

NPCC Consultation Response - Not Buying It

Not Buying It

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[Not Buying It](#) are expert in the reality and legislation around the sex industry. Our founder (via human rights group, Object) helped ensure specific licensing was introduced for the licensing of strip clubs and for the criminalisation of the purchase of sex where coercion was involved. Since then, Not Buying It has been involved in several successful legal challenges against public bodies for their pro-sex industry stance, including the NPCC's 'sex work' guidance – hence the reason for this consultation.

We are heartened to see the NPCC asking the key questions posed in this consultation. But it is imperative it now gives due weight to the points raised by us and the others who represent the vast majority in the industry and the most important voices - those *harmed* in the sex trade.

'Sex Industry' is used here to refer to all forms of the porn and sex industry including all forms of prostitution, stripping, webcamming, 'sugaring', 'survival sex' etc

Underlying Concerns

i. What is the 'Working Group'?

We are concerned at the lack of transparency over the 'sex work' working group. There is no public record of who is/has been in this group and no publicly available information about meetings, discussions and decisions. It is standard practice for public bodies, (such as local councils, TfL, the London Mayor etc) to publish such information. However, our understanding is that a working group, comprised primarily of prostitution advocates, has been instrumental in generating NPCC guidance - and has been doing so for many years. A working group, if one is to exist at all on this issue, cannot be dominated by sex trade advocates (regardless of whether this includes people from the sex trade with 'lived experience'). Any working group must appropriately reflect the reality of the industry and its multiple harms. Given that the vast majority (close to 90% - including in countries with full decriminalisation) seek to exit the industry immediately, because of its extraordinary harms, it is surely these voices which should always have dominated any working group.

We would also point out a further issue of including sex trade advocates – and that is the powerful lobby that backs them. This can easily persuade others into adopting a 'sex work' stance. This has included open acts of intimidation and abuse. Whether overt, or not, time and again we have seen women's support groups (eg domestic abuse/sexual assault centres) and many others advocate *for* the sex

industry/strip clubs having witnessed aggressive campaigns, defamation, assault and even legal action against objectors. They are also often inundated with the message that they are causing even more harm because closing the local strip club/brothel ‘puts women out of work’ (the implication being these women, despite being highly empowered by the sex industry, cannot possibly do anything else). We even know of NGOs who have lost funding for adopting a human rights anti-sex trade stance, whilst some funders are quite open about not funding those who challenge the industry or represent the 90% majority within it who seek to escape.



References

- [Not Buying It and its CEO dragged through 1 year court case for £100Ks by Spearmint Rhino](#)
- [Not Buying It threatened with defamation numerous times by Spearmint Rhino](#)
(proof available on request)

ii. Wider Undue Influence of the ‘Sex Work’ Lobby

The ‘working group’ is just one example of years of undue influence of the powerful sex trade lobby on the NPCC, NCA and many other public bodies, trade unions, political parties, NGOs, the media and others. This minority view, which consistently misrepresents the industry and actually offers the worst possible solutions for those in it, is exceptionally powerful, well-resourced and heavily networked – a large lobbying arm; newsletters subscribed to by a broad spectrum of public bodies, charities and others; constant webinars; poor quality research papers and other publications. This information is then used by decision makers to dictate policy, which are not only deeply harmful but invariably unlawful.

References: [Sex trade advocates and the tactics used](#)

iii. Total Reset Needed

We would suggest that after years of appearing to hear only sex trade advocates, that all who have been unduly influenced by this lobby need a total reset. If 90% of those in the sex trade seek to exit immediately, surely 90% of decision makers' attention should be given to this cohort. Instead we seem to be witnessing an inverse universe where all decision making is based on the 10% - 'sex work' groups who do not represent the reality of the industry; do not represent the 90% in it (eg typically providing no exiting support whatsoever); which often include abusers (pimps) and who advocate for the worst possible policies.

Communications now need to be ongoing and earnest with those who truly represent the industry and those in it and who provide quality research and information.

Rather than carrying out 'open consultations' (such as this current consult) which are typically drowned out by the powerful sex trade lobby, we would urge all public bodies to follow the lead of the UN Special Rapporteur on Violence Against Women and Girls (VAWG). She recently took the bold and unprecedented step of **consulting with sex trade survivors and their representatives** for her global report on prostitution. This offered a unique perspective, reiterating all that we, and others who speak the truth about the sex trade, have been stating for decades. We urge the NPCC and others to examine this closely:



UN Special Rapporteur on Violence against Women and Girls

References

- [UN Special Rapporteur Written Report](#)
- [Video Evidence](#)

