



Organisation: All-Wales Operational Group on Sexually Exploited Women

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About the All-Wales Operational Group:

The All-Wales Operational Group on Sexually Exploited Women was established in 2020, following two roundtable events with several key stakeholders. Services that provide specialist support to survivors of sexual exploitation highlighted that there was a significant gap in the recognition of and response to the sexual exploitation of adults in Wales. This was particularly evident during the Covid-19 Pandemic, which had a profound impact on sexually exploited women¹. Despite being on the forefront of the pandemic, women experiencing sexual exploitation or engaged in survival sex were absent from regional and national responses to the crisis. The operational group are intentional about using gendered language to discuss adult sexual exploitation, in order to recognise that women are disproportionately affected by this form of abuse. However, we are an intersectional group which recognises that sexual exploitation also affects men and non-binary individuals, and are committed to advocating for all survivors

The operational group is fortunate to have a diverse membership and places the expertise of survivors with lived experience and the services that support them at the heart of the work that we do. Membership of the group includes National and Regional Violence Against Women, Domestic Abuse and Sexual Violence (VAWDASV) Advisers, representatives from

¹ <https://beyondthestreets.org.uk/wp-content/uploads/2021/05/The-impact-of-Covid-19-on-women-who-sell-sex-or-are-sexually-exploited.pdf>



Police services across Wales, the Probation Service, as well as statutory and third sector specialist services.

The group are dedicated to working collaboratively to advocate for parity of recognition, investment and service provision for all survivors of adult sexual exploitation. This includes informing appropriately resourced local and regional VAWDASV strategies, needs assessments, informing public policy and sharing good practice. In 2022, the All-Wales Operational group submitted a series of Freedom of Information (FOI) [requests](#) to all twenty-two Local Authorities, seven Health Boards, four Police Forces and four Police and Crime Commissioners Offices across Wales. The aim of these requests was to explore the current level of strategic commitment and investment from named agencies in ensuring support for adults and children who have experienced or are at risk of sexual exploitation, as well as how these strategic commitments align. The group have also facilitated learning events focusing on survivors experiences of sexual exploitation in Wales.

Question 1 - 1. Use of the term 'sex work' for the working group

What does the evidence tell us about the different contexts in which the exchange of sex for money or other resources between adults take place?

The exact nature and prevalence of the exchange of sex for money and other resources across the UK is not fully known. Many challenges exist with collecting accurate data, as individuals often face stigma and significant barriers to reporting their experiences. It is also important to consider that individuals who are among the most marginalised and vulnerable, those experiencing street-based exploitation or engaging in 'survival sex', often do not have the resource or opportunity to engage with research. The views and experiences of these survivors are frequently missing from public and strategic discourse.



National Ugly Mugs defines sex work as “*the exchange of sexual services for money or resources*”². The term sex work encompasses all forms of transactional sexual services and is inclusive of direct sex work such as escorting and indirect forms of sex work such as webcamming. There are a number of settings in which this can occur, including parlours, brothels, online and on the street³. Whilst it is important to recognise that individuals of any gender sell or exchange sexual services, we do know that the sex industry is highly gendered. National Ugly Mugs reports that, at the end of 2022, 79% of their members identified as cis-women and 2% identified as trans women⁴. It is with this gendered lens that the different contexts in which the exchange of sex for money or other resources must be examined.

However, the term ‘sex work’ is **not representative** of every context in which selling or exchanging sex takes place. The exchange of sex also takes place within the context of adult sexual exploitation (ASE). In the absence of a statutory definition of ASE, the operational group have developed a working definition which intends to encompass the broad experiences of survivors: “*Sexual exploitation occurs when someone is coerced, forced, or manipulated into engaging in sexual activities by a third party, or out of necessity to finance basic needs*”⁵. This form of exploitation is not dissimilar to child sexual exploitation, in that the perpetrator often holds power over the survivor, and it is important to recognise that exploitation can still be occurring even if the sexual activity appears to be consensual⁶. This definition also seeks to encompass experiences of so called ‘survival sex’, whereby women sell or exchange sex for basic needs such as food or accommodation. Specialist services in Wales have highlighted that the women that they support, the majority of whom sell sex on the street, use a variety of terms to self-identify. What is consistent though, is that these survivors do not view their experiences as employment, and state that their situations are

² <https://committees.parliament.uk/writtenevidence/8610/pdf/>

³ https://assets.publishing.service.gov.uk/media/5db84ad1e5274a4aa81178e1/Prostitution_and_Sex_Work_Report.pdf

⁴ <https://nationaluglymugs.org/wp-content/uploads/2024/02/N037-NUM-Final-Accounts-2023.pdf>

⁵ <https://welshwomensaid.org.uk/wp-content/uploads/2024/06/Operational-Group-FOI-Report-JUN-2024.pdf>

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/591512/HO_DfE_consultation_response_on_CSE_definition_FINAL_13_Feb_2017_2_.pdf



incomparable to ‘traditional’ work. The use of the term sex work throughout the guidance negates the experiences of these women and does not recognise the exploitation they experience.

Sexual exploitation also occurs within the context of modern slavery and human trafficking. In 2023, sexual exploitation reports made up 15% of all modern slavery cases reported to the Unseen Helpline⁷. Additionally, it is important to recognise how sexual exploitation intersects with other experiences of trauma and gender-based violence. Sexual exploitation can also occur as part of domestic abuse, whereby perpetrators coerce their partners into selling sex in exchange for money or other items such as drugs. Data collected from specialist services in Wales who support sexually exploited women, revealed that in 2022-23, 19% of perpetrators were identified as the victim’s partner and 12% were identified as a relative. It is worth noting that, for 47% of survivors, the relationship to the perpetrator was unknown, this could be due to many factors such as a survivor not disclosing. This form of abuse can also involve perpetrators coercing their partners into engaging in sexual activities with unwanted third parties, such as a friend. Matlosci (2020) recognised that in these cases, there is often ‘no indication that money or anything material was received by the perpetrator’⁸. This is a rarely recognised form of domestic abuse, whereby the sexual exploitation is an extension of the coercion and control exerted over the victim by their partner.

