monitored strands could be included in local policy and the same type of response applied as to other Hate Crimes. Indeed, Merseyside's innovative inclusion of Sex Workers is identified as an example of this.





Sex work liaison officers (SWLOs)

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SWLOs are designated police officers whose role is to work with sex workers, partner agencies and police colleagues to improve reporting and investigation of crimes against those who work in the sex industry.

The focus of SWLO roles should always be on vulnerability rather than enforcement. The SWLO role should include:

Investigating or supporting investigation of crimes against sex workers, overseeing intelligence pertaining to sex work and monitoring crime patterns.

Ensuring effective monitoring of the reporting of crimes against sex workers; including direct reports and reports via the National Ugly Mugs (NUM) report scheme.

Proactively engage with sex workers in a range of settings (street, indoor, online) to build trust and increase/improve reporting.

Working closely with colleagues involved in responding to modern slavery, exploitation and other relevant departments such as Intelligence teams.

Acting as a hub for liaison work, co-ordinating responses to sex work-related incidents, ensuring sex worker voices are heard.

Leading targeted outreach and engagement in places where sex workers may be at higher risk of exploitation and harm.

Sustained community relations and development work with partner agencies.

Advising in-force on responses to sex work-related incidents in line with Authorised Professional Practice (APP).





Sex work liaison officers (SWLOs)

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Evidence shows that SWLOs can play a vital role in improving justice and safeguarding of vulnerable persons, increasing trust and confidence in the police service. They support a focus on disrupting and apprehending violence against women and high-harm exploitation. Forces who have seen significant results have employed SWLOs at Detective level. SWLO roles are especially useful for re-orientating interventions to be focused on sex worker victimisation rather than offending, and for reaching those whose victimisation may otherwise remain hidden.

How SWLOs work in practice needs careful consideration to ensure sex workers understand the role of the police and are not put at risk through intelligence-gathering and closer contact. Although SWLOs deliver significant value, adopting SWLO roles at force level is likely to have limited impact without implementing wider changes such as: a force commitment to zero tolerance of violence against sex workers; improved investigation strategies and prosecution of crimes against sex workers; and building sex worker trust with the wider force through training, policy and strategy.

A SWLO resource pack has been developed by the University of York in partnership with police, partner organisations and sex workers.

This includes:

A sample role profile

A briefing document on best practice in SWLO roles

A more detailed research report

Images developed with sex workers which are available for use





Guidance for community problem solvers / partnership and neighbourhoods

(aimed at both police and partner organisations)

BUILDING RELATIONSHIPS AND UNDERSTANDING



SOLVING PROBLEMS TOGETHER



COMMUNITY ENGAGEMENT AND APPROPRIATE SUPPORT



In summary:

Understand the context in which you are operating. Identify and bring partners and support services together to work in collaboration to safeguard the vulnerable, build trust, share information and work to address all areas of identified vulnerability, including community concerns. You should seek to avoid an over reliance upon a disproportionate enforcement-led approach where exploitation is absent due to the likelihood of this undermining trust and relationships between the police, sex workers and partners.



Resources



Guidance for community problem solvers / partnership and neighbourhoods

BUILDING RELATIONSHIPS AND UNDERSTANDING



Sex workers are often more vulnerable to exploitation and high harm crime. Those working in the industry can have limited confidence in policing. This can create a barrier to understanding the vulnerability and exploitation this group can face. A consistent and compassionate approach can make the difference over time, increasing trust and allowing police and partners to support them and target those who exploit.

To mitigate threat, harm and risk, it is crucial to understand the bigger picture. Partners are key in this, as they will often have more interactions with sex workers and can build our intelligence picture while sharing our policing messages to increase confidence.

Each local population or geographic area will have their own sex working context (online, on street and off street) whether seen or hidden, it's there! It's crucial to understand your community, any local impact and identify intelligence gaps.





Guidance for community problem solvers / partnership and neighbourhoods

SOLVING PROBLEMS TOGETHER



It is important to build relationships and working arrangements with all identified partners and support services, as well as both statutory and non-statutory organisations. Not all solutions to problem solving in this industry will sit with the police.

It is important to consider the roles of partners within your local Community Safety Partnership (CSP) and seek to develop a structured partnership problem solving approach to the prevailing issues.

Third party reporting and intelligence sharing via partners to secure a better understanding of all the issues is desirable. In support of this, it is recommended that there are formalised governance arrangements in place to support both the strategic intent and local tactical delivery.





Guidance for community problem solvers / partnership and neighbourhoods

COMMUNITY ENGAGEMENT AND APPROPRIATE SUPPORT



Community concerns or complaints associated with the sex worker community can manifest in a number of ways. In all cases, prioritise addressing vulnerability and safety whilst targeting those who exploit the vulnerable through enforcement.

Sex workers often present with multiple complex needs, increasing their vulnerability. They have often experienced trauma. It is crucial that we know what partnership support is available (both locally and nationally) and take every opportunity to refer and signpost individuals to the most appropriate agencies.

The focus will be on safeguarding the vulnerable but in working with partners, it is important that the needs of the local community, and in particular concerns associated with sex worker relating anti-social behaviour is proportionality responded to. The needs of the community will be best understood through effective neighbourhood engagement.





Guidance for community problem solvers / partnership and neighbourhoods

Resources

[Neighbourhood Policing Guidelines](#)

[Arizona State University Centre for Problem-Orientated Policing](#)

[SARA Model](#)

Within problem solving, the SARA model is utilised to tackle root causes of issues.

EVIDENCE PUT FORWARD FROM A COMMUNITY-BASED SUPPORT SERVICE:

Sex workers of colour, migrant sex workers, and transgender sex workers experience even greater risk of sexual violence and assault. These are complex experiences of multi-dimensional disadvantages, which can also encompass drug dependency and addiction, homelessness, and mental health problems. Third-sector organisations, like us, provide holistic and gender informed support.

Services supporting both on- and off- street sex workers will take a trauma informed approach which needs to be reflected in policing. It is vital to understand that not all sex workers will have a history of trauma, but many do. For those who wish to exit sex work, this decision and the motivation to do so is deeply personal. Services can support, but cannot create the initial motivation, force the decision, or anticipate the reasons behind it. It is important to recognise that the process can be long and non-linear.