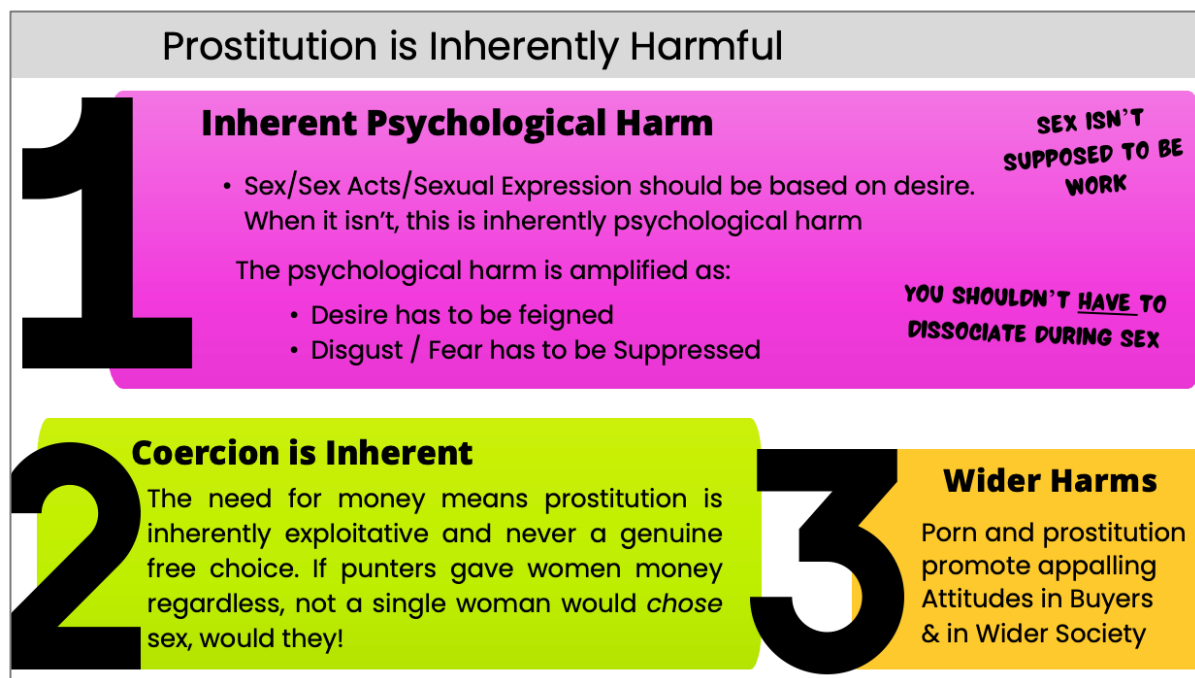
Sex as Work

i. Working hard doesn't make something 'work'

Challenging the view that prostitution cannot be viewed as work doesn't mean that 'selling sex' isn't something that individuals don't work hard at. It is. It is probably the most difficult thing anyone could do - emotionally, physically and practically and with life-long impact. Just because something involves a huge amount of labour doesn't then make it something that should be deemed appropriate as 'work'. We wouldn't claim child labourers work hard therefore they are workers and it's stigmatising and anti-child to call child sweat shops an unacceptable form of 'exploitation'. This comparison seems particularly fitting, given that numerous 'sex work' groups frame 'child prostitution' as work, claiming it is stigmatising to view these children as victims:

References: [Children frequently framed as 'sex workers'](#)

ii. What Other 'Work' Carries Inherent Harm and Coercion?



The pictogram above summarises the 3 major forms of harm inherent to all forms of the sex industry. This is absolutely inherent. It can never be eradicated or even reduced through 'regulation':

1. The sex trade is **inherently psychologically damaging** because sex/sexual expression should always be based on desire. This means 'with who you want, when you want, doing what you want'. This is never the case for the prostitution. Instead, it is sex (or rather access to hands and orifices for male

masturbation) on demand. This harm is further amplified as women have to feign emotions, such as interest and desire, whilst suppressing their actual emotions - boredom, disgust and, often, fear. This is one of the reasons dissociation is normal in all forms of the porn and sex industry as this allows 'feigning and suppression'.

2. All forms of the porn/sex industry entail providing sex/sex acts/sexual activity due to necessity, not desire. This means, **coercion and exploitation is absolutely inherent to the industry** and cannot be prevented.
3. The porn/sex trades also promote **deeply harmful attitudes** both in sex buyers and wider society. This cannot be prevented, even if the industries could magically be 'made safe'. It is part and parcel of the message that women are objects that should be bought by men.

iii. What Other 'Work' Carries such Extreme Levels of Violence & Vulnerability?

Extreme Levels of Abuse	'Levels of Violence Near Pandemic'
Prior to Entry:	In the Sex Trade:
60 % Sexually Assaulted as a Child	93% Experience Violence/Abuse
85% Physically Abused as Child	60% incur traumatic Brain Injury
33 % Spent Time in Care	68% experience PTSD
50% Experienced Homelessness	50-95% experience Addiction
50% Coerced into Prostitution	89% Want to Escape
50% Entered as a Child	50% Coerced to Continue
70% 'Childhood abuse effected 'choice' to enter'	More Likely to be killed than a Combat Soldier

Not only do all branches of the porn and sex industries carry inherent harm, unlike almost any other kind of work (certainly work that is constantly promoted as 'harmless, empowering fun') but they are associated with extreme levels of violence and abuse (even before entry, never mind once within them). The more the industry is legitimised as work, the greater the abuse (yet legitimisation is exactly what the sex trade lobby and 'sex work' groups call for).