Due to its gendered nature, and intersection with other forms of VAWDASV such as domestic abuse and sexual violence, it is imperative that any guidance is not self-standing, but also supports the delivery of relevant VAWDASV legislation, policies and related policing guidance such as the UK’s Tackling violence against women and girls strategy and the NPCCs Policing Violence Against Women and Girls National Framework. In Wales, that also means that guidance must be compliant with the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 and the National VAWDASV strategy for Wales, which

⁷ <https://www.unseenuk.org/wp-content/uploads/2024/05/AA-exec-summary.pdf>

⁸ https://research-information.bris.ac.uk/ws/portalfiles/portal/259331342/Unwanted_sex_with_third_parties_in_domestic_abuse.pdf



explicitly recognises sexual exploitation as a form of violence against women and girls⁹. Additionally, legislation such as the Cyber Action Plan for Wales commits to enabling adults to be safe online¹⁰.

What does the evidence tell us about the pathways into sex work?

While every individual's experience is distinct, available evidence shows that numerous similarities exist among the journeys people take to engage in selling or exchanging sex. Our response focuses on the experiences of women who are sexually exploited, or engage in survival sex, often due to circumstances such as poverty. Across all the different contexts in which selling sex can take place, as detailed above, financial precarity and gain is a significant and recurring factor¹¹. Charities across England have highlighted that they are seeing an increase in women turning and returning to selling sex, due to the impacts of the increased cost of living¹². This is echoed by specialist services across Wales. One service reported that between January and March this year, they saw a 44% increase in the number of women attending their evening outreach service, all of whom are selling and exchanging sex on the streets. It is also vital to consider how financial insecurity affects women from different backgrounds. The Women's Budget Group have highlighted that women from Black, Asian and minority ethnic groups will be disproportionately affected by the increased cost of living¹³. The Group have also highlighted that disabled women, and women with No Recourse to Public Funds, will also be significantly affected¹⁴. Consequently, individuals with overlapping marginalised identities are increasingly vulnerable to exploitation or coercion into the sex industry - as well as additional barriers to exit this. The normalisation and glamorisation of online platforms such as OnlyFans within the mainstream media present

⁹ <https://www.gov.wales/sites/default/files/pdf-versions/2022/5/2/1653392517/violence-against-women-domestic-abuse-and-sexual-violence-strategy-2022-2026.pdf>

¹⁰ <https://www.gov.wales/cyber-action-plan-wales-html#122255>

¹¹ https://assets.publishing.service.gov.uk/media/5db84ad1e5274a4aa81178e1/Prostitution_and_Sex_Work_Report.pdf

¹² <https://news.sky.com/story/cost-of-living-crisis-pushing-more-women-into-sex-work-and-unable-to-refuse-dangerous-clients-12675932#:~:text=News%20%7C%20Sky%20News->

[Cost%20of%20living%20crisis%20pushing%20more%20women%20into%20sex%20work,workers%20have%20told%20Sky%20News.](https://news.sky.com/story/cost-of-living-crisis-pushing-more-women-into-sex-work-and-unable-to-refuse-dangerous-clients-12675932#:~:text=News%20%7C%20Sky%20News-)

¹³ <https://wbg.org.uk/wp-content/uploads/2022/03/The-gendered-impact-of-the-cost-of-living-crisis.pdf>

¹⁴ Ibid



the selling of sex online as a quick, easy and risk-free solution to the financial uncertainty posed by circumstances such as the cost-of-living crisis and rise in tuition fees. Importantly, financial gain is also a driver for the exploiters themselves, whether that be individual exploiters or organised crime gangs (OCG's).

For survivors of sexual exploitation, there are a number of co-existing experiences and needs which lead them to sell sex. For women exploited by a third party such as friend or partner, there is often an element of grooming involved. Perpetrators will build a relationship or connection with a person, in order to abuse or exploit them¹⁵. This may appear as forming a friendship, lending money, or offering a place to stay for the night. Thus, creating a dependency on the groomer. This position of trust is then used to coerce someone into exploitation, often initially under the pretence of repayment for the help provided. Specialist services in Wales have highlighted that some survivors they support have experienced exploitation from an early age, sometimes by parents or guardians. This can lead to involvement with the care system, which can result in individuals becoming increasingly vulnerable to further exploitation and abuse. When sexual exploitation happens within domestic abuse, it exists as part of an extensive pattern of emotional, physical abuse, coercion and control. When this occurs, survivors are often complying with these demands to manage their safety or the safety of their children¹⁶. As part of research conducted by the University of Bristol, one survivor shared that her abuser eventually agreed to stop sexually exploiting her, however in exchange for this she *“had to agree to no college, no friends, no work, basically stay in the house”*¹⁷. It is vital that the significant connection between domestic abuse and sexual exploitation is recognised and centred within the guidance, so that survivors can be appropriately identified and supported. This recognition will also support the effective case building and prosecution of perpetrators, enabling officers to identify and apply relevant offences outside of the sexual exploitation itself, such as

¹⁵ <https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/grooming/>

¹⁶ https://research-information.bris.ac.uk/ws/portalfiles/portal/259331342/Unwanted_sex_with_third_parties_in_domestic_abuse.pdf

¹⁷ *ibid*



coercive or controlling behaviour. Utilising the range of legislation is crucial, particularly as the current prosecution rates for sexual offences are low. Moreover, this will enable the CPS to consider domestic abuse as an aggravating factor for the offence and recognise the breach of trust involved¹⁸.

Homelessness and housing insecurity are also identified factors which can lead women to sell or exchange sex. Research conducted by Generation Rent and MumsNet estimates that 200,043 women across the UK and Northern Ireland are victims of 'sex for rent'¹⁹. The current housing crisis means that women are at increased risk of entering into exploitative situations. In the financial year 2022/23, where data was recorded, at least 53% of survivors who accessed dedicated sexual exploitation services in Wales required additional support associated with housing. For women exchanging sex on the streets, the 'housing' in question can be as simple as a sofa or bed to sleep on for the night. Survivors supported by specialist services in Wales have highlighted that exchanging sex for somewhere to sleep was a key factor in their initial exploitation. Last year, Welsh Women's Aid published a consultation response on the exchange of sexual relations for accommodation, and highlighted the issue with current legislation, with both Section 52 and Section 53 of the Sexual Offences Act 2003 causing victims to be defined as prostitutes²⁰. When we consider that one of the most significant causes for women's homelessness is domestic abuse²¹, it is clear that sexual exploitation cannot be considered in silo – and must be examined within the wider context of violence against women, domestic abuse and sexual violence.

