

Here we look at:

1. What's Out There?

How the porn and sex trade *are* advertised in unrestricted spaces both in print and online

2. So?

The *harm* of such advertising in terms of Gender Equality and Child Protection

3. Get Responsible!

Who is responsible for *regulating* such ads and our dealings with the ASA

4. Change This!

What needs to be done and how this might be achieved

Newspaper Sex Ads

Many national, regional and local press carry ads for porn, sex chat and prostitution, including massage parlours and escort agencies like these:

Chatlines
1-2-1 ADULT CHAT
36p
 SHORT INTRO
LIVE
 0909 860 6684
 Mobiles Call 69179 60p

OLDER LADIES 36p
 0909 860 9980

CHEAP ADULT CHAT
 40p
OLDER WOMEN
 0983 050 0769
COLLEGE GIRLS
 0983 050 5358

CHAT OR DATE
13p
 0872 100 0251

Female 66yrs
 I live alone - no lies
 Keen on gents any
 age for discreet
 no strings fun
 If you are interested
 Text GABY to
 69996 to see pics
 67, 50yrs, 10-15yrs only. Text STOP
 to be taken to opt out.

Ads in the Evening Standard & Metro

STROKE YOURSELF TO HEAVEN & BACK OVER NAUGHTY & EAGER 18 & 19 YEAR OLD COLLEGE GIRLS! TO SEXY COLLEGE GIRLS PORN FILMS ONLY £25

juicy MEDIA

Horny Girls 18/19
 1000's of 18, 19 year olds to choose from! Text - TEENS followed by your postcode for a match. It's that easy! AND you can swap to the next 1/3 match near you by texting the world news. Find a dirty 18/19 year old girl near you! Ask them for photos & videos and for their info/details and get it on! They're horny & up for it!

GRANS
 your postcode to 8957

The Sport newspaper hosts 1000s of ads (often graphic) for porn/prostitution: www.notbuyingit.org.uk/SundaySport

DAILY STAR, Thursday, March 3, 2016 41

SEX
 Live 1-2-1 36p
 STRAIGHT THRU!
 09098606909
 FROM YOUR MOBILE 60p

HORNY GRANNY
 SEX RELIEF
 35 GRANNY DOES IT DIRTY!
 0909 864 1020

LIVE 1-2-1 GRANNY SEX CHAT
 MOBILE CALL 69179 60p

DIRTY LINES
 CHEAP PHONE SEX
 0982 505 3511

DIRTY HOUSEWIFE
 I'm at HOME & WORKING
 MAKE U COME!
 0909 860 9666

CHAT OR DATE WITH GENUINE CALLERS
13p
 WOMEN CHAT FREE!
 WOMEN: 0800 075 1095
 MEN: 0871 908 1766
 GAY: 0871 908 1675

Ads in the Daily Star

Adult Services 18+

DIRECT2U-ESCORTS.COM
 100% Discretion
 100% Satisfaction
 ALL AREAS COVERED
 24 HRS 7 DAYS
 0207 7857210/11/12
 Call operators / Escorts / Drivers required..

VOGUE ESCORTS
 Discreet & reliable service - 30 min arrival
 Call now for website details
 0208 361 7000
 Staff required
 07534 268444

The Red Room Massage
 West Drayton
 LOVELY LADIES
 Open 7 Days
 11am to 5pm
 01895 347 650
 0775 713 036

35p CHEAP RELAX & PLAY PURE ADULT XXX
 0909 864 0220

30 SECONDS IN ALL IT TAKES DIRTY GIRLS KARATED 35p
 0909 864 1006

Sex Ads in West London local paper 'Chronicle & Informer'

40+ DATING
 THE NEW MATCHMAKING SERVICE FOR THE MATURE, FREE AND SINGLE!

TEXT LOVE TO 63222
 FIRST 3 TEXTS COMPLETELY FREE

MATURE DATING
 The new matchmaking service for the discerning single
 Try for free today & join people near you looking for meaningful companionship now.

