

Capital Exploits: A Study of Prostitution and Trafficking in London

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A study commissioned by the Mayor's Office for Policing and Crime (MOPAC)

June 2013

Acknowledgements

The research team is grateful to a host of people who participated in or supported this study.

We are especially grateful to all those who took the time to respond to our emails, be interviewed, participate in a focus group or community forum, or complete our lengthy surveys! Thanks in particular to the service users who shared their personal experiences of involvement in prostitution and trafficking with us in order to further inform and strengthen our recommendations for policy and practice.

We are very thankful for the ongoing guidance and support of the study commissioners, Jain Lemom and Yeliz Osman at the Mayor's Office for Policing and Crime, as well as the other members of our research Steering Group: Professor Betsy Stanko of the Metropolitan Police Service, Davina James-Hanman of AVA, Dr Georgina Smith of Imperial College Healthcare NHS Trust, Karen Anstiss of SC&O9, Dr Maddy Coy of the Child and Woman Abuse Studies Unit at London Metropolitan University, Marai Larasi of Imkaan, and Raggi Kotak of One Pump Court Chambers, all of whom provided valuable comments and professional insights that helped to shape this study. Thanks also to those who attended our roundtable event in July 2012, whose input influenced this final report and informed the recommendations made.

Finally at Eaves a number of colleagues made significant contributions to this study and it would not have come to fruition without them. These include Louise Harcourt (lead researcher), Lisa Young (project consultant), Heather Harvey (R&D Manager), and all our amazing volunteers: Angela Gbemisola, Emma Grant, Francesca Romita, Julia Hilliard, Lauren Baker, Rebecca Kuehler, Roxanne Halsey, Tillie Peacock and Victoria Lazar-Graham.

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Contents

Executive summary	4
1. Background	8
2. Context of the research	9
3. Methods	14
4. The sample	16
5. Research governance and ethical considerations	18
6. Limitations of the research	19
7. Findings	20
7.1 The London overview	21
7.2 London boroughs in depth	26
7.2.1 Prevalence and trends	26
7.2.2 Needs and support	36
7.2.3 Policing and criminal justice	43
7.2.4 Trafficking – particular issues	49
7.2.5 Partnership working and policy perspectives	58
7.2.6 The community perspective	61
7.2.7 Funding and commissioning	64
8. The ‘Way Forward’ – Good practice examples	67
9. Conclusions	72
10. Recommendations for policy, practice and service commissioning	73
Bibliography	80
Appendix A: Methods – in detail	85
Appendix B: Focus borough profiles	90
Appendix C: Research governance and ethical considerations – in detail	92
Appendix D: Limitations of the research – in detail	94
Appendix E: Brief overview of relevant press coverage	96

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Executive summary

Background

This research study, commissioned by the Mayor's Office for Policing and Crime (MOPAC), and undertaken in the period March - August 2012, aimed to identify:

- The extent of trafficking and prostitution in our capital including a borough breakdown and 'hotspot'¹ areas
- Emerging trends and patterns in the London 'sex industry'
- Experiences and needs of women involved in prostitution
- Current provision in London highlighting gaps and levels of unmet need
- The impact of different policing and criminal justice responses to prostitution and trafficking
- Emerging good practice and innovation
- Barriers to progress on this agenda and;
- Recommendations for policy and practice.

Context of the research

The context and starting point for this study is the Mayor of London's Violence Against Women and Girls (VAWG) Strategy: *The Way Forward: Taking Action to End Violence Against Women and Girls* (Mayor of London, March 2010). The three year strategy sets the objective to adopt and promote the United Nations definition of VAWG and focuses on tackling and addressing it in all its forms, acknowledging prostitution and trafficking as forms of VAWG².

Methods

A multi-methodological approach was adopted, gathering and analysing both quantitative and qualitative data from a wide variety of sources. Within the limited timescales and budget available, we conducted a broad London-wide overview of what is already known about prostitution and trafficking in each of the 33 boroughs. This overview was complemented by more in-depth focused research in a smaller number of carefully selected boroughs that capture a broad spread of different borough characteristics. The study included:

- A short review of recent research on the issues of prostitution and trafficking
- Making contact, primarily via email, with an extensive array of individuals, bodies, organisations (including local authorities) and groups in the capital in order to gather as much data as possible on what is known about prostitution and trafficking across London

¹ 'Hotspots' were defined as: specific areas identified by women involved in prostitution, service providers, professionals, law enforcers, and members of local communities, where prostitution visibly exists, or is known to exist, and is concentrated in these specific areas or zones.

² The Mayor of London's position on prostitution and trafficking as forms of violence against women is not the position taken by all respondents who participated in the research and different viewpoints were explored throughout the course of our data collection.

- A content analysis of all relevant council policies and strategies including those focusing on VAWG and/or domestic violence, community safety, homelessness and housing, safeguarding and substance use
- A review of relevant local media reporting on the issues of prostitution and trafficking across London
- Telephone and face-to-face interviews with a range of key informants from both the voluntary and statutory sectors
- A series of focus groups with voluntary and statutory sector representatives
- A detailed online survey addressing the key research questions for our focus boroughs
- A further survey for residents in our focus boroughs, designed to capture community views and experiences
- Attendance and discussion at a series of community/neighbourhood meetings
- The reanalysis of interview data from women involved in prostitution in London recently collected via another relevant study³
- Interviews with women currently or formerly involved in prostitution in London, including women who have been trafficked, to 'refresh' or 'top-up' the data gathered via our earlier study
- A snapshot of brothel activities compiled with the help of male volunteer research assistants
- A roundtable event at the MOPAC's offices in July 2012 to present some initial emerging findings from the research and begin to formulate some key recommendations arising from it.

Research governance, ethical considerations and the limitations of this study are all set out in detail in Appendices to the full report.

The sample

Almost 500 individuals engaged with this research to varying degrees (this includes the large number of attendees at some of the community meetings/events where data were collected).

Key findings and conclusions

- London continues to have a thriving sex industry, both on and off-street, with thousands of women involved in prostitution, a proportion of whom have been trafficked. There is clear evidence of this industry in the vast majority of London boroughs
- There appears to have been a recent and quite rapid increase in the number of non-British women selling sex on-street in a significant number of London boroughs, many of whom are from Romania
- There is some evidence to suggest that trafficked women are now being exploited in on-street prostitution in the capital, as well as off-street, and that the nature of this exploitation is organised and controlled
- There is also evidence of girls and young women under 18 being exploited in prostitution in London, in addition to signs that internal trafficking is taking place
- Evidence is also emerging that there is a cohort of women who are regularly moving back and forth between involvement in on and off-street prostitution, despite previous assumptions that those based on-street and those based off-street are two very disparate groups

³ Bindel, J., Brown, L., Easton, H., Matthews, R., and Reynolds, L., (forthcoming). *Breaking Down the Barriers: A Study of How Women Exit Prostitution*. London: London South Bank University.

- It is suggested that this emerging group of 'transient' women may be 'falling through the cracks' in terms of both service provision and policy development. This finding also challenges the perception that women who sell sex off-street are almost always 'stable' and have low needs, as this may not be the profile of some of these more transient women
- In terms of the impact of the 2012 Olympic Games on prostitution and trafficking in London, there was no evidence of a large influx of *new* women into street prostitution in the Olympic host boroughs. Rather, it seems that much of the focus was on the women already involved in street prostitution in these boroughs, with reports of a notable increase in the number of arrests as part of a large-scale effort by local police to 'clean up the streets' of women in prostitution in advance of the Games
- However, there was evidence that the sex industry was 'geared up' to meet the expected rise in demand that the Olympics would generate, especially in the off-street sector. Service providers suggested that the Olympics was having an effect particularly at the 'higher end' of the industry
- The off-street sex industry as a whole appears to be increasingly organised and increasingly lucrative for those who control it
- Despite the strategic steer from MOPAC, there is a lack of consistency across London in the way prostitution and trafficking are defined as forms of VAWG, and very few boroughs have adopted formal strategic approaches to addressing these issues
- This lack of consistency leads to very different approaches to responding to prostitution and trafficking, even in neighbouring boroughs, which serves to displace vulnerable women and fragment their opportunities for support, thereby further increasing their vulnerability
- With some notable exceptions, there appears to be a widespread failure by services across London to actively identify and record women accessing their support who are involved in prostitution, including those who have been trafficked
- There are many serious problems inherent in the current systems and processes in place to identify, classify and support victims of trafficking in London and beyond
- CJS responses to prostitution vary widely across the capital, but there is a growing consensus that enforcement action against those who sell sex is both ineffective and highly problematic
- There is mounting support across the city for tackling demand by deterring and sanctioning the behaviour of buyers. This was evident across a wide range of respondents including support providers, CJS professionals and community members
- The problems associated with prostitution highlighted by local residents are those of safety (e.g. fear of attack by buyers and exploiters) and public order/nuisance issues. There is some evidence of local residents calling on police and local authorities to switch tactics and target pimps and organised gangs controlling prostitution and trafficking instead of the women selling sex
- There are some indications of the potentially deliberate 'ghettoisation' of street prostitution in London in order to contain it within specific areas
- Dealing with the 'fallout' from prostitution and trafficking is expensive for the taxpayer – women often have complex needs and are contending with the impacts of both physical and sexual violence – yet specialist support to help women to leave prostitution or overcome their trafficking experience is very limited and very poorly funded
- The lack of coordination, joint working and even communication regarding prostitution and trafficking within boroughs and on a pan-London basis between responsible agencies is gravely concerning and suggests that London is too willing to accept and indeed accommodate an industry whose business it is to exploit women and girls

- However, there are pockets of good practice in addressing these issues in some London boroughs, from which many others could learn with a view to significantly improving their responses to women and girls in the capital who are the victims of VAWG.

Key recommendations

1. An end to the time and public resources spent policing a relatively small 'core group' of entrenched women selling sex on-street in most boroughs, who would be better served by targeted support and interventions to help them to stabilise and then develop routes out of the lifestyle in which they are entrenched
2. Robust, sustainable funding for more specialist services across the capital to support women in prostitution. More services are needed which offer a one-stop-shop service, are women-only and provide holistic, integrated and targeted support for women involved in prostitution in order to meet their complex needs
3. Training, awareness raising and the dissemination of good practice guidance to a host of professionals (particularly in health, housing and law enforcement) in order to assist them to identify women involved in prostitution and women trafficked into prostitution and then provide them with the appropriate support and/or signposting to relevant services
4. An end to the regressive approach of police enforcement action against vulnerable women in prostitution, which typically fails to deter women from selling sex and leads to a range of negative consequences
5. Action to decriminalise those who sell sex, including wiping their criminal records of any offences associated with this in order to remove this significant barrier to exiting prostitution and support them to pursue new lives and employment opportunities
6. Measures to focus police enforcement action on tackling demand by targeting buyers and also those who benefit/profit from the exploitation of women in prostitution
7. Awareness raising and training measures with key professionals to address the erroneous approach to classifying trafficking purely as an immigration issue/crime rather than a form of VAWG and a human rights violation, in line with national and international law and standards in this area
8. An end to the detention and criminalising of trafficked women, who should instead be directed to appropriate specialist support
9. In line with the Mayor's VAWG strategy, all boroughs should frame prostitution and trafficking into prostitution as VAWG and develop dedicated strategies to address these issues as such, including guidelines for coordinated, multi-agency cross-borough responses and prevention measures
10. A strategic lead or leads for London on prostitution and trafficking, facilitated by MOPAC, who can effectively address the lack of coordination, poor information sharing, and lack of agreed written policies and guidance at borough and city level that currently hinder an effective over-arching response to prostitution and trafficking in the capital
11. Improved joined-up, multi-agency working and tailored referral pathways between the voluntary and statutory sector services that come into contact with women involved in prostitution, including women who have been trafficked
12. Addressing the lack of funding as the most significant barrier to supporting women in prostitution including women who have been trafficked. Funding for this service user group has to be sustainable, made available on a medium to long-term basis, ring-fenced/protected and sufficient to effectively meet the often complex needs of the women concerned.

1. Background

In January 2012, following a competitive tendering process, Eaves was awarded the contract to undertake research on prostitution and trafficking⁴ in London commissioned by the GLA. The management of this contract has since been taken on by the Mayor's Office for Policing and Crime (MOPAC) in line with the delivery of the Mayor's Violence Against Women and Girls Strategy (Mayor of London, March 2010). This research aims to identify and report on the following:

- The extent of trafficking and prostitution in our capital including a borough breakdown and 'hotspot'⁵ areas
- Emerging trends and patterns in the London 'sex industry'
- Experiences and needs of women involved in prostitution
- Current provision in London highlighting gaps and levels of unmet need
- The impact of different policing and criminal justice responses to prostitution and trafficking
- Emerging good practice and innovation
- Barriers to progress on this agenda and;
- Recommendations for policy and service commissioning guidance.

Eaves' Research and Development (R&D) team was responsible for the delivery of this research, and the project, which was six months in length, commenced on 1st March 2012. This document and associated appendices provide a full report of how the research was conducted and the key findings that emerged.

⁴ The term trafficking referred to throughout this report is specifically in reference to trafficking for the purposes of prostitution. This study uses the official definition of trafficking set out in the Council of Europe Convention on Action Against Trafficking in Human Beings – signed and ratified by the UK and in implementation since 2008: 'Trafficking in human beings shall mean the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs.'

⁵ 'Hotspots' were defined as: specific areas identified by women involved in prostitution, service providers, professionals, law enforcers, and members of local communities, where prostitution visibly exists, or is known to exist, and is concentrated in these specific areas or zones.

2. Context of the research

The context and starting point for this study is the Mayor of London's Violence Against Women and Girls (VAWG) Strategy: *The Way Forward: Taking Action to End Violence Against Women and Girls* (Mayor of London, March 2010). The three year strategy sets the objective to adopt and promote the United Nations definition of VAWG and focuses on tackling and addressing it in all its forms, acknowledging prostitution and trafficking as forms of VAWG⁶.

The Mayor's approach is in line with a range of key international human rights instruments that recognise the harm inherent in prostitution and define sexual exploitation as a human rights violation that is profoundly gendered⁷ – the vast majority of those affected are women and girls. The Convention on the Elimination Of All Forms Of Discrimination Against Women (CEDAW), to which the UK is a signatory, calls on all States Parties to 'take all appropriate measures, including legislation, to suppress all forms of traffic in women and exploitation of prostitution of women'⁸, and it is noted that 'These practices are incompatible with the equal enjoyment of rights by women and with respect for their rights and dignity. They put women at special risk of violence and abuse.'⁹ It is widely recognised that prostitution not only constitutes and perpetuates VAWG, but gender inequality more widely.

The Mayor's strategy outlines five main priorities in tackling VAWG:

1. Ensuring that London becomes a global leader in tackling VAWG
2. Improving access to support
3. Dealing with the health, social and economic consequences of violence
4. Greater protection for those at risk
5. Tougher treatment of perpetrators.

The strategy places prevention at the heart, along with adopting an integrated approach which includes: working to an agreed definition; tackling all forms of violence and linking forms of violence; helping agencies to work together and treating VAWG as a crime. In outlining its approach, the strategy notes that: 'Regardless of whether they have been trafficked, the vast majority of women and girls involved in prostitution are violated and sexually exploited. Though there may be different degrees of coercion, control and violence perpetrated against the women and girls involved, violence is intrinsic to prostitution' (Mayor of London, March 2010:27). Awareness of the strategy, views on its content, and whether and how it is applied by practitioners in their work have all been explored in the course of this research (see Section 7.2.5 for a fuller discussion).

As a background to our study a short review was undertaken of recent research and policy documents on the issues of prostitution and trafficking. This included the following key texts/reports, which we have drawn upon in various ways throughout the course of this research:

⁶ The Mayor of London's position on prostitution and trafficking as forms of violence against women is not the position taken by all respondents who participated in the research and different viewpoints were explored throughout the course of our data collection.

⁷ As defined in the United Nations Declaration on the Elimination of Violence against Women.

⁸ As outlined in Article 6 of the Convention on the Elimination Of All Forms Of Discrimination Against Women (CEDAW).

⁹ General Recommendation 19 of the Committee on the Elimination of Discrimination Against Women.

- *Together We Can End Violence Against Women and Girls: A Strategy* (HM Government, 2009): The previous government produced this national VAWG strategy in 2009. This included prostitution and trafficking as forms of VAWG and emphasised early intervention and prevention work. The current coalition government produced a strategic vision in November 2010, followed by a VAWG action plan at the end in March 2011: *Call to End Violence Against Women and Girls: Action Plan* (HM Government, 2011). This plan acknowledges that women face violence in commercial and sexual exploitation, but advocates separate initiatives to tackle prostitution and trafficking. An updated version of the VAWG action plan was published in March 2012. *Call to End Violence Against Women and Girls: Taking Action – The Next Chapter* (HM Government, March 2012), set out new actions and incorporated prostitution, along with actions focusing on reducing the harm to those involved in prostitution. A further action of note within the plan was for the coalition government to work with MOPAC and partners to provide an effective response to exploitation and trafficking before the Olympics in London.
- *UKHTC: A Baseline Assessment on the Nature and Scale of Human Trafficking in 2011* (SOCA, 2012): This report is an assessment of the scale and prevalence of human trafficking in the UK in 2011. It establishes the number of potential victims of trafficking according to official sources, their origins, the way in which they were trafficked and the type of exploitation that they faced. The sources of information included UK Human Trafficking Centre (UKHTC) intelligence, information from the National Referral Mechanism (NRM – the UK’s official method for identifying an individual as a victim of trafficking, as required by the Council of Europe Convention on Action against Trafficking in Human Beings), and responses to a request for information disseminated by the UKHTC. Two thousand and seventy seven potential victims of human trafficking were identified in 2011, 31% were sexually exploited and 22% were victims of labour exploitation. The most common countries of origin were: Romania, Slovakia, Nigeria, Poland and the Czech Republic. Ninety nine victims were UK nationals, 53% were trafficked for sexual exploitation and over 80% of them were female children. The report concluded that many potential victims of trafficking are still being incorrectly identified as suspects of crimes or as having breached immigration laws.
- *Setting the Record: The Trafficking of Migrant Women in the England and Wales Off-Street Prostitution Sector* (Jackson, Jeffery and Adamson, 2010): This research report explores the nature and extent of the trafficking of migrant women for the purposes of sexual exploitation in England and Wales with the aim of more effectively tackling human trafficking. Although the project was not specifically focused on London, the findings are considered to be relevant to the wider context of this research. Focusing on trafficking in the off-street sector, the research examined the off-street sector in seven regions and then extrapolated the data for England and Wales as a whole. It was estimated that the sector consists of 6,000 businesses and 30,000 women involved in prostitution, 17,000 were found to be migrants and of these: 2,600 were estimated to have been trafficked, a further 9,600 were considered to be vulnerable and 5,500 did not meet the ‘trafficked’ or ‘vulnerable’ thresholds defined by the study.
- *Migrant Workers in the UK Sex Industry* (Mai, 2009): This London-based study comprises interviews with 67 women, 24 men and 9 transgender people working in various capacities in the sex industry. It aimed to examine the experiences and needs of non-British people involved in the UK sex industry. The study draws the conclusion that approx 13% of women interviewed felt they had been exploited in the industry, and asserts that regularisation of the immigration status of non-British people working in the UK sex industry through the legalisation of prostitution would solve the majority of problems confronting the people interviewed. However, the study fails to make any real distinction between female, male and transgender participants despite the fact that the vast majority of people in the sex industry are women selling sex to men, and men and

women have been shown to have significantly different experiences of prostitution. Indeed, the majority of positive statements made in the research about the sex industry were from male and transgender people. Approximately ten per cent of the interviewees were 'not directly related to the provision of sexual activities in exchange for money or favours' (these included four industry 'managers'). This reduces the statistical validity of any figures drawn from this research somewhat. In addition, the 'vast majority' of study participants were sought through their 'commercial contacts'. This compromises the randomness of the sample, and it also may be the case that interviewees felt unable to disclose any negative experiences if interviewed in the vicinity of the business owner.

- *Wrong Kind of Victim – One Year On: An Analysis of UK Measures to Protect Trafficked Persons* (The Anti-Trafficking Monitoring Group, 2010): This study assessed UK measures to implement the Council of Europe Convention on Action against Trafficking in Human Beings, which the UK ratified in 2008. In particular it focused on the National Referral Mechanism (NRM), with which it found several failings, and made a series of recommendations to address these.
- *All Change: Preventing Trafficking in the UK* (The Anti-Trafficking Monitoring Group, 2012): This study aimed to assess preventative measures put in place between April 2009 and June 2011 as part of the Government's strategy to prevent trafficking, an obligation in compliance with its ratification of the Council of Europe Convention on Action against Trafficking in Human Beings. The report concluded that prevention focused work was the weakest of the 'three Ps' (prevention, protection and prosecution) in terms of tackling trafficking. The report suggests that the main reasons for this are: 'a limited understanding of the concept of prevention in the context of trafficking in human beings, the absence of a coherent prevention strategy, and the fragmented coordination of anti-trafficking efforts overall' (2012:6).
- *Does Legalized Prostitution Increase Human Trafficking?* (Cho, Dreher and Neumayer, 2013): This paper explored the impact that legalised prostitution has on 'inflows' of human trafficking. Drawing on an economic hypothesis about the impact of legalisation, the study analysed 150 countries across the world and found that in countries where prostitution was legalised, inflows of human trafficking were higher. This is known as the 'scale effect', where legalisation leads to an expansion in the prostitution market and thus an increase in human trafficking. To examine the hypothesis further, the research also looked in-depth at three countries that have changed their legal approach to prostitution: Germany, Denmark and Sweden. These case studies confirmed the findings from the overview of 150 countries. In Germany, where prostitution was legalised in 2002 to allow third party involvement, human trafficking was found to have sharply increased. In Denmark, where independent prostitution was made legal but the operation of a brothel remains against the law, the number of victims of human trafficking was four times the number of victims in Sweden (where the buying of sex was criminalised in 1999). Despite the findings, the report does not conclude that a model of prohibition should be favoured, but encourages further research to further assess the costs and benefits of different legislative approaches.
- *Breaking Down the Barriers: A Study of How Women Exit Prostitution* (Bindel, Brown, Easton, Matthews and Reynolds, forthcoming): This report was the culmination of a two year research project which assessed the effectiveness of different interventions that are designed to support women to exit prostitution. The research interviewed 114 women involved in both on and off-street prostitution, including seven women who had been trafficked into prostitution. Over two thirds (72%) of the women in the study had experienced one or more forms of childhood violence. Eighty four percent of women reported experiencing violence whilst they were involved in prostitution, with 61% of women experiencing violence from a buyer. The study examined the barriers that women face when exiting, the process of change and the stages women go through to

exit. The study identified nine common barriers to exiting, with problematic drug use, housing and physical and mental health problems being the most frequent barriers. The research also identified a five staged model of exiting and explored the support and interventions that women require at each stage. This study found that there is a need for formal exiting services to help women out of prostitution and that exit is achievable. Women can and do wish to leave prostitution and express the need for both formal and informal forms of support to do so. This is the case for women involved both on and off-street. The report recommends holistic and targeted support that addresses all of women's needs, at every stage of exiting. In order to do this, services need to take a coordinated and integrated approach and build links with specialists who provide specific interventions. The report also recommends training and awareness raising to assist support providers in identifying and effectively supporting women accessing their service who wish to exit.

- *Silence on Violence – Improving the Safety of Women: The Policing of Off-street Sex Work and Sex Trafficking in London* (Boff, 2012): This research report examined the policing of 'sex trafficking', including policing for the Olympics, as well as the more general policing of women involved in prostitution, with a focus on the off-street industry. The report explores whether prostitution and trafficking does increase as a result of large international sporting events, concluding that there is no strong evidence to suggest such an increase and highlighting police reports showing a decrease in prostitution in London. With regard to policing, the research does highlight an increase in the number of brothel raids in the Olympic areas but notes that this action has not led to a large number of traffickers or victims of trafficking being identified. The consequence of such policing is believed to be a potential rise in on-street prostitution as women move onto the streets and a loss of trust in the police. Ambiguities in the UK definition of 'sex trafficking' and with the notion of 'coercion' are also highlighted, which the author argues can lead to the victimisation of 'migrant sex workers' who enter the country legally with the intent to sell sex. It must be borne in mind that this study is hampered by a number of methodological limitations. There is no methodology section, and the data are mainly drawn from Freedom of Information requests and previous reports, coupled with a heavy reliance on quotes from a small number of sources lacking diversity of viewpoint. The study is founded on the assumption that there exists a form of prostitution that is free from harm and voluntarily chosen, but does not elaborate on how this has been established. Finally, the study fails to situate the policing of rape and other violence committed against women in prostitution in the broader context of the policing of crimes of violence against women.
- *Big Brothel: A Survey of the Off-Street Sex Industry in London* (Bindel and Atkins, 2008): This is the report of a survey which examined the size and nature of the off-street sex industry in London. The research provided a thorough breakdown of premises where sexual services were for sale, in addition to data on the women selling sex, the services on offer, price of services etc. Approximately 1,500 brothels were identified in the course of the study from printed advertisements in newspapers alone, and data were gathered from over 900 of these. Westminster, Brent and Camden were found to have the highest number of newspaper advertised brothels of all boroughs in the capital.
- *Men Who Buy Sex: Who They Buy and What They Know* (Farley, Bindel and Golding, 2009): This is the report of a London-based study of 103 men who describe their use of trafficked and non-trafficked women in prostitution, and their awareness of coercion and violence. The vast majority (96%) bought sex off-street and 36% also bought sex on the street or in cars. The men most frequently bought sex in off-street locations in what they describe as brothels (60%), private flats that functioned as brothels (55%) or massage parlours (47%). Of all the men interviewed, 55% believed that a majority of women involved in prostitution were lured, tricked or trafficked, and 50% of interviewees said

that they themselves had used a woman involved in prostitution whom they knew to be under the control of a pimp. When asked what would deter them from paying for sex, the responses suggest that there are a number of effective options. These include being added to a sex offender register (identified by 85% of men as a deterrent), prison (identified by 84%), being publicly exposed via billboard (85%), newspaper (83%), the internet (83%), or in a letter to their family members (79%) or their employer. Higher fines (80%), greater criminal penalties (77%), and having their driver's license suspended (78%) or their car impounded (76%) would also deter these men from buying sex, if they were convinced that the relevant laws and penalties would actually be enforced.