Substance misuse and alcohol dependency are also factors which shape the pathway into selling or exchanging sex, particularly in cases of street based sexual exploitation. One UK based study found that over 50% of women interviewed indicated that they had started

¹⁸ <https://www.cps.gov.uk/legal-guidance/domestic-abuse>

¹⁹ <https://www.generationrent.org/wp-content/uploads/2023/06/Predatory-behaviour-in-the-Private-Rental-Sector-October-2022-1.pdf>

²⁰ [https://www.cps.gov.uk/legal-guidance/prostitution-and-exploitation-prostitution#:~:text=Section%2052%20SOA%202003%20%E2%80%93%20causing%20or%20inciting%20prostitution%20\(maximum%20sentence,gain%20for%20themselves%20or%20another.](https://www.cps.gov.uk/legal-guidance/prostitution-and-exploitation-prostitution#:~:text=Section%2052%20SOA%202003%20%E2%80%93%20causing%20or%20inciting%20prostitution%20(maximum%20sentence,gain%20for%20themselves%20or%20another.)

²¹ <https://www.crisis.org.uk/media/249186/2019-domestic-abuse.pdf>



selling and exchanging sex after developing a dependency on drugs²². Research across the UK also indicates that some women are coerced into selling sex in order to finance their partner or family member's substance misuse²³. This is an experience that is echoed by women currently being supported by specialist services across Wales.

Substance misuse can often be a way to cope with experiences of previous trauma and mental health issues. It is well established that trauma and experiences of abuse or exploitation in childhood, can result in a risk of further abuse and exploitation in adulthood. One snapshot from Encompass found that 23.5% of women supported disclosed experiences of Childhood Sexual Abuse, and 54% disclosed experiences of domestic abuse²⁴. Both these numbers increased significantly if women who had been trafficked for sexual exploitation were removed from the data set. Research conducted by Beyond the Streets, identified mental health as the most prevalent support need amongst women who sell sex²⁵. This included requiring support with mental health conditions such as OCD, depression, anxiety and PTSD, as well as sharing more general feedback about struggling emotionally²⁶. A service in Wales, who provide specialist support for women experiencing sexual exploitation, highlighted the story of a survivor who began selling sex from a young age after experiencing many years of sexual abuse from her step-father. These experiences of abuse led to this survivor selling sex on the streets, and during this time she faced significant challenges with housing insecurity and mental health challenges as a result of substance misuse. After entering a relationship with a regular client, he suggested that she begin selling sex online to fund her use of substances. After receiving specialist support, this

²² <https://link.springer.com/book/10.1057/9781137289421>

²³ <https://www.publichealthscotland.scot/media/12172/scotlands-public-health-priorities-and-violence-against-women-and-girls-priority-4-harmful-substances.pdf> & <https://www.gov.wales/sites/default/files/publications/2019-02/sex-work-drug-and-alcohol-use-bringing-the-voices-of-sex-workers-into-the-policy-and-service-development-framework-in-wales.pdf>

²⁴ https://www.encompassnetwork.info/uploads/3/4/0/5/3405303/encompass_snapshot_2021.pdf

²⁵ <https://beyondthestreets.org.uk/wp-content/uploads/2022/01/Support-needs-of-those-involved-in-the-UK-sex-industry-FINAL-for-publication.pdf>

²⁶ *ibid*



survivor has begun to disengage with selling sex and substance misuse and has shared that her wellbeing is improving due to the support received.

With regard to survivors of modern slavery and human trafficking, evidence indicates that poverty, conflict and a lack of safe migration routes all contribute to experiences of exploitation²⁷. Recent research on the experiences of migrant women selling or exchanging sex in the UK unsurprisingly found that the current unsympathetic immigration environment and having no recourse to public funds are significant risk factors that push women into survival sex, in order to avoid destitution²⁸. These are not the only factors that can shape migrant women's pathways into selling sex however, systematic barriers such as a lack of recognition of international qualifications, coercion and experiences of gender-based violence prior to migration can all contribute.

What does the evidence tell us about the experience of those described as being engaged in 'sex work'?

The group are pleased to see a recognition in the guidance, that that sex industry is multi-faceted, and thus so are the experiences within it. However, it is troubling to see that the guidance has chosen to focus on using language such as "sex work" and "working". Whilst the guidance acknowledges that finite police resources should focus on exploitation, the language used does not reflect this priority. There is little mention within the description of the Sex Work Liaison Officers role of how officers will prioritise exploitation and safeguarding. The group firmly believe that any victim of violence should receive equal opportunity to report and access support, and an individual's involvement in the sex industry should not be a barrier to achieving justice. However, it is dangerous to conflate the experiences, safeguarding and support needs of those experiencing exploitation with sex workers who have agency and autonomy over how they sell or exchange sex.

²⁷ <https://theexodusroad.com/causes-effects-of-human-trafficking/>

²⁸ https://www.cseaware.org/uploads/1/4/1/1/141170061/migrant_women_survey_and_focus_group_report_final.pdf



Many of those who sell or exchange sex will do so in different ways and may move between different settings within the sex industry. This has a direct impact on risk, research by National Ugly Mugs suggests that selling sex indoors is ten times safer than selling sex on the street²⁹. It is indisputable that, regardless of the context in which it takes place, women who sell or exchange sex experience significant levels of violence³⁰, including physical and sexual assault. It is therefore concerning that the guidance seeks to “*differentiate those who sell sex and those that are victims of exploitation*”. There is no recognition within the guidance that this violence is driven by the same misogynistic beliefs which underpin the perpetration of VAWDASV in all its forms. It is also driven by the dehumanisation objectification, and ‘othering’ of women who sell or exchange sex.