- Most who enter the industry are already vulnerable and/or have experienced abuse

- All have been ‘groomed’ by a society that dubs the sex trade ‘harmless, fun, empowering work’
- None in the industry entered through an informed choice with full knowledge of the life-altering and sometimes life-ending harms and risks
- 50% or more enter the sex industries as a child – so incapable of ‘choice’. This also makes it meaningless to view the prostitution of an adult distinct from the prostitution of a child.

References

- [The Human Cost of the Sex Trade](#)
- [The Financial Cost of Prostitution](#)

iv. Sex Industry vs ‘Work’

‘Work’ Does **NOT** Represent Industry

- In What other Job are you in constant **Fear for your Life** ?
- What other normal work place is **dominated by Organised Crime?**
- in what other work sold to you as ‘normal and safe’ do you have a **70% risk of PTSD?**
- What other work gives you **chronic physical health issues** –gynaecological issues, STDs, anal tears/prolapse, constant urinary tract infections, hip dysplasia ..?
- In what other workplace is it **impossible to be safe?**

If this were work it would be shut down instantly on health and safety grounds and for breach of equality law

Nothing else that carries the huge inherent harm of prostitution alongside ‘near pandemic’ levels of violence would ever be classified as ‘work’. Why then is the sex trade?

- [UN Special Rapporteur calls for end to ‘Sex Work’ terminology](#)
- [Home Affair Committee calls for Policing to stop using ‘Sex Work’ terminology](#)

v. The Harms of 'Sex Work' Terminology

Harm of dubbing Prostitution 'Sex Work'		
• Neutral Language could easily be used	'THE SEX INDUSTRY' 'PROSTITUTION'	
• Signals capture by Sex Trade	'PEOPLE WHO SELL/EXCHANGE SEX'	
• Sanitises/Endorses industry		
• Victim blames/stigmatises victims	IF IT'S 'JUST WORK' HOW CAN YOU POSSIBLY BE TRAUMATISED?	
• Increases victims' self blame		
• Increases barriers to disclosure/exiting		
• Reduces services understanding, so ability to support		
• Misleads services/decision makers/influencers/public		
• Reinforces the denial by those in industry	FOR WHAT OTHER WORK ARE BUYERS/MANAGERS PENALISED?	
• Indicates buyers/pimps are legitimate		
• Does not represent or show understanding of reality of Industry		
• Vague & unclear (includes entire sex trade not just prostitution)		STRIPPING ONLY FANS
• Vague & Unclear (pimps are 'sex workers' too!)		

1. Biased Terminology Undermines Policing

The term 'sex work' is heavily promoted by those with a vested agenda to promote prostitution and who openly call for the decriminalisation of pimps and other profiteers.

The use of it by any public body signals clear 'capture' by the sex trade lobby. This dramatically undermines confidence in such bodies. It suggests they cannot possibly understand, accept or deal appropriately with the universal harms associated with prostitution.

It undermines confidence in law enforcement in terms of its ability to deal with well-publicised widespread police misogyny, to analyse information appropriately (rather than being swayed by those who are most vocal even when they propose harmful and often nonsensical ideologies) or to deal with organised crime, given that this dominates the sex trade.

It is particularly concerning, that despite prostitution being framed as 'work' for many years by the NPCC and others, it is those who sell sex (*not* pimps or buyers) who are still being criminalised. Indeed even paying someone subject to force (Section 53A) has, in effect, been decriminalised. Why?

- [Home Affairs Committee condemns inaction on Section 53A](#)

2. Harmful Terminology

Perhaps most concerning, is the fact that this is deeply harmful terminology.

Although reputedly introduced to de-stigmatise those who sell sex, far more stigma (including far higher levels of abuse and murder) is incurred everywhere that frames prostitution as 'work'.

It also causes far more harm - and indeed stigma - to those in the industry, vulnerable to it, seeking to exit or exited.

It sanitises the industry to impressionable or vulnerable people who might consider entering it. By framing the industry in this way, the police are playing their part in **encouraging entry**. They are also helping **groomers, paedophiles and traffickers** in their manipulation of victims.. after all, *'it's just work'*.

The phrase also sanitises, and so helps promote, **sex buying** – when a key element of any policing policy should surely be to discourage, if not eliminate, buying.

It has also meant that current NPCC guidance is wrapped up in tongue-tied pages seeking to explain why **police men should not be sex buyers**. If it is just a job where men buy a service, then isn't that like telling police officers they can't buy sweets at the local corner shop?

It has also tied policy in knots over the idea of **'sex worker identity'**. If it is just work like any other job, that was freely chosen, full of empowered women who can chose anything else if they wish, then how can being in the sex industry possibly be part of a special identity requiring a protected characteristic? If it is just work then how can those in it need special protection? It is claimed this is required due to stigma – but where is the evidence that it is stigma that causes such extreme harms?

Framing the sex trade as work also adds to the high levels of **internalised shame and self blame (self stigmatisation)** experienced both within and once exited the industry. It clearly tells victims that it was their fault for being harmed, after all *'it's just a job'* and in what other job are you traumatised? It also adds to the denial, trauma bonding and cognitive dissonance (believing two totally opposing things as 'fact') by those in the industry. On the one hand, women are being gang raped, beaten, suffering anal tears and prolapse and having their fingernails pulled out by pimps. On the other hand *'it's just work'*.