- *'It's just like going to the supermarket': Men Buying Sex in East London* (Coy, Horvath and Kelly, 2007): This research study focused on men who buy sex in the London Borough of Tower Hamlets. The borough was chosen because it is one of the most deprived areas in London, whilst simultaneously being a site of rapid urban development, particularly in the Docklands. Tower Hamlets has an established on-street prostitution market, in which homelessness and substance misuse are widespread. This report attempts to establish the motivations for men buying sex, their characteristics and the circumstances in which they buy sex. It also explores the wider contexts of their buying, such as who the men have told about their actions, what 'type' of women they prefer (with regard to age, ethnicity, appearance etc.), their use of pornography, their general attitudes towards women who sell sex, as well as how the men began buying sex and whether this happened at home or abroad. The report identified that buying sex was linked to a sense of male entitlement which could also be categorised by a tendency to boast about buying sex and to view buying sex as a form of consumerism. This is part of a broader phenomenon of sexual consumerism – many of the men in this study also frequented lap dancing clubs and had travelled abroad to purchase sex, typically to countries where prostitution is legal. The report highlights this as an area that needs to be explored in order to find different pathways to address demand, and also calls for an exploration of the link between the 'consumption' of pornography and graphic sexual imagery and a sense of entitlement to 'consume' actual sex.

3. Methods

For the purposes of this study we adopted a multi-methodological approach, gathering and analysing both quantitative and qualitative data from a wide variety of sources to provide evidence relating to each of the areas identified in Section 1 above. All data were collected within the six month research phase March - August 2012. Within the timescales and budget available, it was agreed with MOPAC that we would provide a broad London-wide overview of what is already known about prostitution and trafficking in each borough. This is a useful exercise because for the first time it draws together into one place a wide array of information, intelligence and numerical data on prostitution and trafficking in London from a range of diverse sources, and presents this on a borough-by-borough basis. The overview was primarily accomplished via desk-based research. The findings from this exercise are summarised in Section 7.1 below and were presented to MOPAC in an extensive stand-alone appendix, separate to this report.

To complement and add some further depth to the London overview, the research team also undertook more in-depth focused research in eleven London boroughs¹⁰ that capture a broad spread of different borough characteristics – e.g. population demographics, different policing policies on prostitution, geographical location (inner/outer London), prominence or not of the local sex industry, degree and style of local engagement on issues relating to the sex industry, political control, proximity or not to Olympic sites etc. Please note that while we do *not* suggest that the situation with regards to prostitution and trafficking in these eleven boroughs is representative of all of London, the evidence gathered is intended to be illustrative of some of the current trends and themes that relate to the capital's sex industry as a whole. These boroughs have been anonymised for the purposes of this report (see Section 4 below for further information).

A comprehensive description of the varied methods and data collection tools employed in this study is detailed in Appendix A. In summary these included:

- A short review of recent research on the issues of prostitution and trafficking, which is presented in Section 2 above
- Desk-based research to gather as much data as possible on what is known about prostitution and trafficking across London
- A content analysis of all relevant council policies and strategies relating to prostitution and trafficking
- A review of relevant local media reporting on the issues of prostitution and trafficking in each borough
- One-to-one interviews with a range of key informants from both the voluntary and statutory sectors who have a pan-London responsibility for or a pan-London outlook on issues pertaining to prostitution and trafficking in the capital
- The reanalysis of London data collected via a recent national study involving women currently or formerly involved in both on and off-street prostitution across England
- New face-to-face interviews with women currently or formerly involved in prostitution in London, including women who have been trafficked
- Focus groups in the majority of our focus boroughs, one with voluntary sector representatives and one with statutory sector representatives

¹⁰ Five boroughs were initially chosen for focused study, but during the course of the project the research team were able to access and collect detailed data from six additional boroughs for inclusion in our analysis. See Appendices A and B for a fuller description of our sample.

- A detailed online survey of professionals addressing the key research questions for our focus boroughs, which was distributed via on the online tool 'SurveyMonkey'
- Data collected via attendance at a series of community meetings and events where prostitution and trafficking were on the agenda, such as Neighbourhood Watch and Safer Neighbourhood Team (SNT) meetings
- An online survey for residents in our focus boroughs, again distributed by SurveyMonkey, which was designed to further capture community views
- A snapshot of brothel activities in the focus boroughs
- A roundtable event with a range of key informants and experts on prostitution and/or trafficking to discuss emerging finding and formulate some key recommendations arising from the research.

We would encourage any reader with a particular interest in how we collected our data to closely consult Appendix A first before reading the rest of this report.

A full discussion of our key findings arising from this study is set out in Section 7 below. Section 7.1 outlines key findings from the London overview, while Section 7.2 presents the findings from our more in-depth look at some of the London boroughs, arranged according to key themes.

4. The sample

Sample size

Almost 500 individuals engaged with this research in one way or another, as Table 1 below illustrates. However, this figure should be treated with a fair amount of caution, firstly because at some of the community meetings/events where data were collected attendance was not recorded, primarily due to the large numbers of attendees who turned out (the numbers given for this type of event in the table below are estimates only), and secondly because double counting is possible – for example there was nothing to stop focus group participants or community event attendees also completing the relevant online survey. Nevertheless, the research team is satisfied that we were able to involve a substantial number of people in this study, and in doing so gather a broad range of views and experiences relating to the key issues in question.

Table 1. Outline of the sample

Type of data collection	Number held/attended	Number of participants/respondents
One-to-one interviews with key informants (voluntary and statutory)	17	19 ¹¹
<i>Focus groups with statutory sector representatives</i>	4	36
<i>Focus groups with voluntary sector representatives</i>	4	17
<i>Other focus groups</i>	4	29
Total numbers from focus groups	12	82
Face-to-face interviews with women currently/formerly involved in prostitution in London (reanalysis of the <i>Breaking down the barriers</i> [Bindel <i>et al</i> , forthcoming] data)	83	83
Additional face-to-face interviews with women involved in prostitution/trafficked into prostitution in London	10	10
Data collected via Community groups/SNT/Neighbourhood Watch meetings	5	129 ¹²
Online survey for statutory and voluntary organisations	1	80 ¹³
Online survey for community members	1	65 ¹⁴
Roundtable event	1	16
Grand total (individuals)	-	484

¹¹ All of these were one-to-one interviews with the exception of two, in which two respondents participated.

¹² The number of attendees at these events is an estimate, and clearly not every attendee made a direct contribution to the discussions and therefore the data, but all present were informed of the research and given a range of opportunities to contribute both at the event and subsequently (for example via direct communication with the research team or by completing the online community survey).

¹³ 80 respondents commenced the survey and 48 (60%) completed it.

¹⁴ 65 respondents commenced the survey and 57 (88%) completed it.

In addition, Table 2 below outlines in brief the number of brothels from which data were gathered via our brothel calling exercise in five of our focus boroughs (as described in Appendix A).

Table 2. Number of brothels from which data were gathered¹⁵, by focus borough

Focus borough*	Number of brothels
Borough A	25
Borough F	8
Borough G	7
Borough E	6
Borough D	3
Unknown	1
Grand total (brothels)	50

* See below for further information on focus boroughs

The focus boroughs

Given the often sensitive and divisive nature of issues pertaining to prostitution and trafficking, the research commissioners and the research team offered the focus boroughs participating in this study the assurance that they would not be identified by name in this final, publicly available report. Whilst a brief profile of each anonymised borough is contained in Appendix B to give some sense of context, for the purposes of this report the focus boroughs are identified as follows:

Inner London Central Borough	= Borough A
Inner London East Borough 1	= Borough B
Inner London East Borough 2	= Borough C
Inner London North Borough	= Borough D
Outer London East Borough	= Borough E
Outer London Northeast Borough	= Borough F
Outer London South Borough	= Borough G
Outer London West Borough 1	= Borough H
Outer London West Borough 2	= Borough J

There are two exceptions to this rule – Croydon and Lambeth, which have been widely identified as examples of good practice in their responses to trafficking and prostitution respectively (see Section 8 below). Croydon and Lambeth have therefore been identified in this report in order to direct interested parties to find out more about each approach, how it has evolved and the lessons that can be learned from it.

¹⁵ Note that 80 brothels in total were identified across these five boroughs via the brothel calling exercise, but meaningful data were collected from 50, and so these formed the focus of our analysis.

5. Research governance and ethical considerations

In the course of this study, every effort was made to ensure that high ethical standards were maintained throughout. Measures to support this included careful selection of research staff and volunteers, the appointment of an external Steering Group to provide expert knowledge, advice and guidance to the research team, obtaining informed consent from all participants, protecting participants' anonymity wherever necessary, and putting in place protocols to manage disclosures and provide onward advice and support as needed. A fuller discussion of our research governance and ethical considerations is contained in Appendix C.

6. Limitations of the research

Like all real world research, this study has a number of limitations that should be borne in mind when reading this report. In short, these limitations relate to time and budget restrictions, the constraints of desk-based research and online survey tools, lack of robust data in some instances due to the often hidden nature of prostitution and trafficking, and reticence on the part of some to participate in the study, amongst other things. The limitations of this study are detailed more fully in Appendix D, and once again we would encourage a careful reading of this for those who are particularly interested in our methods and the approach we took to this research.

7. Findings

A note on scale and extent

A comprehensive exploration of the scale and extent of prostitution and trafficking into prostitution in London was not possible within this budget and time-limited study, and the prevalence of these phenomena has always been notoriously difficult to establish with a great degree of certainty. However, previous research does provide some insight into the size of the sex industry in the capital. Eaves' study of premises across London where sex is sold identified approximately 1,500 brothels advertised in print media alone and collected operational data from 921 of these (Bindel and Atkins, 2008). Premises were identified in every area of central and greater London, with an average of 28 brothels per borough. Analysis was confined to premises advertised in the classified sections of local London newspapers, which the report authors suggest represent the 'tip of the iceberg' in terms of the real number of brothels in the city, particularly given that online and other sources were not consulted. In addition this study did not examine on-street prostitution.

Using a similar method of identifying premises where sex is sold through advertisements in printed media, but then extending the analysis to online sources and police intelligence, Project Acumen, a police-led research initiative, attempted to establish the size of the off-street 'prostitution sector' in England and Wales, and within this sector assess the prevalence of trafficking (Jackson *et al*, 2010). The authors identified 2,103 'businesses' in London where sex was for sale, and estimated that 5,299 women were involved in off-street prostitution in the city. Again, this study did not concern itself with on-street prostitution.

On the subject of trafficking, Project Acumen found that 96.4% of women in the off-street sector in London were migrants, which equates to 5,108 women. Nationally, the authors found that of the 17,000 migrant women involved off-street, 2,600 were estimated to have been trafficked, and a further 9,600 were considered to be 'vulnerable', as defined by the authors, which includes experiencing financial or cultural factors that can prevent women from exiting prostitution or seeking help to do so. In London this equates to estimates of 766 trafficked women and a further 2,860 vulnerable women respectively.

Within the wider context set out by the above research, this study provides a broad range of evidence from respondents regarding the women involved in prostitution they come into contact with during the course of their work, as well as insights from women involved in prostitution themselves. In some cases individual boroughs were able to provide specific data regarding the number of women involved in their area, and in particular those involved on-street, and these are detailed in Section 7.2 below.

7.1 The London overview

The Mayor's VAWG strategy is a useful tool for setting out priorities and obligations, as well as a reference point for individual boroughs when developing their own strategies in relation to VAWG, including prostitution and trafficking. It is therefore of some concern that a number of boroughs were either not aware of its existence, or of its content (this is discussed further in Section 7.2.5).

There is also an expectation that all boroughs develop their own tailored local VAWG strategy. The importance of individual boroughs having such a strategy as a reference point is two-fold; it clearly states a commitment at local level to tackle VAWG, and it helps to guide policy and practice across the public and voluntary sectors. This, in turn, can assist the voluntary sector in campaigning and lobbying on the issues.

This study identified fourteen London boroughs that class both prostitution and trafficking as forms of VAWG: Brent, Ealing, Greenwich, Hackney, Harrow, Hillingdon, Hounslow, Islington, Lambeth, Redbridge, Sutton, Tower Hamlets, Waltham Forest, and Westminster.

These fourteen boroughs include those that are currently drafting or developing strategies/policies that will include prostitution and trafficking (Brent, Ealing, Hounslow and Waltham Forest). Whilst Hackney's VAWG strategy covers trafficking and prostitution, reference to the latter only addresses 'forced prostitution'.

Some of these boroughs do not have dedicated VAWG strategies but seek to incorporate VAWG into other strategies. The boroughs of Hillingdon and Harrow class prostitution and trafficking as forms of VAWG but have incorporated these into their domestic violence and/or sexual violence strategies. Bromley is currently developing a VAWG strategy, but it excludes prostitution and trafficking.

For nine of the London boroughs it was unclear whether or not they class prostitution and trafficking as VAWG, either because it was not stated in their response; no response was received; or the information could not be obtained via desk-based research. Barking and Dagenham is currently developing a VAWG strategy but it is unclear whether or not prostitution and trafficking will be included. Similarly, Kingston upon Thames Community Safety Partnership appears to have a VAWG strategy but again it is unclear whether prostitution and trafficking are included as the document was not available for consultation. However there is no specific reference to either prostitution or trafficking in the partnership plan for 2011-2014.

The remaining ten boroughs do not class prostitution and trafficking as forms of VAWG. It appears¹⁶ that all but three of these boroughs make reference to either prostitution or trafficking in other policies or strategies including community safety, homelessness, domestic violence and safeguarding.

The majority of London boroughs do not have specific, stand-alone policies for prostitution and/or trafficking although some do incorporate the issues into a VAWG, domestic violence or sexual violence strategy. The exceptions are the London Borough of Croydon which has a protocol for trafficking, Greenwich is in the process of drafting a policy for addressing prostitution within the borough, and Redbridge and Westminster, which are both in the process of drafting strategies on aspects of the sex industry.

¹⁶ Information obtained from desk-based research.

For the majority of boroughs it was unclear whether or not they had a specific policy on the advertising of sexual services, and many council respondents were unsure whether such a policy existed. Only two boroughs (Hillingdon and Sutton) confirmed that they have specific policies, with Hillingdon currently developing one. Thirteen boroughs have policies for the licensing of sex establishments or special treatment premises. Further boroughs may have specific policies for advertising and licensing, however they were either not attainable via desk-based research or the council did not provide information on this matter.

The London sex industry

There is evidence of an active sex industry in the vast majority of London boroughs. This is apparent by the identification of either on or off-street hotspots in most boroughs. Hotspots were identified via a range of sources including information obtained from councils, documents and reports that made reference to prostitution and hotspots, information received from voluntary sector organisations, interviews with women involved in prostitution, responses to the online survey and media reports. There were only five London boroughs (City of London, Hammersmith and Fulham, Havering, Hillingdon and Kensington and Chelsea) where no hotspots (either on or off-street) could be identified. However, previous research undertaken by Eaves (Bindel and Atkins, 2008), which examined the off-street sex industry in London, highlighted the presence of off-street premises in all of these boroughs which suggests that at the very least an off-street industry does exist.

The extent of trafficking into prostitution specifically proved difficult to ascertain, information that the research gathered on the extent of trafficking in the London boroughs is patchy and based on indicators and local intelligence. Our main findings as they relate to trafficking are discussed within a separate section later in this report (see Section 7.2.4 for further details).

Service provision

Fifteen of the 33 London boroughs are covered by specialist services¹⁷ for women involved in prostitution or women trafficked into prostitution. This includes services whose remit is not solely providing support to women involved in prostitution or women trafficked into prostitution, but services which provide some form of targeted support to these service user groups, for example a generic drug support-based service which has a drop-in for women involved in prostitution. Some services cover multiple boroughs, for example SHOC serves four London boroughs and Open Doors covers three. The borough of Camden appears to have the greatest number of specialist services. In the remaining 18 boroughs, the research team were not able to identify any specialist services either through desk-based research, interviews or focus groups.

It is notable that the nature of specialist services for women in prostitution in London varies widely. Some operate from a public health perspective, seeking to minimise the harm associated with involvement in prostitution by offering practical support relating to sexual health, contraception and safe drug use etc. Others focus more on supporting women with the impact involvement in prostitution tends to have on women's mental health and emotional wellbeing, and more in line with the recognition of prostitution as a form of VAWG, these services usually offer women the opportunity of alternatives to prostitution by

¹⁷ The research team defined a 'specialist service' as a service which provides targeted support and provision to women who have been involved in prostitution and/or trafficked into prostitution.

providing them with holistic support to exit and build new lives (for further discussion on this point see pages 42-43).

The research was only able to gather limited data on NHS service provision due to a low response rate from NHS-based services and PCTs. The research team received seven responses that covered twelve of the London boroughs, with one response from South West London PCT which covers five London boroughs. Respondents were only able to provide limited information regarding the services that are provided for these service user groups, in general it would appear that PCTs and the NHS are not able to readily provide information on specific service user groups. Only three respondents provided information on whether or not they identify these service user groups. Two respondents rely on women disclosing and another respondent said their borough was introducing assessments that would assist with identification.

Policing and criminal justice

As part of the London overview, data were obtained from the Metropolitan Police Service (MPS) showing the number of arrests for prostitution-related offences between the months of June 2011 and May 2012. Along with this, an MPS freedom of information request¹⁸ was also used to provide further insight into the number of arrests during the period of 2011-2012. Combining these two sources, there were twelve London boroughs where there were no arrests for prostitution-related offences during this period (Barnet, Bexley, City of London, Enfield, Hillingdon, Hounslow, Islington, Kensington and Chelsea, Kingston upon Thames, Merton, Richmond and Wandsworth). Focusing on the MPS freedom of information request, which encompasses every London borough, the boroughs with the *highest* number of arrests for prostitution related offences in 2011-2012 are contained in Table 3 below¹⁹.

Table 3. London boroughs with the highest number of arrests for prostitution-related offences in 2011-2012

Borough	Number of arrests for prostitution-related offences 2011-2012
Tower Hamlets	42
Lambeth	38
Ealing	21
Westminster	17
Newham	16
Redbridge	14

The majority of outcomes in these boroughs following arrest were charges.

SC&O9 (the Metropolitan Police's Human Exploitation and Organised Crime Command) provided data on the number of brothel visits conducted over the last year, as well as data on any recent operations targeting trafficking. During this period SC&O9 carried out 25 operations (13 of which directly related to trafficking), identified 196 victims of trafficking and undertook 73 brothel visits across the Metropolitan Police District. The number of brothel visits made by SC&O9 per London borough in 2011 is illustrated in Table 4 below.

¹⁸ This FOI was not made by the research team, but located online at:

[http://www.met.police.uk/foi/pdfs/disclosure_2012/march_2012/2012020000936.pdf]

¹⁹ No information is provided within this FOI on the precise offences that resulted in arrest.

Table 4. Number of brothel visits by SC&O9 per London borough in 2011

Borough	Number of brothel visits by SC&O9 in 2011
Tower Hamlets	16
Newham	12
Westminster	11
Waltham Forest	11
Redbridge	4
Camden	4
Greenwich	3
Wandsworth	3
Brent	3
Havering	3
Haringey	2
Lambeth	1
Total	73

SC&O9 also provided data on the number of arrests during the period of January 2011 to December 2011 for individual offences relating to trafficking, including trafficking into the UK for sexual exploitation (Section 57 of the Sexual Offences Act 2003), trafficking within the UK for sexual exploitation (Section 58 of the SOA 2003) and trafficking people for exploitation (Section 4 of the Asylum and Immigration [Treatment of Claimants] Act 2004). A London borough breakdown was provided. During this period the unit arrested 62 individuals. 33 of these arrests related directly to trafficking offences and five of these individuals were arrested outside London. Almost all of the individuals arrested during this period were arrested for multiple offences (hence the number of arrests per offence is greater than the total number of individuals arrested), as shown in Table 5 below. Figures seem low in context, although arguably the length and complexity of SC&O9 operations that focus on multifaceted organised crime networks are likely to be contributing factors in this regard.

Table 5. Number of arrests by SC&O9 per trafficking offence in 2011

Borough	Trafficking into the UK for sexual exploitation, s.57 SOA 2003	Trafficking within the UK for sexual exploitation, s.58 SOA 2003	Trafficking for sexual exploitation, s.4 Asylum and Immigration (Treatment of Claimants) Act 2004	Total number of individuals arrested*
Westminster	2	1	2	4
Heathrow (in LB of Hillingdon)	4	4	3	4
Wandsworth	3	3	2	3
Newham	1	1	2	3
Camden	0	0	2	2
Harrow	0	0	2	2
Hammersmith & Fulham	3	3	3	3
Brent	1	1	0	1
Hounslow	1	0	0	1

Merton	2	0	0	2
Haringey	3	0	0	3
Outside London	5	5	4	5
Total	25	18	20	33

*Note that some individuals were arrested for multiple offences

Finally, data were also obtained from the Ministry of Justice showing the number of defendants found guilty, sentenced and the outcomes of sentencing for selected prostitution and trafficking offences across London in 2011. The vast majority of findings of guilt were for the placing of advertisements relating to prostitution, as Table 6 below demonstrates, whilst findings of guilt for all other offences, including keeping a brothel, seem surprisingly low, particularly given the extent of police enforcement against women in prostitution (as described in Section 7.2.3), and the high profile given by campaigners and the media to convictions of this nature.

Table 6. Findings of guilt for selected prostitution and trafficking offences in London in 2011

Prostitution/trafficking offence	Findings of guilt in London 2011
Placing of advertisements relating to prostitution	154
Keeping a brothel for prostitution	10
Causing or inciting prostitution for gain	4
Controlling prostitution for gain	4
Trafficking into the UK for sexual exploitation	3
Keeping a brothel	2
Person persistently loitering or soliciting for the purposes of prostitution	2
Trafficking within the UK for sexual exploitation	1
Kerb crawling	1
Persistent soliciting of a person or persons for the purpose of prostitution	1
Tenant permitting premises to be used as brothel	0
Total findings of guilt in London boroughs in 2011	182

Whilst the above data provide a useful snapshot of Criminal Justice System (CJS) responses to prostitution and trafficking in London in recent times, the picture provided by these quantitative data alone is incomplete, at times inconsistent and lacking in context. For example, it is difficult to comment on data on the number of arrests for prostitution related offences in London when it is unknown exactly how many women are involved in prostitution in every borough and therefore whether these arrests represent a large or small proportion of the women concerned overall. Interestingly the two boroughs with the highest arrests are boroughs that operate court diversion schemes where arrest and attendance at court is required in order for women to enter this scheme.

Similarly, whilst the data supplied by SC&O9 give a picture of where their operations take place, it is difficult to comment further or make meaningful comparisons on this given the varied size and nature of the sex industry in the different London boroughs that feature here. Considering the extent of police action across London against those who sell sex, and in some cases against those who purchase or control the sale of it (as documented in Section 7.2.3 below), alongside the prevalence of both the on- and off-street sex industry in London (as documented above and in Section 7.2.1 below) all of these data from the CJS seem surprisingly low, notwithstanding that they only relate to those cases that actually come to the attention of the law.

7.2 London boroughs in depth

This section complements and builds upon the London overview provided above. It contains a thematic discussion based on the analysis of more detailed data and intelligence on prostitution and trafficking in the capital gathered from eleven London boroughs who participated in this research.

7.2.1 Prevalence and trends

This is not a prevalence study – because of the nature of prostitution and trafficking into prostitution it is very difficult to be certain about the extent of both, and the study's time and budget constraints prevented a more comprehensive exploration of prevalence. Instead we present below evidence and local intelligence provided by a range of our respondents, and support providers in particular, regarding the women involved in prostitution they come into contact with during the course of their work. Some patterns and trends do emerge within the data provided, and we outline these below.

Women on-street

Respondents were asked to estimate the number of women selling sex on-street in their borough. The majority noted that it was difficult to provide an estimate given that many of the women are very mobile and may only be seen on-street for short, concentrated periods of time before 'disappearing', only to reappear some weeks or months later. Some respondents in a number of boroughs were able to provide varied numerical data as follows:

- 106 women involved in prostitution have been identified in Borough H around one particular area alone (which is a known on-street hotspot)
- Lambeth's multi-agency Prostitution Group (LPG) estimates that approximately 150-180 women selling sex on-street in the borough are engaged with services at any one time
- A police officer in Borough E reported that he has '117 girls on his list' of those selling sex on-street in that borough. Another respondent based in Borough E estimated that there are 50-100 women involved in street prostitution in the borough
- Two respondents based in Borough F estimated that between 40 and 80 women are selling sex on-street in the borough.

Clearly it needs to be borne in mind that most of the above are estimates only, some relate only to the number of women actually engaging with services in the relevant borough, and double-counting is possible as the same women may be recorded in more than one borough. However, these figures do give some sense of the size of the on-street sex market in London.

It is also evident that within and between boroughs numbers fluctuate over time – several respondents spoke of the virtual disappearance of many of the women who used to sell sex on-street in Borough E, reportedly the result of a police 'crackdown' on the women in preparation for the Olympics, which pushed them into neighbouring boroughs or led them to sell sex in much less visible ways. Conversely, Borough J reported quite a sudden and 'escalating problem' with on-street prostitution in their borough, in part fuelled by police enforcement action in neighbouring Borough H which has displaced women into Borough J.

Borough A, on the other hand, reports a slow decrease in the number of women selling sex on-street in the borough over time, although its off-street industry arguably remains the

largest in the UK. Respondents from Borough A suggested that because tackling drug crime is a major priority for the borough and that traditionally many of the women on-street were drug users, tackling the former through enforcement had the effect of also reducing the latter.

It is of particular interest that a pattern emerged across boroughs regarding the number of women *entrenched* in on-street prostitution. By 'entrenched' we mean involved in prostitution on a regular, usually long-term basis, whereby their involvement essentially dictates their lifestyle and may even be a 'way of life' for them. Respondents were asked to estimate how many women in their borough this situation applied to, and they repeatedly identified an entrenched group of 15-40 women, with 20-30 being the most common response. Typically this was the group primarily targeted with law enforcement action by the police (in boroughs where this was the approach taken), given their visibility and frequent presence on street, which, from a police perspective defined these women as 'persistent offenders'.

This finding is of particular note when one considers the time and public resources spent policing this relatively small 'core group' of entrenched women, who might be better served by targeted support and interventions to help them to stabilise and then develop routes out of the lifestyle in which they are entrenched. An upfront investment in exiting interventions is likely to save public money in the long-term, not to mention improved health and life circumstances for this particularly vulnerable group of women.