As detailed in our response to the previous question, numerous survivors of exploitation experience domestic abuse and are coerced into sexual acts by a partner or family member. Similarly, not all perpetrators who act as ‘pimps’ are acting as part of a network of organised crime. As such, the group find it concerning that the guidance seems to focus on exploitation perpetrated by Organised Crime Groups, as this does not reflect the experiences of many survivors³¹. One service shared the experiences of a survivor who began selling sex on the streets following a relationship with her ex-partner. Her ex-partner introduced her to drugs and forced her to sell sex on the street to fund their joint drug use, and would be physically and emotionally abusive towards her, particularly if she returned home with no money after going out to sell sex on the street. In one survey conducted by Beyond the Streets, 77% of respondents who identified violence and safety concerns also mentioned concerns regarding family, friends and relationships³². Concerns raised included abusive relationships with partners and family members. The guidance for front line police officers and staff provides little direction on how to actually identify exploitation outside the

²⁹ <https://publicpolicyexchange.co.uk/event.php?eventUID=NE04-PPE>

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/303927/A_Review_of_the_Literature_on_sex_workers_and_social_exclusion.pdf

³¹ https://research-information.bris.ac.uk/ws/portalfiles/portal/259331342/Unwanted_sex_with_third_parties_in_domestic_abuse.pdf

³² <https://beyondthestreets.org.uk/wp-content/uploads/2022/01/Support-needs-of-those-involved-in-the-UK-sex-industry-FINAL-for-publication.pdf>



context of modern slavery or organised crime or, once exploitation is identified, how to appropriately safeguard. For example, whilst there is reference to referring into the NRM, there is no guidance on how to address wider safeguarding needs or what organisations can provide support, aside from stating that support should be offered. The guidance does not mention the completion of Public Protection Notices which enable referrals to relevant partner agencies such as local specialist Violence Against Women and Girls Services, drug and alcohol services. The completion of DASH RICs where applicable, or the function of SWOT MARACs in providing wraparound support and safeguarding are also not referenced. Additionally, there is no mention of domestic abuse, coercive control or sexual violence within the appendices of key legislation. Without the consideration of how domestic abuse and sexual exploitation intersects, opportunities to identify and support survivors will be missed, and the guidance will fail to actualise its five guiding principles.

In addition to experiences of domestic abuse, women who sell or exchange sex are at heightened risk of sexual violence. Some studies suggest that up to 50% of women involved in selling sex across the UK have experienced rape or a serious sexual assault³³. This sexual violence can range from rape, sexual assault, sexual harassment, and online offences such as non-consensual sharing of intimate images. Whilst experiences of sexual violence are present within all the contexts in which the selling of sex can take place, those selling sex on the street are particularly vulnerable. It is unclear how this guidance supports operational policing to consider the experiences and needs of those involved in selling sex or supports the delivery of the recommendations made within the End-to-End Rape Review and Operation Soteria/Bluestone. It is disappointing that the risk, harm and managing safety section within the introduction chooses to focus on stating that *“Whilst violence is a common experience, NOT ALL sex workers experience this in their work”*, instead of articulating the many risks these women experience and educating officers on how to respond in a trauma informed way which prioritises individuals’ needs and relevant

³³ <https://www.cseaware.org/safety-insights.html>



safeguarding. The guidance would appear to place a disproportionate focus on individuals who it is felt do not experience harm of exploitation within the sex industry, and the language used is a sanitisation of the real harm that individuals experience.

Experiences of stalking and harassment are also common for women who sell or exchange sex. This can be perpetrated by 'clients' or potential 'clients' and is a risk regardless of the context in which the exchange of sex takes place. The Beyond the Gaze report, which specifically focuses on online based sexual services, identified that 45.6% of respondents experienced unwanted contact, 36.3% experienced threatening or harassing contact and 31% reported verbal abuse³⁴. However, there is also the risk of violence and abuse from the wider public, particularly for women selling sex on the street. Specialist services in Wales have highlighted that women the women they support are regularly facing violence from the public, ranging from verbal abuse and physical assaults. One service reported that a number of women they support have been subjected to having urine hurled at them whilst on the street.

Those who sell or exchange sex also face a plethora of systematic barriers to reporting violence, accessing support and exiting the sex industry. Distrust in authorities, including the police, health and social services, is a significant one. A number of women who sell sex report having poor experiences with accessing support³⁵. This is often due to stigma and lack of understanding about survivors needs. For example, specialist services in Wales report that homelessness needs assessments do not take into consideration multiple disadvantages or the different needs of survivors. Agencies do not account for the fact that some individuals may live a transient lifestyle or may not have access to a phone. Consequently, individuals can often miss appointments and then be labelled as unwilling to engage or no longer in need. For victims from marginalised and minoritised communities, the barriers are heightened. Institutional racism, systemic racism and experiences of

³⁴ <https://www.beyond-the-gaze.com/wp-content/uploads/2018/01/BtGbriefingsummaryoverview.pdf>

³⁵ <https://beyondthestreets.org.uk/wp-content/uploads/2022/01/Support-needs-of-those-involved-in-the-UK-sex-industry-FINAL-for-publication.pdf>



discrimination are all barriers faced by Black, Asian and Minority Ethnic women³⁶. In one study conducted by Galop, which explored the barriers that LGBTQ+ survivors of sexual violence face to reporting, 25% of respondents stated that they had concerns that police would discriminate against them due to their LGBT+ identity³⁷. A lack of trust in the Police and wider criminal justice system is a significant barrier to reporting any experiences of violence or exploitation, particularly in a climate where Police perpetration of violence and the low conviction rates for sexual offences have been widely reported on. Feelings of shame, concerns about not being believed, and a lack of trauma-informed practice are all barriers to seeking support and justice. For women who are engaged in survival sex, and have substance dependencies or other complex needs, it is simply not feasible for them to engage with the invasive and time consuming Criminal Justice System. As a result of this, those who exploit and abuse women who sell sex go unidentified and not convicted, and women exploited by the sex industry bear the consequences.

2. Should police continue to work with Adult Service Websites?

Evidently, Adult Service Websites (ASWs) are a critical part of proactive and reactive police investigations into child and adult sexual exploitation. In terms of proactive policing, examination of these adverts within an ethical framework can support Police to identify ongoing exploitation or trafficking. For reactive investigations into reported offences, the guidance highlights that these websites will hold relevant information that will support the case building and effective prosecution of offenders.

However, evidence gathering must not be the sole focus of this engagement. The group believe that sexual exploitation, although a form of gender-based violence which is rooted in misogyny, socio-economic and gender-inequality, is not inevitable. A focus on prevention is also key. Despite some platforms' co-operation with law enforcement investigations by providing statements and complying with data requests, these websites continue to

³⁶ https://changinglives.cdn.prismic.io/changinglives/680dea5d-e4ad-4390-a073-c85f8c40db56_STAGE+BAME+Briefing+-+August+2023.pdf

³⁷ <https://galop.org.uk/wp-content/uploads/2022/05/Navigating-the-Criminal-Justice-System-Support-Services-as-an-LGBT-Survivor-of-Sexual-Violence.pdf>



knowingly facilitate and profit from exploitation. As such, the group feel that the focus of police work with these websites should also be on expecting ASWs to be vigilant for sexual exploitation and reminding them of their duty to take more proactive measures to safeguard or screen their users. One study which conducted interviews with police officers identified that *“officers from several forces felt online advertising platforms should be more proactive in measures to safeguard against exploitation, trafficking and slavery”*³⁸. We hope the new provisions held within the Online Safety Act will ensure a positive working relationship with ASWs and the police.