It also makes it much harder for women to disclose and gain the necessary support. After years of sex trade lobbying, many services now see the sex industries as 'just' work – or it is perceived that they do. This makes disclosure even harder than it already is for those in, exited or seeking to exit the industry or for services to be able to respond appropriately. *'How can I even tell a service who says my abuse was work?'* How can people possibly be getting the support they need if they cannot even disclose?

3. 'Sex Work' is Unclear, Non-Legal Terminology yet Neutral Alternatives Exist

Policing bodies should be using legally recognised terminology. The term 'sex work' carries **no legal meaning**. Terms such as 'the sex industry' and 'prostitution' do however.

'Sex work' refers to every aspect of the sex trade – including (supposedly) non-physical (and supposedly 'less harmful') aspects such as lap dancing or webcamming. Different forms of support are clearly needed depending on whether physical contact is involved (eg in theory women in lap dancing do not require emergency sexual health services since no sexual contact is involved).

Is the NPCC guidance about prostitution or the entire gambit of the sex industry?

In terms of terminology, the simple solution is to use **neutral language** such as:

'people experiencing the sex industry' .. 'women in the sex industry' .. 'people in prostitution'
'women who sell or exchange sex'

Language such as this is much clearer and does not stigmatise either way or indicate a 'stance' or itself contribute to harm. Surely, this is the kind of language that all impartial bodies should be using.

vi. The Sex industry is VAWG not 'Work'

This is far more about words, however. Words merely indicate how the entire industry is to be viewed and therefore dealt with. Unless and until the entire sex industry is comprehensively understood as a form of VAWG (Violence against Women and Girls) – actually an extreme form of VAWG - it cannot possibly be understood or dealt with appropriately. This is further explained below:

a) Victim Profile

Compare the profile of those in the sex trade (all forms of it) to VAWG:

References: [The Human Cost of the Sex Trade](#)

VAWG MODEL: VICTIM PROFILE	SEX TRADE VAWG	
	Vulnerable/Pre Abused/Exploited Enter	✓ ?
	Denial. Trauma Bonded. Dissonance. Dissociation. Split Persona. Coerced	✓ ✓
	Extreme Violence/Multiple Abusers	✓ ?
	Shattered Mental/Physical Health	✓ ✓
	Re-entry normal	✓ ✓

- The sex industries are overwhelmingly populated by **vulnerable and pre-abused women** (which may or may not be true of other forms of VAWG)
- The **denial and trauma bonding** seen in victims of DV/childhood sexual abuse is normal in the sex trade as a key survival mechanism (trauma bonding to abusers and the abusive industry itself, along with its addictions and physical and emotional harms)
- Cognitive **Dissonance** (believing two totally contradictory things as true at the same time) and Emotional Dissonance (split personas) just as for is also normal in the sex trade, so too is **coercion and exploitation** – indeed this is the foundation of the entire industry
- **Extreme levels of violence** at the hands of multiple abusers (pimps, punters, partners outside of the industry) is normal. This may or may not be true of DV or other forms of VAWG.
- Just as for other forms of VAWG, the **physical and mental health** of women in prostitution is shattered (and often denied whilst in the industry).
- **Re-entry** into the sex trade (on average 8 times) is also standard – just as for other forms of VAWG, such as DV

b) Policy and Attitudes

Despite the sex industries clearly falling within a VAWG model, it is shocking how sex trade victims are treated compared to victims of other forms of VAWG:

VAWG MODEL: POLICY/ ATTITUDES		SEX TRADE	VAWG
	'Normal, Empowering, Choice'	✓	X
	Recognised as harm even if no Violence	X	✓
	'Inevitable'	✓	X
	Abusers Decriminalised	✓	X
	Abusers Listened to	✓	X
	Victims in Denial Listened to	✓	X
	Survivors Listened to	X	✓

- In what other form of VAWG are we told that it is an **empowering choice** and so normal it should be viewed as 'a job like any other'?
- Other forms of VAWG are recognised as VAWG even if **no overt violence** takes place – eg Domestic Violence (DV) might not always involve violence, rather coercive control. Yet coercion and exploitation is absolutely inherent to prostitution as it is predicated on sex driven by need, not the desire that it should only ever be based without causing psychological harm.
- What other form of VAWG are we told is **inevitable**? In fact prostitution is far less inevitable than any other form of VAWG, given that 90% of sex buyers could be stopped dead in the tracks merely with 'naming and shaming', small fines or other such minor deterrents:

References: [Inevitable? The sex Industry can easily be decimated](#)

- For what other VAWG do we call for **abusers** to decriminalised, for only **victims** in denial to be listened to and for the **majority**, including **survivors** to be ignored, ridiculed or smeared?

vii. Work or VAWG – What Really Works?

These pictograms outline the consequences of framing prostitution as 'work' compared to VAWG (aka The Nordic Model). It is somewhat inexplicable that 'sex work' groups do not embrace the Nordic Model. It is only this that can (and does) significantly reduce the high levels of violence in the industry, that decimates the 'underground industry' and that decreases 'stigma'. It also significantly reduces competition amongst sex sellers (given that the 90% who seek to exit are supported to do so). The reverse is true for a 'work' model – yet it is this that is promoted by all 'sex work' groups.