With regard to trends in on-street prostitution, one striking finding from this study, as reported by many of our frontline respondents, is the recent and evidently quite rapid increase in the number of non-British women selling sex on-street in a significant number of London boroughs. Respondents reported that this was a phenomenon that had occurred sometime in the last one to five years. Previously it was the generally accepted view that most non-British women selling sex in the UK were to be found off-street (Jackson *et al*, 2010; Kinnell, 2008). However, according to respondents in numerous boroughs, more and more women are selling sex on-street who are reported to be 'Eastern European' and primarily 'Romanian'. We use inverted commas here as this information needs to be treated with some caution – some who reported these nationalities may never have spoken directly to the women concerned, and not all women involved in prostitution may be willing to divulge their personal details to the casual enquirer. Nevertheless, this information was echoed by support providers, including outreach workers, interacting directly with the women involved both on the streets and within their services. Respondents reported the following:

- A significant proportion of the women currently selling sex on-street state that they are from Romania (Romanian women selling sex on-street were reported in Borough H, Borough J, Borough E, Borough F, Borough B and Borough A)
- In Borough H and Borough J Romanian women are described as 'overtaking the market' from the local women who had sold sex on-street in these boroughs in the past
- This group of women tend to sell sex on-street in groups and are highly mobile – some are seen to be transported by taxis and privately owned vans to various on-street sites that are known as hotspots for street prostitution. A respondent in Borough B noted that the Romanian women she has had contact with have arrest records in Borough E, Borough B and Borough A, which chimes with reports from one Borough A SNT of Romanian women soliciting male guests at the entrances to hotels in an area popular with tourists, and groups of Romanian women soliciting on a very upmarket street in the borough, as reported by Borough A council representatives

- Many of the women spend long hours selling sex on the street, and some are reported to be 'out every night'
- Many of this group are reported to be quite impoverished in terms of their health and general appearance. Very few are drug users
- Some of this group are reported to be 'very young' – some suggest as young as fourteen or fifteen, in other words children who are being sexually exploited (reports of girls this young came from Borough F, Borough J and Borough H – Borough J's VAWG strategy group noted that it is difficult to establish the young women's actual ages as they do not carry ID and it is suspected that this is being held by someone else)
- Borough D respondents did not mention the presence of women from Romania specifically, but did note that the Eastern European women they are seeing on-street are getting 'younger and younger', and many are aged just sixteen or seventeen
- When asked, the women say that they have come to the UK to sell sex in order to send money home for their children/families (there were reports of this from Borough H, Borough J and Borough F) and some begin selling sex on-street within days of their arrival in the UK (representatives from Borough E reported that some of the women on-street have only been in the UK for two weeks, and in some cases for only one day)
- There is some evidence from Borough H, Borough J and Borough E that the women are moving between the streets and local brothels to sell sex, and that in Borough E the maids from the brothels are 'overseeing' them while they are on the street
- Some level of control of these groups of women is evident – as well as maids from nearby brothels, there are reports of male 'minders' 'watching over' the women whilst they solicit on-street, and women are seen leaving cash in makeshift 'drop sites' such as behind the panels that protect streetlight wiring, from where it is later collected by the same men who transport the women between hotspots
- In Borough F outreach workers report being approached and surrounded by pimps operating in hotspot areas of the borough and told to 'move on'. There are several reports of a 'Godfather'-like figure who controls many of the Romanian women in prostitution in the borough
- In Borough J and Borough H the women are selling sex in specific areas of each borough and do not cross paths – respondents suspect that this suggests some level of organisation and potentially control
- The women in these boroughs are sometimes 'replaced' – some of the women the police recently charged for prostitution offences have not be seen again, but new women have essentially taken their place
- Intelligence suggests that the women selling sex in Borough H and Borough J actually live in Slough and are being brought to street hotspots and brothels together in vans. Police have information from the Sat Nav of a car used to transport the women. It contained twenty different addresses across Birmingham, Leicester, Slough, East London, Borough J and Borough H – the addresses recognised in Borough J and Borough H were addresses of known brothels. Police have stopped some of the vans bringing women into the boroughs – all of the documentation relates to the same four addresses in Slough
- Respondents reported that there has been some suggestion that women are selling sex to pay off debts for things such as flights to the UK.

As the above suggests, many respondents, and particularly support providers, shared similar concerns regarding the Romanian women selling sex in their borough. They had suspicions that this group of women are not 'working independently' but are linked to a wider prostitution network in which large cash sums are being generated. Respondents described how police operations targeting begging by Romanian nationals around Marble Arch have also identified an increase in prostitution around Park Lane – reportedly involving Romanian

women – and questioned whether the two activities may be linked and involve the same networks/controllers.

Respondents suggested that many of these women may not be fully aware of their rights and are very unlikely to seek help from or report problems to the police. Respondents also highlighted the language barriers faced in seeking to support this group of women. Many speak some English but say they cannot when asked questions they do not necessarily want to answer. One Borough D-based respondent reflected on why this may be the case: "...I would say that that silence has been bought – it takes a very long time for them to say what is actually going on...you have to win the long-term trust of that person."

When asked, women report entering the UK and selling sex of their own free will and show reluctance to have much engagement with local support services. They report that 'friends from home' told them that Borough E and Borough B are good spots from which to sell sex in London. However, it is hard to deny that all of the evidence outlined above, taken together, indicates the existence of organised control of what appears to be a particularly vulnerable group, as one Borough E-based respondent highlighted: "...they can't get any other work, so they end up on the streets. I don't swallow that at all. I think some of it's true. But to be in the country one day and straight on the streets?..." It cannot be said that this evidence proves coercion or proves that these women have been trafficked, but it certainly indicates that this may be the case, and many respondents who provided this information suspected that the Romanian women they had come into contact with were indeed victims of trafficking. What is clear in this case is that urgent intervention is required to ensure these women's safety, including measures to address suspected child sexual exploitation.

An additional group of particular concern was identified in Borough B. Based on local intelligence, a support provider in the borough highlighted suspicions of trafficking within the Bangladeshi community. Bangladeshi women are reportedly being brought from Bangladesh into the UK on student visas. They often work, and are potentially exploited, in local restaurants, but there are reports of them being exploited in prostitution as well, primarily in off-street locations where their buyers are locally-based Bangladeshi men. There is even some local intelligence regarding Bangladeshi women soliciting on-street whilst dressed in traditional dress – this prevents them from being noticed by police and means they are likely to only be approached by Bangladeshi buyers. Furthermore, it is suspected that some of these young women are being controlled and exploited by young locally-based Bangladeshi men operating in gangs.

Women off-street

Respondents were asked to estimate the number and characteristics of women selling sex off-street in their borough. Data regarding off-street women were less readily available than those which were provided about on-street women, primarily because the off-street sex industry tends to be less visible and to operate more covertly than its on-street counterpart. Nevertheless, some borough respondents were able to provide some valuable insights and local intelligence.

A significant number of Brazilian women have been noted in the off-street industry in Borough D. One respondent from the voluntary sector in Borough D noted that some of the Brazilian women selling sex in brothels there "wouldn't see themselves as trafficked but are".

A respondent from Borough A noted the women present in brothels in that borough tend to be in their late teens to early twenties. There is usually a mix of ethnicities, including women from Eastern European and Africa. A Borough D-based service noted that the biggest change for them over the last few years is the number of 'migrant workers' selling sex off-street, and the same service has noticed that a lot of flat-based women are advertising their services online, which is quite a new phenomenon in the borough.

Respondents based in Borough A noted a recent increase in 'escorting', which is believed to be mainly female students becoming involved in prostitution to fund their way through university. This group of women are 'more appealing to clients', according to one support serviced in the borough. Borough A respondents also described 'a lot' of transgender people involved in off-street prostitution in one particular area of the borough, and drug use was believed to be high among this group. Additionally support providers highlighted an increase in 'hidden sex workers', described as women involved in prostitution to supplement their income, who may be recreational drug users. Respondents from a Lambeth based support service were keen to challenge what they saw as the 'misconceptions' about off-street women not having alcohol or other substance use issues – they regularly support off-street women including those 'escorting' who require significant assistance and interventions in this regard.

A sexual health service based in Borough D has noticed changes in the ways both women and men are selling sex in the borough, with reports of them engaging in 'riskier practices', including taking more chances in term of use of protection and the buyers they see. A health professional based in Borough D reported an increase in the number of trafficked women accessing her service who are pregnant – it is reported that women can earn more money in brothels if they are pregnant. This same service is seeing an increase in the number of young, pregnant women from Eastern Europe and Africa, especially Sierra Leone and Nigeria. This respondent noted that it is very difficult to encourage these young women to disclose what is happening to them, in many cases linked to the fact that they have no recourse to public funds and are afraid of being deported.

In terms of the types of premises in which women are based, representatives of the statutory sector in Borough E reported that in conducting crack house closures they often found women based there who were selling sex. This same finding was echoed by statutory sector respondents in Borough D, who noted that this group seemed particularly vulnerable to harm and exploitation.

In Borough D and Borough A it was suggested that as a result of brothel closures more women are selling sex from their own homes. A voluntary sector respondent from Borough E reported that while brothels are being closed in the borough new ones are being opened at the same time.

Borough D authorities reported that they 'only really get involved' when there have been complaints from residents about a particular brothel, and that they have noticed an increase over the last few years of former council flats that have been bought under the right-to-buy scheme now being used as brothels. The owners rent privately to someone that they may or may not know is planning to run a brothel. Neighbours usually notice very quickly and report their concerns to the council.

Representatives of the statutory sector in Borough D noted that the council are checking premises more regularly (following a case in the borough in which a brothel burned down killing a woman and a buyer). In doing so they are supposed to be alert to signs of

'vulnerability' in the women based there, but it was noted that there is no framework to support this and that overall the approach is 'very ad-hoc'.

Respondents based in Borough A reported evidence of organised and managed prostitution off-street in the borough, primarily undertaken by the brothel owners. It is interesting to note that when brothels are raided in Borough A there is a tendency to uncover some of what has been described by respondents as 'slick operations' – i.e. large premises where ten or more women are selling sex at any one time and credit card machines and class A drugs are found on site.

Since strengthened brothel closure powers came into force, over the last two years Borough A council has undertaken approximately sixty brothel closures. The premises they close in central London tend to be one of three types: 1) Properties, especially flats, whose ownership is traced to 'privately owned off-shore companies'. Usually the ownership relates to the entire block of flats including all the individual units, therefore the council do not receive local complaints because there are no neighbours in the same building. It is usually impossible to trace the ownership to one named individual, only the off-shore company names can be identified. 2) Exclusive flats that have very high rents paid upfront several months in advance. When the council visits the flats, those present have no idea who their landlord is or who owns the property, rent money is left in an envelope at the front door for an unknown person. 3) Social housing that is being run as a brothel, this is the case in one particular block in Borough A, which generates many complaints from residents because of the volume of people coming through the block and ringing the wrong doorbells looking for the brothel.

The same council respondent has intelligence that many of the first two kinds of brothels described above are linked. She noted: "They found that if they hit sequentially [to investigate or close a brothel], by the time they did the first one the rest would know". Once the council closed one of these a new one would swiftly replace it: "they would close one and they would literally pop up again. They paid a deposit and got a new property". The women who were present in the previously closed brothel would be quickly re-established in the new one. Men found on the property reportedly never take responsibility for involvement in the operation of the brothel; they always say they are the women's customers. There are usually three or four women found in the property but belongings and papers indicating that more are based there. It was noted that most of these women are not known to the statutory services in Borough A, and if they are they tend not to engage for long, often disappearing off their radar very quickly.

Borough A council representatives also noted that with investment in their borough and the changes in housing benefit, less and less affordable properties will be available to rent in the borough. They anticipate that as a result, women selling sex in properties 'working for themselves' who are already in the minority in the borough, will become even scarcer as they are priced out of the local rental market. The council therefore expects an even further increase in organised criminals who can afford to finance expensive properties running the majority of brothels in the borough.

Evidence garnered from our brothel calling exercise gleaned further data of note, some of which suggest significant levels of organisation of prostitution in these locations, for example:

- Prostitution organised from private flats appears to be on the increase, while at the same time commercial 'shop front' establishments appear to be decreasing

- A number of brothels (particularly in Borough D, Borough E and Borough F) advertise fifteen minute appointments. This is a new trend which could suggest that women involved in on-street prostitution are being appropriated into off-street premises, or it may be the result of market forces, lower prices, more competition, and a transient buyer market
- In several boroughs, a number of brothels appear to be under the same ownership, for example brothel owners and 'front of house' (maids or security 'personnel') were found to present exactly the same services and prices, all listed and described in the same way
- Advertisements for escorts in local newspapers often lead the caller not to 'independent' women as advertised, but to brothel management who keep 'books of women' and match them up with the buyer's requirements
- Only five brothels out of the sample of fifty specifically offer 'British women' – one brothel in Borough A advertised that it offered 'All foreign, we don't employ English girls.'
- There appears to be an increase of brothels offering the 'girlfriend experience'²⁰ since 2008 research (Bindel and Atkins, 2008)
- 'Full service without condom' is very common, as is 'cum on girl/face', and 'cum twice'.

In addition to press advertising of individual women and of brothels (usually described as 'saunas' or 'massage parlours'), carding is widespread. The cards are typically professionally made and mass produced, appearing in phone boxes and newsagents' windows. However, in Borough A there are reports of handwritten cards and in Borough H women advertising on post-it notes, although the telephone numbers provided on these usually reach the same local brothel.

Respondents in Borough D reported that carding is penalised heavily, with a number of 'carders' being issued ASBOs and fined. There is evidence that British Telecom are intending to develop strategies to support police in charging carders with criminal damage to public telephone booths, and that adhesives are being used that are harmful to skin. One respondent commented that, because the cards tend to be replaced quickly after removal that such initiatives to deter carding are essentially pointless, akin to, "...trying to attack an iceberg with an ice-pick."

Finally, in terms of licensing in relation to the sex industry, the Mayor's VAWG strategy recommends that local authorities make better use of their powers for regulating the likes of health establishments, saunas and lap dancing clubs. However, there is little evidence from this research that councils have taken this on board. Representatives of the statutory sector in Borough A raised their concerns about licensing, particularly of massage parlours in one particular area that are actually operating as brothels. Similarly, representatives of the statutory sector in Borough D noted that many saunas and massage parlours in the borough operating under 'special treatment' licenses are being tolerated. It is reported that even when it is known that sex is probably being sold on the premises these licences are still issued and "most of the women in there are likely to be from abroad, so you could argue that they have all been trafficked according to letter of the law since their travel has probably been facilitated somehow, they would not have come over on their own." One representative of the police in Borough D recommended undertaking 'heavy scrutiny' of special treatment licenses, noting that: "we're giving out licenses and not doing due diligence around who we're giving them to."

²⁰ The 'girlfriend experience' (GFE) refers to a prostitution service that mimics the actual relationship that a man has with a girlfriend. Women are usually required to kiss, and to stay overnight with the buyer.

Women involved both on and off-street

Whereas previously there was a generally held view that there is quite a clear distinction between women involved in on-street prostitution and women involved off-street, and that they represent two quite disparate groups (Sanders, 2007), evidence is emerging (Bindel *et al*, forthcoming) that this distinction is becoming increasingly blurred, with some women regularly moving back and forth between involvement on-street and off-street. This study has made the same finding.

The widely held assumption that women who operate off-street are safer and have fewer health problems and substance misuse issues has, in recent years, been challenged (Raphael and Shapiro, 2004; Bindel *et al*, forthcoming). The *Breaking down the barriers* research found that women involved on-street and those involved off-street often share similar life histories, routes into prostitution and, despite assumptions to the contrary, similar needs and experiences.

Similarly, as discussed above, another new trend is the discovery of women who are believed to have been trafficked into the UK on-street, whereas historically they have been prostituted off-street.

What is often named and understood as 'escorting' can be more accurately described as 'mobile phone prostitution', noted by respondents in a number of boroughs, where women contact, or are contacted by, buyers who take the women indoors. It has been widely acknowledged that prostitution transactions conducted from the buyers' home can be particularly dangerous as the woman has no security or easy means of escape. Indeed, the Australian local government guidelines for women in prostitution doing 'outcalls' in states where prostitution has been fully legalised specifies ways in which to avoid gang rape and serious harm in such circumstances²¹.

There is clear evidence from this study of the emergence of a transient group of women – those operating both on and off-street in London. A voluntary sector respondent providing services across three boroughs in east London suggested that there are fewer women on the street because many build up 'regulars' who they contact using their mobile phones. Whether this group of women should be categorised as being 'on' or 'off-street' is unclear as they appear to be shifting between the two.

Borough E voluntary sector respondents reported that women using their mobile phones to get in touch with buyers indicates a shift in the way that street prostitution in that particular borough is managed and organised, and that there is evidence of 'brutal' attacks, and heightened risks associated with buyers calling women into their own homes. One police respondent in Borough E also highlighted the case of a young Romanian woman who works in central London lap dancing clubs, but to 'make extra money' is selling sex on-street in east London after her shift at the club ends.

Evidence of a similar trend is emerging in Borough D. According to one voluntary sector respondent, a number of women have ceased selling sex on the street in one particular area in the borough recently because of a police 'clean-up', and are now using mobile phones to contact buyers, or have moved into Borough A.

²¹ *Safety Tips For Escort Workers*, via <http://www.sexworker.org.au/SafetyLegalInfo.aspx>

Whilst all women in prostitution are vulnerable to violence and abuse, it should be noted that this emerging group of 'transient' women who are perhaps not defined by services as part of their traditional on or off-street service user group, may be 'falling through the cracks' in terms of both service provision and policy development. This finding also challenges the perception that women who sell sex off-street are almost always 'stable' and have low needs, as this may not be the profile of some of these more transient women.

The Olympic effect?

With regard to the 2012 Olympic Games in London, the Mayor's VAWG strategy noted the following: 'Whether there is an increase in trafficking or not, the Olympic Games are likely to impact on the women already in prostitution in the five Olympic host boroughs. Coordinated and victim-centred policing across the boroughs is essential to ensure that women are not displaced from one borough to another.' Our research found evidence to support the prediction that women already in prostitution in Olympic areas would be affected. However, it seems the opposite to what was recommended occurred – i.e. policing was far from 'victim-centred' in the run up to the Games and women in prostitution were indeed displaced in significant numbers.

The general consensus amongst respondents was that the evidence for an increase in trafficking into prostitution associated with large sporting events is patchy and in some cases contradictory. Nevertheless, the majority accepted that such events are likely to lead to a rise in the demand for prostitution in general, as one Borough E police officer highlighted: "...you can't say there's not going to be an increase [in the demand for prostitution during the Olympics], 'cause I think that would be stupid. It's supply and demand. There's going to be an awful lot of money here."

However, during the course of this study no-one had seen any evidence of a large influx of *new* women into street prostitution in the Olympic host boroughs²². Rather, it seems that much of the focus was on the women already involved in street prostitution in these boroughs, including those who are entrenched and 'repeat offenders' in the eyes of the law. Many respondents, and support providers in particular, talked of a large-scale effort by local police to 'clean up the streets' of women in prostitution in advance of the Games. There were several reports of a noticeable increase in arrests in the months running up to the Games, in addition to women regularly being 'moved on' by police.

In Borough E, voluntary sector respondents noted that greater enforcement actions against women by the police were in evidence for about two to three years in the build-up to the Games. The impact of these practices was twofold – due to heightened police action many women felt compelled to re-locate to neighbouring (non-host) boroughs to sell sex where police attention was not as focused, whilst those who remained in host boroughs continued to sell sex but became less and less visible and accessible to support services. Respondents in Borough E noted that the Olympics seemed to have 'changed the way the women are working', with significantly less accessing support locally than was usually the case. They also noted that women who had been moved on by police and were compelled to sell sex in other boroughs felt even less safe – primarily because they are not familiar with the area and any escape routes when needed.

²² Note that the majority of data regarding the potential impact of the 2012 Olympic Games on prostitution and trafficking in London was collected during the period March-July 2012, just prior to the staging of the Games, and this is reflected in the way findings on this subject are presented throughout the report.

One support provider based in Borough E outlined the unexpected scale of police activities: "...we were expecting the clean-up but not to the extent that we wouldn't see anybody [i.e. no women at all encountered when on outreach where there were significant numbers before]." There is an expectation amongst support providers that women will return to Borough E to sell sex once the Olympics is over and everything has 'quietened down'.

Unsurprisingly the Olympic effect was felt elsewhere in London too. In Borough F there were reports of on-street women moving from Borough E to Borough F to avoid the Olympic crackdown.

Support providers in Borough J described how they are expecting a spike in the trafficking of women into prostitution in the borough linked to the Olympics, and believe that the numbers of women will continue to rise until Christmas 2012. Borough J council sought funds to help them address prostitution and trafficking in their borough in the run up to the Olympics. However, they were told they were not eligible for such funds because they are not an Olympic host borough. Respondents from Borough J were keen to highlight that all boroughs of London are likely to be affected by the Olympics and that just because they do not have an Olympic venue or stadium does not mean they do not need support in this regard.

Support providers in Borough A suggested that the Olympics is having more of an effect at the 'higher end' of the industry in the borough, and that 'behind closed doors' in some of the more 'exclusive' brothels there is a definite increase in the industry.

In Borough D, where support providers were clear that the Olympics is fuelling a growth in demand, police noticed an increase in brothels in the borough in the run up to the Olympics, especially in one ward where the Olympics' media centre is based. Borough D statutory sector respondents noted that 'the women know the men [buyers] are going to be there'. Police in the borough described how they are regularly serving notices on the same people in different addresses just a few streets apart: "All we're doing is following them around trying to keep a lid on it." "Look at the top of Tottenham Court Road – there are 100 different cards displayed in those phone boxes linked back to just nine or ten different brothels in the area. There's obviously a demand for it."

What is clear from this research is that the sex industry was evidently 'geared up' to meet the expected rise in demand that the Olympics would generate, particularly in the off-street sector. Further evidence to suggest this was contained in media reporting during the build-up to the Games – an overview of relevant press coverage is provided in Appendix E.

Another trend that became evident during the course of this research is what could be described as the continuing 'ghettoisation' of street prostitution. This is not a new phenomenon, but arguably has been exacerbated by preparations for the Olympics. This approach, in which street prostitution is pushed into the more economically deprived and therefore less 'well-to-do' wards of individual boroughs, is quite evident in Borough F for example, where residents in two particular borough wards described how their lives and communities were adversely affected and disrupted by a very visible on-street prostitution 'scene' (for further discussion see Section 7.2.6).

Demand

During the course of this research several interviewees and survey respondents raised the issue of demand – men’s use of women in prostitution – and in particular the apparent inequity in police response and arrest patterns. Problematising demand is a relatively new approach within academia as well as community and criminal justice responses (Demandforum.net, 2012).

However, as frequently as respondents raised the issue of the need for the decriminalisation of those selling sex, that of the necessity to deal appropriately with buyers was also suggested as a potential solution in addressing problems caused by sex markets. In Section 8 a ‘good practice’ example outlines a holistic approach to tackling demand that incorporates criminal justice, support and public awareness/deterrence initiatives. Tackling demand within the criminal justice framework is discussed further in Section 7.2.3.

In terms of recent trends in relation to buyers, a Lambeth-based support provider reported that women using their service had experienced an increase in violence from buyers over the past year. This included buyers using violence because they do not want to pay for the sexual services they have received or because they want ‘more for their money’. The same support provider noted less empathy than ever before in the attitudes of buyers towards the women they purchase, including buyers who think it is “okay to buy sex from someone no matter what condition they are in.”

As part of our review of media reporting (see Appendix E) it was noted that there is also growing community support for tackling demand. A number of articles in local newspapers, prompted by community-led campaigns, focus on a shift in the way local residents perceive the problems around street prostitution in their area. The main themes within the articles are as follows:

- Women in street and off-street prostitution appear to be the main targets of police
- Buyers and exploiters (pimps and traffickers) do not appear to be the focus of police attention
- Problems highlighted by residents are those of safety (i.e. risk of attack by buyers and exploiters) and public order/nuisance
- The women involved in street prostitution are largely referred to as victims and the buyers are clearly identified as ‘the problem’
- Local residents are calling on police and their local authority to switch tactics and target pimps and organised gangs controlling prostitution and trafficking²³.

Community perspectives on prostitution are further explored in Section 7.2.6 below.

7.2.2 Needs and support

Eighty three women who participated in the *Breaking down the barriers* research (Bindel *et al*, forthcoming; see Appendix A) were involved in prostitution in London. This sample includes six women who were trafficked into prostitution. For the purposes of this study, demographic data for these 83 women were analysed to give an insight into the characteristics, needs and general profile of women involved in prostitution. It is important to note that the *Breaking down the barriers* research is not representative of all women

²³ See Appendix E for further details and sources.

involved in prostitution in London or London's sex industry more broadly, but given the number of women who participated in the research, it does provide useful insights into their experiences and also their needs. Key findings from our London sample include:

- Fifty seven interviewees (69%) were involved in on-street prostitution, whilst 20 (24%) were involved in off-street prostitution and six women (7%) had been trafficked
- The ages of women ranged between 19 and 53 years old with 62% of interviewees aged 30-44
- The majority of London interviewees were British (81%)
- Sixty women (73%) experienced one or more forms of violence during childhood (including physical, verbal, emotional and sexual violence). Over half (53%) experienced physical violence
- Seventy one per cent of women had children, nearly a quarter (24%) had one child and 46% had two or more children
- Fifty three women (64%) reported being homeless or in temporary accommodation at the time of interview
- Over a third (39%) of women had no formal qualifications, nearly half (46%) had completed further and/or vocational qualifications and 13% had completed secondary education²⁴
- Just over three quarters (78%) were unemployed and on benefits, 13% were unemployed and not on benefits and 6% were in part-time or full-time employment unrelated to their involvement in prostitution
- Seventy two per cent of women reported one or more current physical or mental health problem. Just over half (53%) reported one or more mental health problem and 45% reported one or more physical health problem
- Sixty four per cent of interviewees reported current problematic drug or alcohol use at the time of their first interview, whilst a tenth reported occasional drug use and a further tenth reported recreational drug use. Six per cent of interviewees were non-drug users
- Eighty two per cent of women reported past or current involvement with the criminal justice system²⁵ and just over half (51%) reported having a relevant criminal record²⁶
- A third (33%) of women entered prostitution under the age of 18
- Thirty five women (44%) reported experiencing some form of coercion into prostitution. Twenty one per cent of interviewees experienced coercion from a partner, whilst women also experienced coercion from a pimp, relative or another person
- Over four fifths (85%) of women experienced at least one or more form of violence during their involvement in prostitution. Sixty five per cent of women experienced violence from a buyer, 35% from a partner and 23% from a pimp.

A further thematic analysis was undertaken of 21 interviews with women from the above sample who were involved in prostitution in our original five focus boroughs. Women were involved in all of these boroughs, with the exception of Borough F. For this new study, an additional five interviews were conducted with women involved in prostitution in these same boroughs to provide further information and insight into women's needs and experiences. All transcripts were analysed for themes relating to women's involvement in the London sex industry including patterns, trends and changes, hotspots, women's experiences of policing

²⁴ One (1%) interviewee was recorded as having 'other qualifications'.

²⁵ Past or current involvement with the criminal justice system included any pending legal matters, any current or past orders, conditions or requirements, any criminal record and any periods of imprisonment women may have had.

²⁶ A relevant criminal record was defined as having been convicted of offences related to a woman's involvement in prostitution. The research's definition of prostitution-related offences is confined to offences directly relating to prostitution including loitering, soliciting, keeping a brothel etc.

and services and support that they accessed. Selected key findings from our analysis of all of these interviews are presented here.