What does the evidence tell us about the extent to which ASWs enable child and adult exploitation?

Adult service websites provide a platform for those who sell sex to advertise their services online and have undoubtedly contributed to the expansion of the sex industry. Adult service websites also provide a platform for exploiters, whether they are operating individually or as part of organised crime. Whilst it is good to see the link between exploitation and ASWs recognised in the guidance, it is extremely concerning to see the assertion that *“the vast majority of services advertised on ASWs are by independent sex workers”*. Although challenges with collating accurate statistical data do exist, most existing data, literature, and survivor testimonials indicate the very opposite. In 2021, the Cross-Party Group on Commercial Sexual Exploitation conducted an inquiry into advertising websites in Scotland and found them to be a *“major enabler”* for sex trafficking and sexual exploitation in Scotland³⁹. Written evidence by the Home Office for the House of Commons Home Affairs Committee Report on Human trafficking unequivocally states that *“ASWs are the most significant enabler of sexual exploitation linked to trafficking”*⁴⁰. Additionally, some studies suggest that as many as 75% of victims of trafficking for sexual exploitation are advertised online⁴¹. One specialist service in Wales shared that, through their monitoring of adult

³⁸ <https://www.beyond-the-gaze.com/wp-content/uploads/2018/01/BtGpbriefingpolice.pdf>

³⁹ <https://www.appg-cse.uk/wp-content/uploads/2021/03/Online-Pimping-CPG-report.pdf>

⁴⁰ <https://committees.parliament.uk/publications/42482/documents/211207/default/>

⁴¹ <https://www.appg-cse.uk/wp-content/uploads/2024/02/Men-Who-Buy-Sex-APPG-report.pdf>



platforms, they have identified a number of cases that have involved children or young people whose profile has been uploaded by parents or other exploiters. It was very obvious from the photos used in the profile that the individuals were underage and, if effective screening tools were in place on the platform, these should never have been able to be uploaded or should have been automatically flagged and removed. Services have expressed that the platform OnlyFans in particular is favoured among young people and there appears to be little to no safeguards on the site. It is vital that the connection between child sexual exploitation and adult sexual exploitation is recognised. Viewing child and adult sexual exploitation separately can overlook the experiences of young people. A 17-year-old using an online adult platform would be considered a victim of sexual exploitation, however the next day that same individual could turn 18 and freely use an online platform. Clearly, viewing this from a chronological perspective alone does not account for the nuances of pubescence, the impact of trauma, and the varied experiences of young people. Consideration for the distinct experiences of young people will lead to more effective safeguarding, prevention and identification of perpetrators.

Adult services websites enable child and adult sexual exploitation in all its forms, including exploitation perpetrated by intimate partners or family members. A participant in a 2020 study on the link between sexual exploitation and domestic abuse detailed her abusive relationship with her husband, who posted photos of her on escorting websites *“as a way of creating more income”*⁴². The development and expansion of online sex industry undoubtedly makes it easier for men to procure sex, and also means that those being exploited are far less visible, if they are not engaging in selling sex on the street for example. Survivors supported by specialist services in Wales who are on ASW platforms, have stated that they are not there by choice. These survivors have expressed that being on these platforms has led to more frequent incidences of abuse and heightened their risk, and the websites have been utilised by their exploiters in order to maximise profit. It is unclear why

⁴² https://research-information.bris.ac.uk/ws/portalfiles/portal/259331342/Unwanted_sex_with_third_parties_in_domestic_abuse.pdf



the guidance has steered away from existing credible data and research that assert ASWs as a primary driver of exploitation. The challenges with identifying exploitation on adult service websites, also contribute to the prevalence of violence and exploitation, this will be explored further in our response to the question below.

What does the evidence tell us about how effective ASWs are at screening and monitoring exploitative and illegal activity through risk assessment?

The group find the guidance's claim that some ASWs have "very robust" safeguarding measures in place extremely troubling. It is indisputable that the primary aim of these platforms is to profit from the sex industry. One investigation by the BBC found that moderators for the site Only Fans were given guidance by the platform to show more leniency towards successful accounts that breached their terms and conditions⁴³.

Concerningly, one operation conducted by Lancashire Police revealed that one man being investigated for human trafficking had spent approximately £25,000 placing adverts on the platform Vivastreet. In response to this, rather than considering this activity a significant indicator of exploitation, the website provided him with his own account manager⁴⁴. For such platforms, profit will *always* come before safety. One specialist service in Wales reached out to an adult platform in 2023, after learning that the website is able to upload details of relevant support agencies on their site. To date, this advert has not been posted to the website, despite attempts to follow this up from the support service. This adult platform also made the point that they are a small team, despite the platform being world-wide, and thus there are limitations on what they have the capacity to do. Whilst the group believe that women who sell sex should not be marginalised or stigmatised, the rise and normalisation of platforms such as Only Fans means that an increasing number of women and girls are being groomed into providing online sexual services, under the false impression that this poses little to no risk to their safety. For platforms that do have them in place, most

⁴³ <https://www.bbc.co.uk/news/uk-58255865>

⁴⁴ <https://www.appg-cse.uk/wp-content/uploads/2018/05/Behind-closed-doors-APPG-on-Prostitution.pdf>



safety measures are easily bypassed, with reports of children as young as 14 being able to set up accounts by using the ID of a friend or family member who is over 18⁴⁵. The previous NPCC lead for child protection, former Chief Constable Simon Bailey, has stated that children are being exploited on these platforms, and has expressed that platforms such as Only Fans are “*not doing enough to put in place the safeguards*” to protect children⁴⁶.