Models for Addressing the Sex Trade

'Work'

The sex trade *has* to be legitimised (and 'regulated' to 'minimise harm') either by:

Legalisation

- Sex Sellers, Buyers, Profiteers (pimps) all decriminalised. State controlled (supposedly)

Full Decriminalisation

- Sex Sellers, Buyers, Profiteers (pimps) all decriminalised. No State Involvement)

'VAWG'

Work to **end the industry**:

1. All sex sellers recognised as Victims

- Never Criminalised
- Supported, including to Exit

2. All buyers/profiteers seen as abusers

- Criminalised or otherwise deterred

3. Strident Steps to deter entry/buying

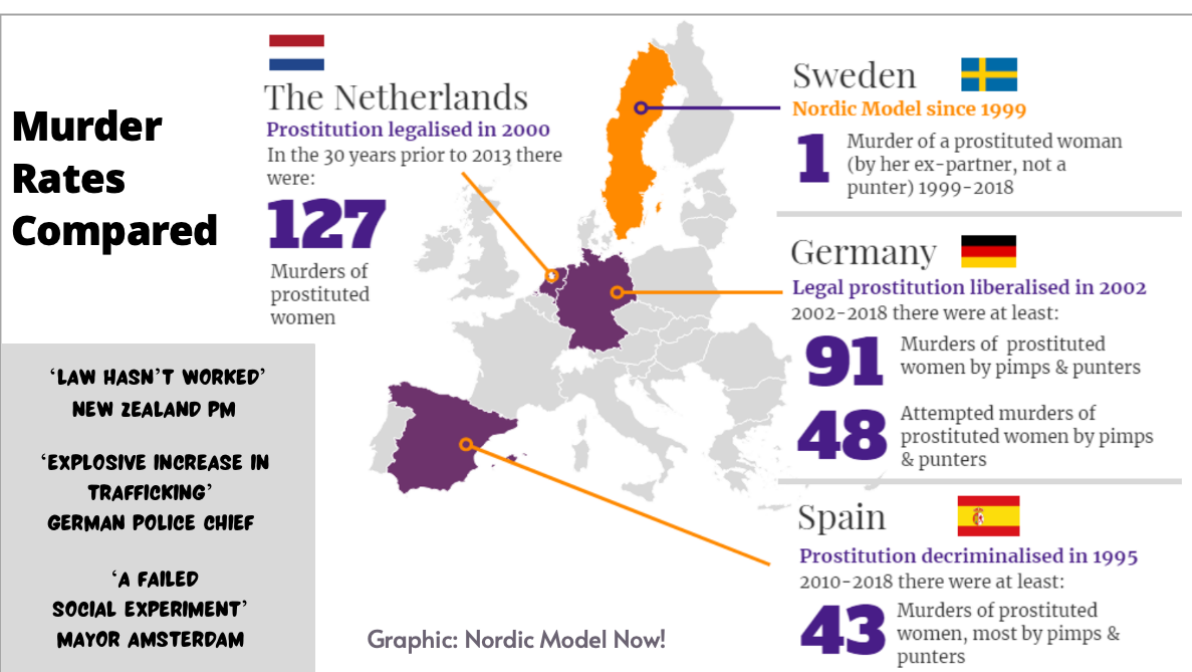
The End Result

'Work'

- **Increases** Demand
- **Increases** Trafficking/Exploitation
- **Increases** Illegal Trade
- **Increases** Child Prostitution
- **Increases** Violence/Murder
- **Enables** Organised Crime
- **Impossible to Police**
- Sex Sellers still **criminalised**
- **Decreases** Sex Seller Income/Safety
- **90% still want to Exit**
- **No Exit Support** as 'Just Work'

VAWG

- **Decreases** Demand
- **Decreases** Trafficking/Exploitation
- **Decreases** Child Prostitution
- **Decreases** Violence/Murder
- Organised crime **Not Enabled**
- **Possible to Police**
- Sex Sellers **Not Criminalised**
- **Increases** income/safety of Sex Sellers
- The 90% **supported to Exit**



Why 'Sex Work' doesn't work – Market Forces

- There is potentially **huge profit** to be made by exploiters
- So the industry everywhere is **dominated by exploiters**
- There is an **unlimited global supply** of potential 'product'
Vulnerable/impoverished/socially groomed people who can easily be exploited – probably the majority of the 7 billion inhabitants of the world
- So anywhere that makes it easier for exploiters, maximises profit, minimises risk/penalties **gives the 'green light'** and will always be a hub of exploitation
If not enough 'local product', vulnerable people are readily imported
- **Legitimising/enabling** the industry in any shape or form gives that 'green light'
- **Criminalising** all profiteering, all enabling and all buying can clearly 'stop the industry in its tracks'

Why VAWG/Nordic Model Works*

Prostitution is an entirely unnecessary industry

Tackling Demand shrinks/end prostitution

Ending Demand Readily Achievable

Criminalise + small fines/exposure = 90% Reduction in Sex Buying

90% in Industry want to exit

None would 'chose' industry if fully informed/genuine choice

References

- [Prostitution work or violence ?](#)
- [Work and Abuse models compared](#)
- [Prostitution as Abuse](#)
- [Prostitution as 'Work'](#)
- [What Sex as Work means](#)
- [Prostitution and Covid – Under Decriminalisation, 'sex workers' still criminalised](#)

Should Police Work with ‘Adult Services’ Websites?