Involvement in the sex industry

The women in our two study samples were involved in on and off-street prostitution – some women were involved in both aspects moving between off-street and on-street, and two women self-defined as escorts. In line with the data for the wider London sample, women reported experiencing violence both on and off-street throughout their involvement in prostitution. Two women interviewed for this research who were involved off-street said that although involvement on-street is seen as dangerous, off-street was also unsafe and violence was experienced: “Even the house that I worked from it was never safe, do you know, there was other women there but they was always getting robbed or like the men would come in, they would pay you and then obviously you’d get a slap or they wouldn’t pay you”. (Interviewee 2)

Trends, patterns and changes in the sex industry

Interviewees identified a number of recent changes in the sex industry, many of which related to the buyers of sex. Five women described changes in relation to buyers’ expectations, with several highlighting that buyers want more or different services for less money. One woman involved in escorting thought that this change might be the result of PunterNet and similar websites where buyer reviews have led to a rise in expectations, with buyers wanting more of a ‘porn star experience’ as opposed to a ‘girlfriend experience’. This interviewee also noted an increase in competition in the industry as more escort agencies have been established.

In Borough D, and in one area in that borough in particular, some interviewees noted a change in the area with fewer women visibly involved in prostitution. The area was described as having been ‘cleaned up’ as a result of police action, chiming with reports from service providers also based in the borough. Interviewees suggested that women may have moved into other boroughs or to off-street premises.

A number of women interviewed believed that the Olympics would have an impact on the sex industry in London, and more specifically an increase in the number of women selling sex and those buying sex. Reasons given were an increase in tourists visiting relevant areas, and because the Olympics would provide the opportunity for money to be made. One interviewee who was formerly involved on-street near a football stadium in London described the increase in buyers of sex and the money that she could make on match nights. For some matches she would have regular buyers who came to the area from all around the UK. As a result of this experience she felt sure that the Olympics would increase the numbers of both buyers and sellers of sex in the capital.

Policing and the criminal justice system

Policing and the criminal justice system were discussed by all interviewees, the majority of whom spoke about negative aspects of policing and the criminal justice response. Throughout their involvement in prostitution women had had a range of contact with the police and many had been arrested, received fines, attended court and been issued ASBOs. Two women highlighted changes in policing in Borough D, noting a crackdown by police which was targeting women and not the buyers of sex.

Many women discussed their experiences and feelings about reporting incidents and crimes to the police. Most spoke about reporting in a negative sense, with some women recalling bad experiences in the past where they had reported an incident and the police had either not taken the report seriously or nothing had happened following the report. Several women thought that this response was due to their involvement in prostitution. One interviewee noted that she lacked confidence in reporting to the police as she knew that they were buyers in an off-street venue where she had been involved in prostitution. As a result of these negative experiences and because of a lack of trust, most interviewees said that they did not feel confident in reporting to the police or even approaching them for help.

Two women, however, did feel confident and able to report incidents, with one noting that the police response had improved and that this had increased her confidence in this respect. One woman described her positive experience of reporting a rape to the police and the support that she received throughout that process. She noted that she was expecting a negative response because of her involvement in prostitution but both the police and her solicitor were supportive, guiding her through the process, which helped her proceed with taking the case to court.

In terms of police and criminal justice action, the negative impact of fines and sentences on women involved in prostitution was raised by several interviewees. Women stated that arresting and fining women involved in prostitution does not work to deter them, and that women either could not pay fines or had to return to prostitution in order to pay them. One woman described the barriers that criminal convictions pose with regard to finding future employment. Some women also highlighted the use of prison sentences against women involved in prostitution, noting that they were counterintuitive and did not provide support. Conversely, one interviewee highlighted the benefits that a prison sentence had had for her. After being arrested for prostitution-related offences she was sent to prison, and she believed that this was what had pushed her to stop using drugs and eventually exit prostitution.

Overall, interviewees thought that the police should be more understanding and supportive of women involved in prostitution. Women's suggestions for improved policing approaches included: the police working more closely with specialist services in responding to women, not arresting and fining women selling sex, decriminalising women selling sex, targeting and taking action against buyers and legalising off-street flats. There was also the suggestion from several women that if police had a more sympathetic response it might increase women's confidence and trust in approaching them for help or to report a specific crime.

Support and services

Women in our two study samples had accessed a varied range of support services including women-only services, one-stop-shop based services, housing and homelessness services, substance misuse services and generic health services. Some women did not access any services whilst they were involved in prostitution, except for general health and sexual health services. Many interviewees were not aware of services available specifically for women involved in prostitution and had accessed services via chance, word-of-mouth or through signposting after accessing another service. One interviewee suggested that services need to be publicised more proactively in order to raise awareness of their existence and what they can offer.

The aspect of service provision most valued by women was combined practical and emotional support usually provided by specialist services. Support that went beyond

immediate help in terms of women's current involvement in prostitution and helped them with all aspects of their lives was described as being really valuable and needed. Diversionary activities to keep women occupied, women-only services and services which were welcoming, safe and understanding were also viewed as important.

For some women, part of good support was having a key worker, and even more importantly, a positive and trusting relationship with this worker. Aspects of key working support which women particularly liked included: having a key point of contact, having someone understanding to talk to, and being accompanied to appointments and services. One interviewee who did not have a key worker noted that this was something she would like from a service in order to advocate on her behalf and help to coordinate her support. Other women spoke about the slow process of accessing and navigating services and their desire for more responsive, tailor-made support; elements of provision which it was suggested could be achieved by having a dedicated support worker.

A few interviewees highlighted the need for more services, improvements to housing access and provision, and the need for more women-only services which essentially acted as a one-stop-shop for support. Two interviewees suggested that it would also be useful for women involved in prostitution to have a one-stop-shop service that was open throughout the night. The two women interviewed who were involved in escorting also spoke about the need for specific, tailored services for this particular group of women.

Support providers' perspectives

In terms of their needs and support, many of the issues raised by women in prostitution were reflected by those who provide support to this group. The lack of specialist services and the need for more across London were highlighted by many respondents. A number of boroughs involved in this study such as Borough E and Borough F had few or no services whatsoever that support women in prostitution. In the case of on-street women in particular it was noted that services need to be available and accessible when they are – i.e. primarily during the night. Lack of access to suitable housing for women was highlighted as a key concern as well as the huge dearth of even the most basic support for women with no recourse to public funds, as a representative of Borough D council noted: "the local authority cannot house people with no recourse to public funds, you've got to move them on. If I find a woman [with no recourse] in a brothel or crack house who might want to exit there is very little I can offer them."

Despite its large sex industry, respondents from Borough A noted that some organisations in the borough had 'no idea' where to signpost women for much-needed support, and suggested there may be a role for MOPAC in raising greater awareness of the services that do exist.

In boroughs with few services, those who support women experiencing domestic violence highlighted the challenges of trying to extend this support to women involved in prostitution. In Borough A and Borough D cases of women with a history of involvement in prostitution had been dealt with at MARACs (Multi-Agency Risk Assessment Conferences). In Borough A it was domestic violence and not prostitution that was the primary reason such cases had reached the MARAC. In Borough D three cases of women in prostitution who had been sexually assaulted came to the MARAC over the past two years simply because there was nowhere else in the borough for these cases to be addressed "...there was nowhere to take the cases to so that's why we did it with the MARAC – because there wasn't a process...". But this respondent noted that they could not open MARACs up to such cases in the future

because then they would not be able to provide a full service for their domestic violence service users.

It is clear that an attempt to 'shoehorn' support for women involved in prostitution into support mechanisms for women experiencing domestic violence is problematic. One Lambeth-based support service noted that domestic violence refuges do not want to accommodate women involved in prostitution – their support needs are usually deemed to be too high and complex. One voluntary sector representative from Borough F recommended the development of more IDVAs or ISVAs dedicated to supporting women out of prostitution.

Challenges and barriers to supporting women involved in prostitution were highlighted by voluntary and statutory sector professionals who responded to the online survey. The most common challenge (identified by 21 of 80 respondents) related to women's engagement with their services. However, whilst vulnerable women in prostitution leading relatively chaotic lives may indeed have difficulties engaging with services, clearly the services themselves also need to consider how welcoming and accessible they are to this particular service user group and how they can work to meet women's needs so that they become and stay motivated to engage.

A lack of funding (17 respondents) and a lack of specialist knowledge or training for staff to work with this service user group (17 respondents) were also identified as significant challenges/barriers to supporting women involved in prostitution. In response to what would help overcome these challenges and barriers, respondents most frequently said an increase in funding, tools to assist with the identification of women involved in prostitution and guidance around working with and responding to this service user group.

A linked, recurrent theme throughout the course of this research is the reluctance of some of the more generic services (both voluntary and statutory) to identify and record women in prostitution, including trafficked women, who access their support. This leads to a gap in vital knowledge that would allow services to tailor their responses to women in prostitution more appropriately. Respondents in Borough A reported very 'limited' recording of information regarding women involved in prostitution in the borough. It was noted by respondents in Borough D that services have 'a fear of labelling people' and the women themselves 'have a fear of disclosing' their involvement in prostitution. Of the survey respondents who said they did not come into contact with women involved in prostitution during the course of their work, or that they did not know, 71% thought that it was possible that women involved in prostitution do in fact form part of their service user group but they are not proactively identifying them. Indeed the majority of survey respondents stated that they rely on women themselves to disclose this information during assessments, interviews and key working sessions. It is suggested that providing holistic support to women is likely to be problematic if professionals are not identifying women's involvement in prostitution, or not enabling women to disclose this information to them, and therefore may not have a full awareness of their support needs.

Like women in prostitution, many of those who provide dedicated support to them recognise the value and importance of women-only services (this was highlighted in Borough D, Borough E, Borough F and Borough A). It is interesting to note that a number of services who do not necessarily operate on the basis of a feminist ethos nevertheless shared the view that women-only spaces are vital when working with this group of women. A service provider based in Borough E illustrated this point: "...it is important for them to have that women-only drop-in service. There was a time where there was no-one available to do the

needle exchange apart from men from our team who were happy to do it – and the women didn't want it at all – they are quite strict about having the space for themselves.” This was echoed further by a service provider in Borough A: “...women-only space is a good thing...women supporting women works. The fact that no men can attend or enter the area of our service has been really positive for the women receiving support; women feel they can be more truthful and open.”

In a similar vein, a Lambeth-based support service noted that they avoid as far as possible referring women to mixed hostels or mixed substance use support groups, following negative experiences women they support have had in both settings where their vulnerabilities were further exploited by male residents/group members.

The Mayor's VAWG strategy recommends that service providers work to develop more holistic approaches to supporting women involved in prostitution, including facilitating exiting. In the latest action plan arising from the strategy, the need for national and local government and the health sector to fund exiting services is highlighted (Mayor of London, 2011). The *Breaking down the barriers* research found that women can and do wish to leave prostitution and that exit is achievable, providing women receive the right kinds and levels of support (Bindel *et al*, forthcoming).

There were a range of mixed views and approaches to the issue of exiting identified during the course of this study. A number of services noted that they do offer exiting support, but not proactively. Exiting was described by one such agency as a 'very personal' thing, and some services would only discuss the possibility of exiting with women if the women raised it themselves, as one Borough E-based voluntary sector support provider explained: “For us it's when she mentions it. I don't want to get into exiting because it's my view, it should be when it's what they want – and there are times after being attacked twice in a month where they just want to leave – but then they'll come back the week after and be OK...”.

A number of respondents commented that the services that are the most difficult to engage around the need for exiting tend to be health-based services that are focused on addressing immediate harms and needs, in particular in relation to physical and sexual health (noted by respondents in Borough D and Lambeth). Other respondents questioned this focus, such as one Borough E-based voluntary sector support provider: “A lot of the women are put on methadone, and there's no time-scale, or is it indefinite? How are you helping them change – from one drug to another indefinitely?...Also, they need to be re-educated, have a change of mindset – think more positively about themselves. Building self-worth and self-esteem, and how they would want their lives to be instead of keeping them in the same circle – helping them to think about the future. There is more to it than just their practical immediate needs.” Voluntary sector support providers in Borough F also highlighted the importance of supporting women to have a 'change in mindset' about themselves and their lives rather than just 'a quick fix of practical solutions'.

Finally, respondents from a Lambeth-based exiting service highlighted the importance of services simply raising the issue of exiting with the women they support thereby letting them know that that opportunity is there should they wish to pursue it. The importance of support services at least presenting exiting as an option to women was emphasised, as they “hear time and time again they aren't even asked [if this is an option they wish to consider].”

7.2.3 Policing and criminal justice

The Mayor's action plan for 2011/12, arising from the VAWG strategy, prioritises the following activities in relation to prostitution and the criminal justice system:

- Discourage the use of ASBOs or other criminal sanctions to deal with women in prostitution
- Clamp down on kerb crawlers and men who pay for sex with exploited women
- Tougher sanctions for convicted men buying sexual services e.g. ASBOs, publishing their names in the local papers upon conviction of a criminal offence.

Evidence of enforcement action

As previously discussed, respondents in some boroughs (such as Borough E and Borough D), reported evidence of police 'crackdowns' or actions to 'clean up the streets', primarily in relation to visible on-street prostitution. Borough E's recently heightened police activities in this regard were linked by respondents to the Olympics and the perception that police had been tasked with ridding boroughs of visible 'criminal' and 'anti-social' activities that could potentially damage London's image at a time when it is under an international spotlight.

In a number of boroughs, while regular 'crackdown' operations may not be the norm, the current overall approach to policing prostitution was described as 'enforcement' (identified by respondents in Borough D, Borough H, Borough E, Borough B and Borough A). In the majority of cases this was defined as punitive action by the police primarily against those selling sex – including ready use of cautions, fines and arrests, particularly of women regularly loitering or soliciting on-street and therefore defined by police as 'persistent offenders'. Brothel raids and closures were also reported to be part of the police's enforcement approach and were utilised in a number of boroughs. It was noted that men purchasing sex and those operating as pimps rarely receive the same level of attention from police.

As an example of enforcement action, one representative of a voluntary sector support service in Borough E described police action about one year ago during the process of their clampdown on street prostitution in the borough: "We went through a period where ASBOs were being heavily used...but that died down a while ago...There were no engagement orders or diversion schemes used...it is heavy policing, it does feel like we are sometimes targeted because they know that the women are going to use our service, why not go to where you know you are going to find the women, so that's been a problem for us, they park literally across the road [from the service]. Our outreach team used to say that they felt that they were followed by some police vans at times...it just felt like there was a big campaign, they had portfolios of the women and their pictures...some of them were just going to buy electricity, and *clearly* going to buy electricity, but being targeted because 'she's a street worker and she's on the street'...any excuse..."

Indeed it is the case that Borough E has a history of naming and shaming the women involved in street prostitution in the borough, including publicising women with ASBOs on the council's website and putting photographs of the women in residents' letter boxes.

Evidence of limited police response

Contrary to the above, there were reports of police in some boroughs and within particular borough wards essentially 'turning a blind eye' to very visible on-street prostitution and

leaving it to continue uninterrupted, despite the complaints of local residents. In these cases specific hotspots tended to develop and new women came or were brought to the area to sell sex.

A significant number of survey respondents were unable to say what their local force's overall approach to policing prostitution is in practice. This was echoed by voluntary sector respondents in the Borough A focus group, who believed that much of the borough's policing is tied up in one particular area focusing on general street crime, and that policing any element of prostitution is low on their agenda. Representatives of the statutory sector in Borough A explained that drug crime is the chief priority of borough authorities, and that when prostitution does come under the spotlight this is only in relation to clipping²⁷ and this activity's links with the drugs trade.

Despite having a large and extremely active off-street sex market in their borough, in general, Borough A authorities appear to adopt a laissez faire approach to the brothels operating there, perhaps because they are overwhelmed by the sheer number of them. Representatives of the statutory sector in Borough A stated that they had 'no idea' how many brothels are operating in their borough and that "actually very little is heard about them". Several statutory sector respondents in Borough A noted that the only thing that will cause the authorities to turn their attention to a brothel within their borders is a resident's complaint, as highlighted by a member of one Borough A SNT: "...we will deal with a brothel if it's creating a nuisance to residents, but otherwise we don't get involved – if it's not on the radar, we can't actively go looking for it."

A similar finding was made in Borough D, another borough with a particularly large off-street sex market, where statutory sector representatives acknowledged that there is an 'overall tolerance' of brothels. Borough D police note that if there is intelligence around 'underage girls or trafficking' they will investigate further, but "if there is no intelligence, we would probably allow it to be tolerated."

Views on the enforcement approach

In boroughs where proactive enforcement to policing prostitution is used, some police respondents described the benefits from their perspective of applying this approach. Borough D issues ASBOs to women selling sex on-street, particularly if they have come into the borough to sell sex but are not resident there. They also use anti-social behaviour injunctions against those selling sex out of private flats. Their priority is to address residents' complaints, particularly in one area, and in what the police acknowledge as a 'contentious' move, they do arrest women for breach of ASBOs and believe that this works to deter them 'in some cases'.

Police representatives in Borough D believe that enforcement works in their borough in part because when it is used the less chaotic women will simply move to flats in other boroughs. In other words enforcement 'works' to move women elsewhere, not to actually deter them from selling sex. According to one respondent: "What we don't do in [Borough D] is offer services without any consequences. We will say we offer services, but if you don't take up the services we'll enforce – we're very clear about how we work." It was acknowledged that even if enforcement does not stop that individual selling sex (i.e. they move on to do so

²⁷ The colloquial term for the practice in which a person offers and is paid to provide a sexual service but does not carry it out and takes the buyer's money.

elsewhere) Borough D police believe that enforcement does 'stop the community from suffering' the impact of prostitution in their area – their lives can 'go back to normal'.

Similarly, a Borough E-based police officer who noted that they have women on record who have numerous cautions in surrounding boroughs, went on to acknowledge that while enforcement in one borough typically leads to the displacement of women to another, this does at least help local police to 'hit their targets' in terms of addressing prostitution within their own borough.

In Borough B some enforcement action is being used against women on-street and arrests of women are reported to be on the increase. Support providers also report that local police are undertaking brothel raids and closures. There is conflicting evidence on this issue in both Borough E and Borough B, with police responsible for licensing in both boroughs stating that over the last year they have only undertaken brothel visits and issued warning letters, but have not executed any raids or closures, whilst support providers and the women they support report that some police raids have continued.

In Borough B support providers describe how the police have moved away from the approach of referring women on-street to support and court diversion, favouring instead the enforcement approach. This is reported to be largely the result of changes in local police leadership, who felt that the previous approach was too focused on the welfare of the women in prostitution at the expense of the welfare of the local residents. From a support provider perspective this is a 'turnaround for the worst', and respondents report that the police do not realise that ensuring improved safety for the women on-street will contribute to improving community safety overall. It was also noted that local women involved in prostitution are not considered by police to be a legitimate part of the local community and are typically seen as 'of less value' than other residents.

With regard to the enforcement approach overall, there was a significant consensus across the majority of respondents that this approach to policing prostitution is problematic and ultimately has a range of negative impacts on the women that are targeted, without actually deterring them from their involvement in prostitution, which is usually supposed to be the intended effect of this kind of action. The negative impacts of using criminal sanctions against women in prostitution cited by respondents include:

- The 'revolving door' – the process by which women are arrested and fined for prostitution and immediately return to the streets in order to earn the money to pay the fine, exemplifying the wider issue of how criminal sanctions against women in prostitution often serve merely to maintain or prolong their involvement within it
- Isolation from support – the use of ASBOs was seen as highly problematic – women are often ASBO-ed from the areas in which they sell sex, which are often also the areas where they access support, and may have developed some kind of support network, a situation which typically leads the most vulnerable women selling sex on-street into further chaos and danger (this was reported to be a particular problem in Borough D where women have been prevented from accessing vital drug and medical treatment by the constraints of their ASBOs)
- Invisibility – women targeted by police for selling sex on-street often change their practices in order to do so more covertly to avoid detection, which may move them away from informal sources of support as well as making them less visible and accessible to those services that seek to support them (this was particularly noted in Borough E and Borough D where the risks and harms associated with selling sex on-street were reported to have increased since heavy enforcement action was employed by police)

- Displacement – as highlighted above, enforcement often merely serves to displace women to neighbouring boroughs and they may ‘do the rounds’ of several boroughs to avoid police attention as much as possible
- Mistrust in police – women who have experienced what they view as ‘heavy-handed’ enforcement action from the police, including brothel raids, are often less likely to turn to police when they need them, for example to report violent attacks by buyers or pimps, and are less likely to support police in securing a conviction (this was particularly noted by respondents in Borough D and Borough E and by Sapphire police)
- A failure to recognise coercion and exploitation – focusing legal sanctions on vulnerable women in prostitution was viewed by many as essentially ‘punishing the victim’ rather than those who benefit from their exploitation
- Treating women in street prostitution as a ‘local nuisance’ – police enforcement of women selling sex was described as sending a message both to the women themselves and the local community that women are merely a nuisance to be removed rather than potentially vulnerable members of that same community
- A failure to address routes into and out of prostitution – respondents argued that criminalising women involved in prostitution rarely deters them because it typically does little to address any of the underlying factors that led women to become involved in the first place, such as substance use, mental health problems or the exploitation of vulnerability by another person, and in turn hinders their ability to exit as a criminal record closes many doors to opportunities in the legitimate job market and can leave women with few alternatives but to remain in prostitution.

Many of the police respondents in this study themselves recognised the challenges and drawbacks associated with the enforcement approach. Some respondents (for example in Borough F and Borough A) noted that they did not feel supported by other criminal justice colleagues when they pursued this approach – the example was given of magistrates who are reported to be opposed to heavy enforcement action against women in prostitution and are therefore reluctant to impose sanctions such as ASBOs on women who are brought before them following arrest.

A representative of Sapphire who is eager to ensure that women in prostitution are properly supported to report sexual violence to the police, noted that enforcement actions such as brothel raids represent a conflict within police policy because they can damage the trust that needs to be developed between police and the women concerned in order for them to feel able to turn to the police for support.

A significant minority of police across the boroughs (and particularly those represented on SNTs), noted that whilst they are taking an enforcement approach to dealing with prostitution in their borough they do recognise that this is not the ideal approach and would prefer to be able to work with local support services to which they could signpost women for help. However, for many this was not an option, in part because this was not an approach that their superiors sanctioned, but also because the necessary support services simply do not exist in their locality. This situation was highlighted by a police officer in Borough E who agreed that enforcement alone is not the ideal approach: “it’s got to be hand-in-hand [with some form of support for the women]. If we arrest a girl [sic], we need to push them away from the courts into a scheme that can deal with their chaotic lifestyles...Enforcement is a great way of picking them off the streets, but you’ve got to have someone to hand them to.”

Yet, despite the general consensus regarding problems associated with enforcement alone, some of the alternatives to the more punitive approaches available within the CJS such as

court diversion and Engagement and Support Orders (ESOs)²⁸ are not being implemented. This study found only a very small handful of court diversions schemes for women in prostitution in operation across London, with varying degrees of success, and awareness and use of ESOs are extremely low. In his written response to our queries, one council representative based in southeast London highlighted some of the challenges involved in applying ESOs: 'One issue has been training...After ESOs were introduced we expected a training programme rolled out for police, magistrates, court staff etc., so that everyone was aware of when and how to use them. In fact many agencies remained unaware of ESOs. Crucially neither the police nor magistrates seemed to be engaged early on to ensure their support.'

The role of local police

In terms of the overall approach to addressing prostitution in each borough, a number of police, alongside other statutory and non-statutory service providers, expressed concern at the lack or loss of locally-based police with dedicated responsibility for prostitution and trafficking in their borough. It was noted that with the move from Clubs & Vice to SC&O9, the focus has also moved away from policing prostitution locally to a focus on trafficking and organised crime that addresses larger organised networks and is therefore often tackled on a London-wide rather than a local borough basis.

A representative of the voluntary sector in Borough D noted that in the past the borough had a named officer with responsibility for prostitution to whom they could turn for advice. In their view since this role no longer existed and the focus had shifted to policing trafficking specifically, the relationship between both women in prostitution and the local police, and service providers and the local police, had deteriorated. A similar point was made by a service provider in Borough E who explained: "we used to have a good relationship with a female vice officer. It was useful to have her there – we could go to her when things were happening". In Borough F support providers described having no working relationship or even contact with their local police at all.

It seems that in recent years the policing of prostitution in individual boroughs has largely fallen to local police with more generic community safety roles who do not have any specialism in this area. A number of respondents suggested that these local police do not have the awareness, training, time or capacity to deal with prostitution effectively or even prioritise it within their wider work. Respondents in Borough J expressed a local need for a dedicated police team: "that can be focused on and prioritise prostitution and trafficking and not be taken off for other tasks...so that they can go out regularly and be proactive." Respondents from across boroughs identified a similar need and highlighted the importance of a specialist police team working closely with local support services to really understand the issues that women face and to ensure that they are adequately protected and their needs are being met. This was highlighted by a service provider in Borough E: "police need specialist training and a basic level of understanding of the women's needs...to see how a night goes for a woman – to see what type of police contact she's had that night, her health needs, the risks she's in".

In addition, practitioners recommended that teams such as this, whilst focusing on prostitution within their own borough, should also communicate and work with similar teams

²⁸ Engagement and Support Orders (ESOs) provide an alternative sentencing option to a fine that requires a person convicted for loitering or soliciting to attend three meetings to engage with support services regarding their involvement in prostitution.

in neighbouring boroughs to prevent the displacement and 'back and forth' movement of women between boroughs that results from conflicting police approaches, and in doing so prevent the 'buck passing' that is often described as happening between boroughs in this regard.

Views on addressing demand

It is clear from responses across boroughs and different professional backgrounds that there is a greater recognition than ever before of the need to also tackle demand and point a brighter spotlight on buyers as part of addressing prostitution in-borough, in line with the Mayor's VAWG strategy. It was noted by some respondents that the increased consensus around this point was a phenomenon only in evidence over the last five years or so.

Voluntary sector representatives in Borough F and Borough A highlighted what they described as the injustice of police only targeting the women selling sex with enforcement action when the buyers are also quite visible. A respondent in Borough A noted that buyers were able to operate with impunity in the borough with very few consequences, "just a whisper in their ears" from police. In Borough H and Borough J kerb crawlers are reported as usually being easy to spot, and although minimal court action had been taken against them to date, this was set to change as tackling demand becomes more of a focus for these boroughs.

Both voluntary and statutory sector representatives suggested that 'naming and shaming' techniques can be an effective deterrent in addressing buyers' behaviour. A representative from Borough D noted: "their biggest fear is that they're going to get a letter through the letter box." This was echoed in Borough J where respondents said that the fear of being caught was the greatest deterrent for buyers and that pursuing police action against buyers and having press attention at court has proved effective.

However, whilst there was positive interest in tackling demand from many boroughs, this did not necessarily mean that there was anything in place to do so. In the majority of boroughs examined, women selling sex remained the main target of enforcement. Some respondents, and particularly police, noted that whilst addressing demand makes sense in theory, in practice it can present a number of challenges.

Respondents from Borough J noted that the problem with tackling kerb crawlers is 'getting the balance right' between targeting them and raising awareness amongst the women of potentially violent offenders. In Borough D, past kerb crawler operations had proved successful but the local vice unit that undertook this work was disbanded making it practically impossible to carry out further operations of this sort. Another statutory sector respondent from Borough D grappled with the size and nature of the problem: "you can't tackle demand unless you go and stand outside every single brothel, there's nothing that can be done, it's treading water, they just move to private landlords, you're chasing shadows." However, other boroughs, such as Lambeth (see Section 8 below), have demonstrated that relatively simple steps to tackle demand can in fact be effective.