Additionally, even on the most ‘robust’ sites, there is very little screening done of clients. Where measures are in place, their effectiveness in ensuring the safety of users is highly questionable. Whilst measures such as ID checks may prove details such as identity and residency within the UK, they are not effective screening tools to identify potential perpetrators of violence or abuse. One service in Wales, who provide support to women who sell sex, shared that they had supported a survivor who uses online platforms to meet clients. This survivor had received a message via an ASW from a man and subsequently arranged to meet. After entering his vehicle, she realised that two other males were present in the car, this woman was subsequently trafficked to another area and supplied with drugs before escaping the property in which she was being held. The gaps in safeguards on these platforms is also highlighted by the recent case of Mark Brown, who was a registered user of the ASW Adultwork. In 2021, Mark Brown murdered two women, Leah Ware and Alexandra Morgan, whom he met through this site⁴⁷. This case also illustrates the gendered dynamics and power imbalance often present in the purchasing of sex. The timeline of Brown’s relationship with one of the victims, Leah, demonstrates the overlapping relationship between sexual exploitation, sexual violence and domestic abuse. Following their initial contact on Adultwork, Brown rented a flat for Leah, and began exerting an increasing amount of control over her, including withdrawing money from her account and collecting her medication⁴⁸. Those who exploit or abuse women who sell sex, often employ the same tactics as perpetrators of domestic abuse. The so called ‘boyfriend model’ of coercion, is a

⁴⁵ ibid

⁴⁶ <https://www.bbc.co.uk/news/uk-57255983>

⁴⁷ <https://www.sussexlive.co.uk/news/sussex-news/monstrous-mark-brown-trial-timeline-7837090>

⁴⁸ ibid



common tactic used by organised crime gangs to recruit women into exploitation⁴⁹. It is vital that police recognise this link.

The NPCC guidance recognises that whilst it might be possible to identify exploitation in an ASW advert, several challenges exist with this. In 2021, a spokesperson for the National Crime Agency highlighted that it can be difficult for law enforcement to distinguish between adverts placed by those acting independently, and adverts placed by exploiters, without utilising additional intelligence. They also highlighted that exploiters are adept at hiding behind seemingly legitimate adverts on these platforms⁵⁰. Given the challenges that the police face with identifying online exploitation, even with their expertise and resources, it is unclear how ASW's would be any more effective at identifying exploitation or illegal activity, unless it is very overt. One support service in Wales has noted several factors which may indicate that an individual is being exploited via an ASW. Features like unusual phrasing or language, frequent updates and changes to adverts, changing locations or the use of unrealistic or generic photographs can all be indicators that exploitation is taking place. Consistent emoji use across a number of different adverts can suggest a connection between the posts, as well as the use of similar language or the same phone number. The fact that these adverts were able to be posted to and remain on platforms, demonstrates that ASW's are ineffective at screening and monitoring exploitative activity on their sites, even when it is overt. Beyond the Gaze's Briefing for Police on Internet Sex Work found that 80.8% (n=518) of respondents had experienced at least one type of crime within the last five years⁵¹. The scale with which those using online platforms experience crime would suggest that ASW's are largely ineffective at identifying exploitative or illegal activity on their platforms. In addition, many adverts on ASW's contain contact details for the poster, so further arrangements can be made directly rather than through the website itself. As the

⁴⁹ <https://www.appg-cse.uk/wp-content/uploads/2018/05/Behind-closed-doors-APPG-on-Prostitution.pdf>

⁵⁰ <https://www.sunderlandecho.com/read-this/in-town-for-one-week-only-how-crime-gangs-are-using-legal-adult-websites-to-sell-their-victims-and-why-vice-squads-back-them-3138088>

⁵¹ <https://www.beyond-the-gaze.com/wp-content/uploads/2018/01/BtGpbriefingpolice.pdf>



guidance recognises, it is common for individuals across several different platforms. This can provide challenges for ASWs to regulate or monitor the activity that is being facilitated through their platform.

Even when exploitation has been identified and reported to a platform, ASW's can be slow to respond or remove the content⁵². The rise of technology-facilitated gender-based violence, which includes 'deepfake' sexual images, also affect women who sell or exchange sex. Although not specific to ASW's, the Revenge Porn Helpline was established in 2015 in response to the rising reports of 'revenge porn' and the creation of new legislation around non-consensual sharing of intimate images. The helpline has established great links with social media companies and adult platforms such as Pornhub and supports survivors with the removal of intimate images from these sites. However, it is disheartening that survivors face so many barriers to getting content removed. The fact that these platforms are far less responsive to requests to remove non-consensual content without the support of a specialist service such as the helpline evidences the priority for these platforms is not the safety of its users. Legislation such as the Online Safety Act, seeks to make online spaces safer by introducing mandatory responsibilities for online platforms such as the removal of illegal content and the introduction of new criminal offences⁵³. However, employees involved with the moderation of content are not required to undertake training before flagging harmful content, as such it is likely that there will be oversights.

What does the evidence tell us about the impact of different policing approaches on tackling exploitation in the context of ASWs?

Whilst the examination of ASWs can absolutely be a useful tool for proactive and reactive policing, placing a focus solely on organised exploitation will result in missed opportunities to identify and safeguard survivors. As stated in our responses to the previous questions, survivors who have experienced sexual exploitation by an intimate partner or family

⁵² <https://www.bbc.co.uk/news/uk-57255983>

⁵³ <https://www.bondsolon.com/the-online-safety-act-2023-%E2%80%93-a-canter-through/>



member have highlighted the role of ASW's in facilitating that abuse. The many ways that sexual exploitation can be perpetrated within the context of adult platforms needs to be understood and considered by police. For those being exploited by intimate partners, adverts and booking agreements may be in their own name and thus not raise suspicion, however exploitation and coercion are still occurring. A narrow approach which places a disproportionate focus on one type of perpetrator will result in opportunities to identify and support survivors being missed.

Tackling exploitation within the context of ASWs is not just an intelligence gathering exercise that exists in silo. Evidently, if intelligence regarding ongoing exploitation is identified, this would lead to further police action which seeks to make contact with the identified victim. There is evidence which demonstrates that scanning ASWs can lead to positive identification of perpetrators and successful criminal justice outcomes⁵⁴. What is not often clear in these cases, is the outcome or experience for the survivor. One inquiry into organised sexual exploitation in England and Wales, details a visit conducted to an identified brothel by Cambridgeshire Police⁵⁵. The brothel was identified as a result of a profile which had been placed on Adultwork, this prompted police to conduct a visit to the premises. Despite there being obvious signs of exploitation at the location, none of the women present disclosed any exploitation or abuse having taken place, and they were left with contact details of support services. It is unclear whether any perpetrators were identified or arrested as a result of this visit, and it is likely that this visit was not a positive one for the women present. Whilst police should not be deterred from investigating suspected abuse or exploitation, a more holistic approach which links in with specialist services in the local area can result in more positive experiences for women.