Guidance for community problem solvers / partnership and neighbourhoods

COMMUNITY ENGAGEMENT AND APPROPRIATE SUPPORT



The SARA Model has 4 stages:

- S* Scanning Identify emerging issues and prioritise potential crime and disorder problems in a particular area or locality.
- A* Analysis Analyse potential problems by gathering information and intelligence to identify any underlying causes.
- R* Response Develop and implement tailored activities to address the causes of the problem(s) identified in the analysis phase.
- A* Assessment Measure the impact of the response in order to test and evaluate if it had the desired effect. If the outcome has not been achieved, adapt and change the response where necessary.
- O* Objective You might want to consider an objective but understand sara is designed to change; what started as one objective may turn into something different through using the sara model

Click here

Watch the College of Policing SARA Model Explainer





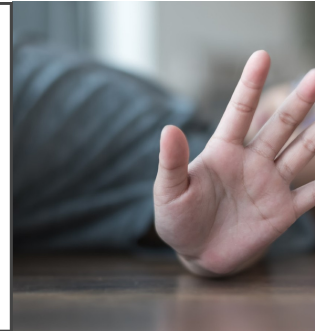
Guidance for front line police officers and staff

Key Messages: -

SAFEGUARD THE VULNERABLE



FOCUS ON EXPLOITATION



BUILD TRUST AND CONFIDENCE





Guidance for front line police officers and staff

SAFEGUARD THE VULNERABLE



Sex workers often do not have confidence in policing due to their lived experience, or a fear of enforcement or prosecution. This can create a barrier to truly understanding vulnerability and exploitation. A consistent and compassionate approach can make the difference to increase trust over time, allowing police and partners to support sex workers.

Don't criminalise sex workers simply for being sex workers or for engaging in practices that have been undertaken to increase their own personal safety. Safe working practices should always be encouraged in preference to less safe practices. Ensure individuals in brothels know that if they are only providing sexual services and are not involved in the management of the brothel, they are not committing an offence.

Be aware of and utilise support services and partner agencies to provide support to sex workers, with a focus on improving their safety and reducing the risk of exploitation or other criminality. Promote support services such as NUM, Changing Lives or Beyond the Streets to sex workers at every opportunity,





Guidance for front line police officers and staff

FOCUS ON EXPLOITATION

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Sex workers can be more vulnerable to exploitation and high harm crime. First and foremost, look at exploitation and coercion and treat sex workers as victims when appropriate (recognising that not all sex workers are victims).

Police adopt risk assessments in many different areas and reviewing a sex worker's own risk assessment would give a strong indication of how vulnerable they are. This should be done individually with sex workers, not in groups. Do not assume exploiters are always male. When speaking to sex workers, be mindful of who else might be around and what risk there is to them if they are seen talking to police. If there is exploitation, dominant or complicit persons may overshadow and drown out those who are being exploited or coerced. This is made worse if there are language barriers and non-independent interpreters.

When considering whether a sex worker is being coerced or exploited the following circumstances (not exhaustive) may indicate the sex worker has vulnerabilities or is subject to exploitation:

- The individual is unable to edit their own ASW advert. This may be owing to language issues or IT skills, but it also must be considered that this may be due to the individual not being permitted to have a say. It may also be because what is being advertised and how it is done is something they do not have a say in.
- The Individual does not control their own contact number used by those buying sexual services. This can indicate they use a third party to assist them or their work is organised by a third party.





Guidance for front line police officers and staff

FOCUS ON EXPLOITATION

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- High risk services are offered, such as unprotected sex.
- General working conditions and environment. It should be a minimum expectation that the sex worker using a property has the freedom and provisions to leave if they desire, have access to fresh clothing, food and toiletries.
- How the sex worker screens clients. There will be a variety of methods, the least safe would be a text-arranged meeting with no prior interaction. Alternatively, webcam meetings, on-line booking or phone calls might indicate a greater focus upon safety.
- The individual has no knowledge of how or capability to contact the police, support services or networks.
- The individual is unable to explain why they chose to come to the area the interaction occurs in or they do not know where they are.
- The individual cannot explain where their money goes. Clearly, they may not wish to tell police this, but it could also be a sign there is a third party benefiting from their work directly and they are scared to reveal this.
- Methods of travel may also raise questions if there is ambiguity around how they have travelled between locations and whether this has been facilitated by a third party.





Guidance for front line police officers and staff

FOCUS ON EXPLOITATION

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These broad areas should be explored through open discussions with sex workers. Remember, the police are present to improve safety and identify exploitation. We do not start from a position that assumes criminality on the part of the sex worker.

Where exploitation is suspected but not evidenced sufficiently to act, intelligence should be gathered, and support offered to the sex worker. Exploitation does not necessarily mean modern slavery or human trafficking (MSHT) offences, but it could be an indicator. Controlling prostitution for gain (S.53 Sexual Offences Act 2003) may be a more common explanation of what is occurring. Some sex workers work for, or have their business organised by, third parties such as agencies. This practice may fall into the S.53 offence, so in these circumstances the views and vulnerability of the sex worker should be a significant factor when considering the extent of any investigation. The collection of intelligence should still occur.

If trafficking is suspected and the potential victim elects to engage, the correct approach is to submit a referral via the National Referral Mechanism (NRM) and raise a crime. Should the victim choose not to support an investigation, but MSHT is still suspected, a crime should be recorded and a **DtN (Duty to Notify) form** submitted. Advice from force MSHT SPoCS can be sought in these situations. Evidence-led prosecutions have occurred for MSHT offences. Take advice but prioritise the safety of the individual: what will happen when you leave?





Guidance for front line police officers and staff

BUILD TRUST AND CONFIDENCE



It is likely a sex worker will fear that the police will criminalise them and not take complaints seriously. Being the victim of an offence is not “an occupational hazard” and all offences against sex workers should be recorded and investigated thoroughly and sensitively. Reassurance at an early stage is important.

Where offences have been committed against sex workers, and the motivation relates to their occupation, consideration should be given to investigating these offences as hate crimes by way of supporting victims in these circumstances.

Building trust and confidence is key to engagement and obtaining best evidence where offences have been committed. The individual needs of a victim should be considered, and they should always be treated with respect, sensitivity and discretion, and, where appropriate, as a vulnerable victim. Often the worst time to engage with a sex worker is when they are working.

If you are conducting a welfare visit, as a default do not turn your body worn video (BWV) on – your primary purpose is to engage and build trust. If there is a requirement to gather evidence by way of BWV explain why this is necessary.





Guidance for reactive investigations

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1. Understand vulnerability
2. Target those who exploit
3. Enhanced victim support

Consideration of special measures is important and will help to address vulnerabilities. Depending on the circumstances, an ISVA or IDVA, should be considered in respect of the relationship between victim and suspect.