All References: [Online Pimping Sites](#)

Online Pimping Sites – Reality Check
Santised as ‘Adult Sex Work Sites’
Online Sites are now main way men buy sex
Dominated by Organised Crime/Traffickers
75% of Sex Trafficking now happens Online
Drive Demand, Pimping, Trafficking, Paedophilia, Underground Industry
Impossible to Police or ‘Make Safe’
Banning sites does NOT ‘drive industry underground’

1. Language and Framing

The euphemism ‘adult service website’ needs to stop being used immediately. Prostitution procurement sites should never be legitimised with such language, in the same way that the industry itself should never be legitimised (and falsely represented) as ‘work’. To add insult to injury, let’s not forget that many of those sold on such sites are underage and the sites themselves are readily accessed by children. They aren’t ‘adult’ at all.

Most people are shocked to hear that the NPCC, National Crime Agency (NCA) and others have even considered working with such sites, let alone that they have been doing so for years and view them as ‘key partners’. Given the high levels of criminality associated with such sites, they public more correctly view them as ‘pimping sites’.

At very least, neutral, clear and honest terminology could be applied such as ‘**Prostitution Sites**’.

ii. Modern Day Pimps

The pictograms below outline the reality of online pimping sites, the meaningless ‘regulation’ in place and their total lack of co-operation with law enforcement. We would suggest any attempt to work with

them, severely compromises trust in the police, and potentially police integrity - given the high levels of organised crime and trafficking from which these sites profiteer.

We would also point out the standard 'fake evidence' offered up by the sex trade lobby .. 'sites can be regulated' .. the industry 'will go underground' if they shut. The fact that these statements (either wholly unevicenced or supported by blatantly biased and poor quality research) are so readily accepted yet further undermines the integrity of public bodies, such as the NPCC and NCA:

Online Pimping Sites - The Facts

- Online Sites allow easily change of location, facilitating moving victims
- Traffickers adapt continuously to avoid detection
- Lack of clear indicators of trafficking means nothing
- Often no link to trafficker - eg pre paid cards used to pay for ad

- Phone Nos act as 'Call Centres' connecting men to Multiple women
- Woman's profile frequently does not match who she actually is
- Women often do not manage their own profile
- Even if they do, often coerced by traffickers

Sex Trafficking generates 10 x more per victim than any other form of trafficking

Fake Safety Measure

- **'Passport Verification'** meaningless - often not of women being sold
- **'Screening'** - There is zero screening of Punters
- **VPNs** readily available
- **Not Safe** even if buyer is 'regular punter'
(so were the mass murderers of prostituted women in Ipswich, Bradford etc)

Fake Arguments

- **Helps 'identify' trafficking victims** - It enables traffickers who are still rarely convicted ¹
- **'It will go Underground'** - 'Dark Web' unsuited to traffickers, hard for buyers to access
- **If buyers can access it, so can law enforcement**
- **'It will just be displaced'** - Then it can be stopped as all sites illegal. In reality, market shrinks
- **'It's too Hard to Police'** - *impossible* to police when legal, infinitely easier when illegal

Working With .. or Working For?

- NCA has 'worked with' online pimping sites for years
- Sites already fully aware they host trafficking
- NCA fully aware
- Sites will not and cannot 'design out' trafficking

"We have a positive working relationship with **ONE WEBSITE** but not with others"

National Crime Agency

NCA says 'too intrusive' to ask for:

- Country of origin of bank account for ads placed
- If Ads placed are not for the woman bought
- Proportion of Ads connected to other women (eg one tel no. for multiple ads)

"ASWS* directed to report any suspicious behaviour .. they have **NOT MADE ANY REFERRALS**"

National Crime Agency

iii. Closing Online Pimping Sites doesn't 'Drive the Underground Industry'

Banning Online Pimping Sites - The Reality

USA

- SESTA-FOSTA Bill passed
- Backpage Closed (a monopoly and hub of exploitation/child abuse)
- **Market collapses**
- **Immediate 2/3 reduction in demand**
- **Unique users fall by 90+ %**
- Dissipation to other sites at much smaller, more manageable scale
 - Back Page annual revenue \$150mil
 - Post SESTA-FOSTA largest market player revenue just \$20 mil
- Exploiters 'get out of the game' as much harder/less profitable

France

- Viva Street stops all sex ads
- Massive withdrawal of demand and activity

The clarion call of the sex trade lobby is that the sex industry 'goes underground' whenever it is prevented from operating. This has been proven false time and time again. In fact the exact opposite is true - the more the sex trade is legitimised, the more 'underground' it becomes. So why would ending the online legitimacy of the industry be any different? And of course, where online pimping sites are banned, the industry cannot 'displace', it shuts down:

Brothels

Brothels – Reality Check

Dominated By Organised Crime

Rarely ‘Independent Sex Workers’

High Levels Violence / Abuse

Illegal. Enforce the Law

Work With Exiting/Survivor Groups NOT Pro Pimp Groups

ALL brothel keeping is illegal, regardless of whether coercion involved.
Why isn't the same true of ALL pimping (ONLY illegal if exploitation involved) and ALL other forms of profiteering (not criminalised at all, except when carried out through brothel keeping)?