What does the evidence tell us about the impacts on sex workers (within the context of ASWs) of different approaches/responses to sex work (e.g. criminalisation, economic

⁵⁴ <https://www.appg-cse.uk/wp-content/uploads/2018/05/Behind-closed-doors-APPG-on-Prostitution.pdf>

⁵⁵ ibid



aspects, health, wellbeing, safety, family, support networks, access to justice, marginalisation etc.)?

Current evidence within Wales demonstrates significant disparity in policing approaches and data collection, something which is echoed nationally. In 2022, the All-Wales Operational Group submitted a series of Freedom of Information requests to all four police services within Wales, as well as other statutory bodies such as health boards and local authorities. The aim of these requests was to examine how data on sexual exploitation is collected by the named bodies, how survivors are risk assessed and supported, as well as how approaches to child sexual exploitation and adult sexual exploitation align. Although all four police forces in Wales responded to the request for information, 50% of forces stated that they were unable to provide any data associated with the FOI request⁵⁶. Of the two forces that did have relevant data, only one was able to provide statistical data regarding the number of identified victims of adult sexual exploitation. Fears of being ‘outed’ and having information being recorded against them on police systems, means that the approach of proactively scanning ASWs can be concerning for some women who sell sex. In one survey conducted by National Ugly Mugs, respondents highlighted inconsistency in police responses and interpretation of legislation as a key reason for a lack of trust in the police, resulting in a reluctance to engage or report⁵⁷. A consistent national policing approach that recognises adult sexual exploitation as a form of violence against women and girls and prioritises safeguarding, is crucial.

There is a historic lack of trust between those who sell sex and law enforcement authorities, something which is acknowledged in the guidance. Fear of criminalisation is perhaps the most significant barrier to reporting to police, with 72% of respondents to the aforementioned NUMS survey highlighting this as a reason for a lack of trust in law enforcement authorities⁵⁸. The group are unequivocal in the belief that women should not

⁵⁶ <https://welshwomensaid.org.uk/wp-content/uploads/2024/06/Operational-Group-FOI-Report-JUN-2024.pdf>

⁵⁷ <https://link.springer.com/article/10.1007/s13178-021-00627-1>

⁵⁸ <https://link.springer.com/article/10.1007/s13178-021-00627-1>



be criminalised for selling sex, and it is not in the public interest to do so. Criminalisation of women who sell sex is an approach that only serves to further marginalise individuals and enable perpetrators. It is positive to see a commitment in the guidance to building trust with those who sell or exchange sex, however this should not deter police from pursuing investigations into abuse, exploitation or trafficking. There is much debate around the consequences of various policing responses to the sex industry and current legislation, these can become cyclical conversations which contribute to inconsistency amongst authorities and do not serve those who experience harm, exploitation and abuse. Instead, law enforcement should focus on embedding a trauma informed approach and working with specialist services and those with lived experience. Simply put, any report of violence or abuse perpetrated against women who sell sex should be taken with the same credence and investigated with the same vigour as any other report of crime. A victim's involvement in selling sex should not be considered an undermining factor by criminal justice authorities. Additionally, these circumstances should not be the significant focus of the investigation, unless actually relevant, for example for investigations into trafficking. A holistic, person centred, and trauma informed approach should be taken, one which works with victim-survivors, listens to their needs without stigma or assumption and works to address these in partnership with specialist services in the local area.

3. In regard to brothel keeping legislation, is the current focus on exploitation rather than prosecuting individuals operating out of the same premises the right approach?

As already stated in answer to previous questions, the group are unequivocal that women should not be criminalised for selling or exchanging sex. Certainly, women should not be penalised for taking measures to safeguard themselves. The focus of police intervention should be on appropriately responding to reports of violence or harm, identifying and safeguarding victims, and pursuing perpetrators of abuse and exploitation. Pursuing perpetrators of abuse and exploitation, also includes pursuing individuals who facilitate and profit from that exploitation.



However, as also expressed in previous answers, the group are concerned that the guidance focuses exclusively on organised sexual exploitation and that this will lead to safeguarding opportunities being missed. The guidance shares learning from Police Scotland which identifies some considerations police should make when attending a brothel, however it is also important to consider that some exploitation may not be as overt. For example, an individual may have freedom of movement within a brothel, and no known links to OCGs, however they have still been coerced into selling sex by an abusive partner, or due to poverty. Two specialist services that provide outreach to sexually exploited women in Wales have already highlighted the impact this guidance has had on some police services. These services have shared that there has been a clear shift in focus from local officers, including local public protection units, towards trafficking and organised sexual exploitation and this has led to less engagement with those services. Whilst trafficking and organised exploitation are prevalent and absolutely should be a policing priority, survivors of sexual exploitation will be missed if this is the only priority. These services have expressed how vital the link with local police and intelligence is. To date, this partnership working had been very beneficial, it has facilitated better relationships between police and those who sell sex, has supported effective safeguarding and related processes such as SWOT MARACs. Both services have expressed concerns about the impact that this change will have on future partnership working.

What does the evidence tell us about the impacts on sex workers (within the context of brothels) of different policing approaches/responses to sex work (e.g. criminalisation, economic aspects, health, wellbeing, safety, family, support networks, access to justice, marginalisation etc.)?

As highlighted in our response to the evidence for different policing responses within the context of ASWs, there is significant inconsistency in policing approaches and the interpretation of related legislation. This inconsistency not only exists between different police forces, but amongst officers within the same force. Routine police attendance at



brothels can lead to feelings of distrust and criminalisation for those selling sex. Targeted police activity at these locations, particularly activity which has no criminal or safeguarding outcomes, can also result in premises or exploitation being moved to another area. This can prove challenging for support services doing outreach and can lead to women becoming estranged from their support networks. It is clear that there has been an effort made within the guidance to consider the different impacts that this police activity can have on women who sell sex.

It is inescapable that concerns about exploitation, trafficking and violence will lead to police attendance at brothels, saunas and parlours. However, approaches can be taken which minimise the negative impacts of police attendance on women at these locations.