Independent sex workers might become victims in other ways – labour exploitation, hate crime, sexual violence etc. This also needs to be recognised and identified by officers when working with sex workers.

The evidence suggests that people working on the street will experience multiple disadvantages including repeat victimisation of crimes, domestic violence, drug and/or alcohol misuse/dependence, mental and physical health concerns and homelessness.

Police should identify the specific vulnerabilities of each individual, and work with other agencies to share information, develop understanding of issues and build trust and confidence with sex workers.

Ultimately, whatever actions the police take, it must be weighed against the impact it will make on the life and wellbeing of the sex worker.





Guidance for reactive investigations

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- ✓ Consideration of special measures is important and will help to address vulnerabilities. The use of an ISVA or IDVA, depending on circumstances, should be considered in respect of the nature of the relationship between victim and suspect.
- ✓ Some crimes sex workers experiences are hate crimes – driven by a motivation from the offender to harm because they are a sex worker. Hate crime models should be used in these circumstances.
- ✓ Consider allocating a dedicated victim contact officer that solely deals with victim care, this allows the sometimes-complex needs, questions, and concerns to be dealt with. Set clear updates and expectations at the start and at key points in the investigation.
- ✓ Investigate the spectrum of crimes against sex workers (some of which may not be connected to sex work).
- ✓ Building trust with sex workers is key to gathering evidence, understanding their specific vulnerabilities and facilitating interpreters, intermediaries and support workers when planning interviews or court.
- ✓ Be thoughtful around your use of language – avoid language such as ‘assault on a sex worker’ unless it is relevant. This unnecessary labelling minimises their status as a victim. They are a victim of crime.

Common offences committed against sex workers include robbery and assault. Others require more specific legislative knowledge, and it is not always obvious what offences may have been committed. For example, offences relating to the refusal or removal of condoms. Give consideration to consent issues around this activity from a rape perspective.

‘Doxing’ is the researching and broadcasting of private information. This can be considered as a form of harassment and the effects on the targeted sex worker can be significant, especially as many sex workers deliberately hide their true identities from clients, families, friends and neighbours. Early engagement with CPS will assist investigations.





Guidance for reactive investigations

Page 3 of 3

Exploitation and coercion of sex workers occurs across a range of offences. There is organised criminality within the sex industry and, when uncovered, it should be vigorously pursued. Some practices by sex workers may suggest exploitation or organised criminality, but, equally, they may be used for personal safety reasons (for example the use of drivers or working for an agency). The views and vulnerability of the sex worker should be at the forefront of consideration when determining the extent to which these circumstances are prioritised for investigation. Listen, Investigate, and decide.

Some of the offences likely to be encountered may require evidential recovery of data held on adult services websites (ASWs) if services have been offered online. Sex workers may advertise or be advertised on more than one platform. Much of this can be done simply via open source. Different ASWs have different features but there is a large quantity of data that can be collected evidentially from these sites. Be aware that adverts on ASWs can be taken down quickly.

Hidden behind the profiles and adverts, the ASWs themselves hold a large amount of information which could be key evidence depending on the investigation type. This evidence includes payment details for adverts and revenue, IP addresses for profile editors, email addresses, phone numbers, verification photos and ID documents. Some ASWs also have customers who complete a registration process so information is often held which may identify them.

UK Law Enforcement will work with ASWs to reduce criminality and improve safety. If offences are found on ASWs that are linked to an advert or profile. engagement with the ASW may reveal other offences, victims and offer disruption tactics. Even if investigations involving ASWs do not reach fruition, it is vital that intelligence is gathered and learning shared.

In summary:

Sex workers are likely to need enhanced witness or victim services. Where appropriate, treat them as vulnerable victims and provide a dedicated point of contact.

Vigorously pursue those who target sex workers – a crime is a crime and the 'sex work' status should not adversely influence decision making.

Engage with the CPS at an early stage as investigations are often complex.





Partnership working

Page 1 of 4

WHY WORK IN PARTNERSHIP?

Partnership working is essential to policing sex work. Partners aid police in protecting victims and achieving effective outcomes for perpetrators. Partners can support police in breaking down barriers between police and sex workers. Partners hold the expertise in holistically working with sex workers. When it comes to short-term problem solving, getting to know the local sex worker services will be invaluable. When it comes to longer-term problem solving, and problems that may be larger than local level, getting to know national sex work organisations will be invaluable. Our partners are often the key to assisting police in bringing about effective change.



WHAT SHOULD BE THE FOCUS?

In identifying partners, the police should consider what issue they are trying to resolve, and who might be best placed to help. The focus of the partnership should be to safeguard the vulnerable and tackle exploitation. Many forces will assign a Neighbourhood Inspector or Chief Inspector to lead local partnership working.





WHO ARE THE PARTNERS OF THE POLICE?



There are a wide range of partners who can support the police and local communities with their approach to sex work. This partnership is likely to include statutory partners (for example the NHS, police, probation and local councils) who are likely to have a joint responsibility for risk assessing and having suitable support plans in place for any individuals who are identified as vulnerable adults under existing provisions. The partnership is also likely to include third sector partners (for example domestic abuse services, homeless shelters, or drug and alcohol services) who are likely to be involved by providing practical support to people who are engaged in sex work.

Consideration should also be given, however, to other partners who might be best placed to support the policing response depending on the locally identified need. Some partnerships could include:

Businesses - They could be involved in problem-solving by changing business practices to improve public safety (for example, a local shop that is impacted by sex working in their area, an online ASW who might be able to provide additional safeguarding advice to workers, or a contracted private provider of a sexual assault referral centre).

Community groups - They could be involved in sharing information about what is happening in their area, or providing feedback on the partnership response (for example, residents associations, sex worker networks, or local councilors).

Academic institutions - They could be involved in developing learning opportunities (for example, a local college that might be able to provide courses and advice to sex workers, or institutions that might be undertaking research in this area).

[National Ugly Mugs \(NUM\)](#) - NUM is a UK-based charity which works with sex workers and the police. It is a valuable resource for sex workers to increase their own safety, and with the consent of survivors, will also assist police investigations. NUM's sex worker only area of their website has safety suggestions for sex workers. Consider referring sex workers to NUM. Sex workers can sign up to NUM, which offers victim support case work, reporting and alerting services and other tools (including the NUM checker for sex workers to search phone numbers, email addresses, profile names and vehicle registrations) to reduce the likelihood of sex workers meeting with potentially dangerous clients.