Customer support
 Call 0207 720 7130 Monday - Friday 10am - 4pm
 or email us at support@jmediauk.com

ADULTS ONLY
 Try sexy contacts FREE to view via [saucycontacts.co.uk](http://www.saucycontacts.co.uk)

Even 'Date' lines look suspiciously like ads for prostitution/sex chat with pay-per-minute charges ('Chronicle & Informer')

Online Sex Ads

The internet is awash with unrestricted ads for porn/prostitution – many are totally unrestricted others simply ask viewers to ‘confirm they are over 18’. At very least, such ads should be ‘age verified’ like the internet porn they are promoting soon will be.

 <p>Bella Of Secrets Category: Escort Agencies Area: Greater Manchester Description: A sexy, fiery mix with a real lust for life,...</p>	 <p>Blossy Of Secrets Category: Escort Agencies Area: Merseyside Description: Rosy is beautiful and has a very large bust, a...</p>
 <p>Melissa Of Secrets Category: Escort Agencies Area: Merseyside Description: Melissa is the perfect companion for those gentlemen who love...</p>	 <p>Sexy Independent English Leah Category: Independent Escorts Area: Barking and Dagenham Description: My name is Leah, and I am currently studying at...</p>

Strictly Confidential markets itself as a ‘leading hub’ for escorts. There is no meaningful age restriction with visitors to the site merely asked to ‘confirm they are over 18’. This site is just one of countless similar sites www.strictlyconfidential.co.uk

Online ‘Classifieds’

The ASA does not regulate ‘personal ads’. It needs to, and it needs to deem such advertising unacceptable and have power to force the hosting company such as Back Page or Craig’s List to cease. If the ASA does not take on this function some other body, with teeth, needs to with the hosting site, Google, Facebook, twitter etc all taking on responsibility or fined. It should also be noted that many ‘personal ads’ are clearly orchestrated by big business.

Back Page Totally unrestricted ads for prostitution are notorious on sites like ‘Back Page’

<http://london backpage.co.uk/FemaleEscorts>

Sun. 17 Dec.

[New service from Turkey SERENA outcall only 07798697281 - 21](#) (London and Heathrow)

[🦋 I'm the one "for a good time call" 🦋 party like no tomorrow 🦋 swing from shandelier - 26](#) (Central London park lane, City, mayfair,)

[🇧🇷🇵🇸 BUSTY sexy curvy ISABELLA BLOND 🍆 anal lover in central London 🇧🇷❤️ - 24](#) (Tottenham court rd, Oxford St, Warren St)

[👤 Top 1💖 Sexy & hot Babies In London 💖07472891440 - 20](#) (Goodge street, Charing cross, Bayswater,)

[👑 Top Class Sexy Model Rennie👑 just near Goodge st Call📞07393564184 - 25](#) (Goodge St, Warren st Tottenham court rd)

[New service from Columbia NINA outcall only 07436035724 - 22](#) (London and Heathrow)

[NEW TOP QUALITY IN TOWN 100% REAL PHOTOS amazing services call me on 07404919627 - 25](#) (Hendon Central Brent Cross Cri

[NEW TOP QUALITY IN TOWN 100% REAL PHOTOS just arrived few days a go .07404299914 - 26](#) (Aldgate East Canary Wharf Shadw

‘be my companion and socialise with me, help me relax with massages. Be a girlfriend with no strings attached adult fun on occasions’

‘Available for sex parties, gang bangs and escorts too’

Craig’s List

Take this one step further with men advertising free or cheap rooms in exchange for sex (or a ‘resource’/no strings girlfriend’): <https://london.craigslist.co.uk/apa/d/lovely-brand-new-studioall/6393983555.html>, ‘Massage girls’: <https://london.craigslist.co.uk/apa/d/studio-flats-for-massage-girls/6390097754.html> or ‘for gang bangs’ <https://london.craigslist.co.uk/apa/d/3-bedroom-flat-for-parties/6415876883.html>. Sometimes the meaning is obtuse with talk of ‘landlord sharing the flat occasionally’ and asking for photos ‘so I can get to see who I am talking to on the phone’. These are not even classified as ‘adult ads’ but are in amongst normal ads for ‘Rooms for Rent’.