Partnership working is a key approach that needs to be taken by police, and specialist services are a vital part of this. Unless there is a report of immediate harm that warrants a grade 1 response, police should seek to link in with these local services. Some specialist services already conduct regular safeguarding visits to brothels to offer holistic support to women. Therefore, police attendance at brothels solely to conduct welfare checks may well be a duplication of work that risks women disengaging entirely. Where suspected exploitation has been identified on an adult platform, the value in this joined up approach has been highlighted by specialist services in Wales, many of whom have managed to build more trusting relationships between police and survivors through partnership working. Through this approach, services in Wales have also been able to build relationships between the women and other authorities, such as local mental health services, GPs and SARCs. Speaking of support received by a service in Wales, one survivor stated, *“They helped me get my flat, mental health workers linked me in, family doctor, numerous agencies, for my methadone for my drug problem”*. Any police approach should be person-centred and without judgement, with a focus on listening to the needs of the woman and responding accordingly.

What evidence is there for the rate of prosecutions under brothel-keeping legislations?



Within the UK, although it is legal to sell sex, many activities associated with the selling of sex are criminal offences defined by UK law. The Sexual Offences Act 1956, and Sexual Offences Act 2003 define a number of offences relating to the selling or exchange of sex. The term prostitution is used within this legislation. Available data from the Crown Prosecution Service indicates that between 2017 and 2022, the highest rate of offences charged for a first hearing at magistrates' court were under sections 33A of the 1956 act, and sections 51A and 53 of the 2003 act⁵⁹. Section 33A of the Sexual Offences Act 1956 relates to Keeping, managing, acting or assisting in the management of a brothel. Section 51A of the 2003 act relates to solicitation, while section 53 of the act defines the offence of controlling prostitution for gain. Charges under solicitation legislation have decreased year on year between 2017-2022, beginning at 106 between 2017-18 and falling to 47 between 2021-2022⁶⁰. A similar decline can be seen for section 53 of the 2003 act. The number of charges relating to the offence of keeping, managing, acting or assisting in the management of a brothel appear sporadic between 2017-2022. Between the years 2017-2019, the numbers are relatively consistent at 63 and 61 respectively. However, the number then decreases significantly to 17 and 12 for the following years, before rising again to 69 between 2021-2022⁶¹. The number of charges relating to other offences such as keeping a brothel, a tenant permitting a premises to be used as a brothel or for prostitution, remain consistently and extremely low. There is also a year-on-year decrease in charges relating to section 52 of the 2003 act, which relates to causing or inciting prostitution. There were just five charges brought in relation to this offence between 2021-2022⁶². Concerningly, within the same time frame, charges relating to section 53A of the Sexual Offences Act 2003 never peaked above four. This section created an offence of paying for the sexual services of a prostitute subjected to force⁶³. Although these statistics related to charges and not necessarily prosecutions, and they don't account for offences under the Modern Slavery

⁵⁹ <https://www.cps.gov.uk/foi/2023/prosecutions-prostitution-keeping-brothel-and-trafficking-sexual-exploitation>

⁶⁰ *ibid*

⁶¹ *ibid*

⁶² *ibid*

⁶³ <https://www.legislation.gov.uk/ukpga/2003/42/section/53A>



Act, it is clear that these numbers are far lower than the actual scale of sexual exploitation and organised exploitation within the UK.

What is not discussed within the guidance, is criminalisation that occurs outside the offences listed in the Sexual Offences Acts. Women who sell sex on the street are particularly visible, and reports from the local community can lead to these women being stop-searched. Many women who sell sex on the street are dependent on drugs and carry weapons for their safety, leading to arrests under the Misuse of Drugs Act 1971, Section 1 of the Prevention of Crime Act 1953 and section 139 of the Criminal Justice Act 1988. Altercations with potential clients can lead to arrests for public order offences. Although not offences relating to solicitation, loitering and brothel keeping legislation, many of these arrests and subsequent prosecutions are directly linked to their exploitation. Changes to the way these outcomes are recorded could provide a clearer picture of the rates that women who sell sex are being criminalised across the UK.

What evidence is there for the negative or positive outcomes of prosecution?

The All-Wales Operational group are clear in the view that there are no positive outcomes for women who are prosecuted for their own exploitation, poverty or trauma. Having a history of intelligence, arrests and convictions for offences relating to prostitution can make it significantly more challenging for women to stop selling sex and find employment. Exiting is already a lengthy and complicated process, and criminal convictions act as a structural barrier⁶⁴. Research by the organisation Nia, regarding the impact of prostitution-specific criminal records on women seeking to exit prostitution, unsurprisingly echoes this conclusion. In their study, the charity notes that *“disclosure and barring service regulations result in prostitution-specific records being disclosed in most cases for women even years after they have exited”*⁶⁵. These interactions with the police and criminal justice system also

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https://static1.squarespace.com/static/651fe077005a1a2b2a3d3e72/t/664379e53bb25b4bad08ad0b/1715698152178/SERP_PathwaystoExit_FULL_Final.pdf

⁶⁵ https://niaendingviolence.org.uk/wp-content/uploads/2020/02/Im_No_Criminal.pdf



erode trust, and result in women becoming further excluded. Research also shows that this criminalisation can negatively impact women's mental health, leading to increased drug and alcohol use, as well as internalised feelings of shame⁶⁶.

The group are equally clear that those who coerce or force individuals into sexual exploitation, and those who profit from this abuse must be prosecuted. However, it is important to recognise that criminal justice outcomes alone will not address many of the needs of survivors, and a holistic co-ordinated approach with relevant partner agencies is required. For a woman who is exchanging sex for accommodation, the arrest or removal of a perpetrator will not reduce her vulnerability to further exploitation. In such cases, officers should consider other immediate safeguarding measures such as emergency accommodation. One survivor supported by services in Wales stated *"I've got a lot more chance now to stop working but when you've got no benefits and no home your only option is to work. The project has helped me get all that secured"*. Although legal action can be successful in ensuring safeguarding, granting restraining orders, exclusions and requirements to engage in rehabilitative programmes, prevention is also key. The perpetration of violence against women who sell sex, is underpinned by the same misogyny, sexism and social inequality which drives the perpetration of any form of gender-based violence. This recognition is vital in order to effectively tackle the perpetration of sexual exploitation and support criminal justice agencies to identify and utilise all the offences relevant to the case, some of which may sit outside of the Sexual Offences Acts. This connectivity is currently absent from the NPCC guidance.

⁶⁶ Ibid