WHEN DO THE POLICE NEED TO WORK IN PARTNERSHIP?



Practitioners should ensure that they have an awareness of GDPR and local **information sharing agreements** that are in place to support partnership working.

The partnership should also have **clear referral, reporting, and governance** in place to support partnership working. This may include reporting into MAPPA, MARAC, local Community Safety Partnerships, or a bespoke structure. Whichever method is adopted, practitioners should have clear referral pathways, the opportunity to share information, the opportunity to have a shared understanding of risk, and where required, a clear plan in place around how vulnerable people will be safeguarded and exploitation tackled.

To highlight the importance of partnership work, [click here](#) to view the points to consider put forward by a real community-based service that specifically supports sex workers. Strong links with partners means holistic and dynamic support given to sex workers, as well as more effective policing of perpetrators.





WHEN DO THE POLICE NEED TO WORK IN PARTNERSHIP?



We have regular meetings with the local policing teams, which helps us to identify vulnerable women that may require our support and intervention. We have two SPoCs north and south of hotspot areas who assist us and provide information to the violence against women and girls (VAWG) meetings we chair monthly.

We attend fortnightly LPT meetings to provide information to help reduce ASB and ease tensions in hotspot areas. We have spoken with members of the public on how our service is assisting on-street sex workers.

We have provided vital intelligence to protect potential victims from convicted perpetrators who have previously harmed sex workers. We also assist victims of rape and sexual assault to make statements to the police, which increases police reporting. We work closely with the modern slavery and human trafficking (MSHT) team by sharing intelligence on 'pop up brothels' to help protect those who are being sexually exploited.

We have direct links with the RASSO team who have provided staff with EEK training (early evidence kit) where we can take swab samples, store clothing in a freezer, and arrange for the police to collect it. This provides vital assistance in the conviction of perpetrators.



[Case Study](#)





Partnership working

WHEN DO THE POLICE NEED TO WORK IN PARTNERSHIP?



Case Study from Brighter Futures

Lex is a 30-year-old female who engages in on-street sex work. She has been engaging with our service for many years.

We would often see Lex on our street outreach sessions during the evening where we would supply her with condoms for safer sex and MUG sheets to ensure she avoided dangerous 'punters'.

During one drop-in session, Lex was shown a folder of photos of convicted perpetrators who had caused harm to women and children, and who still may pose a risk. The police provide us with these photos so we can reduce the risk to women and help them avoid "having business" with these males.

Lex was shocked to find one of her regular clients in there. Lex said he had picked her up two or three times previously in the past few months.

We advised Lex not to accept business from him again as he was assessed as being an enduring risk and had been convicted of the murder of a sex worker. He had strict conditions not to have any contact with sex workers.

We immediately contacted the police and they advised us that they would need a statement from Lex who was willing to engage.

As the male in question was on strict license conditions, conditions which he had clearly broken, he was arrested and returned to prison. We supported Lex throughout the process. The police thanked her for her bravery. Lex wanted to protect other sex workers and we thanked her for that.





Guidance for scanning vulnerability

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1

SCANNING FOR VULNERABILITY

An increasing number of sexual services are advertised online. Sex workers use adult services websites to advertise services and vet clients which can improve their safety. As ASWs are the largest marketplace for sexual services, they are also exploited by traffickers and organised criminals who seek to make profit from the exploitation of vulnerable victims by advertising people online and making the profiles appear to be voluntary sex workers. There are currently over 50 ASWs covering the UK with many more providing regionally-specific coverage. Some sites are also run by individual sex workers. The ASWs which currently have the largest share of the UK sexual services market are Adult Work and Vivastreet.

Other platforms may also be used to sell sexual services, including social media. Some of these ASWs are only advertising sexual services whilst others also promote non-sexual adverts (for example, items for sale).

Reviewing ASWs and linked online forums provides law enforcement with the opportunity to better understand the online sex worker community in each area and to gather evidence against recorded crimes. They can also be used for proactive investigation into exploitation and abuse. It is, however, important that law enforcement is transparent about its work in this area to ensure that this builds trust and confidence of sex workers. The focus should be on building knowledge of the sex work marketplace and investigating those who abuse and exploit sex workers or victims of trafficking.

It is inherently difficult to scan ASWs and interpret what is occurring behind adverts. Forces are encouraged to access the NCA's guide "Adult Services Websites: 3 Step Advert Assessment" (available from the NCA), which offers advice on the signs of exploitation and vulnerability to look for whilst scanning ASWs. Adopting a scanning process may lead to more actionable intelligence against exploiters.





Guidance for scanning vulnerability

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2

APPROPRIATE RESPONSE

It should be remembered that the vast majority of services advertised on ASWs are by independent sex workers and these should not be the focus of police activity. However, given the difficulty in distinguishing between independently advertised services and those which have been coerced or controlled, it is likely that there will be engagement with those who are not being exploited. Where this happens, the focus must be on building trust and increasing safety, which may involve signposting individuals to support agencies and local sexual health provisions for example.

Excessive scanning and proactive engagement can lead to unwanted interaction with non-vulnerable sex workers and erode trust. Joint working and advice from partners prior to this activity should be considered. Training from NUM may be also be available.

Force Leads should consider who is tasked with engaging with providers of sexual services. There is a balance to be struck between the use of intelligence unit staff who may understand the operation of OCGs, and the use of neighbourhood officers who may be better placed to work in partnership with local organisations.

Any visits to locations used for sex work should be low key. Use of sensitive terminology should be carefully considered. Media interaction should be avoided during visits. Officers need to be cognisant to the welfare needs and dignity of those encountered. Please refer to the guidance for front line officers and staff.





Guidance for scanning vulnerability

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3

DEVELOPING A PICTURE OF THOSE WHO EXPLOIT

There will be visits and situations which require further development work to fully understand the extent of possible exploitation linked to what has been discovered. It may not always be clear that exploitation is occurring, but when it is suspected, intelligence development may be required.

Mentioned within the guidance to investigators, ASWs hold data on those taking out and paying for adverts. These ASWs will cooperate in providing information to UK law enforcement. The data provided may include the IP addresses of locations used to take out the advert, payment details, the names given to take out adverts and contact details.

Rental agreements and booking details for premises used for the exploitation of sex workers could also reveal an audit trail. This will be achieved more easily with hotels, however, other properties may require open source or land registry checks.