From a practical perspective it is difficult to enforce the law in relation to demand if one is not properly informed, as one Borough D-based police officer demonstrated: "...well what offence have they committed? If they've phoned a number from a phone box and visited a brothel without trafficking, there's no offence." This is an inaccurate interpretation of the law as the offence is one of purchasing sex from someone subject to any form of exploitation, which does not have to include trafficking. Furthermore, it is a strict liability

offence to do so which means the buyer cannot claim ignorance of exploitation as his defence.

Borough E police reported actions against buyers in their borough, although other respondents from Borough E did not appear to be aware of this. The police representative from Borough E noted that every time they stop a buyer he gets issued with an ABC (Acceptable Behaviour Contract) and all his details are recorded. There is a list of 118 men with these ABCs in Borough E of whom only one has reoffended. However, it was noted that it is impossible to check on individuals with ABCs between boroughs – reoffending in another borough will not be identified because the information is held on different computer systems, which represents a big gap in terms of ensuring effectiveness and most likely leads to the displacement of buyers to purchase in other boroughs. It was also noted that: “Prostitution cautions, arrests and stops are all on different systems – checking all three takes ages.”

It is a positive finding in line with the Mayor’s strategy that a consideration of buyers forms part of the equation in police efforts to address prostitution, and there was a great deal of agreement about the efficacy of kerb crawler operations that employ female undercover police officers as ‘decoys’ posing as women selling sex. However, this type of operation was understood by some boroughs such as Borough F and Borough A to be very expensive and therefore beyond their capacity to deliver, and there was little awareness of more cost-effective methods to target buyers such as those employed in Lambeth (see Section 8).

7.2.4 Trafficking – particular issues

Prevalence and understanding of trafficking

As previously noted in this report, due to its criminal and therefore covert nature, the extent of trafficking across London was virtually impossible to ascertain in this study. However, data from Project Acumen do provide some insight in this regard, with estimates that suggest that hundreds of female victims of trafficking are being exploited in prostitution in London at any one time (Jackson *et al*, 2010 – see start of Section 7 above).

The information provided on the prevalence of trafficking by respondents in this study is patchy and largely based on indicators and local intelligence. One such indicator is the number of trafficked women receiving formal support in the capital, although it must be borne in mind that many trafficked women never receive such support because they are deported or imprisoned upon coming to the attention of the authorities, they remain in the control of their traffickers, are unaware of the assistance that is available to them or return to their country of origin of their own accord.

Referrals to the Poppy Project, a specialist project run by Eaves which supports women trafficked into the UK, were analysed for the purposes of this study. The focus of the analysis was referrals of women suspected to have been trafficked into the UK to be exploited in prostitution, which were received by Poppy from within London between April 2011 and March 2012. These data are not intended to establish the prevalence of trafficking in London, but instead provide an insight into the number of potentially trafficked women coming to the attention of services in each borough. It is important to also note that firstly Poppy referrals do not necessarily mean that women have been trafficked (detailed assessments of referrals may subsequently establish that this is not the case for some), and

secondly that the referral data relate to the borough that women were referred from, which is not necessarily the borough where women were exploited.

Between April 2011 and March 2012 the Poppy Project received a total of 61 referrals from London boroughs of women suspected to have been trafficked into prostitution. Boroughs that the Poppy Project most frequently received referrals from during this period were Islington with nine referrals and Southwark with six. Barking and Dagenham, Brent, Bromley, Lambeth and Newham all made three referrals each during this period whilst Barnet, Ealing, Haringey, Hillingdon, Lewisham, Waltham Forest and Wandsworth each made two. There was one referral from each of Croydon, Enfield, Greenwich, Hackney, Kensington and Chelsea, Redbridge, Sutton and Westminster. During the period in question nine referrals were made from unspecified London boroughs and the remaining boroughs made no referrals.

A lack of awareness and understanding of what constitutes trafficking was evident throughout this study from both statutory and voluntary sector respondents. A number of respondents highlighted the complexity of definitions and the law in relation to trafficking and acknowledged that they did not have a full understanding of either. Some respondents struggled to understand, or in some cases seemed unwilling to accept, that trafficking can involve facilitating the movement of someone using very subtle forms of deception, coercion or the abuse of a person's vulnerability (as defined by the Council of Europe Convention – see page 8 for the full definition), and that these same subtle methods can be used to continue to control, exploit and profit from a person once they are in the UK. Many also failed to realise that the movement of a person across international borders does not have to have happened in order for trafficking to occur, people, including British nationals, can be trafficked internally between towns and cities within the UK in order to be exploited in multiple locations.

When discussing trafficking, some respondents assumed that this can only involve very severe levels of control (some invoked the 'stereotypical' trafficking victim – a woman chained to a radiator in a brothel), while others talked of trafficking as being an 'emotive' issue that they assumed was always exaggerated in terms of both its nature and its prevalence. One police respondent mistakenly believed that trafficking could not take place in on-street prostitution: "on the street...they can just walk away if that's what they wish", again demonstrating a failure to understand the forms of control that can be exerted on trafficked women.

Numerous respondents talked of entering brothels or speaking to women selling sex on the streets, asking them directly had they been trafficked and feeling reassured by a negative response. This in itself demonstrates a concerning lack of understanding of the nature and complexity of trafficking – not only is it the case that many vulnerable women in this situation may not understand the term 'trafficking' and/or initially may fail to recognise and name their experiences as such, but it is also clear from the experience of specialist support providers that it can take months or even years for women traumatised by what has happened to them to overcome fear, stigma and shame in order to piece together and recount in full their experience of having been trafficked. In other cases respondents feared asking about trafficking as they felt they would not know how to respond once they had opened this 'can of worms', and others seemed to find it preferable to assume that virtually all non-British women selling sex without any visible evidence of heavy external control must simply be 'migrant sex workers'.

This lack of understanding of trafficking, lack of acceptance of its occurrence, or disregard for the official definition as set out in law, were of particular concern when demonstrated by service providers who are duty bound to identify and appropriately support women who have been trafficked into prostitution.

Classification of trafficking

The Council of Europe Convention on Action against Trafficking in Human Beings (Council of Europe, 2005) is clear that a gendered approach to tackling trafficking is essential (Explanatory Note articles 1a and 17) and that the focus should be the rights of the individual as a victim of crime and human rights abuse. Those that are identified as victims of trafficking can receive exceptional temporary access to a range of specialist support²⁹ in recognition of their status as a victim of crime. The Convention also provides that as such, victims should not be treated as perpetrators of crimes (Explanatory Note article 26), or be held in detention, and should be able to access compensation and independent legal advice.

Despite this, there is still no consistent agreed classification of trafficking across London. The UK Border Agency define trafficking as an immigration and organised crime issue, whereas MOPAC and the UK Government include trafficking in their VAWG strategies. A number of respondents to this study emphasised that the location of trafficking within VAWG is crucial in order to ensure effective and appropriate responses to the needs of victims of trafficking. As one respondent argued, trafficking is not a form of organised immigration crime; it is a human rights violation.

Enforcement and criminalisation of trafficked women for immigration crimes is commonplace³⁰. Women experience additional harm due to the fact that the National Referral Mechanism (NRM – the UK's official method for identifying an individual as a victim of trafficking, as required by the above Convention) is administered by immigration case owners and uses the same model as asylum and immigration in decision-making. A number of respondents noted that the refugee model is inappropriate in trafficking cases as it puts the onus of proving refugee status on the would-be refugee. Indeed, in trafficking cases, the Convention is clear that the onus is *not* on the victim but on the designated competent authority (within the UKBA or the UK Human Trafficking Centre) to clarify an individual's status as a victim of trafficking.

The effect of placing trafficking within an immigration framework can mean that different and often conflicting policies and approaches may overlap (for example enforcement policies versus those that relate to victim care and rights). This was highlighted by a UKBA respondent who described situations in which UKBA enforcement teams might potentially come into contact with victims of trafficking whilst conducting enforcement raids. It was noted that the enforcement teams would need to understand how the two approaches might interact. As the Poppy Project has experienced, and as pointed out by a legal practitioner interviewed for this research, trafficked women are more likely to be criminalised or detained prior to being identified as victims, resulting in difficulties with the disclosure of their experiences.

²⁹ Including a 45 day reflection period in which they can access, inter alia, accommodation, financial support, health care, other support services, legal advice and in some cases can apply for and receive a year's residency in the UK.

³⁰ For example, 24% of cases referred to the Poppy Project are of women who have been placed in immigration removal centres and prisons for immigration crimes that are in fact bound up in their experience of having been a victim of trafficking.

Furthermore, women often have little information to assist in a police case against traffickers, and a lack of evidence reduces a case to one person's word against another's. However, SC&O9 did note that in terms of cases of trafficking for sexual exploitation, juries are quite sympathetic and SC&O9 rarely lose a case of this kind in court.

A number of CJS respondents pointed out that as a victim and witness of trafficking, a woman's immigration status can affect her credibility throughout the CJS and can give rise to discriminatory attitudes, often characterised by authorities' lack of belief in her story. This can also impact on whether or not the police and CPS take a case further. The fear is that the victim's credibility and the likelihood of a prosecution could be prejudiced as it may be insinuated that the victim is lying or exaggerating her experiences of trafficking in order to help with her immigration claim. Respondents noted that although the CPS are now using a different type of evidence test which attempts to circumvent this problem, such concerns do persist, and may indeed be compounded by the fact that some key players within the CJS fail to fully understand the nature of coercion within the context of trafficking, especially in relation to the new trend of trafficking cases that are perceived to be more transient and 'autonomous' in nature, where more subtle forms of control such as debt bondage and immigration threats are applied.

Issues with victim identification

Since the NRM first became operational in 2009 only the UKBA and the Metropolitan Police have received mandatory training for their role as 'first responders' (the agencies who initially refer suspected victims of trafficking into the NRM³¹). There has been no national or London-wide mandatory training for all first responders including local authorities. This study identified, in common with previous findings made by the Anti-Trafficking Monitoring Group (Anti-Trafficking Monitoring Group, 2010) and others, many barriers resulting in first responders failing to identify victims of trafficking. These include lack of knowledge, skills and training, and a dearth of communication and joint working. Other barriers include victims' fear and lack of trust when dealing with public sector authorities.

In particular, respondents highlighted victims' perceptions of the police as a barrier to proactively reporting trafficking to the authorities and to disclosing their experiences if they come into contact with the police. Respondents noted the effect of negative experiences of police in both the victims' country of origin and in the UK (for example 'heavy-handed' brothel raids, arrest or detention due to their immigration status, police involvement in brothels and what they had been told about UK police by their traffickers), all of which greatly hinder disclosure. Another respondent suggested that due to these barriers the police need to think of more creative routes to support women to disclose their experiences aside from going into a police station.

Although it is usually the case that whilst women are in their trafficking situation their access to services is relatively low, some respondents noted that, of those women who did have access to services during this time, nearly all failed to identify the women as trafficked and they returned to the control of their traffickers. Respondents also stressed that because trafficking is sometimes viewed as a 'taboo subject' this leads some service providers to deliberately avoid enquiring about trafficking on assessment for fear of 'labelling' service

³¹ 'First responders' include the Serious Organised Crime Agency (SOCA), Local Authorities (or HSC Trust in Northern Ireland), the UKBA, police, Gangmasters Licensing Authority, the Department for Health, Social Services and Public Safety in Northern Ireland, Barnardo's, Kalayaan, Medaille Trust, Migrant Helpline, the NSPCC, the Poppy Project, the Salvation Army, TARA Project (Scotland), and Unseen.

users. That said, clearly, it is the responsibility of all actors who may come into contact with a potential victim of trafficking to be alert to identifying them, especially as the nature of this crime could mean that this particular contact could be the only chance they have to receive help.

This study found that generic services, such as those provided by local authorities and the NHS, and non-specialist voluntary sector services, generally have little awareness and understanding of trafficking and the NRM. However, there was consensus among respondents that such services are in fact well-placed to identify and assist women as victims of trafficking, but that barriers to doing so include lack of capacity, training, funding and in some cases an unwillingness to acknowledge the full extent and nature of trafficking.

Our research found that the NHS and NHS-funded services are particularly poor at identifying victims of trafficking. Poppy Project referral statistics show that the NHS is the lowest referrer to the project. Problems with identification that arise in NHS services are not only a matter of awareness regarding trafficking but also due to traffickers/members of the traffickers' network being used as interpreters or accompanying women to physical and sexual health-related appointments. Other barriers include the assumption that it is not the health professional's place to 'get involved' and fear that they would not know what to do if they did receive a disclosure or make an identification. Focus group respondents noted that NHS services also tend to assume women are involved in prostitution entirely as 'free agents' and fail to enquire further or even consider that trafficking may be part of their experience.

There is, however, also good practice within the NHS. One London PCT for example has set up a forum for organisations working with VAWG that includes trafficking. Also, respondents suggested that the NHS model of a safeguarding nurse could include or be replicated for trafficking. It was also noted that there is a pilot project for NHS services in Leicester proactively identifying victims of trafficking.

The National Referral Mechanism (NRM)

As noted above, NRM 'first responders' identify and refer suspected cases of trafficking to the NRM. Victims cannot self-refer. The case is then placed with a competent authority who will make the decision as to whether or not the person is a victim of trafficking. There are two stages of decision-making in the NRM; a 'reasonable grounds' decision (five days after referral) – in which the case manager decides that they 'believe but cannot prove' the person to have been trafficked – and a 'conclusive grounds' decision (given 45 days after a positive reasonable grounds decision is made – this 45 day period is known as the 'reflection period') – in which the case manager decides that 'it is more likely than not' that the person has been trafficked. As previously highlighted, the onus, as laid out by the Convention, is placed on the competent authority to determine the credibility of a victim of trafficking, not on the victim to prove their entitlements.

If a negative decision is received at either stage, there is no appeals process. Legal and other advocates can ask for a decision to be reconsidered in an informal procedure, especially if new information comes to light. The only other challenge that can be made to an NRM decision is via judicial review, but recent cuts to legal aid render this option significantly less accessible.

There are numerous problems with the NRM and these have been extensively documented by the Anti-Trafficking Monitoring Group (ATMG) and others (ATMG, 2012). There was

broad consensus amongst respondents to our study regarding the existence of these same problems and the recommendations made by the ATMG to address them. Some points raised, with particular implications for London boroughs responding to trafficking, include the following:

- The 45 day 'reflection period' and follow-on services – this is a very short time in which to expect a victim of trafficking to be in a fit state and to have enough trust in services to be able to provide a full and coherent disclosure, and for services to gather the evidence necessary and provide her with access to the support she needs. The Salvation Army, who is the current provider contracted by government to deliver these services, indicated that they must refer their service users to other forms of support after 45 days. A Salvation Army respondent stated that nobody who has left their service after the reflection period has 'gone on the streets', although they did not elaborate on the support they usually found for these women thereafter
- No self-referral option – as discussed above, there are several reasons why first responders may not always be very effective at identifying a victim, yet trafficked women cannot refer themselves into the NRM. If a woman is not identified, then she will not be referred into the specialist support she is likely to need to help her through the NRM process and beyond, and her situation is likely to be further exacerbated by the fact that she may also have no recourse to public funds
- Lack of information, intelligence and data – there is already a lack of concrete, reliable information about trafficking across the capital, and currently the only 'official' source of data is referrals into the NRM. However, this does not reflect the entirety of those trafficked as many do not come to the attention of first responders, and others choose not to enter the NRM system. A UKBA respondent noted that the NRM itself gives the opportunity to evidence some trends and patterns regarding trafficking, yet either this is not being done or it is not being publicly shared. In this regard many respondents supported the ATMG's recommendation for the establishment of an independent special rapporteur or ombudsman on trafficking who could demand, collate and publish such data. It was noted that it would also be useful if the NRM could capture information on what happens to victims after they have been referred into it beyond their positive or negative decisions. This may not be possible for UKHTC, but support services often have this information, although it is not currently part of the Salvation Army's contract obligations to record what happens to their service users after they leave their service
- No recourse to public funds – women trafficked into the UK who end up in London typically have no recourse to public funds. Although under the Convention the UK government is obliged to provide accommodation, financial and support services nationwide for victims of trafficking, if there is a failure to identify victims in the first instance or a failure of the system to acknowledge genuine victims, then they are likely to face a host of additional problems in terms of accessing services, accommodation and subsistence due to the major restrictions of the no recourse to public funds rule.

It was noted by a UKBA respondent that NRM referrals have been dropping since the mechanism was put in place in 2009. This respondent suggested that this is due to first responders receiving initial negative decisions and therefore learning enough about trafficking and the referral process to stop referring inappropriately. Others suggested that this is a worrying analysis of the issue. A very significant number of initial NRM decisions have been widely acknowledged as flawed (ATMG, 2012). Eighty per cent of negative asylum/humanitarian protection decisions were overturned on appeal in the asylum tribunal for women accessing Poppy Project services (Richards *et al*, 2006; Asylum Aid, 2010), suggesting initial decisions were indeed erroneous. Reasons posited for the high levels of wrongful initial refusals include lack of understanding of women's human rights; a culture of

disbelief; and the fact that the NRM is modelled on an immigration asylum system. A first responder should refer into the NRM based on their knowledge and training. When in doubt they should err on the side of caution. It is important for first responders to understand the problems with NRM decision-making and not to assume that a negative decision simply means that the person is not a victim of trafficking.

An even more concerning point raised by several respondents in our study is the complete absence of challenges to NRM decisions; despite the acknowledged weaknesses inherent within this system. ATLeP (the Anti-Trafficking Legal Project) also reported a reduction in cases referred to them for legal support with challenging decisions. Although, as noted above, there is no formal appeals process within the NRM, victim advocates can ask for decisions to be reconsidered informally, and judicial review remains a possible option in some cases. The UKBA respondent noted that in London there have been no challenges to NRM decisions made by the current government contracted service provider, the Salvation Army. A respondent from the Salvation Army confirmed that they do not challenge NRM decisions and nor is this required of their sub-contractors.

This situation is of particular concern given the aforementioned high levels of wrongful initial decisions and successful appeals within the NRM system, an array of criticisms and concerns from various expert sources about initial decision-making, and repeated calls for improved training, knowledge and awareness for all staff from all agencies handling trafficking cases. Such a reduction in challenges and advocacy is therefore very concerning as there is nothing to suggest that this is due to improved identification and decision-making. It raises the spectre of individuals wrongfully denied their status as victims of trafficking and unable to challenge this injustice.

Support and advocacy services

Many respondents, including women who have been trafficked, highlighted the crucial role that specialist trafficking support and advocacy services play in supporting victims of trafficking and ensuring that their rights are upheld, as well as providing a link to help facilitate prosecutions and gather intelligence against traffickers. Respondents noted that the added value of services such as the Poppy Project lies in the fact that they provide much more than just basic support for women. Their advocacy, particularly in relation to immigration cases, NRM cases, and cases within the criminal justice system, including assessment and reports to ascertain victim of trafficking status, are vital in ensuring successful outcomes for women.

A number of respondents noted with concern that support for suspected victims of trafficking is not always sought by the first responder when an NRM referral is made or that in some cases an accommodation-only referral is made. Due to the usually complex needs of victims of trafficking, accommodation-only support is far from adequate. Respondents from SC&O9 pointed out that police should have a uniform approach to victim support (regardless of their obligations as first responder), including signposting and referring to accommodation and other forms of specialist support.

One respondent emphasised the need for more resources for other specialist support for victims of trafficking such as counselling and legal advice. Another highlighted some criminal solicitors' lack of understanding and expertise in this area which often leads them to provide poor advice to victims of trafficking which can exacerbate problems of credibility and could mean an increased likelihood of imprisonment, detention and deportation. It was noted that London does have a good stock of specialist legal advisers for victims of

trafficking. However, it was recommended that the Legal Services Commission should be more flexible as to the number of trafficking cases firms can take on (they are currently restricted in this), potentially create specialist trafficking advocacy units in law firms/specialist law centres or provide funding for ATLeP to refer cases to experienced legal representatives. Respondents noted that the importance of specialist legal advice for victims of trafficking cannot be underestimated. Finally, a number of respondents highlighted problems with ensuring the ongoing safety of victims of trafficking who have assisted the police in their investigations, and advocated for more and better formal witness protection for these women.

Internal trafficking

The Special Representative and Co-ordinator for Combatting Trafficking in Human Beings for the OSCE (OSCE, 2012) highlighted the fact that some 60 UK nationals were referred to the NRM between April 2009 and June 2011, indicating the existence of internal trafficking. Similarly, UKHTC's assessment of the nature and scale of human trafficking in the UK identified 99 UK citizens who were trafficked *within* the UK in 2011, 52 of whom were trafficked for the purposes of sexual exploitation (SOCA, 2012). The report notes that the real number of such victims is likely to be higher than those identified through formal channels by the authorities.

Some respondents in this study raised the issue of women and girls being transported from outlying areas such as Slough in and out of London to sell sex. Police in one instance described intelligence they had gathered regarding a group of women being transported between brothels all over the UK, which could also suggest internal trafficking. Websites advertising prostitution also provide information for buyers about women in prostitution who are 'going on tour'; although it is not clear to what extent coercion may or may not be a feature of this.

Nevertheless, research respondents made very little mention of 'internal trafficking' per se during the course of this study, which suggests a paucity of evidence as well as a lack of awareness of this phenomenon. It is notable in this context that most media coverage and ministerial statements on this subject feed the perception of trafficking as transnational and immigration-related, thus further reducing awareness of internal trafficking. Yet at the same time there has been extensive coverage of the 'grooming' of young girls and women for prostitution, with victims often being transported around the country to be sexually exploited in numerous locations. The Office of the Children's Commissioner's Inquiry into child sexual exploitation in gangs and groups identified 2,409 victims of this form of exploitation between August 2010 and October 2011 (Berelowitz, Firmin, Edwards and Gulyurtlu, 2012), and Barnardo's reports that a snapshot of their service users who had been sexually exploited taken in September 2012 found that 26% had been 'moved for sex' – i.e. internally trafficked (Barnardo's, 2013).

It may be that the term 'grooming' is better understood and more widely used in public debate and professional discourse by some who may not always realise that the phenomenon that they are dealing with could be synonymous with an internal trafficking scenario. It is clear that it would be helpful to draw some of these different strands of discussion and evidence together in order to encourage better understanding of the extent and nature of these particular forms of exploitation.

Pan-London responses

Overall, trafficking for the purposes of prostitution was viewed by respondents as a pan-London issue. In many cases this has led to individual boroughs feeling that they do not have the capacity or specialist knowledge to address trafficking at the local level, with some local authorities, including local police, suggesting that identifying and tackling trafficking is not their responsibility. It is clear that addressing this lack of 'ownership' of the issue at the local level requires a more centralised steer and joined-up approach.

Indeed, a recurring theme throughout our study was the need for a more coordinated, multi-agency pan-London approach to tackling trafficking across the capital. Respondents suggested that such an approach would serve to address many of the problems and knowledge gaps they highlighted in relation to victim identification and the NRM, as well as improving awareness and understanding of trafficking overall and enhancing victim support and advocacy. They also noted that support services, in order to be effective and safe for trafficked victims, need to be able to work with women across borough borders.

Numerous respondents from both the statutory and voluntary sectors recommended the establishment of a pan-London multi-agency forum for all relevant actors working with the issue of trafficking, to include representation from those operating at local level who do not necessarily specialise in this issue but nevertheless come into contact with victims of trafficking, such as local authorities, local police, and other local statutory and non-statutory support providers. Respondents suggested that such a forum should undertake the following:

- Develop a pan-London approach to tackling trafficking, including from a primary prevention perspective
- Share information and intelligence and in doing so collate relevant information and data on trafficking in a centralised format for the capital as a whole
- Share and promote knowledge, expertise and best practice in terms of responding to trafficking, and do so sustainably so that the learning is not lost through staffing changes
- Identify and prioritise training needs and skills development opportunities for all those who may come into contact with victims of trafficking during the course of their work.

Respondents acknowledged the barriers and challenges of multi-agency working such as a lack of understanding of partners' roles and remits, fear of the consequences of working with the voluntary sector (e.g. exposing a service to criticism and complaint), fear of information sharing between services who have (or are perceived to have) different aims. Notwithstanding such concerns, respondents commended the value of joint working on this issue.

One respondent recommended that the relevant agencies work together more closely to develop a trusted form of confidential exchange of information and intelligence, with each understanding the input from others alongside the experiences of victims. One respondent noted the loss of valuable intelligence on trafficking when a suspected victim is deemed not to be 'credible' by the system. Mechanisms were suggested for better capturing this information, including a proposal that all suspected victims of trafficking should be interviewed by an independent actor (video-recorded if possible and appropriate), to gather key information for all the required processes at once (the NRM, the CJS, and any asylum/immigration processes). The information garnered could be used to provide intelligence on trafficking whether or not credibility is eventually established.

Another respondent noted that there should be more interaction between local actors and the UKBA regarding trafficking and the NRM. It was suggested that local immigration leads should be forging these relationships and embedding joint working. Examples were given of local protocols in some London boroughs that have enabled successful joint working and noted that the Olympics has helped forge such local relationships, emphasising the need for a driver in partnership working. It was suggested that to make joint working successful it needs to be set out in policy as standard, but with some flexibility as different boroughs have different needs and resource levels.

Respondents from SC&O9 highlighted that, as well as investigating cases of trafficking, they also provide a resource to assist local police forces including a 24 hour on-call service for borough police, which acts as a point of contact and advice on trafficking, the NRM and legislation, an internet site for local police and a mandatory e-learning package for the Met. Inevitably however, SC&O9 do not have the capacity to take on all trafficking cases in London and are selective in the sense that they focus on high-level criminal and complex cases, taking an organised crime perspective. As a result, SC&O9 respondents emphasised that there is an agreed policy across the Met that if an allegation of trafficking is made in a London borough, that borough's local police force should deal with it. However, as previously discussed, police at the local level often do not consider trafficking to be part of their remit and some are even unaware of their role as 'first responders' to the NRM. The same was found of several local authorities who were the focus of this research.

To address this, respondents called for clarity and accountability on the responsibility for trafficking cases within the police and local councils and for this to be as uniform as possible across London. It was suggested that local authorities require step-by-step guidance regarding trafficking and the NRM and that this should be rooted in a local authority VAWG strategy that includes the trafficking of both adults and children, to address the somewhat artificial distinction often drawn between child and adult victims.

Respondents were also clear that decision-making to identify and determine the status of an individual as a victim of trafficking benefits from a multi-agency approach. To ensure this a number of respondents recommended more in-depth multi-disciplinary training to create a better understanding and knowledge of trafficking for all first responders, which would greatly assist with victim identification, decision-making, joint working and the smoother operation of the NRM.