The PSED

Any body that regulates the media is a Public Body, legally bound by the PSED (Public Sector Equality Duty) to actively seek to eliminate discrimination, harassment and victimisation. This duty is clearly particularly high when it comes to the porn/sex trade^{1,2}. That is why we focus here on how the unrestricted advertising of the porn and sex trade is a major breach of this duty.

The Porn and Sex Trade

The Porn and Sex Trade are probably the most abusive industries on the planet:

- At least 90% of mainstream pornography shows violence against women³
- It is probable that much of the porn available, *and advertised*, on the internet is in breach of BBFC codes⁴
- Well documented research on prostitution reveals an equally bleak scenario: 75% of women in prostitution started as underage children; 70% suffer from PTSD; 70% spend time in care; 45% report prior sexual abuse as a child; 95% of women in street prostitution have serious drug dependency, the majority of those in prostitution have been threatened with a weapon and physically assaulted. It is any wonder that 90% of women in the sex trade want to get out⁵
- It has been recognised for decades through research, international treaties (such as CEDAW and the Beijing Platform for Action) and Government policy that the porn/sex trade and their off shoots (lap dancing, Page 3 or the 'mere' objectification of women) deeply harm the women involved *and wider social attitudes towards all women*⁶. A situation that leads to 'Harvey Weinstens' and underpins high global levels of male violence against women. The recent House of Commons report on the sexual harassment of girls in school underlines the fundamental role played by boys' heavy consumption of pornography⁷.

¹ EHRC non-Technical Guidance states 'the greater the relevance and potential impact, the higher the regard required by the duty' <https://www.equalityhumanrights.com/en/publication-download/essential-guide-public-sector-equality-duty>

² EHRC Technical Guidance to the PSED states that Public bodies must 'take a proportionate approach to assessing impact on equality. This means taking an approach that is suitable to the size, resources and functions of your organisation, and to the relevance of the decision or policy to equality and good relations.' https://www.equalityhumanrights.com/sites/default/files/technical_guidance_on_the_psed_england.pdf

³ Researchers carried out a blow-by-blow analyses (literally) of the 50 *top selling* porn videos in the USA. Nearly 88% of scenes showed physical aggression against women, including hitting, choking, gagging. This actually represents a significant under-representation of the level of violence, since one woman being hit numerous times by several men in one scene was only scored as one act of violence. Further, the level of violence now seen in mainstream porn will have increased significantly since 2010, when this study was carried out: <https://www.democraticunderground.com/125529726>

⁴ An indication of unacceptable pornography is outlined in the BBFC's 'Age Ratings You Trust' pg 24. This clearly harm-based/PSED approach includes any behaviour that suggests a lack of consent and strong physical or verbal abuse, threats and humiliation http://www.bbfc.co.uk/sites/default/files/attachments/BBFC%20Classification%20Guidelines%202014_0.pdf

⁵ This has been confirmed through numerous international studies. More information: <https://nordicmodelnow.org/resources/articles> <http://enddemand.uk/about/commercial-sexual-exploitation-uk> <http://www.catwinternational.org/Resources/Research> <http://demandchange.eu/facts> <http://www.prostitutionresearch.com/pdf/Prostitutionin9Countries.pdf> <https://nordicmodelnow.org/2017/12/18/submission-to-the-appg-on-prostitution-the-global-sex-trades-inquiry-into-pop-up-brothels/>

⁶ This has been compiled in numerous reports: Object: www.notbuyingit.org.uk/Dots; Home Office Sexualisation of Young People Review: <http://webarchive.nationalarchives.gov.uk/+http://www.homeoffice.gov.uk/documents/sexualisation-of-young-people.pdf> Not Buying It: <http://notbuyingit.org.uk/sites/default/files/IMPRESS%20Why%20Objectification%20Must%20End.pdf>

⁷ House of Commons Women's & Equalities Committee 'Sexual Harassment and Sexual Violence in Schools' <https://publications.parliament.uk/pa/cm201617/cmselect/cmwomeq/91/91.pdf>

Unrestricted Advertising of the Porn and Sex Trade

Whilst the porn and sex industries in all guises is in and of itself harmful, our focus here is on the **promotion of these industries in *unrestricted spaces***. This adds a clear and distinct layer of harm:

- Nothing could more normalise, promote, mainstream and justify these abusive industries.
- The ads themselves are typically graphic, objectifying, demeaning and stereotyping – ie the ads themselves undermine men’s attitudes towards women (and so counter the PSED).
- Mainstream promotion fuels demand, so increasing the need for more ‘product’ (women) and yet further increasing the harm associated with the porn/sex trade.
- It also negates and de-sensitises to the extreme involved with them or the attitudes they promote.
- In a campaign spearheaded by women’s group, Eaves, The Metropolitan Police⁸ asked all newspaper editors to cease carrying prostitution ads over half a decade ago because of their link with illegal activities such as trafficking. Since then, coercion into prostitution, a ‘norm’ within the sex industry, has now also been made illegal, meaning that even more of the sex trade that is being advertised is highly likely to be unlawful. The Eaves/Met initiative was supported by the Press Trade Body, ‘News Media Association’ (formerly the Press Association)⁹. Our communications with Sir Alan Caton, OBE, formerly Suffolk Police Chief, confirms that he personally insured local newspapers ceased carrying sex ads after the serial murders of women in prostitution in Ipswich in 2006.

Child Protection

- Any unrestricted advertising of the porn/sex trade means these industries may be being promoted to children – a clear issue of child protection in and of itself.
- The ads themselves are typically graphic, objectifying, demeaning and stereotyping – the ads themselves undermine boys attitudes towards girls and girls body image and self esteem.
- Advertising in a *newspaper* means the ads are accessible to children, particularly given that their reading is promoted by educationalist with an estimated 1/3 to 1/2 of underage children reading them¹⁰.
- The *internet* is *the* dominion of children and young people. This means the unrestricted advertising of porn and prostitution online makes it even more child-accessible than its placement in newspapers.
- The majority of children who view porn online stumble upon it on line unintentionally⁷, just as they stumble across unrestricted ads for it.
- Children’s use of porn is at an all time high: a majority of children are now viewing it at 14 or younger⁷ with 10% of 12/13 year olds¹¹ using it so much that they fear they are addicted to it.
- Unrestricted advertising of the porn/sex trade is clearly likely to incite children to, illegally, seek to access such industries (no doubt a considerable number of internet savvy underage children will do so successfully).
- It provides an easy ‘grooming aid’ to paedophiles (unrestricted online porn/sex ads or in newspapers make it, quite literally ‘child’s play’ for any abuser to suggest this is totally normal to his target).
- Such mainstream advertising makes a mockery of Government attempts to reduce children’s excessive exposure to porn, such as internet opt in or soon-to-be-introduced age verification scheme (if porn can only be accessed after rigorous, credit card-linked verification of age, how can it be right for ads for it be unrestricted and accessible to any child?)

⁸ Widely publicised at the time, confirmed here: <http://www.notbuyingit.org.uk/sites/default/files/ASA%20Sex%20Ads%20Police.pdf>

⁹ Publicised at the time, confirmed here: <http://www.notbuyingit.org.uk/sites/default/files/ASA%20Press%20Assoc%20Sex%20Ads.png>

¹⁰ <http://www.notbuyingit.org.uk/Newspapers4Kids>

¹¹ <http://www.bbc.co.uk/news/education-32115162>

Get Responsible!

Here we outline who is responsible for allowing unrestricted sex ads in newspapers and on line, our dealings with the key regulatory body (the ASA) and the problems in regulating online and 'classified' ads.

The ASA

- The ASA, Advertising Standards Authority, regulates essentially all advertising, both non-broadcast (printed and online ads) and broadcast (TV and radio).
- The ASA is a public body bound by the PSED. They themselves are aware of this and they have been taken to Judicial Review (not on PSED-related grounds), which can only be done with a Public Body.
- The PSED clearly weighs particularly heavily when considering advertising of the porn and sex trade according to both EHRC (Equality and Human Right Commission) guidance ¹ and EHRC technical guidance ² to the PSED.