Exploiters' bank accounts may also reveal expenditure on ASW adverts, other property bookings and possibly even travel. Early use of a financial investigator will greatly assist the development of investigations. Traditional telecommunications development work should also be considered. This is key when a possible exploited sex worker is not in control of their phone or the phone number advertised on ASWs.

4

IN SUMMARY

Scanning ASWs and responding both appropriately and sensitively to an individuals' vulnerability is the correct approach to safeguarding. Intelligence development should be focused on those who exploit.





Investigation of organised exploitation

Page 1 of 2

Organised exploitation will mean different things to different people. To some, all forms of prostitution are exploitation and any relationship which involves one person paying for sex with another is an exploitative one.

For the purposes of this guidance, organised exploitation will be considered to be offences committed under the 1956 and 2003 Sexual Offences Act or the 2015 Modern Slavery Act. Investigations of this nature can be complex, cross national/international borders, accumulate a lot of material and identify initially hidden suspects, as well as new victims.

This section of the guidance is aimed at signposting investigators to other material, learning resources and advisors. This is intended to provide assistance in what can prove to be complicated investigations.

In March 2019, the Modern Slavery Police Transformation Unit, through the What Works team, published a guide to sexual exploitation: Investigative Opportunities under the Modern Slavery Act 2015 (this is marked official sensitive). The guide is designed to assist in the supervision and management of modern slavery investigations. It is a comprehensive document which covers several important topics. The modern slavery website also has information of use and can be found at: Policing Slavery.

All ROCUs have modern slavery coordinators embedded within them. If you suspect sexually exploited people are being moved around, the investigation is likely to be classed as modern slavery. Reaching out to the modern slavery coordinator early on may well prove invaluable as the investigation progresses.

The National Crime Agency also has dedicated tactical advisors from the modern slavery and human trafficking team located nationally, again these points of contact can assist you with managing investigations.

All police forces also have NPCC sex working SPoCs. Engagement with these points of contact is also recommended to ensure coordinated activity at a force level is achieved and best practice worked towards.





Investigation of organised exploitation

Page 2 of 2

Tackling Organised Exploitation (TOEX) is a Home Office funded national team, based within ROCUs who can provide analytical support to investigations. Large-scale sexual exploitation investigations, particularly those within the slavery arena, will not respect county boundaries. Investigations, particularly those relating to ASWs, can quickly expand into complex cross-border inquiries.

The scale of organised sexual exploitation can range from controlling relationships between perpetrator and victim to low sophistication organised crime groups to highly organised crime networks. Even basic organised crime groups can, however, be operating internationally. Upon the advice of various SPoCs, forces engaged in these operations may well be signposted to liaise with law enforcement agencies from different countries or recommended to form a joint investigation team (JIT).

It is advisable to consider setting some early aims and objectives for investigations into sexual exploitation. Investigations which include advertisements on ASWs can generate a lot of material, especially when added to phone data and downloads. These investigations can become complex and coping with a growing investigation can feel overwhelming.

Identifying and supporting victims quickly could be considered more important than mapping large networks. When a large network is uncovered, dealing with it will draw in a lot of resources; disrupting activity and supporting victims should always be an option.

Remember, there will always be someone who has experienced something similar before - reaching out for advice with any exploitation investigation is imperative. Use the SPOC network!





On street sex workers

Page 1 of 2

Key Points

Vulnerability and trust

Diversion and partnership working

Robust pursuit of exploiters

Intelligence

Sex Workers may come to the attention of frontline staff in a variety of ways, this may be as the victim of crime when they contact a force, as part of specific intelligence or on a general patrol.

Trust and confidence in the police from the sex worker community is generally low due to an inconsistent and, at times, a poor policing response to this community over the years. This lack of trust means sex workers are less likely to report when they are victims of an offence. This in turn generates an insidious cycle where exploiters and offenders are more likely to target those working in this area as they are aware that they are less likely to be caught and put into the criminal justice system for their offending. On-street sex workers are especially vulnerable to numerous kinds of offending. Many on-street sex workers may have potentially overlapping vulnerabilities such as substance misuse issues and being the victim of ongoing exploitation.

On-street sex working is a complex issue and there can be localised effects which will also need addressing, including the wider impacts on communities. There will be times where the needs of residents and others affected by street sex working will need addressing through engagement and problem solving, most commonly by Neighbourhood Policing teams and other partners.





On-street sex workers

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Where an on-street sex worker reports being a victim of crime, it is imperative that officers who form the first response treat the person reporting as a victim first and foremost. Officers must be cognisant that those targeted on-street may have been targeted previously and not reported the crime or have had negative experiences having reported such crimes in the past. It is vital, therefore, that the vulnerability of the victim(s) is considered and that a victim-centred approach is used.

Though many aspects of sex working are lawful, offences remain around soliciting and loitering which will be applicable to on-street sex work. Where officers suspect and/or have evidence of loitering, offences should still be recorded and evidence retained, however, it will not be commonplace to seek to prosecute those who sell sex. Instead, every effort should be made to refer these individuals to partner agencies and seek a diversionary route wherever possible. Local neighbourhood teams or those working in protecting vulnerable people are likely to have existing relationships, knowledge and access to structures and should be involved at an early stage.

Those who commit loitering offences may also benefit from the use of out of court or diversionary outcomes from an investigation. However, a careful understanding of the individual's behaviour will be required before considering whether this is an appropriate course of action. Where there are previous offences of soliciting, a history of sexual offending or violence, it would be extremely unlikely that diversion would be appropriate.

Where people are identified as exploiting on-street sex workers, or any other category of sex worker, persons should be dealt with robustly. It is extremely unlikely that circumstances will exist where the application of any discretion will be appropriate.

Where applicable, always record intelligence submissions around on-street sex working to help build the most detailed local picture possible.





Brothels

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It is illegal to keep a brothel, which is a venue where more than one sex worker works (not necessarily at the same time). There is no statutory definition of a 'brothel', however, it has been held to be "a place where people of opposite sexes are allowed to resort for illicit intercourse". Despite the legal standing of brothels, the priority should be to penalise those who organise the selling of sex and make a living from the earnings.