7.2.5 Partnership working and policy perspectives

The Mayor's strategy highlights the importance of effective partnership working to address all forms of VAWG. However, pockets of good practice aside, this study identified a serious lack of a coordinated approach to responding to prostitution and trafficking across London, poor or no information sharing, and a lack of agreed written policies and guidance both locally within boroughs, and from a pan-London perspective. Many boroughs defined their approach to dealing with the issues as 'ad-hoc', essentially responding in a less than uniform manner, without any broad consensus as to the approach, on a case-by-case basis.

This written response from statutory sector representatives in Borough F summarises some of the key problems of a joined up approach to addressing prostitution succinctly, including the particular challenges for local councils: 'There is a large gulf between the desires and objectives of all the parties involved in any work undertaken to deal with prostitution. Local

Communities do not want prostitution to be allowed to take place in their communities, suffering from the associated anti-social behaviour, crime and sex debris left by both the women involved in prostitution and the men who use these women. Outreach organisations look for assistance for the women, working from the perspective that women are the victims and should not be targeted for enforcement. While statutory bodies are left in-between, trying to manage the situation and carry out the work with criticism from both sides that they are focusing on the wrong priorities.'

In terms of support provision to women in prostitution, respondents in a number of boroughs acknowledged their lack of joined-up working and tailored referral pathways to ensure that women receive the support they need. Some respondents lacked knowledge and awareness of services they could signpost to in their own borough and across the capital.

Many boroughs raised the point that they cannot/will not provide support for those who sell sex in their borough who are resident elsewhere, as highlighted by one statutory sector representative: "[Borough D] is a magnet for people to come from other areas so we're often dealing with non-[Borough D] residents...that can make it difficult to plan...especially making them move on if they don't want to go back to abusive situations." Respondents in this focus group suggested creating clearer and more robust pathways to deal with such cases on a London-wide rather than a local borough basis given that women in prostitution are often not tied to a single borough.

A number of borough representatives noted that strong coordination and joint working is occurring in their borough in relation to tackling domestic violence and supporting women experiencing it. Several respondents suggested the need to learn from this and perhaps extend or replicate similar systems and practices to other forms of VAWG including prostitution and trafficking. Interestingly this was again highlighted by a representative of the statutory sector in Borough D: "joint working is very good around DV...with robust pathways for DV referrals...so I think if you pooled all the resources you already have here [in Borough D] you could actually have a very robust pathway in place that would support the professionals who are being disclosed to."

What is apparent from this research is that the lack of a coordinated approach to addressing prostitution was most evident and potentially most detrimental when it came to law enforcement. There was a lot of 'buck-passing' identified in this context, with police giving little consideration to the impact enforcement action in their own borough may have on neighbouring boroughs and on vulnerable women who are displaced and face increased risk of harm as a result. This was highlighted by a written response from statutory sector respondents in Borough F: 'London boroughs are not concerned with the effects of their operations on neighbouring boroughs, resulting in a merry-go-round of these groups [women and buyers] moving from one borough to another depending upon the nature of enforcement work being carried out at that time.'

In Borough J there was acknowledgement that the police need to work closely with those in Borough H and also the police force in Slough, where many of the Romanian women who sell sex in these London boroughs are based. Borough J representatives also noted that they are seeking to work with SC&O9 on this issue, looking for advice and strategy around an investigation, as the problem is believed to be 'bigger than the borough'. Statutory sector representatives in Borough A also noted that there is 'no point in just focusing solutions in one borough.'

Voluntary sector representatives from this borough called for: “a proper network in [Borough E] or even in London, like a contact network.” “A forum where we get together every so often, having a contact point, not having it lead by a certain agency so that it isn’t about their own agenda...There needs to be a bit more discussion...A cross-borough thing – like we have for alcohol services.” Respondents in Borough A also identified the need for something similar and noted that: “The Mayor’s Office is the place where cross-borough cooperation needs to come from as they have the oversight that individual boroughs don’t have.”

In terms of their own borough strategies on VAWG, it was noted by some that prostitution and trafficking still do not feature in this. In fact Borough A is moving away from their VAWG strategy, replacing it instead with one that focuses solely on domestic violence, and prostitution and trafficking are not included. Statutory sector representatives from the borough acknowledge that the issues of prostitution and trafficking are low on their agenda: “...when it comes to prostitution and trafficking per se, although it’s on the agenda once in a while...it never reaches the level where people really want to address it.” It was acknowledged that prostitution, and the ‘psychological impact’ of it on those involved is ‘low down on the list of priorities in the borough.’ Again, these seem surprising statements for a borough with such a flourishing sex industry. At least there was some motivation amongst statutory sector representatives to consider the issues further, suggesting that it ‘would be good to address this list [of local priorities].’

The Mayor’s own VAWG strategy itself highlights the lack of a ‘strategic approach to the sex industry in London and its links to violence against women.’ Clearly the Mayor’s strategy represents progress on this point, but it is worth noting that a significant number of our research respondents were not familiar with the strategy (noted in particular by representatives of the voluntary sector in Borough E and Borough A), either its existence or its content, with some stating that it ‘would be useful to know more about it.’ There were others who were aware of the strategy but did not utilise it directly in the course of their work.

A service provider with a pan-London remit noted that in relation to VAWG as a whole MOPAC: “make the classic mistake of working horizontally not vertically...There is no feedback from the front line or from survivors.” This respondent suggested that MOPAC need to hold regular meetings with those working on the ground providing direct support to women involved in prostitution so that they can gain a current, in-depth insight into the issues and challenges faced. It was recommended that this same approach should include seeking feedback, views and advice from women involved in prostitution directly, empowering them to be involved in designing the services and policy responses that they really need. However, this same respondent also made a broader point in her written comments regarding MOPAC’s responsibilities for tackling VAWG in the capital: ‘I don’t think it is helpful for VAWG to be framed solely as a policing/crime issue – not least because it exacerbates the battle to get health providers involved – but also because it tends to focus efforts based on risk and visibility rather than women’s human rights and early intervention.’

An east London-based service provider was keen for MOPAC to progress the delivery of the Mayor’s strategy, and highlighted the need for a pan-London strategic lead on prostitution and trafficking who would ensure delivery of the strategy and its related action plans across the capital. Other respondents suggested that a role or function such as this might be helpful, with some suggesting that given the extent of the work that needs to be done, there should perhaps be two such roles/functions – one focused on prostitution and the other on trafficking. The same respondent who highlighted the need for a strategic lead, also called on MOPAC ‘to put their money where their mouth is’ and ensure adequate

funding for vital services for this group, and services that support exit in particular. In addition, it was suggested that all London boroughs should be engaged in a cost-benefit analysis, as this would 'make them sit up and listen' when it comes to the public and human cost of prostitution and trafficking, compared to the much smaller cost involved in offering high quality support to a woman, helping her to stabilise and achieve exit.

7.2.6 The community perspective

Awareness, visibility and perceptions of prostitution

The views and experiences of London residents regarding prostitution and trafficking were mainly captured via discussions with residents at community forums such as Neighbourhood Watch and Safer Neighbourhood Team (SNT) meetings in our focus boroughs, alongside responses to our online survey for community members, and are presented in this section.

Borough F residents reported very visible and prevalent street prostitution in particular wards of the borough, and one described the related activities as 'a 24-hour attack on the community'. They noted with great concern the physical impact of prostitution on their neighbourhoods, including litter and paraphernalia commonly associated with street prostitution such as needles, dozens of condoms and wet wipes left behind in public spaces. Some residents stated that they no longer allow their children to play outside or visit the local park, as both are either strewn with used condoms or obvious sexual activity is taking place. One resident noted that pimps and buyers present a danger to children locally, and others feared raising their children in the area. The noise from street prostitution-related activity is also reported to be adversely affecting residents' quality of life. Some said they had fewer visitors to their homes than in the past because people feel increasingly uncomfortable to come to the area in the face of such visible prostitution activities.

Many residents, and women in particular, reported feeling unsafe in the area at night, some had started using taxis rather than walking in their neighbourhoods and others noted an increase in robberies and drug-related crimes, which they believe are linked to prostitution.

Women selling sex are reported to be attempting to open the car doors of passers-by to solicit them, and handing out cards offering sexual services on the street. A number of residents described the women's behaviour as 'brazen'. Some male residents described being embarrassed or offended by the fact that they or their sons are solicited by the women on the street. Other residents noted that local young women had been approached by buyers seeking sex in the mistaken belief that these young women are selling it.

Problematic behaviour was reported from the large numbers of buyers who approach women and girls soliciting in the borough. One Borough F resident reported witnessing over 50 cars with male drivers picking up women in street prostitution in the same area over the course of a single evening. Prostitution services are reported to be very cheap in the borough in comparison to other areas of London, and this is one factor that is believed to attract buyers to the area. Borough F has apparently become so well known for prostitution that buyers travel from as far as Walthamstow and Kent to purchase sex.

Violent and controlling behaviour from pimps towards the women has also been witnessed, as well as aggressive behaviour from the same pimps towards both residents and outreach support providers in the area. One resident noted that "many people can't speak out because they are intimidated by the pimps." It was also noted that the women involved

appear fearful of those who are evidently controlling prostitution in the area, and residents report that a number of the women involved in prostitution locally are under the age of 18 (with some as young as 14-16) and appear to be particularly vulnerable.

Borough F police report that almost all the women selling sex on-street in the borough are from Romania and that although, when asked, none report being controlled directly, they believe that the women may simply be saying this to police because they are fearful of the consequences of disclosure. Police recently conducted a sweep of the area and found weapons believed to be used by pimps in cases of 'disagreements' with buyers.

The overall perception of Borough F residents is that street prostitution in the borough has steadily increased over the last ten years and that the negative impact of this on their community is also increasing over time.

Members of Borough E's SNT noted that although prostitution is regularly on their agenda it is not an issue that has been particularly prioritised in recent years. There is reported to be a 'regular' group of women who sell sex on-street in the same area of Borough E throughout the day. They are believed to be between the ages of eighteen and thirty and are mainly white British. Many are reported to have serious drug problems, with some admitting to committing other crimes such as burglary and theft in order to go to prison and spend some time off the streets.

Reports from a Borough D-based SNT suggest that on-street prostitution is on the decrease in parts of the borough, primarily because police are conducting night patrols targeting women in the lead up to the Olympics. Local police and the Local Safeguarding Children Board associated with this SNT noted that they had not had any reported cases of trafficking in their area and that therefore: "It is not a risk that needs to be pursued".

Local police and council responses

There was a broad consensus amongst Borough F residents that the measures currently used by local police are not effective at reducing prostitution in the area and that arresting women seems to have little impact. It was noted in one ward that local Police Community Support Officers (PCSOs) end their shifts at 11pm before prostitution-related activities really begin, and that the phone number accessible to residents to report problems is apparently not operational throughout the night. Residents reported long-standing concerns that police in some borough wards have failed to view street prostitution as a priority, are not taking their concerns seriously, and are doing little to address issues in the long-term. They state that the police only arrive hours after they first call them, and that although some have provided photos of women and buyers to the police they have not acted upon them. The majority of residents would welcome a greater police presence and a more proactive approach.

In another Borough F ward, police take a more proactive but punitive approach, cautioning and arresting women resulting in attendance at court, fines, ASBOs and even prison sentences. Police report that they are keen to refer women to support services in the area but say they are not aware of any. The same police also try to address kerb crawling and impose £80 fines on buyers, which they believe deter the men as they are usually not seen again in the same area once fined. They operated a 'name and shame' policy in the past but have ceased using this approach.

Borough F police report being under-resourced to deal effectively with prostitution in the borough and note this is in stark contrast to neighbouring Borough E, whose policing resources are believed to have increased significantly in this area, reportedly to undertake a 'clean-up' of the streets in preparation for the Olympics. Conversely, community-based respondents from Borough E report that prostitution is not seen as a priority for the borough, the policing of it is entirely complaints-led, and the borough would benefit from the establishment of a dedicated 'vice team' and a designated lead for prostitution. Borough E police are reported to lack sufficient knowledge to effectively tackle kerb-crawlers (the only organised action to tackle demand for prostitution in the area in the past has reportedly been carried out by 'vigilante groups' from a local Mosque), and instead focus all their efforts and resources on punitive action targeted at the women selling sex. Like their colleagues in Borough F, they would like to work more cooperatively with local support services for women.

In terms of local council responses to on-street prostitution, a number of residents of one Borough F ward described what they believed to be a deliberate council policy to isolate and maintain prostitution within that ward, one of the most economically deprived in the area. In what could be described as the 'ghettoisation' of street prostitution, residents argued that their ward has become a 'dumping ground' for prostitution in the borough and that "the council are happy to contain it and leave it here." For residents this explained the perceived lack of interest and action by both the police and the council in response to their ongoing complaints about the impact of prostitution on their community and lives. Some noted that the council was only just beginning to listen to their concerns because they had recently submitted a petition with over 6,000 residents' signatures to the council calling for immediate action to address all of the problems they associated with street prostitution in the area.

Residents' recommendations

It is clear from discussions with residents about the local impact of street prostitution that their foremost concerns are their own – i.e. regarding the safety of their children and families, the protection of family honour, the appearance and cleanliness of their neighbourhoods, the value of their property etc. – and it is undoubtedly the case that in some boroughs street prostitution-related activities have had a very negative effect on residents' lives. Whilst many did not wish to consider or discuss the needs, harms and potential exploitation that the women selling sex in this context appear to be experiencing, some did acknowledge with concern the young age of some of the girls/women involved as well as the presence of control in the form of pimps. There was recognition amongst some residents that these girls and young women are in need of help and support, including support to get out of prostitution. They recommended that the local police refer women directly to support providers, and also that they should have better access to social care such as safe and appropriate housing, particularly for those with no recourse to public funds.

Whilst some residents suggested an increase in punitive action against the women selling sex, others argued that arresting and fining women is not effective. Some residents wanted local police and the council to concentrate more heavily on the buyers who create demand and those who coerce and control prostitution. This is an important finding given that until very recently buyers and pimps were given little or no consideration in this context by residents who usually called for police action and 'punishment' that focused solely on the women selling sex. One reason for this may be the increased visibility of both buyers and pimps in boroughs such as Borough F, alongside a heightened awareness that many buyers

are members of their own community, which has led to a wider recognition and understanding amongst residents that these figures are 'key players' in the existence and perpetuation of prostitution. One resident noted that "Those behind the prostitutes are the ones we need to address"; and significant numbers called for a variety of responses, from awareness raising and education for men who buy sex, to fines, 'naming and shaming' and even imprisonment.

In terms of the overarching response to street prostitution in their area, residents wished to see the following measures put in place:

- Street prostitution to be taken more seriously and residents' concerns acted upon by both the local council and local police, including making areas less physically conducive to the operation of prostitution (greater police presence and availability especially at night, lighting, CCTV etc.)
- A coordinated and properly resourced strategy to address prostitution, led by the council and involving the police and other relevant local agencies
- A combined approach with other areas in terms of funding, enforcement, policies and strategies so that prostitution is not merely shifted or displaced from one area to another
- Improved dialogue between the council, the police and community members (it is after all a statutory duty for local authorities to take account of the concerns of local communities), so that residents are kept informed of actions to address prostitution locally and their outcomes
- The involvement of community leaders in addressing the local problems associated with prostitution. In Borough F, for example, there was a suggestion to involve Romanian community leaders to help break down the barriers between residents and the women selling sex.

7.2.7 Funding and commissioning

Perhaps unsurprisingly, particularly in the current economic climate, respondents from both the voluntary and statutory sectors raised the problem of a distinct lack of funding for the services and responses they are trying to provide to women in prostitution, including women who have been trafficked. Seventeen respondents to the online survey said that a lack of funding to provide for these service user groups was one of the main barriers faced when working with women involved in prostitution and women trafficked into prostitution. Funding for services was often described as short-term, not ring-fenced or protected and not sufficient to really meet the often complex needs of the women concerned.

Statutory sector representatives in Borough F, for example, described in their written response a lack of funding as the main challenge they face in addressing prostitution, noting that because this work is not a priority across the borough: 'A number of areas of work to both target kerb crawlers or carry out outreach work, we have not been able to action due to cost implications of this work.' A representative of the voluntary sector in Borough A noted that if services are not adequately funded to support women in prostitution effectively then they are essentially a 'waste of money', because all they are doing is 'just fighting fires'.

Some respondents noted the benefits of ensuring that they receive funding from statutory bodies to support women in prostitution as this pushes the state to take responsibility and meet some of their obligations to this vulnerable group. Similarly, a number of respondents highlighted, with some exceptions, that the NHS does not do enough for this group of

women and should be pressured to fund more dedicated services, including 'one-stop-shops' with GPs, dentists, drug support and counselling all in one location that would address a broad range of the women's physical and mental/emotional health-related needs.

Conversely, respondents from one Borough D-based voluntary sector support service noted that they deliberately do not accept funding for their service from the local council because they really value their independence, and feel that a funding relationship means that the council could dictate how they run their service, and possibly prevent them from advocating effectively on women's behalf when they have problems with the council or other statutory bodies.

A range of respondents, particularly from the voluntary sector, noted that often their service commissioners do not fully understand or recognise the value of the work that they do, and some fail to grasp the full extent of the complex needs of some of the women in prostitution that they support. Some commissioners were said to expect 'too much for too little'. It was noted that women in prostitution tend not be voters and do not carry much political clout or even value within their communities, meaning that they are rarely prioritised when it comes to dividing up limited resources.

Key points re cost-benefit

Although a full cost-benefit analysis of providing services to women in prostitution was not within the remit of this study, it was explored briefly with respondents to get some sense of their knowledge and views on this matter. Virtually no respondents knew how much it costs their service to support a woman in prostitution or a woman who has been trafficked during a set timeframe. However, a number did highlight the cost to the public purse of 'picking up the pieces' of prostitution. One pan-London service provider noted: "There is a definite cost- benefit – it is cheaper to provide proper services for those women rather than clean up the mess, so why aren't we doing it?"

A Borough E-based police officer highlighted the resource-intensive nature of responding to women in prostitution via the criminal justice system: "...on operations we have up to ten officers, two cars...think about the time and resources spent from arrest to the woman leaving the police station – most are kept overnight, tens of hours in custody time, food, drink, showers in the morning, staff time picking women up and driving them to court, that is even before court time." Another respondent in Borough E mentioned the cost to the state of unwanted pregnancies amongst women in prostitution who make more money selling sex without a condom, highlighting the case of one on-street woman who has had eight children taken into state care.

Similarly, an east London-based support provider highlighted a wider range of costs, including time, money and service capacity that are typically incurred as a result of prostitution. These relate to enforcement action by the police, court time and resources, visits to A&E (which women in prostitution often use in place of a GP) and sexual health clinics, support with substance use, time and costs spent in dealing with residents' complaints etc. She recommended costing all of these things and then comparing this to the much smaller cost involved in offering high quality support to a woman, helping her to stabilise and ultimately exit prostitution.

A number of respondents, including representatives of the voluntary sector in Borough F, believe that one-stop-shops for women in prostitution could save money and have a positive cost-benefit impact. Eaves notes that in contrast to the many tens of thousands of pounds

or more outlined above that even one woman in prostitution can cost the state in a year, it costs our organisation approximately £104,000, primarily in salary costs and overheads, for two staff in our LEA exiting project (one full time, and one working four days per week) to support 70-100 women per year in the exiting process. It was noted by one of the respondents from LEA that: "If women are happy and leading a positive life it would save on other services in the long term."

As previously noted in Section 7.2.5 above, a full cost-benefit analysis was suggested as an important tool to encourage local government to properly invest in addressing prostitution. This point was echoed by statutory sector respondents in Borough A, who noted that because there is no clarity around the extent of prostitution in the borough, there is therefore 'no way to justify investing in services if numbers are unknown'. She went on to state that there needs to be more evidence regarding what is going on locally so that authorities can invest, but that it is clear that given the impact of prostitution on health, housing, domestic violence and children's services, exiting saves money. It has been established that Borough A's 'family recovery project' (following domestic violence) voids the cost of £1 in every £2 and that a similar calculation needs to be undertaken in relation to exiting prostitution support provision.

8. The 'Way Forward' – Good practice examples

Tackling prostitution as VAWG – the Lambeth example

The London Borough of Lambeth is widely recognised across London as an example of good practice when it comes to addressing prostitution in borough. A number of boroughs that participated in this research, including Borough D, Borough F and Borough A, were aware of Lambeth as a model of good practice, particularly in relation to the work of the Lambeth Prostitution Group (LPG – described below) and the framing of prostitution as a form of VAWG. However, borough respondents, both voluntary and statutory, asked for more detail on the Lambeth approach and its effectiveness and were also keen to find out how this approach developed, evolved and garnered support over time. The information on this approach set out below was gathered from Lambeth council's Violence Against Women and Girls Programme Manager.

Lambeth's VAWG Programme Manager described the development and delivery of the borough's VAWG strategy. Lambeth's VAWG strategy (2011-14) saw a change in Lambeth's approach to prostitution. Lambeth took the strategic decision to shift responsibility for tackling prostitution from an enforcement-led approach targeted at those selling sex to one that recognises prostitution as a form of VAWG. Work to address prostitution in the borough was placed within the remit of the VAWG Programme Manager. It was agreed that Lambeth's previous approach to prostitution, centred on law enforcement and the dispensing of ASBOs to women selling sex, was no longer appropriate under the VAWG framework.

The change in approach was inspired by the previous government's VAWG strategy (HM Government, 2009), the Mayor of London's VAWG strategy (Mayor of London, 2010), the Glasgow model, Lambeth's long-established multi-agency approach to tackling domestic violence and the commissioning of two reports to research the extent of VAWG in the borough. From this they have developed a multi-agency approach to prostitution which recognises it as VAWG.

Lambeth has the largest on-street sex market in south London. The Lambeth Prostitution Group (LPG) estimates that in 2012 approximately 150-180 women engaged with services at any one time. It is estimated that there is a core group of approximately 15-20 women who are entrenched in prostitution in the borough. However, there has been a notable reduction in women selling sex on-street since the strategy was put in place. It is believed that the majority of women are being exploited by a boyfriend and/or pimp. A significant number of women involved in off-street prostitution are accessing support from Trust, Spires, substance use and mental health services. The main hotspot area is Brixton Hill.

The Programme Manager outlined the following steps that the borough has taken in the delivery of their VAWG strategy:

- Recruiting a VAWG Training and Awareness Officer
- Developing a VAWG training programme
- Developing a VAWG communications strategy
- Including VAWG in their sexual entertainment venues licensing policy
- Developing the Gaia Centre into a one-stop-shop for women experiencing violence in the borough with funding secured for the delivery of the VAWG strategy, and by collating the funding that was used for various services that women need (from housing, the Home Office, the council, Supporting People etc.) into one pot for the provision of the

one-stop-shop. This has created clearer referral pathways for women who experience VAWG. As VAWG funding has been secured by the council (£1.5 million per annum is the total budget for all of Lambeth's VAWG work), the Gaia Centre has a 2.5 year contract, and includes the following services: Independent Gender Violence Advocacy for those at high risk of homicide/serious harm, Community Outreach Workers, a peer support scheme, volunteer opportunities, an early intervention scheme to reach out to and support 13-16 year-old girls, group support sessions, the Sanctuary Scheme (to support survivors to stay safe at home and avoid homelessness), and childcare provision

- Creating a VAWG forum (transforming the previous DV forum)
- Funding the Chrysalis scheme – 31 units of specialist accommodation and services for women involved in on-street prostitution; creating an accommodation pathway to support women to independence
- Continuing to commission a court diversion scheme (from Trust) that enables women who are arrested for prostitution-related offences to be diverted from court to attend two appointments at specialist support services
- Continuing to support street outreach services that work with women involved in on-street prostitution or other street activity/rough sleeping
- Redeveloping and refocusing the Lambeth Prostitution Group (LPG). The LPG had been established for ten years; however the group traditionally adopted the borough's previous approach to prostitution. Since the borough's change in approach this group is now an operational, multi-agency group (including professionals from the police, health services, mental health services, substance use services, voluntary sector services and the council) which discusses and plans responses to individual cases of women involved in prostitution, similar to the MARAC model
- Undertaking joint working with the courts, the CPS and Lambeth borough police
- Tackling demand. Lambeth's focus is no longer one of issuing ASBOs to women involved in prostitution. Its focus in terms of enforcement has instead shifted to the buyers in order to tackle the demand for prostitution, based on the Glasgow model. A kerb crawler escalation policy was implemented in November 2011. Every month the dedicated police vice team distributes warning letters which are handed to suspected buyers in cars and on the street. If the same person is suspected of looking to purchase sex in the area again this escalates to an Acceptable Behaviour Contract (ABC), then an ASBO. The vice team also carry out operations once a month, which include decoy (undercover) operations which provide better routes into the criminal justice system as they can gather direct evidence to prosecute. From December 2011 to March 2012 over 70 men have been arrested and/or warned as part of the Safer Lambeth kerb crawler escalation policy. Out of the 70 men, there have been no repeat offenders. Lambeth has not secured any prosecutions under Section 14 of the Policing and Crime Act (2009) to date; their arrests have focused primarily on kerb crawling and soliciting. The police have also closed a number of 'addresses of concern' in the borough, believed to be operating as brothels
- Conducting an awareness raising and public education media campaign focusing on tackling demand.

In the Programme Manager's view, Lambeth was successful in implementing this new direction in terms of tackling prostitution in the borough as a result of four key factors: 1) evidence of prostitution in the area and the clear need for specialist services (based on two research projects commissioned on the extent of VAWG and victim-survivor views in Lambeth), 2) strong leadership within the council which secured their firm commitment to tackling VAWG, including prostitution, appropriately, 3) securing/protecting funds dedicated to addressing VAWG, and 4) the commitment of the local police to embracing the new approach.

The Programme Manager noted that the current lack of a central approach to VAWG and the focus on localisation from the current government means that councils can ultimately do as they wish in terms of prostitution. Progress on this agenda relies heavily on a council's own commitment to tackle prostitution within a VAWG framework.

Lambeth's VAWG strategy does not identify the borough as a hotspot for trafficking into prostitution, however it was noted that trafficked women are often moved around London so trafficking is a problem throughout the capital. The Programme Manager states she would consider accepting a case of trafficking into the LPG group, but notes that Lambeth are not as focused on trafficking in terms of identification and services in the borough, as it is seen as more of a pan-London issue. From 2003-2012 Lambeth referred 19 women to the Poppy Project. The top three countries of origin were Nigeria (4 women), China (3) and Sierra Leone, Latvia, and Albania (2 in each case)³².

Tackling trafficking – the Croydon example

Croydon is well known for its work to address trafficking in the borough, and an important element of that strategy is a community-based bottom-up motivation in the form of Croydon Community Against Trafficking (CCAT), who produced their own report into brothel activity in the area in 2009.

Croydon's drive to address trafficking results from a combination of factors. There is some degree of knowledge and acceptance of the existence of trafficking in the borough. Respondents highlighted previous research (Dickson, 2004) that had identified over 100 establishments selling sex in the borough, alongside an active and concerned local community keen to tackle evidence of trafficking in these establishments.