We can only imagine the question about brothels is included because one of the key arguments put forward by the sex trade lobby to decriminalise brothel-keeping is the idyl of ‘independent sex workers working together in a flat they have rented’ who and then arrested by the police.

The issue of criminalising those who sell sex in brothels is moot. As we, and all those who recognise prostitution as VAWG state time and time again, no one selling sex should ever be criminalised.

And the reality is that there is very little ‘independent’ prostitution of this nature. Pimps circle all who attempt this – of course they do, there are vast profits to be made off these women and they certainly don’t want others thinking about following suit. They may call the police on such women or carry out physical and sexual assaults to bring them into line.

The truth is, that brothels are essentially run by profiteers from which women (pimped, trafficked, groomed or otherwise) ‘hire’ space.

Equalities and Other Considerations

i. Equality Duties

The purpose of Equality law is to afford the best possible protection and equalities for women (and other protected groups). It *must* be followed by all public bodies, including policing.

Specifically all decisions must:

‘seek to eliminate harassment, victimisation and discrimination’ of women and ‘foster good relations’ between the sexes.

Unfortunately, current NPCC ‘sex work’ guidance comprehensively fails to do this – instead it actively promotes such harms.

ii. Who Says What, Why



In order to abide by equality law, it is vital for public bodies to understand who says what, why and to consider who *is* given a voice and who *should* be given a voice:

1. Who Supports the Industry? A few who sell sex

There is considerable focus on ‘lived experience’. However this never seems to mean those actually with ***lived*** experience *in the past* ie survivors. Instead, it means only those still in the industry (or still closely tied to it) – ie those ***still living*** the experience. Or at least, those still in the industry who advocate *for* the sex trade. This is a tiny majority, given that 90% urgently seek to exit because of its extreme harms. Yet it is only this small minority that are heard

Advocates still in the industry (often already coming from a background where abuse is normalised) are likely experiencing any or all of the following: emotional and cognitive dissonance, denial, dissociation, desperation, threat, intimidation, coercion and trauma bonding (while of course constantly being told ‘it’s just work’ and ‘the best possible solution is full decriminalisation’). This is testified to time and again by exited women, indicated by research and demonstrated by the actions and statements of those in the industry themselves. It is readily validated and understood when the psychology of abuse is applied to sex trade victims just as it is for victims of other forms of VAWG.

- [The Strip Industry – Denial, intimidation and trauma bonding](#)
- [The Strip Industry – Threat and Intimidation](#)
- [UN Special Rapporteur highlights intimidation vs those who challenge ‘sex as work’](#)

2. **Who Supports the Industry? The Sex Trade Lobby**

The most powerful representative of the sex industry is, of course, the multi \$trillion porn and sex industry – with a clearly vested interest to maintain and grow the sex trade (which, of course, is exactly what legitimising it does). This includes many ‘sex work’ group and unions – which are often dominated by pimps.

3. **Who Supports the Industry? Other Sex Trade Advocates**

There are many other pro-sex trade advocates who are not directly involved with the sex trade eg academics, trade unions, political parties, NGOs and much of the media/social media. The ability of the sex trade lobby to sway policy and public opinion cannot be underestimated, from UN Women to anti-trafficking NGOs. Some of these supporters adopt even the most extreme pro-sex industry positions - the Lib Dems would decriminalise ‘consensual sex trafficking’, whilst the New Zealand Government views children raped in prostitution as ‘sex workers selling a service’.

- [Who are the sex trade advocates?](#)
- [Media ‘Pornogander’](#)

4. Who Opposes the Industry?

Survivors (and their allies) represent the 90% of those in prostitution seeking to exit (a figure which holds true even in fully decriminalised New Zealand – the idyllic end goal of sex trade advocates).

We ask the NPCC and all others to question why:

- Survivors are ignored, their voices are not listened to, their views/experiences are not acted upon. They are not even heard. They are silenced. They are censored.
- Their trauma seems to be deemed ‘balanced’ out by a small minority still in the industry with opposing views or (supposedly) better experiences
- Their *en masse* trauma is seemingly outweighed by a ‘right’ to ‘chose’ to sell sex or the (readily debunked) ideology that the industry can be ‘harm reduced’ and any attempt to curtail it ‘will drive it underground’.

Why is it that those who oppose the industry are not listened to whilst those who support it are?

More than simply questioning this, this imbalance to be rectified urgently (a necessity if any attempt to abide by equality law is sought)

iii. Research or ‘Research’?