Relevant Law

The following are summary-only offences under Sexual Offences Act 1956: -

Section 33
Keeping a brothel

Section 35
A tenant permitting premises to be used as a brothel

Section 34
Landlord letting premises for use as a brothel

Section 36
A tenant permitting premises to be used for prostitution

In addition, the following either way offence was introduced to cover the circumstances where the element of control required for the offence of controlling prostitution for gain is difficult to prove because the owner of a brothel has put himself/herself at a distance from the actual running of the establishment. This is punishable with a maximum penalty of seven years imprisonment on indictment:

Section 33A of the Sexual Offences Act 1956
(inserted by Sections 55(1) and (2) of the Sexual Offences Act 2003)
Keeping, managing, acting or assisting in the management of a brothel.

The two main brothel keeping offences are section 33 and 33A of the 1956 Sexual Offences Act. For a section 33 offence, the definition does not require payment, but it does require illicit intercourse to take place on a premises, provided by more than one person, either simultaneously or one at a time. The S.33a offence requires payment to take place. Intercourse will also include sexual acts. The CPS website is a useful aid to a more detailed understanding of the laws connected to brothels: [Prostitution and Exploitation of Prostitution | The Crown Prosecution Service](#).

The NPCC guidance aims to target those who exploit and protect the vulnerable. Sex work poses a range of risks and sex workers gathering together at the same premises for safety should not mean they are criminalised under brothel keeping legislation.





Brothels

Page 2 of 4

Learning from Police Scotland states that each circumstance should be considered on a case-by-case basis and the following factors should be taken into account:

Links to other known addresses

Are there any links to organised crime groups?

Who is paying rent or utilities on the premises?

Who is paying for the advertisement of sexual services?

Does the occupant have the means and capacity to be operating alone?

If a foreign national, does the occupant speak and understand English?

Is the occupant free to come and go as they please?

Is there evidence of the premises being used by others as a brothel?

Police may find themselves at brothels through design or circumstance such as:

There will be dynamic occasions where police are called to brothels by sex workers or sex buyers. The victim's needs should be the focus of such calls to service. If exploitation is uncovered, this will identify further victims.

Community concerns and complaints may focus neighbourhood teams on a brothel. If a location is being used as a brothel and is the cause of anti-social behaviour, there may be less intrusive ways to tackle this type of complaint. Interacting sensitively with the occupants may immediately address community concerns.

If an address is subject to intelligence connected to exploitation, depending on the urgency, research on ASWs will be of use in identifying the nature and scale of the operation. A warrant or welfare visit may be the best approach. Welfare visits should always be low key and conducted according to their aim.

A suspected brothels that is to be the subject of a warrant needs to have a comms plan in place. In the interest of building the trust of the sex working community, it is important that warrants are only conducted for the purposes of protecting victims of exploitation and not to criminalise sex workers or have the perception of doing so.

If a brothel is entered by police for the purpose of targeting exploiters, evidence of exploitation and the use of the premises may form part of the prosecution case. In collecting this evidence, the dignity and rights of sex workers present need to be maintained.

There is a lot of evidence which can be noted, filmed or if required recovered from a location which will assist in making the case that it is a brothel, this can include:





Evidence from outside a property

- Extra rubbish bags and bins containing used condoms wipes and tissues
- Numerous visitors, but typically less busy in the mornings
- Handwritten notes left for visitors on entrances
- Curtains mainly drawn or windows covered
- Multiple women living at the address
- Complaints of anti-social activity connected to the premises
- Occupants regularly recycled after staying for relatively short periods and moved on

Communal areas of the property

- Properties with more than the expected number of bedrooms such as an HMO
- Handwritten signs close to entrances such as “please use other entrance”
- Lack of personal or family effects in communal areas
- Less upkeep and cleaning of communal areas
- Internal doors closed
- Disproportionate amount of washing and drying clothes typically underwear
- Limited variety of food and mainly just bulk purchased of items

Other signs

- All bedrooms containing waste bins
- Lists tallying numbers and costs (to keep track of customers and earnings)
- Multiple mobile phones
- Constant phone calls or messages
- Open web pages featuring adult services websites (ASWs) such as Adult Work or Vivastreet
- Evidence of international money transfers
- Evidence of banked cash deposits or bundles of bank notes





Bedrooms, toilets and bathrooms

- All bedrooms containing waste bins
- Lack of personal effects in bedrooms
- Mattresses covered by single sheets
- Moisturiser, baby oil or other lubricants by the bed
- Tissues, baby wipes or toilet roll by the bed
- Bins containing disposed of condoms, wipes and tissues
- Unusual numbers of towels
- Apart from a bed and bedside table, the bedroom is scarcely furnished
- Dimmed lighting, LED lights or coloured lights in the bedroom
- An abnormal presence of incense, scented candles or air fresheners
- Webcamming stations set up, possibly with backdrops and soft furnishings (sex workers may also provide camming services to customers when not engaged in contact meetings)
- Presence of un-concealed or displayed sex and/or bondage "toys"
- Presence of sex-related dressing up outfits
- A range of guest toiletries in the bathrooms and toilets
- Disposable bedroll similar to that found on a doctor's examination bed
- Warmer than normal bedrooms
- Large amounts of hair, makeup and beauty products (sometimes bulk purchased)





Male sex work

Sex work undertaken by any gender will share common characteristics such as transactional sex undertaken to obtain a form of material or financial gain for one's self or another's benefit.

There are, however, differences with male sex work (MSW) and those engaged in this space.

MSW can occur in a range of venues where GBT+ or MSM (men who have sex with men) meet or socialise with other men, for example Public Sex Environments or Public Sex Venues where sex work may be more coincidental than arranged and organised.

MSW also occurs in brothels which may be larger, organised premises that host a number of MSW working from the venue.

There are many adult services websites used as common platforms for MSW to advertise their services through escort agencies or personal ads.

One difference between MSW and female sex work (FSW) are assumptions made about the sexuality of the sex worker. Due to the nature of their work, it is wrongly presumed that MSW will identify as gay or bisexual. The reality is that many MSM engage in MSW for a variety of reasons, which often have no link to a person's sexuality.

Public attitudes towards MSW and FSW are markedly different with less stigma, judgment, negative language and prejudice shown towards MSW.

The opportunity for sexual exploitation to occur in MSW spaces is just as real as it is for FSW; the criminal justice response to any crime and vulnerability that occurs against MSW should not be prejudiced due to the gender and/or sexuality of victims, survivors or perpetrators concerned in a report to the police.





Approach to missing sex workers

When a sex worker has been reported missing, in assessing risk, the nature, vulnerability and safeguarding considerations of sex workers must be carefully considered to ensure the risk is graded appropriately. The lifestyle of sex workers suggests enhanced risk and vulnerability, so sufficient enquiries should be conducted to determine whether there are any suspicious or concerning circumstances.