Croydon Council's work to address the issue of trafficking has resulted in training on trafficking being delivered by the International Organisation for Migration to frontline staff in the police, council, NHS and other local agencies in Croydon.

Although the council does not currently classify trafficking as VAWG, they have developed specific protocols^{33,34} on the issue, and established a dedicated human trafficking sub-group to the Croydon Council Children and Adults Safeguarding Boards. Supported by CCAT, the council recognised the need to understand and address its responsibilities as a first responder under the NRM. Trafficking and sexual exploitation are also mentioned in other strategy and policy documents such as community safety and crime reduction and in Croydon's joint strategic needs assessment for 2010/11. CCAT have also played an important part in the development of Croydon's interagency child and adult working protocols.

Some of the elements underpinning activities to tackle trafficking in the borough were highlighted in detail by respondents, as follows:

³² Source: Poppy Project statistics 2003-2012.

³³ *Croydon Safeguarding Vulnerable Adults Board: Adult Trafficking Protocol:*
<http://www.croydonpractitionerspace.co.uk/section/detail/multi-agency-support/useful-tools/croydon-safeguarding-vulnerable-adults-board-adult-trafficking-protocol>

³⁴ *Croydon Safeguarding Children's Board: Child Trafficking Protocol:*
<http://www.online-procedures.co.uk/harrow/files/2013/03/Croydon-Child-Trafficking-Protocol-2012.pdf>

- A dedicated sub-group to Croydon Council's safeguarding boards has been established which is cross-borough and multi-agency and includes smaller and non-statutory organisations. The sub-group is chaired by the Deputy Chief Executive Officer of Croydon Council, and aims to bring key players and interested parties together to jointly inform a strategy to address trafficking, with the priority being any potential victim of trafficking, whilst not minimising the concerns of local residents. The sub-group promotes information exchange, training, policies and practice that facilitate both female and male victims of trafficking being put in touch with relevant support agencies and having access to information that can assist them and highlight their options. The sub-group has worked with and been informed by a range of voluntary and statutory sector organisations that provide support to women in prostitution, including women who have been trafficked. Feedback has been positive in terms of participants and invitees having their voices heard and being able to help shape policies
- The community group Croydon Community Against Trafficking (CCAT) describe themselves as driven not by an anti-prostitution analysis of the problem of trafficking for sexual exploitation, but by the perspective of modern-day slavery. CCAT has informed itself and its members very extensively on current legislative and policy frameworks and has knowledge of a range of organisations and support services for victims. They undertake a wide range of activities to support their aims, including:
 - Campaigning, lobbying and work with schools to deliver awareness-raising around trafficking
 - The collection of data locally on the sex industry in Croydon to try to identify indicators of trafficking. CCAT share information with the local police and council and they advocate that the priority must be to support people who have been trafficked as victims of crime and not to prosecute them for immigration or other related offences
 - Work with the council to help shape the NRM protocol
 - Work with the local PCT to promote data collection and identification in the health services
 - Extensive campaigning to try to stop the advertising of sex establishments where they have identified the presence of indicators of trafficking. However, this activity has also been the subject of complaints, with some women involved in prostitution saying it has affected their livelihoods
 - Work to identify some of the cost-benefit factors involved in reducing trafficking as part of promoting their work, which has attracted support and funding for the group's activities, as well as demonstrating 'a business case' to prevent trafficking and invest in exiting support.

CCAT have been operating for six years and feel they have obtained considerable credibility and results. They are fully alert to the danger that intensive action in one borough can simply result in the displacement of vulnerable people to neighbouring boroughs. They are therefore very keen to work with neighbouring and other boroughs to help develop and grow community action networks beyond Croydon in recognition of the pan-London and mobile nature of prostitution and trafficking, as one key CCAT respondent noted: "...we can help other groups get started. In terms of what other boroughs need, it is simply a commitment to do something about a crime that wins no votes for MPs and councillors and what the average person in the street knows nothing about. Many services touch upon the problem if a victim somehow appears but none of them take responsibility to see things right through. No one looks for victims in the first place."

- The Adult and Child Trafficking Protocols were developed by the Croydon NRM project, a Croydon Council multi-agency project group. Working together with a range of organisations including CCAT, the protocols were developed to ensure the highest

standard of referrals and support for victims of trafficking. This has resulted in staff in both children's and adult's services receiving specialist training, up-to-date information and a network of relevant contacts. Respondents in Croydon working with the NRM stressed the complications arising from attempting to support suspected adult victims of trafficking who fall outside the NRM process

- Croydon police also established a team with specialist knowledge on trafficking, abuse and NRM referrals. They work extensively with the local community and a range of organisations and are attempting to improve data gathering and intelligence locally. The police are also planning to situate work on trafficking within their hate crime strategy, which they hope will significantly increase the prioritisation, and potentially resourcing, of their work in this area.

Members of CCAT noted that it had taken several years of lobbying and advocacy to bring the council to the point of such effective joint working and to accumulate the data and knowledge that now drive the work. All parties signalled the difficulties posed by lack of resources, both time and financial. CCAT feels that they have executed an important accountability and enforcement role in keeping the authority's 'eye on the ball' for all things trafficking-related in the borough, in line with their accepted responsibilities under the NRM.

These two boroughs clearly demonstrate good practice in relation to addressing two very inter-linked issues, that of prostitution and trafficking into prostitution. Undoubtedly the ideal for boroughs hoping to do the same effectively would be to take on board lessons and recommendations from *both* Lambeth's and Croydon's approaches in order to ensure that women exploited in prostitution, including those trafficked and those not, are as fully protected and supported as they can be, and that steps are taken to eradicate all forms of exploitation as far as is possible.

9. Conclusions

- London continues to have a thriving sex industry, both on and off-street, with thousands of women involved in prostitution, a proportion of whom have been trafficked. There is clear evidence of this industry in the vast majority of London boroughs
- There is some evidence to suggest that trafficked women are now being exploited in on-street prostitution in the capital, as well as off-street, and that the nature of this exploitation is organised and controlled
- There is also evidence of girls and young women under 18 being exploited in prostitution in London, in addition to signs that internal trafficking is taking place
- The off-street sex industry as a whole appears to be increasingly organised and increasingly lucrative for those who control it
- Despite the strategic steer from MOPAC, there is a lack of consistency across London in the way prostitution and trafficking are defined as forms of VAWG, and very few boroughs have adopted formal strategic approaches to addressing these issues
- This lack of consistency leads to very different approaches to responding to prostitution and trafficking, even in neighbouring boroughs, which serves to displace vulnerable women and fragment their opportunities for support, thereby further increasing their vulnerability
- With some notable exceptions, there appears to be a widespread failure by services across London to actively identify and record women accessing their support who are involved in prostitution, including those who have been trafficked
- There are many serious problems inherent in the current systems and processes in place to identify, classify and support victims of trafficking in London and beyond
- CJS responses to prostitution vary widely across the capital, but there is a growing consensus that enforcement action against those who sell sex is both ineffective and highly problematic
- There is mounting support across the city for tackling demand by deterring and sanctioning the behaviour of buyers. This was evident across a wide range of respondents including support providers, CJS professionals and community members
- There are some indications of the potentially deliberate 'ghettoisation' of street prostitution in London in order to contain it within specific areas
- Dealing with the 'fallout' from prostitution and trafficking is expensive for the taxpayer – women often have complex needs and are contending with the impacts of both physical and sexual violence – yet specialist support to help women to leave prostitution or overcome their trafficking experience is very limited and very poorly funded
- The lack of coordination, joint working and even communication regarding prostitution and trafficking within boroughs and on a pan-London basis between responsible agencies is gravely concerning and suggests that London is too willing to accept and indeed accommodate an industry whose business it is to exploit women and girls
- However, there are pockets of good practice in addressing these issues in some London boroughs, from which many others could learn with a view to significantly improving their responses to women and girls in the capital who are the victims of VAWG.

10. Recommendations for policy, practice and service commissioning

Recommendations are arranged below to reflect the key themes identified amongst the research findings. It is clear that addressing the complex, often multi-layered issues of prostitution and trafficking in a city such as London requires effective and well-grounded multi-agency, multi-disciplinary work. For this reason virtually all of our recommendations are relevant to more than one 'audience' – in most cases multiple authorities/agencies have the power, resources or skills required to bring the recommendation into effect and will need to work together to do so successfully. For ease of reference the main audience or subject of each recommendation is included in brackets below, but these are not exhaustive. Our recommendations are extensive; in the interests of prioritising, key recommendations are presented in **bold**.

Prevalence and trends

1. **An end to the time and public resources spent policing a relatively small 'core group' of entrenched women selling sex on-street in most boroughs, who would be better served by targeted support and interventions to help them to stabilise and then develop routes out of the lifestyle in which they are entrenched** (Local Authorities, police)
2. Urgent intervention to ensure women and girls' safety, including measures to address suspected child sexual exploitation of Romanian girls across the capital (Local Authorities, police)
3. An immediate pan-London coordinated investigation based on intelligence that this group of Romanian women and girls are not 'working independently' but have been trafficked and are linked to a wider prostitution and potentially begging network in which large cash sums are being generated via exploitation (police, including SC&O9)
4. Support providers to challenge the misconceptions about off-street and 'escorting' women never having alcohol or other substance use issues, and rarely facing danger in selling sex, as this and other research has found otherwise (statutory and voluntary sector service providers)
5. Support providers to ensure that their services are identifying and are accessible to the emerging group of 'transient' women selling sex both on and off-street who are perhaps not currently defined by services as part of their traditional on or off-street service user group, and therefore may be 'falling through the cracks' in terms of service provision (statutory and voluntary sector service providers)
6. Councils and police in central London to proactively prepare to tackle the expected increase in organised criminals who can afford to finance expensive properties running the majority of brothels in their area (Local Authority, police)
7. A revisiting and reassessment of the evidence regarding trafficking associated with the Olympics in 2013 as victims may take time to come to the attention of support providers and the authorities, particularly if immediate escape from the control of traffickers has not been possible (MOPAC).

Needs and support

1. **Robust, sustainable funding for more specialist services across the capital to support women in prostitution, including women who have been trafficked, particularly in those 18 boroughs where there are currently no such services** (national and local government, service commissioners)

2. **More services for women in prostitution, including women who have been trafficked, that offer the following** (national and local government, service commissioners, statutory and voluntary sector service providers):
 - a. **Holistic, integrated and targeted support for women involved in prostitution in order to meet the complex needs of women seeking support at different stages in their involvement in prostitution and/or the exiting process**
 - b. **Women-only services – both women involved in prostitution and the services that support them shared the view that women-only spaces are vital when working with this group**
 - c. **One-stop-shops, with flexible opening hours (including during the night when some women are more likely to need and access them), that provide a host of services that women in prostitution are likely to require, such as health care, drug support, counselling, support with housing, benefits, financial problems etc.**
3. More services to proactively offer women in prostitution the option to exit, and provide dedicated support to do so. Exiting services should be properly funded to provide support that is tailor-made to women's individual needs and includes elements of both practical and emotional support, preferably provided by dedicated key workers with whom trust can be built over time (statutory and voluntary sector service providers, service commissioners)
4. More investment in specialist accommodation provision for women exiting/seeking to exit prostitution, in addition to fast-tracked support for women in prostitution who are homeless (national and local government, service commissioners, statutory and voluntary sector service providers)
5. **Training, awareness raising and the dissemination of good practice guidance to a host of professionals (particularly in health, housing and law enforcement) in order to assist them to identify women involved in prostitution and women trafficked into prostitution and then provide them with the appropriate support and/or signposting to relevant services** (specialist service providers, MOPAC)
6. Improvements to assessment, identification, recording and monitoring procedures by all social care services regarding women in prostitution, including women who have been trafficked, so that these services know who their service user base is and can respond accordingly (statutory and voluntary sector service providers)
7. A London-wide resource (online and hard copy) of services available to women involved in prostitution and women trafficked into prostitution that will assist professionals with signposting appropriately, alongside improved publicising and promotion of such services (MOPAC)
8. Avoidance of the 'shoe-horning' of women in prostitution into provision for women experiencing domestic violence, with consideration given instead to the development of more support mechanisms (such as IDVAs and ISVAs) specifically dedicated for women in prostitution, including supporting them with routes out (statutory and voluntary sector service providers)
9. Better engagement by the NHS in exiting provision, to look beyond the immediate needs and harms that women in prostitution face to adopt a more strategic, long-term approach to supporting women out of prostitution, thereby removing the harm (NHS service commissioners).

Policing and criminal justice

1. **An end to the regressive approach of police enforcement action against vulnerable women in prostitution, which typically fails to deter women from selling sex and leads to a range of negative consequences including women's isolation from support and the displacement of women to other boroughs which results in the heightened risks associated with selling sex in unfamiliar territory, and mistrust in the police which prevents women from reporting violent offences against them and seeking police support. This measure requires support and direction from senior borough police at the highest level** (police)
2. Resources currently spent on enforcement to be used instead to divert women away from the criminal justice system and into appropriate support, including support to exit prostitution (for example via the extension of court diversion schemes across London) (police, Local Authorities, service commissioners, statutory and voluntary sector service providers)
3. Diversion programmes should not always be premised on women being arrested and appearing in court, rather there should be automatic diversion from court based on women's commitment to engage with services (police, Local Authorities, service commissioners, statutory and voluntary sector service providers)
4. **Action to decriminalise those who sell sex, including wiping their criminal records of any offences associated with this in order to remove this significant barrier to exiting prostitution and support them to pursue new lives and employment opportunities** (national government)
5. **Measures to focus police enforcement action on tackling demand by targeting buyers and also those who benefit/profit from the exploitation of women in prostitution** (national and local government, police)
6. Training and awareness raising for police and other CJS professionals on the needs and vulnerabilities of women involved in prostitution, and on the application of the laws and practices to tackle demand, which should also address the assumption that this always requires the use of female officer 'decoys' and is therefore cost-prohibitive. More cost-effective methods such as the use of a kerb crawler escalation policy (like that employed by police in Lambeth) should be put in place across the capital (police and other CJS professionals)
7. The establishment of local borough-based police with dedicated responsibility for prostitution and trafficking in their borough, including a named officer with responsibilities in this area that local support services can turn to for information and advice, as required (police)
8. Strengthened communications, information sharing and the coordination of working relationships between police teams in neighbouring boroughs across London to prevent the displacement of women in prostitution and buyers between boroughs and the 'buck passing' that this often entails (police)
9. Strengthened communication channels between local borough police and SC&O9, so that local intelligence and good practice responses in relation to prostitution and trafficking into prostitution are more readily shared and no cases of organised control of prostitution 'fall between different stools' (borough-level police and SC&O9)
10. Extension across London of the good practice currently promoted by Sapphire in encouraging women in prostitution to seek the support of police following violent offences committed against them (police).

Trafficking

1. An agreed classification across London of trafficking as a form of VAWG, which should feature in the VAWG strategies that all boroughs should put in place (MOPAC, Local Authorities)
2. **Awareness raising and training measures with key professionals to address the erroneous approach to classifying trafficking purely as an immigration issue/crime rather than a form of VAWG and a human rights violation, in line with national and international law and standards in this area** (specialist support providers, MOPAC)
3. **An end to the detention and criminalising of trafficked women, who should instead be directed to appropriate specialist support** (national and local government, police and other CJS professionals)
4. A uniform local-level procedure for identifying and referring victims of trafficking and documenting this process, including specialist points of contact in relation to trafficking to be established in each local authority (Local Authorities in collaboration with all relevant local agencies)
5. A more joined-up approach to tackling trafficking at the borough level, supported by better data collection and information sharing (including patterns, trends and long-term outcomes for victims), alongside the development of improved skills and good practice locally (Local Authorities in collaboration with all relevant local agencies)
6. Local police to take greater responsibility for addressing trafficking in their borough, to avoid the assumption that it is a pan-London issue and therefore outside of their remit. This includes police being made aware of and taking full responsibility for their role as 'first responders' with the National Referral Mechanism (NRM) process (police)
7. Improved witness protection for victims of trafficking who support police in their trafficking investigations (police and other CJS professionals)
8. Mandatory training on the NRM to be rolled out to all 'first responders' to improve knowledge and assist with decision-making, with a view to making this process fairer and much more effective from the perspective of trafficking victims (Local Authorities, specialist support providers)
9. More and better funded specialist services to support and advocate on behalf of victims of trafficking, and in doing so help them to rebuild their lives (national and local government, service commissioners, statutory and voluntary sector service providers)
10. Training for all relevant service personnel (including the NHS) to improve identification, to increase knowledge of the relevant definitions and laws pertaining to trafficking, and to help develop a better understanding of coercion and the often subtle forms of control used by traffickers to ensnare their victims (Local Authorities, the NHS, specialist support providers, MOPAC)
11. The up-skilling of criminal solicitors to handle trafficking cases more effectively, and the Legal Services Commission to allow greater flexibility regarding the number of trafficking cases that firms can pursue (CJS professionals)
12. A pan-London multi-agency forum for all relevant actors coming into contact with victims of trafficking across the capital that would facilitate the sharing of information, intelligence and good practice, and ultimately the delivery of an effective pan-London approach to tackling trafficking (MOPAC and all relevant agencies)
13. An urgent, in-depth analysis of the impact of the complete lack of challenges currently being made to NRM decisions in London and the extent to which women are being wrongfully denied their status as victims of trafficking as a result of erroneous decision-making (CJS professionals, specialist support providers, victim advocates)

14. More research and analysis on the incidence and nature of internal trafficking in the UK, and its links to 'grooming' and sexual exploitation by UK-based 'gangs' (police, specialist support providers, research bodies)
15. Full implementation of the recommendations made by the Anti-Trafficking Monitoring Group (all relevant agencies).

Partnership working and policy

1. Better promotion of the Mayor's VAWG strategy so that more agencies can use it to support their work locally in addressing prostitution and trafficking as VAWG (MOPAC)
2. **In line with the Mayor's VAWG strategy, all boroughs should frame prostitution and trafficking into prostitution as VAWG and develop dedicated strategies to address these issues as such, including guidelines for coordinated, multi-agency cross-borough responses and prevention measures** (Local Authorities, MOPAC)
3. **A strategic lead or leads for London on prostitution and trafficking, facilitated by MOPAC, who can effectively address the lack of coordination, poor information sharing, and lack of agreed written policies and guidance at borough and city level that currently hinder an effective over-arching response to prostitution and trafficking in the capital** (MOPAC and all relevant agencies)
4. **Improved joined-up, multi-agency working and tailored referral pathways between the voluntary and statutory sector services that come into contact with women involved in prostitution, including women who have been trafficked** (statutory and voluntary sector service providers, police)
5. A pan-London forum facilitated by MOPAC where support organisations share knowledge, good practice, service user feedback and pool their resources in relation to exiting (MOPAC and all relevant agencies)
6. A central online resource that contains up-to-date information on policies, legislation and responses to prostitution and trafficking that every borough can access (MOPAC, specialist support providers)
7. Improved due diligence by local authorities in respect of the licensing of venues where it is suspected that sex is being sold (Local Authorities, police).

Communities

1. Local authorities, including the police, fulfil their statutory duties to establish appropriate forums to hear and take full account of the concerns of community members, in this instance regarding the impact that prostitution has on their neighbourhoods and lives, and to keep residents informed of their approaches to addressing prostitution in their local area (Local Authorities, police)
2. Actions to raise awareness and understanding amongst local community members of the needs and experiences of women involved in prostitution so that they are better informed and more empathetic in their responses to the women concerned (Local Authorities, community members/groups/forums)
3. Actions to capitalise on community support for tackling demand, which includes recognition that many of the men who buy sex and the women they purchase are also members of the same community (Local Authorities, police, community members/groups/forums)
4. Sufficient resourcing for individual councils to address prostitution in their area, via measures to tackle demand alongside appropriate and effective specialist support for the women concerned (national and local government)

5. Local authorities address and take measures to prevent the further, unjust ghettoisation of prostitution in more economically deprived borough wards, where it may be perceived that the local backlash will be less vocal (Local Authorities, police)
6. The promotion and support of community groups such as CCAT (Croydon Community Against Trafficking), which can act as a useful stimulus and source of support to local authorities in addressing prostitution and/or trafficking at local borough level (Local Authorities).

Funding and commissioning

1. **Addressing the lack of funding as the most significant barrier to supporting women in prostitution including women who have been trafficked. Funding for this service user group has to be sustainable, made available on a medium to long-term basis, ring-fenced/protected and sufficient to effectively meet the often complex needs of the women concerned** (national and local government, service commissioners)
2. Funding for dedicated services supporting women in prostitution should be diversified where appropriate – funding from statutory bodies pushes the state to take responsibility and meet some of their obligations to this vulnerable group, whereas funding from non-statutory sources allows some organisations the independence to more freely advocate on behalf of the women they support (national and local government, service commissioners, statutory and voluntary sector service providers)
3. Empowerment of women currently or formerly involved in prostitution, including those who have been trafficked, to be involved in service design and evaluation (Local Authorities, service commissioners, statutory and voluntary sector service providers, MOPAC)
4. Improved communication between policy makers and those working on the ground, adopting a bottom-up approach (local government, MOPAC)
5. A strengthening of service commissioners' understanding of the value of the work that services supporting women in prostitution provide, and the full range of complex needs that the women they support often have (Local Authorities, service commissioners)
6. In terms of service planning and commissioning, greater recognition that high-quality, holistic support for women to exit prostitution is far more cost effective than providing services and interventions that merely serve to address or contain immediate harm or criminalise the women concerned (Local Authorities, service commissioners, statutory and voluntary sector service providers)
7. MOPAC to develop detailed guidance for commissioners to support them to commission holistic, evidence-based services that address the multiple, complex needs of women involved in prostitution (MOPAC)
8. A full cost-benefit analysis of providing different types of interventions and services to women in prostitution; which in turn would provide a stronger evidence base for effective service commissioning in this area (Local Authorities, service commissioners, MOPAC, statutory and voluntary sector service providers).

Good practice examples

1. Two London boroughs demonstrate good practice in relation to addressing two very inter-linked issues, that of prostitution (Lambeth) and trafficking into prostitution (Croydon). The ideal for boroughs hoping to do the same effectively is to take on board lessons and recommendations from *both* Lambeth and Croydon's approaches in order to ensure that women exploited in prostitution, both those trafficked and those not, are as

fully protected and supported as they can be, and that steps are taken to eradicate all forms of exploitation as far as is possible (all relevant agencies and authorities).

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Appendix A: Methods – in detail

The London overview

Two approaches were taken to collecting data for the London overview. The first involved extensive desk-based research, which included the following:

- A short review of recent research on the issues of prostitution and trafficking, which is presented in Section 2 above
- Making contact, primarily via email, with an extensive array of individuals, bodies, organisations and groups in the capital in order to gather as much data as possible on what is known about prostitution and trafficking across London. We requested relevant policies and strategies, statistical/numerical data as well as evidence/knowledge from professional practice, local insights, soft intelligence etc., and also their recommendations in relation to these issues. In summary we contacted and requested information from the following sources:
 - Local councils in the 33 London boroughs, focusing on violence against women and girls (VAWG) coordinators (or individuals whose roles include VAWG/domestic violence coordination) and community safety leads
 - The Metropolitan Police Service (including Safer Neighbourhood Teams)
 - The Crown Prosecution Service
 - SC&O9 (formerly SCD9, the Metropolitan Police's Human Exploitation and Organised Crime Command)
 - Research governance contacts for the London Primary Care Trusts (PCTs)
 - An array of voluntary sector organisations in the capital whose work may bring them into contact with women in prostitution including women who have been trafficked, such as drug and alcohol services, women's centres, counselling services, housing and homeless services and health services
 - Community groups and organisations whose activities may bring them into contact with women in prostitution including women who have been trafficked.
- A content analysis of all relevant council policies and strategies including those focusing on VAWG and/or domestic violence, community safety, homelessness and housing, safeguarding and substance use. This involved obtaining and compiling as many relevant policies as possible that were available publicly or provided upon request, and analysing all content that pertains to prostitution and trafficking in each
- A review of relevant local media reporting on the issues of prostitution and trafficking in each borough.

A pro forma was designed to capture most of the information from the desk-based research in as uniform and concise a way as possible and present it on a borough-by-borough basis (summarised in Section 7.1 and detailed in full in a separate appendix provided to MOPAC). Wherever relevant, additional information gleaned from focus groups and interviews (outlined below) pertaining to hotspots, estimates of numbers involved in prostitution, information about services and anything else of relevance was also added to the borough pro formas to give as complete a picture as possible.

The second approach to conducting the London overview involved undertaking one-to-one interviews, some face-to-face, and some over the telephone, with a range of key informants from both the voluntary and statutory sectors who have a pan-London responsibility for or a pan-London outlook on issues pertaining to prostitution and trafficking in the capital. Some

had a particular knowledge and expertise on prostitution in general, others on trafficking into prostitution specifically, and a few had both. These interviews were intended to add greater richness, depth and context to the data gathered via the desk-based research. Individuals interviewed were representatives of the following:

- Health
- Legal advocacy
- Local Authorities
- The Metropolitan Police Service, including representatives with specialisms in prostitution, trafficking and sexual violence
- Sex workers' rights/advocacy
- Specialist services providing support to people in prostitution
- Specialist services providing support to victims of trafficking
- Specialist services providing support to women fleeing male violence
- The UK Border Agency (UKBA).

These interviews typically lasted one hour, although some were significantly longer. The majority were conducted between March and July 2012. Interviews were audio recorded with respondents' permission and then transcribed to aid analysis. Key findings are incorporated throughout Section 7.

London boroughs in depth

In order to add some further depth to the London overview, the research team also undertook more in-depth focused research in five carefully selected London boroughs that capture a broad spread of different borough characteristics – e.g. population demographics, different policing policies on prostitution, geographical location (inner/outer London), prominence or not of the local sex industry, degree and style of local engagement on issues relating to the sex industry, political control, proximity or not to Olympic sites etc. In discussion with MOPAC these boroughs were chosen for closer attention (and anonymised for the purposes of this report): Borough A, Borough D, Borough E (an Olympic borough), Borough F and Borough G.

However, as the research evolved, the team had the opportunity to gather further information on prostitution and trafficking from some additional London boroughs whose representatives were keen to engage with the study. Additional information above and beyond that gathered as part of the overview, with varying degrees of detail, was therefore also gleaned from Borough B, Borough C, Borough H and Borough J, in addition to our 'good practice example' boroughs Croydon and Lambeth, and has been included wherever relevant in the discussion of our findings in Section 7.2. While we do *not* suggest that the situation with regards to prostitution and trafficking in these eleven boroughs is representative of all of London, the evidence gathered is intended to be illustrative of some of the current trends and themes that relate to the capital's sex industry as a whole. See Appendix B for brief profiles of the nine anonymised boroughs.