Non-Broadcast Advertising:

- For non-broadcast advertising (print and online ads), The ASA applies codes written by CAP, Committee of Advertising Practice, an apparently distinct body that is, however, intimately linked to the ASA.
- CAP codes ¹² focus heavily on 'offence' (including 'the right to offend') and 'target audiences', with little mention of social responsibility or harm.
- The codes include numerous, in depth sections dedicated to the 'responsible advertising' of every adult and potentially harmful industry imaginable:
 - Tobacco may not be advertised at all.
 - E cigarettes may not be advertised in newspapers or magazines.
 - Alcohol, rolling papers and filters and gambling may only be advertised in media where children make up less than 25% of the audience.
 - Many of these codes also contain additional guidelines on 'taking care not to exploit young people, the vulnerable or use sexual imagery'.

However, there are NO CAP CODES AT ALL on 'Responsible Advertising' of the Porn/Sex Trade.

- ASA *interpretation* of CAP codes are frequently equally incompatible with the PSED with frequent reference to whether the 'target audience' was 'offended' rather than to 'harm' or seemingly any understanding of equality ¹⁴.
- The ASA's lack of consideration of porn and sex ads is out of keeping even with meager CAP codes on 'social responsibility' and certainly its more extensive codes on child protection ¹³ as well as precedence the ASA itself has set by ruling against merely objectifying ads ¹⁴.
- It is even more out of line with new CAP codes to 'end the sexualisation of underage children' ¹⁵ (*brought in to align CAP to BCAP codes, see below*) and to 'end gender stereotyping in advertising' ¹⁶.

Broadcast Advertising:

- The ASA also regulates broadcast ads (TV and radio) via Broadcast Advertising (BCAP) codes. These codes and regulatory powers were handed to the ASA by Ofcom in 2004.
- In stark contrast to non-broadcast/CAP codes *Broadcast codes*¹⁷ include two entire sections outlining in great detail how the porn and sex trade may (and often may *not*) be advertised, including extensive efforts to age restrict it.

Prostitution and 'Sexual Massage' May NOT BE ADVERTISED AT ALL in Broadcast Media.

¹² <https://www.asa.org.uk/codes-and-rulings/advertising-codes/non-broadcast-code.html>

¹³ http://www.notbuyingit.org.uk/ASA_Codes_2.pdf

¹⁴ http://notbuyingit.org.uk/sites/ASA_Flaws.pdf

¹⁵ <https://www.asa.org.uk/news/new-rules-prohibiting-the-sexualisation-of-under-18s-in-advertising.html>

¹⁶ <https://www.asa.org.uk/genderresearch.html>

¹⁷ <https://www.asa.org.uk/codes-and-rulings/advertising-codes/broadcast-code.html>

- Given the ASA's lack of consideration of porn and sex ads (and an appalling track record on sexist advertising at the time) we question why Ofcom handed over broadcast responsibilities to them and suggest it should intervene on the issue of unrestricted advertising of the porn and sex trade both in non-broadcast media now.

Our Dealings with the ASA

- We have spent nearly 2 years talking to the ASA on the issue of unrestricted newspaper sex ads.
- We have extensive literature and written communications with them detailing how porn/sex ads in the public domain are a breach of numerous of their codes (despite the weakness of these codes with regard to social responsibility or the PSED) including codes on child protection.
- The ASA spent 6 months investigating porn ads in the graphic Sports Newspaper. After meeting with us and a special internal round table meeting they decided that the ads were 'unlikely to offend the target male audience' but should not be on the cover 'as then children might see them'.
- They then refused to investigate sex ads in the ES. A decision upheld by their independent assessor.
- The ASA might fear legal challenge by the porn/sex trade for restricting its advertising. (Local Councils appear to operate from a similar position of fear when considering whether to grant strip club licenses, despite the fact that, to our knowledge, no successful legal challenge has been made against an authority for refusing a license. A successful PSED-based legal case has however been made *against* granting a license)¹⁸.
- ASA communication with our lawyer (Louise Whitfield of DPG, expert in public bodies and the PSED) further demonstrates total lack of understanding of the PSED by the ASA and how it should be applied