DUTIES OF THE POLICE



ROLE OF THE NCA MISSING PERSON UNIT



In summary:

- Seek to build trust and confidence with sex workers and avoid any unnecessary criminalisation of them.
- Seek to criminalise those who exploit.
- Focus on issues of safeguarding and vulnerability, keeping an open mind whilst gathering information and evidence.



Approach to missing sex workers

DUTIES OF THE POLICE

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Article 2 of the European Convention on Human Rights

The police have a legal duty to protect people against a risk of a real and immediate threat to life or serious injury when the police know, or ought to know that risk exists.

Article 3 of the European Convention on Human Rights

The police have a legal duty to protect a person or persons against a risk of a real and immediate threat of inhuman or degrading treatment when the police know, or ought to know that risk exists.

Article 4 of the European Convention on Human Rights

The police have a legal duty to protect a person from slavery, servitude and forced or compulsory labour when the police know, or ought to know that risk exists.





Approach to missing sex workers

DUTIES OF THE POLICE

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Core Police Duties under the Common Law

- To protect life and property
- To prevent and detect crime
- To preserve order
- To bring offenders to justice

To accurately assess risk, the police will need as much information as possible. This could include information on medical and mental health issues, physical disability, learning needs, drug or alcohol dependency, indicators of human trafficking, modern slavery and exploitation, other vulnerabilities and the risks that the person may pose to others.

The police will also need information that will generate meaningful enquiries to locate the individual. This may include information on who they have travelled with, relatives, details of individuals they know who are already in this country, places that they know or would like to stay in the UK, social media details, email addresses, mobile phone details, identity documents, and financial details. Obtaining quality information is therefore an important aspect of safeguarding.





Approach to missing sex workers



ROLE OF THE NCA MISSING PERSON UNIT

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The NCA Missing Person Unity provide support and advice to police forces investigating missing person cases and assist in the identification of bodies and remains.

Their extensive experience in dealing with missing person and unidentified body investigations provides an essential service to police forces and can help resolve cases that may otherwise remain outstanding. This can save police forces significant time and resources and provide the friends and family of missing and unidentified persons with vital closure.

They also maintain a central national database of missing persons and unidentified cases. This national database provides a unique function enabling the cross-matching of outstanding missing individuals with unidentified people, bodies and remains. The range of services they provide to police forces include:

- National and international cross-matching of outstanding missing individuals with unidentified people, bodies and remains.
- Tactical advice and support to suspicious cases, such as suspected homicide and no-body murders, and cold case reviews.
- Procedural assistance around effective retrieval and retention of forensic material.
- Provision of training to police forces on missing and unidentified case investigations.
- Co-ordination of enquiries with our network of partners.
- Collation and dissemination of good practice in missing person enquiries
- Access to specialist advice from experts in a range of fields.





Approach to missing sex workers

ROLE OF THE NCA MISSING PERSON UNIT

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Police and members of the public can review a central national database of unidentified people and bodies cases, and submit details regarding the potential identity via our online reporting form. The unit will acknowledge the email within five working days. Depending on the quality of information provided, however, they cannot guarantee that the force or coroner will be able to investigate further, or how long the investigation may take.

Click here 

[Search our database](#)





Migration

In most urban areas of the UK, migrants are significantly represented in the sex industry. In public debates and in the media, migrant workers tend to be associated with modern slavery and human trafficking for the purposes of sexual exploitation.

Sometimes, migrants put up with (and factor in) having to face exploitative work situations in the sex industry in the short-term in the hope to find more favourable conditions in the longer-term. Their understandings and experiences of self-realisation and exploitation are often embedded in complex interpersonal agreements and sentimental relations. In most cases, it is only if these situations deteriorate, or offer no hope of improvement, that they see themselves as exploited or victims of trafficking and accept help. Many migrant sex workers come from countries where they cannot count on law enforcement because sex work is criminalised or because people working in law enforcement are corrupt, homophobic, transphobic, or sexist. These shifting perceptions and complex experiences strongly influence whether migrant sex workers in the UK see law enforcement as a threat or an opportunity.

Migrant sex workers are a very diverse population in terms of their economic status, education, language skills, jobs in (and outside of) the sex industry, family situations in the UK and abroad, gender, and sexuality. One commonality, however, is that they all fear being deported because of the lack of legal status, which can happen if they entered the country irregularly or if their legal documentation expired. This is because this will prevent them from supporting themselves and their families in their home country, or, affect their ability to repay debts they contracted in their home country in order to migrate.

For law enforcement to be able support the most vulnerable migrant sex workers, it is paramount that there is - and that they know that there is - a clear separation between immigration law enforcement and sex work law enforcement. That migrants know that they do not risk deportation if they need protection from the police. Unless this happens, law enforcement will be seen as a threat and not as an opportunity for migrants, even when they experience exploitation and trafficking.



Key legislation in England and Wales

Page 1 of 2

The acts of buying and selling sex are not illegal in England and Wales, however, many activities that may be associated with it are. All prostitution legislation is gender neutral.

Guidance by Offence

The following are all “summary only” offences, for which the police have discretion on how they respond. The offences are punishable with either a fine not exceeding level 3 on the standard scale [£1,000], or up to three months imprisonment.

Sections 33 and 34 are ‘lifestyle offences’ within Schedule 2 of the Proceeds of Crime Act 2002.

Loitering or Soliciting for Prostitution

- Section 1(1) of the Street Offences Act 1959 (amended by Section 16 of the Policing and Crime Act 2009) makes it a summary-only offence for a person persistently to loiter or solicit in a street or public place for the purposes of offering services as a prostitute.

Keeping a Brothel

The following are summary-only offences under the Sexual Offences Act 1956:

- Section 33 – Keeping a brothel
- Section 34 – A landlord letting premises for use as a brothel
- Section 35 – A tenant permitting premises to be used as a brothel
- Section 36 – A tenant permitting premises to be used for prostitution.
- Section 33A of the Sexual Offences Act 1956 (inserted by Sections 55(1) and (2) of the Sexual Offences Act 2003) creates an either-way offence of keeping, managing, acting or assisting in the management of a brothel to which people resort for practises involving prostitution (whether or not also for other practices). This offence is an either-way offence and has a maximum penalty of seven years imprisonment on indictment.

Advertising – Placing of Adverts in Telephone Boxes

- Section 46(1) of the Criminal Justice and Police Act 2001.