A number of tools were used to collect this more in-depth information. We undertook a series of focus groups in seven London boroughs. In most of the focus boroughs we undertook two groups per borough, one with voluntary sector representatives and one with statutory sector representatives. We made this spilt to ensure that all respondents felt comfortable to speak freely and share views and ideas with others facing similar experiences and potential challenges in their work in this area. Voluntary sector respondents included representatives of:

- Voluntary sector organisations, including those providing support services to people involved in prostitution
- Community groups
- Women's services, including VAWG support services
- Housing/homelessness services
- Substance use services
- Mental health services.

Statutory sector respondents included representatives of:

- The Local Authority – including, for example, the VAWG/Domestic Violence coordinator and in some cases Councillors
- Community safety
- Safeguarding/social services
- Police/Safer Neighbourhood Teams/Liaison officers
- The NHS.

Focus groups were well attended, on average containing seven respondents each, and typically comprising a broad range of representation from the above bodies/services. The majority of focus groups were conducted between April and July 2012. In one instance, where the hosting of a focus group was not possible, respondents instead provided a written response to the questions usually covered in our focus groups. Four additional focus groups were also conducted. One was held with staff from Scarlet, Eaves' centre for women in London experiencing violence, and one with staff from the Poppy Project, Eaves' support service for trafficked women. These focus groups provided some individual borough intelligence but also a pan-London view of prostitution and trafficking in the capital, given their pan-London (Scarlet) and UK-wide (in the case of Poppy) remits. We also conducted a focus group with a mix of representatives from the voluntary and statutory sectors in Croydon, which was identified as an example of good practice in London in relation to that borough's response to trafficking specifically. In addition, we conducted a further mixed focus group in Borough J with members of the borough's VAWG strategy group, who are in the process of considering their response to prostitution as part of the development of their new VAWG strategy. This group provided data on prostitution and trafficking from both Borough J and Borough H. Data from these focus groups are incorporated into Section 7.2.

The research team also designed a detailed online survey addressing the key research questions for our focus boroughs, which was distributed via on the online tool 'SurveyMonkey'. The survey was used to gather both quantitative and qualitative data from a wider number and range of professionals in the boroughs than could participate in our focus groups. Potential respondents from the same areas of both the voluntary and statutory sector listed above were contacted via email and invited to complete the survey online. Whilst the survey was targeted at specific boroughs, some respondents were based in other boroughs as the survey was circulated beyond the initial recipients as well as being sent to other individuals and respondents involved in the research. The survey focused on: the services that respondents and their organisation provided for women involved in prostitution and/or women trafficked into prostitution; multi-agency working; gaps, barriers and challenges faced when working with these service user groups; the local sex industry (including hotspots, patterns and trends); the policing response in the borough and recommendations for policy, practice and legislation. Respondents were given over six weeks to complete the survey.

Given the impact that prostitution and on-street prostitution in particular, is known to have on communities (Hubbard *et al*, 2007) it was deemed important to also gather data on the views and experiences of residents in the focus boroughs. Members of the research team attended a series of community meetings where prostitution and trafficking were on the agenda, such as Neighbourhood Watch and Safer Neighbourhood Team (SNT) meetings, and had the opportunity to gather data in these forums. Typically these meetings took place in borough wards that had highlighted prostitution as a local priority. Again, in one instance, where the research team's attendance at an SNT meeting was not possible, respondents instead provided a written response to a short series of relevant questions that we posed to them in advance.

Our presence at these forums alerted us to the full extent of strong community feeling on issues relating to prostitution that we felt it important to capture as far as possible. We therefore designed an additional online survey for residents in our focus boroughs, again distributed by SurveyMonkey, which was designed to further capture community views and experiences.

Clearly, this study would not be complete without some attempt to capture the views and experiences of those in prostitution in London, including women who have been trafficked. This was achieved in two steps. To begin with, we reanalysed data collected from another relevant study – the *Breaking down the barriers* project. *Breaking down the barriers* is a three-year national research project on prostitution recently completed by Eaves in conjunction with London South Bank University (Bindel *et al*, forthcoming). Through this project we collected extensive qualitative and quantitative data from 114 women currently or formerly involved in both on and off-street prostitution across England, which explored their routes into prostitution, their experiences within it and, where relevant, their views and experiences of exiting prostitution. A large proportion of our sample (83 women), were London-based, allowing us to extract and reanalyse data from this group. Given the limited timeframe and budget available for the MOPAC study, this was a swift and cost-effective way of providing recent data on women's experiences of prostitution in London for inclusion in this report.

However, the research team also wished to 'refresh' or 'top-up' these data and so our second step in this regard was to conduct ten new face-to-face interviews with women currently or formerly involved in prostitution in London. Five of these women had been trafficked across international borders into prostitution in London and were accessed via the Poppy Project. The other five were accessed via a drop-in support service based in Borough D. The women were interviewed between May and August 2012 and the interviews explored their experiences of their involvement in the sex industry in London, their support needs and any recommendations they had regarding policy and practice in this area. The women were guaranteed anonymity and provided with a gift voucher and diary in recognition for their time and contribution to the research.

Data were also collected directly from brothels during the course of this study. In line with the brief, we aimed to gather information on numbers and trends in both the on-street and off-street sex industry. However, the latter is notoriously difficult to research given its low visibility and lack of transparency. In order to provide some insight into this sector of the industry a snapshot of brothel activities was compiled with the help of male volunteer research assistants recruited by the research team. Three male volunteers spent thirty hours between April and July 2012 telephoning the numbers of premises advertising 'sexual services' in local newspapers from the original five focus boroughs. A hard copy of an 'escort guide' provided further contact details. The website Punternet was also consulted to identify

'field reports' from buyers who had purchased sex off-street in the focus boroughs. This was another way of determining what brothels are currently operational in these areas, thereby informing the brothel calling exercise. The volunteers made all the usual enquiries that a potential buyer might regard regarding the services on offer, the type and location of the premises, how many women were available and their nationalities and ethnicities. Eighty brothels were contacted at least twice each and meaningful data were gleaned from fifty in total. Data gathered from the phone calls were recorded on a dedicated pro forma. At the end of the data collection period the volunteers were interviewed by a member of the research team in order to collate key findings and their wider experiences of making the calls.

Finally, to round off the data collection period, the research team held a roundtable event at MOPAC's offices in July 2012, to which a range of key informants and experts on prostitution and/or trafficking were invited. Attendees included the MOPAC commissioners, research Steering Group members, an MP, council representatives, police, specialist support providers, a representative of the All Party Parliamentary Group on Prostitution and the Global Sex Trade and a representative from the Ministry of Justice. The aim of this event was to present some initial emerging findings from the research, discuss and debate these with all present, and begin to formulate some key recommendations arising from the research based on these discussions.

All data were collected within the six month research phase March - August 2012. As the extensive list of data collection opportunities outlined above suggests, every effort was taken during the course of this study to ensure triangulation by gathering data from as wide a range of sources as possible. Quantitative data were analysed in Excel. Qualitative data, of which there were significant amounts, were analysed to identify and draw out key themes to the point of saturation. A complete description of our sample and its size is set out in Section 4 above. A full discussion of our key findings arising from this study is set out in Section 7. Section 7.1 outlines key findings from the London overview, while Section 7.2 presents the findings from our more in-depth look at some of the London boroughs, arranged according to key themes.

Appendix B: Focus borough profiles

Borough codes

Inner London Central Borough	= Borough A
Inner London East Borough 1	= Borough B
Inner London East Borough 2	= Borough C
Inner London North Borough	= Borough D
Outer London East Borough	= Borough E
Outer London Northeast Borough	= Borough F
Outer London South Borough	= Borough G
Outer London West Borough 1	= Borough H
Outer London West Borough 2	= Borough J

Borough A

Borough A is situated in the centre of London. It has a higher than average population that is of working age and one which is ethnically diverse. The borough has a complex pattern of deprivation where affluent areas sit adjacent to significantly deprived ones. Borough A is controlled by a Conservative-run council. The borough is believed to have one of the largest on and off-street sex industries in the UK, attracting large numbers of 'sex tourists', particularly to off-street venues.

Borough B

Borough B is an Olympic host borough to the east of inner London. The borough is densely populated and has a relatively young, ethnically diverse population. The borough is known for its high levels of economic and social deprivation. Borough B is currently controlled by a Labour-run council. It has both an on and off-street sex industry, with the on-street industry being more prominent.

Borough C

Borough C is in inner east London and is an Olympic host borough. The borough is densely populated and has a relatively young population. It has high levels of deprivation and higher than average percentages of young people not in education, employment or training. The borough is controlled by a Labour-run council. Borough C has a significant visible on-street sex industry.

Borough D

Borough D is an inner borough in the north of London. The borough has a relatively young population in relation to the rest of the city, and one which is transient and highly mobile. Borough D is currently controlled by a Labour-run council. The borough has a thriving on and off-street sex industry, being a destination for 'sex tourists' from London, the rest of the UK and Europe.

Borough E

Borough E is a borough in the outer east of London and is an Olympic host. The borough is one which is relatively deprived, with high rates of unemployment, poorer quality housing and higher crime rates in comparison to the rest of London. The population is unusually

young and very ethnically diverse. The borough is controlled by a Labour-run council. Borough E has a significant on and off-street sex industry and during the run-up to the Olympics the borough was a target for police crack downs and 'clean ups' in relation to prostitution in the area.

Borough F

Borough F is situated in the outer northeast of London. The borough is relatively deprived, with health and wellbeing inequalities. The population is very diverse in age and ethnicity. Borough F is controlled by a Conservative-run council. In recent years, the on-street sex industry has become increasingly prominent and concentrated in certain wards as women have been dispersed from neighbouring boroughs.

Borough G

Borough G is an outer borough in the south of London. The borough is reasonably affluent with low crime rates. It has a relatively young population including a large student population. In comparison to the rest of London, the borough is not as ethnically diverse but is becoming increasingly so and this is expected to continue. Currently, the borough is controlled by a Liberal Democrat-run council. The borough has both an on and off-street sex industry, both of which are relatively hidden.

Borough H

Borough H is situated in outer west London. The borough has a relatively young population but a significant percentage of the population is an ageing one. The population is also ethnically diverse. The borough is controlled by a Labour-run council. Borough H has an on-street sex industry which is particularly prevalent in one particular area of the borough.

Borough J

Borough J is an outer London borough in the west of London. The population is relatively young and young age groups are projected to increase. Compared to the London average, the population is ethnically and linguistically diverse. The borough is relatively deprived, with certain wards being extremely so. The borough is controlled by a Labour-run council. Until recently the borough did not have a visible on-street sex industry but numbers of women regularly seen on-street have increased over the past year.

Appendix C: Research governance and ethical considerations – in detail

This Appendix describes how this research was governed and the various steps that were taken to ensure that high ethical standards were maintained throughout.

- All project staff are Eaves' employees with extensive research experience and full CRB clearance
- Eaves R&D also recruited a number of volunteers to work on this research, all of whom were selected following Eaves' volunteer recruitment procedures, and received full CRB checks
- The project team worked throughout the course of the research in close contact with commissioners at MOPAC, who received regular progress updates and in turn provided the team with a range of contacts, guidance and recommendations – e.g. in terms of gaining access to some research participants (such as local councils)
- The project team also recruited an external Steering Group (SG) to provide expert knowledge, advice and guidance to the research team and to assist with the recruitment of research participants where relevant/appropriate. Members of the SG were carefully selected based on their knowledge and particular field of expertise³⁵. In addition to ongoing contact with SG members via email, full SG meetings were held in May 2012 (to discuss the interim report), July 2012 (to assess progress and findings) and September 2012 (to discuss the final report and dissemination of findings)
- Given that this study required access to police data for London, upon the advice of Professor Betsy Stanko, the team completed documentation to formalise the protocol for requesting and accessing data from the MPS
- From the outset, the research team put in place a range of ethical protocols to ensure that high ethical standards were maintained throughout the study. This is especially important given that part of this project involved collecting data from vulnerable people (i.e. women involved in prostitution). Ethical approval to interview women for the *Breaking down the barriers* research (described in Appendix A above) was sought and obtained from both the London South Bank University Research Ethics Committee and the Central London (Camden and Islington) NHS Research Ethics Committee. Our ethical procedures for all of our research of this nature include:
 - Obtaining informed consent from all participants to take part and negotiating consent on an ongoing basis as the research proceeds (for example in cases where women may be too intoxicated from alcohol or drugs to give informed consent, or where they become distressed and may wish to take a break from or terminate the interview)
 - Offering follow-up advice, support and signposting for further assistance for any participants who may require this after interview
 - Protecting the anonymity of all participants via the careful handling and storage of data (in line with the Data Protection Act, 1998) and by choosing suitable and safe locations (for both interviewees and interviewers) in which to conduct interviews
 - Putting in place a range of protocols to manage disclosures by participants – e.g. where there is a risk of serious harm to them or another person (this included a protocol for managing child protection concerns)
 - Consulting with experts on the SG should any further ethical challenges arise

³⁵ Steering group members: Professor Betsy Stanko, Metropolitan Police Service; Davina James-Hanman, AVA; Dr Georgina Smith, Imperial College Healthcare NHS Trust; Jain Lemom, MOPAC; Karen Anstiss, SC&O9; Dr Maddy Coy, Child and Woman Abuse Studies Unit, London Metropolitan University; Marai Larasi, Imkaan; Raggi Kotak, One Pump Court Chambers and Yeliz Osman, MOPAC.

- The use of 'covert observation' methods in the brothel calling exercise was indicated a) because there were no other appropriate methods to obtain these essential data about an important social issue that is in the public interest and b) to ensure the safety and anonymity of all parties, in this case especially because to discuss harmful and illegal machinations of brothels could be dangerous or detrimental to people involved in prostitution. The male research assistants recruited as Eaves' volunteers who made the calls fully complied with ethical guidelines as set out by the British Sociological Association.

Appendix D: Limitations of the research – in detail

Like all real world research, this study has a number of limitations that should be borne in mind when reading this report. These limitations are outlined as follows:

- The project was relatively constrained by short-time scales and a small budget – with more time and resources we could have looked in depth at a greater number of London boroughs and explored an even broader range of questions and themes
- Desk-based research can be limiting, and there tends to be fewer opportunities for triangulation. The London overview we have provided is as comprehensive as possible but does contain some gaps and may be ‘uneven’ in places with a great deal of information in some areas/from some boroughs and very little in others. This is primarily due to the fact that the research team had little control over the extent and nature of responses we received to our email enquiries from councils and other respondents
- Due to the visibility of on-street prostitution, more is known and therefore reported about it than is the case with off-street prostitution and trafficking. This is reflected in the report which contains proportionately more data and discussion regarding on-street prostitution, despite a general consensus that the off-street sector is far larger. However, every attempt was made to ensure that this imbalance is fairly minimal
- This is *not* a prevalence study – because of the nature of prostitution and trafficking into prostitution it is very difficult to be certain about the extent of both, and the study’s time and budget constraints prevented a more comprehensive exploration of prevalence. Instead we have presented evidence and local intelligence provided by a range of our respondents, and support providers in particular, regarding the women in prostitution they come into contact with during the course of their work
- The intention of focusing in more depth on certain boroughs is for illustrative purposes only and it is not intended that the findings that relate to these boroughs should be extrapolated to the whole of London. Rather, the evidence gathered from these boroughs, in ‘snapshot’ format, usefully highlights some of the current trends and themes that relate to the capital’s sex industry as a whole
- Council representatives of one of our focus boroughs (Borough E) took part in a focus group with members of the research team for data collection purposes, but subsequently requested that their contributions be withdrawn from the research, when it was made clear that it was not possible for them to see a draft of the report before it was given to the commissioners. The reason supplied was the council’s concerns relating to the ‘sensitivity’ around their borough being the only Olympic host borough that formed part of our original group of five focus boroughs. As a result, contributions from council representatives during the relevant focus group were not included in our data analysis and therefore do not feature in this report
- Representatives of a statutory-funded health service whose services for people involved in prostitution span three of our focus boroughs (Boroughs B, C and E) initially participated in the study – two took part in a focus group and one in a one-to-one interview. However, these respondents subsequently asked that their contributions to the study be withdrawn as they did not agree with the way in which the data they provided had been contextualised within the final report. In line with ethical guidelines that allow research participants to withdraw consent for their participation in research right up to the time of publication, contributions from all three respondents were duly removed from the final draft of this report
- No focus groups were conducted in Borough G despite this borough being one of our focus boroughs. Council representatives did not wish to participate in the research as they do not believe that prostitution and trafficking are a problem in Borough G and felt

that their time would not be best served attending a focus group when they would have nothing to say about these issues. The focus group with voluntary sector representatives in Borough G was cancelled because only one invitee agreed to attend. Every effort was therefore made to collect data and general information on prostitution and trafficking in Borough G via other avenues, including brothel calling, online and via media reporting

- The limitations of online survey tools such as SurveyMonkey are well known, including the fact that respondents are self-selecting and that there is nothing to stop any respondent from completing the survey more than once. This was addressed as far as possible by initially inviting only named individuals to complete the survey, and it remains a useful data collection tool in a study with limited time and resources available
- The data obtained through our brothel calling exercise are somewhat 'anecdotal' in nature, in the sense that it was acquired from subjects who assumed that they were talking to prospective buyers. Details which could not be easily verified by an actual visitor to the premises – such as age and ethnicity – are less reliable than quoted prices and services, which tended to follow a set pattern throughout the exercise
- It is worth bearing in mind intelligence provided by a Steering Group member at the start of the research about young women being sexually exploited and procured for prostitution via social networking sites such as Facebook, Twitter and BBM (BlackBerry messenger). Despite attempts, we were unable to find any direct evidence of this, as it proved difficult to uncover, but this is something that undoubtedly merits further exploration in future.

Appendix E: Brief overview of relevant press coverage

Researchers identified and analysed relevant media reporting on prostitution and trafficking in London, including crime reporting and local media, in order to ascertain the following:

- Concerns from local residents
- Opinions of service providers and other statutory and non-statutory agencies.

Pro-legalisation

Overwhelmingly, the national press has reflected a pro-legalisation position on prostitution during the build-up to the Games, embracing the position of groups that lobby for all prostitution laws to be repealed, such as the International Union of Sex Workers and the English Collective of Prostitutes.

It was argued that the Olympics had been used by the police and authorities to further criminalise women in prostitution and that this criminalisation is detrimental because:

- They are prevented from expressing their free choice to do what they want with their bodies³⁶
- They are denied business opportunities during this busy and lucrative period³⁷
- They are made more vulnerable because they have been displaced from their usual 'safe' environment^{38, 39}
- The police tactics are stopping women from reporting crime^{40, 41}
- They are made more vulnerable because they are pushed underground⁴².

These arguments are often used to support the idea that prostitution should be legalised. Where there is mention of risk, it is never revealed where the risk actually comes from and pimps and buyers appear to be invisible in the debate.

Claims of an increase in trafficked women during the period of the Olympics was usually denied by commentators.⁴³

However, there are a small number of articles that report on an increase in activity to curb prostitution in Olympics areas⁴⁴.

These articles rarely mention the harm done to women in prostitution whether they are coerced or not, nor present the point of view that paying for sex is, in certain circumstances, a crime.

³⁶ <http://www.bbc.co.uk/news/uk-england-18507887>

³⁷ <http://www.thesun.co.uk/sol/homepage/features/4377239/On-the-Games-Web-vice-sites-target-Olympics-fans.html>

³⁸ http://www.huffingtonpost.co.uk/natalie-bennett/london-olympics-prostitues_b_1430555.html

³⁹ <http://www.independent.co.uk/sport/olympics/sex-workers-feeling-threatened-by-crackdown-on-prostitution-near-olympic-site-7609024.html>

⁴⁰ <http://www.guardian.co.uk/society/2012/jun/09/olympics-crackdown-on-sex-trade?newsfeed=true>

⁴¹ <http://www.morningstaronline.co.uk/index.php/content/view/full/120348>

⁴² <http://www.independent.co.uk/sport/olympics/how-the-olympic-cleanup-put-sex-workers-in-danger-7737986.html>

⁴³ <http://www.bbc.co.uk/news/magazine-18174387>

⁴⁴ <http://www.9jabook.com/forum/topics/london-prostitute-rescued-soliciting-olympics-market-at-newham> <http://blogs.metro.co.uk/olympics/sex-and-the-olympic-city/>

They also do not mention the danger encountered by residents living in and around prostitution hotspots, and especially the threats the women living in these areas face.

Occasionally journalists will express the less liberal approach that brothels should be re-opened to keep the streets clean.⁴⁵ The assumption is that on-street prostitution is more dangerous than off-street prostitution, and that it is easier to regulate the industry that way and to minimise the harm done to the women involved.⁴⁶ Once again, the harm done to women is not defined.

In support of police crackdown on the women

Many articles from national and local press appeared to support the increased police crackdown on women involved in prostitution.

Overwhelmingly local newspapers embraced the point of view of the local residents of hotspots. Prostituted women are seen and defined as a nuisance to residential areas and responsible for attracting kerb crawlers.⁴⁷ Indeed, the notion that women in prostitution are viewed as 'debris' or 'nuisance' is quite prevalent⁴⁸.

The problem is framed in terms of indecency and morals, and sometimes on religious grounds.⁴⁹ Some coverage contains a moralisation of the women involved in prostitution, yet there are few mentions of the morality of the men purchasing women for sex.

Prostitution is widely criticised for being out in the open. There is little or no mention of off-street prostitution because that tends to cause less nuisance for residents.

Police strategies of arresting women and displacing them is criticised for being ineffective^{50, 51}. However, some articles support further criminalisation of the women and tougher law enforcement strategies.

A number of articles are based on an assertion that prostitution was on the rise in the run up to and during the Olympic Games, and that a huge number of women were being transported from Eastern Europe by organised criminal gangs^{52, 53}. However, despite these assertions, the analyses still does not present these women as being need of protection or support^{54, 55, 56, 57}.

⁴⁵ <http://www.independent.co.uk/opinion/commentators/mary-dejevsky/mary-dejevsky-legalise-brothels--but-lets-get-prostitutes-off-the-streets-7778729.html>

⁴⁶ <http://blogs.independent.co.uk/2012/05/24/the-debate-should-brothels-be-legalised/>

⁴⁷ <http://www.wandsworthguardian.co.uk/news/4631224.print/>

⁴⁸ <http://www.opendemocracy.net/ourkingdom/sarah-boyes/londons-capital-clean-up>

⁴⁹ http://www.guardian-series.co.uk/news/9768051.WALTHAM_FOREST_Campaigners_to_shame_kerb_crawlers/

⁵⁰ http://www.ilfordrecorder.co.uk/news/news/prostitution_in_ilford_getting_worse_despite_crackdown_claim_residents_1_1403453

⁵¹ http://www.ilfordrecorder.co.uk/news/news/prostitution_in_redbridge_still_a_major_problem_for_residents_1_1409129

⁵² <http://www.dailymail.co.uk/news/article-2150691/Prostitutes-offering-sex-60-night-Travelodge.html>

⁵³ <http://www.metro.co.uk/news/897160-prostitutes-and-beggars-flooding-london-ahead-of-2012-olympics>

⁵⁴ <http://www.bbc.co.uk/news/uk-england-london-17588665>

⁵⁵ http://www.eastlondonadvertiser.co.uk/news/crime/new_police_chief_launches_operation_falcon_to_clean_up_tower_hamlets_1_1409370

In support of criminalising the demand

Following a small number of local campaigns by residents, some local press coverage reported on a shift in the way that local residents perceive the problems around street prostitution in their area. Several campaigns focus on or mention the fact that women are the main targets of police raids, while kerb crawlers and pimps are not getting arrested in such a large number^{58, 59}. These campaigns are referred to as 'women's' campaigns⁶⁰. The problem for the residents is mainly framed in terms of their own safety⁶¹.

These articles acknowledge an increase in prostitution-related activity especially in Olympics areas. Residents' demands that police and local authorities switch tactics and target pimps and organised gangs controlling the prostitution and trafficking are outlined in some articles⁶². The women in prostitution are referred to as vulnerable and perceived to be victims of a system that has failed them^{63, 64}. There is no or very little mention of morals or 'indecent', but rather of the harms done to women in prostitution and the threats experienced by women living in hotspots⁶⁵.

A very limited number of articles in the national press have relayed the abolitionist point of view on prostitution without supporting it. In these articles the abolitionist view is provided as a counter point to the mainstream view that prostitution should be tolerated.

The arguments put forward are that:

- Legalisation leads to an increase in the sex trade, trafficking and sexual exploitation
- Legalisation does not erase the stigma associated with prostitution
- Legalisation puts women more at risk as they lose anonymity
- Off-street prostitution is not safer for women and does not offer protection from violent buyers or coercive pimps⁶⁶.

⁵⁶ http://www.ilfordrecorder.co.uk/news/crime-court/big_turnout_to_discuss_blight_of_prostitution_on_the_streets_of_ilford_1_1426312

⁵⁷ <http://www.ibtimes.co.uk/articles/356975/20120627/east-london-prostitution-petition-tower-hamlets-end.htm>

⁵⁸ http://www.eastlondonadvertiser.co.uk/news/crime/protest_over_police_targeting_prostitutes_in_olympic_host_boroughs_1_1364336

⁵⁹ http://www.eastlondonadvertiser.co.uk/news/crime/protest_calls_for_stop_on_targeting_east_end_prostitutes_ahead_of_olympics_1_1422823

⁶⁰ http://www.eastlondonadvertiser.co.uk/news/crime/protest_over_police_targeting_prostitutes_in_olympic_host_boroughs_1_1364336

⁶¹ http://www.eastlondonadvertiser.co.uk/news/mums_drive_out_prostitutes_from_spitalfields_flower_dean_estate_1_1369682

⁶² http://www.eastlondonadvertiser.co.uk/news/crime/protest_calls_for_stop_on_targeting_east_end_prostitutes_ahead_of_olympics_1_1422823

⁶³ <http://www.eastlondonlines.co.uk/2012/06/tower-hamlets-residents-discuss-pre-olympics-prostitution-clampdown/>

⁶⁴ <http://www.ibtimes.co.uk/articles/356975/20120627/east-london-prostitution-petition-tower-hamlets-end.htm>

⁶⁵ http://www.eastlondonadvertiser.co.uk/news/mums_drive_out_prostitutes_from_spitalfields_flower_dean_estate_1_1369682

⁶⁶ <http://blogs.independent.co.uk/2012/05/24/the-debate-should-brothels-be-legalised/>

One article refers to the threat of an increase of child trafficking, whilst noticeably ignoring the threat of trafficking in women⁶⁷. A few articles also make the link between advertising in local newspapers and the increase in trafficking^{68, 69}.

⁶⁷ <http://www.dailymail.co.uk/femail/article-2165027/London-set-flooded-prostitutes-2012-Olympics.html>

⁶⁸ http://www.croydonguardian.co.uk/news/9761097.Report_calling_for_ban_on_newspaper_sex_ads/

⁶⁹ <http://www.holdthefrontpage.co.uk/2012/news/report-calls-for-new-clampdown-on-newspaper-sex-ads/>