- **Full transcript of our complaints and ASA decisions:** www.notbuyingit.org.uk/ASAFlaws
- **Recommendations to the ASA, cosigned by numerous human rights groups and experts:** <http://www.notbuyingit.org.uk/ASARec>
- **ASA communication with our lawyer:** <http://www.notbuyingit.org.uk/sites/default/files/ASA%20Solicitor%20Letters.pdf>

Classifieds

- Currently the ASA does not regulate 'personal' or 'classified' ads.
- We urge the EHRC and stakeholders such as Ofcom, the DCMS, Home Office and Children's Commissioner to urgently look into the regulation of such ads. They include 'personals' (eg for prostitution) in newspapers; online listings (eg Craig's List) where men advertise rooms in exchange for sex; or women advertising themselves for prostitution. It should be noted, however, that many personal 'date' ads in local newspapers look suspiciously like paid-for sex chat or sex services generated by business, not individuals.

Online Advertising

- Ultimately we must end the unrestricted online advertising of porn and prostitution. A mammoth task but for a regulator with real teeth, powerful fining abilities and with cooperation from Facebook, Google and other industry giants this can, and must, be achieved. Age verification intends to end underage access to online pornography. A similar solution must be found to its advertising – possibly through the same mechanism.
- Indeed any regulatory body that oversees Facebook, Twitter, Youtube, Instagram, Google etc is a public body. If these online giants take on self regulatory functions, it could be argued that they themselves are public bodies and so beholden to the PSED. Ultimately, this might be the only way to finally ensure a socially responsible online media, free of abuse trolling as well as abusive content or ads for it.

¹⁸ A draft document outlining successful use of the PSED against Local Authority strip club licensing is available on request, similar principles applying to the ASA's inability to recognise porn/sex ads as harmful.

We Call For

1. CAP Codes to be Aligned with BCAP codes

This precedent has already set by the ASA itself when it aligned the two sets of codes over sexualised advertising of children. This would then ensure:

- **An End to all Porn and Sex Ads in Newspapers.**
- **An End to all Porn and Sex Ads in Non-Age Restricted Spaces Online.**

2. 'Personal Ads' relating to Porn/Prostitution in print and Online to be Controlled

By bringing them under the remit of the ASA or some other relevant regulatory body.

How?

- Potentially this could be achieved through a step-wise or multi-pronged approach eg through Judicial Review against the ASA for allowing sex ads in newspapers and/or through lobbying in partnership with other stakeholders to ensure a full overhaul of ASA codes and rulings.
- Such stakeholders include: The Home Office; DCMS (Department for Digital, Culture, Media and Sport); Ofcom; EHRC (Equality and Human Rights Commission); BBFC (British Board of Film Classification); The Children's Commissioner; Children's Groups.

Why Now?

- The ASA and CAP are reviewing their Public Body Duties in 2018, making this is a particularly opportune time to ensure they bring their codes and interpretation of them in line with the PSED.
- Age verification of porn by the BBFC also comes into effect in 2018, making the unrestricted advertising of age-restricted porn even more unacceptable.
- Age verification is also likely to increase the volume of porn advertised (both in print and online):
 - The industry will need to do more to encourage men to overcome any qualms in giving credit card details in order to now enter porn sites.
 - It will also be looking at ways to 'groom' children as future porn-users now that porn will no longer be readily accessible to the under-aged.
 - And if unrestricted promotion of porn in turn encourages underage children to evade the age verification scheme that would obviously hardly be a blow to the porn industry.
- We would suggest that a move to age-restrict advertising of the porn/sex trade is not a radical notion and would meet with substantive public approval, given the level of concern for underage children's exposure to porn and the harm this is causing. Our straw poll of over 150 people showed 97% in favour of ending sex ads in newspapers ¹⁹.

The ASA And Beyond

All media regulators are public bodies – including even regulators of the notoriously sexist/racist press (judges having granted leave to take Judicial Review against both former and current press regulators). We would suggest regulator(s) of online media (which could be content providers/internet giants themselves such as Youtube and Google) are also public bodies. Thus, using human rights legislation to ensure socially responsible *advertising* could set a precedent for a socially responsible press and even internet – heralding an urgently needed sea change to the current situation.

¹⁹ <http://www.notbuyingit.org.uk/should-newspapers-advertise-porn-prostitution>