Key legislation in England and Wales

Page 2 of 2

Kerb Crawling

- Section 51A of the Sexual Offences Act 2003 (as amended by Section 19 of the Policing and Crime Act 2009) creates a summary-only offence for a person in a street or public place to solicit another for the purpose of obtaining a sexual service.

Exploitation of Prostitution for Gain

- Causing or Inciting Prostitution for Gain: Section 52 Sexual Offences Act 2003 creates an either way offence for a person who intentionally causes or incites another person to become a prostitute in any part of the world and does so for or in the expectation of gain for himself or third party.
- Controlling Prostitution for Gain: Section 53 Sexual Offences Act 2003 creates an either way offence for a person who intentionally controls any of the activities of another person relating to that person's prostitution in any part of the world, and does so for or in the expectation of gain for himself or a third party. Sentencing: On conviction on indictment, a person is liable to imprisonment for a term not exceeding seven years.
- Paying for Sexual Services of a Prostitute Subjected to Force: Section 53A Sexual Offences Act 2003. [Click here to view full legislation.](#)

Trafficking for Sexual Exploitation

- Section 2 of the Modern Slavery Act 2015 creates an either way offence of arranging or facilitating the travel of another person for the purposes of sexual exploitation, which involves the commission of an offence under Part 1 of the Sexual Offences Act 2003, or section 1(1)(a) Protection of Children Act 1978. On conviction on indictment, a person is liable to a maximum term of life imprisonment.

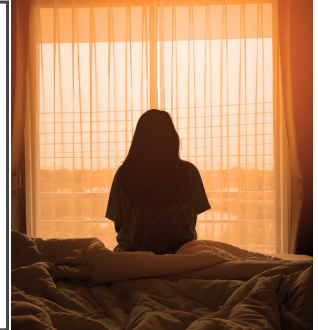
Sexual Exploitation of Children

- Section 47: Paying for sexual services of a child
- Section 48: Causing or inciting sexual exploitation of a child
- Section 49: Controlling a child in relation to sexual exploitation
- Section 50: Arranging or facilitating the sexual exploitation of a child



The voices of sex workers

"THE GOOD"



"THE BAD"



"THE UGLY"



"THE CHALLENGES"





The voices of sex workers

"THE GOOD"



Claire, an independent escort, was assaulted and robbed at knifepoint by a client. She was encouraged by another sex worker to report the incident to NUM.

She reported to us, expressing her concern that the police would not take her seriously and that her sex work would be later disclosed on DBS checks.

NUM caseworkers supported Claire in her decision, and she eventually chose to report anonymously to the police. She also asked to speak to a sex worker-friendly officer to explore her options further

Following this, Claire made a formal report. A police investigation commenced, and NUM supported Claire and the investigating officers by providing statements, database searches and emotional support.

An arrest was made, and the perpetrator sentenced to five years and four months imprisonment following trial.





The voices of sex workers

"THE BAD"



Catherine reported her experience of sustained harassment by a client to NUM, requesting police contact.

An alert was created to be sent to our members, but as Catherine requested police contact, the alert was placed on hold until police contact had been initiated. NUM caseworkers provided support to her.

Email contact was made with the known SPoC, who was no longer in post, delaying the initial contact. The officer who took on the case asked for Catherine's address, which was refused.

Catherine's address was obtained by the police, who attended her house unannounced late at night, leaving her shocked and upset. Catherine disengaged from the police and from NUM as a result, feeling that her trust had been broken.

NUM re-established trust with Catherine after reassuring her they had not been responsible for providing the police with her address. She chose not to pursue further contact with the police, however.





The voices of sex workers

"THE UGLY"



Julia reported her experience of being raped by a client to NUM requesting contact for emotional support and to discuss the possibility of formally reporting the incident to the police.

Julia stated she needed some time to process what had happened and would be in contact when she was ready. Information about SARCs and sexual health were provided at the time and Julia was left to make her own informed decision on how she wanted to proceed.

An outreach team referred Julia to the local SPoC. This was picked up by a Superintendent as Head of Local Policing & Partnerships who cascaded the case down to the appropriate Detective Chief Inspector. The case was further cascaded to the appropriate investigating officer and a sexual offences liaison officer.

Contact was made with NUM within 24 hours to allow them to introduce themselves - this is rare. During this contact, barriers and best practice were discussed to ensure the victims wishes were centred.

Both the allocated Investigating Officer/DC and the Sexual Offences Liaison Officer made contact to introduce themselves to our member and explained their role. NUM and the Sexual Offences Liaison Officer worked together to signpost the individual to relevant support in the local area.

The member reports being happy with the contact and approach from police thus far. The member had a date for ABE arranged - this was cancelled an hour before and a few further attempts were made to book an alternative time, but they were also cancelled. Our member found this disappointing and difficult to deal with as she has prepared herself for the interview physically, mentally and with her time.





The voices of sex workers

"THE CHALLENGES"



Lack of consistency:

"It seems that there is not a unified approach to the way the police deal with incidents. There is very little consistency even from within the same police force. There are many occasions when the cons outweigh the pros to reporting"

'Postcode lottery', Who is your SPoC and how do we contact them.

Happy to report in the future:

"Having a really understanding and non-judgemental police response means I'm likely to report again in the future with NUM's supports"

Having a reliable SPoC is really important to a smooth process entering the CJS.

Barriers for Migrants:

"Fear of deportation is often the reason not to report for migrant sex workers which has made them a big target for organised crime groups."

Raids on brothels/assuming human trafficking or sexual exploitation are massive barriers in reporting crimes committed against migrant sex workers.





Acknowledgement

This guidance has been created through working collaboratively with range of stakeholders from across policing, statutory authorities, academia, non-governmental organisations, the voluntary sector and persons with lived experience of sex work. Many thanks to all those who have been involved in the development of this resource.

Deputy Chief Constable
Dan Vajzovic





National Police Chiefs' Council Sex Work Guidance

The National Police Chiefs' Council (NPCC) with the College of Policing have agreed to the circulation and adoption of this updated guidance to police forces in England, and Wales.

In view of legal differences, this guidance relates to England and Wales only, although its principles and recommendations may be used in the other constituent countries of the United Kingdom, if desired, by those responsible for police policy.

It is NOT PROTECTIVELY MARKED under the Government Protective Marking Scheme and any requests for advice and rationale in relation to Freedom of Information Act disclosure should be made to the NPCC Central Referral Unit at npcc.request@foi.pnn.police.uk.



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