‘Prostitution Decreases Rape’

‘Dissociation, denial, trauma bonding .. is caused by Stigma’

‘Stay safe - don’t wear a scarf’

‘How to avoid unwanted Sexual Contact in the Sex Industry’

All global, multi £trillion industries .. tobacco ... fossil fuel giants .. fully recognise the power of research to influence decision makers and sway public opinion. It is well documented how and why such corporates create ‘false research’ alongside either suppressing or ‘debunking’ the facts. If anything, the sex trade lobby has done an even better job. Media now typically do not even attempt any semblance of ‘balance’ but purely present the ‘sex work’ view.

In light of this, it is no surprise that the information presented as ‘fact’ by sex trade advocates is typically highly unreliable and sometimes outright dangerous.

It is concerning how readily all information provided by what is self-evidently a powerful and highly vested interest group is taken at face value without question and rapidly adopted into policy and public perception. At the same time, all information challenging this narrative is scrutinised to the nth degree, treated with the utmost suspicion or frequently dismissed outright due to ‘coming from those with a vested interest’ (‘anti-sex’, ‘stigmatisers’, ‘someone with a one-off bad experience’, ‘anti-sex worker prudes’.) Any public body must keep a genuinely open mind and must carefully assess all information placed before. If it relies on poor quality information it will be breaching equality law, and, worse, harming the most vulnerable in society.

- [Research or ‘Research’?](#)

iv. Pro-Sex Trade Decisions : Breaking the Law

Time and again, pro-sex trade decisions have been shown to be unlawful. Just a few examples are provided below. Again, all public bodies should pay careful attention if they are to avoid breaching equality law, never mind providing the best support to those in, exited or at risk of the sex trade.

- [Breaking the Law](#)

v. Harm of the Industry

The multiple and extreme harms of the sex trade have already been covered throughout this document. It is self-evident that it is impossible to abide by equality law when any decision promotes or enables any form of the sex trade.

We would also argue that it is meaningless to distinguish between different branches of the sex industry, suggesting one is ‘less harmful’ or ‘safer than another’. This is not purely because of the similar harms across all forms but because it is normal for women to operate across the sex trade spectrum. Women in lap dancing, for instance, will invariably also have an Only Fans account and be involved in escorting, work at the local brothel and/or ‘sugaring’.

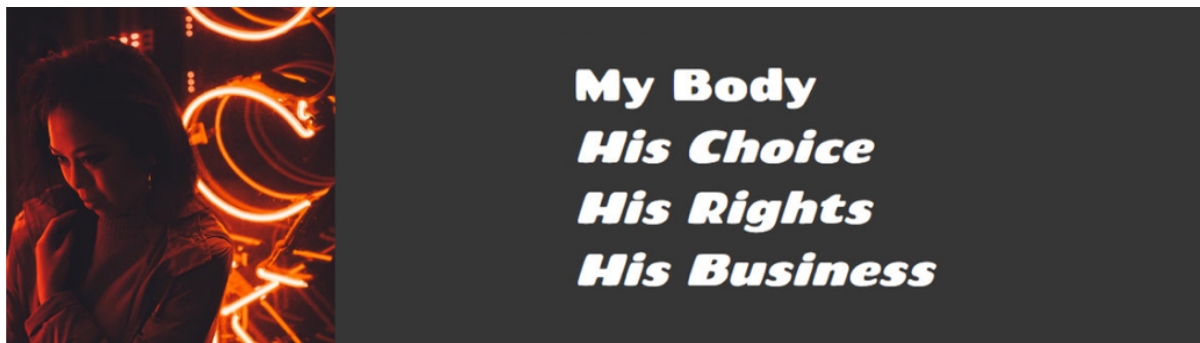
- [Harm across the sex trade spectrum](#)

vi. The Wider Impact

Under equality law, public bodies *must* consider the impact of all their decisions on wider society. Typically, sex buyers are more abusive towards all women, not just those they buy. Equally, the porn and sex industries have a profound impact on wider society – arguably they are now the most significant promoters of the attitudes that underpin male violence against women.

- [The Johns](#)
- [The Wider Impact](#)

vii. Debunking the Myths



The reference below debunk some of the myths put forward by the sex trade lobby. Most are in relation to strip clubs, but exactly the same holds true for the rest of the sex trade. Strip clubs actually provide a particularly fitting example of how the more the sex industry is legitimised, the more ‘underground’ its behaviour. The strip trade has a High Street presence across the world and is avidly promoted as sexy, harmless fun. Yet it operates like an underground industry – evident from the ease with which it circumvents all regulation, links with criminality, trafficking, prostitution and organised crime and the clear corruption of local decision making.

- [‘It’s Inevitable’](#)
- [‘It will Go Underground’](#)
- [‘You’ll put Women out of Work](#)
- [‘It’s a Right to Choose’](#)
- [‘It’s Well Regulated’](#)
- [‘How Safety Systems Fail Women’ \(and other important information\)](#)
- [Strip Clubs UK – the underground nature of the industry/corruption of decision making](#)
- [Spearment Rhino – the underground nature of even the most prestigious strip chains](#)

Stigma

Stigma deserves a special mention here, since this is the very reason given to justify using the term 'sex work' (which of course, then *has* to lead to the industry being viewed as work and therefore full decriminalisation).

Of course, it is absolutely true that women in the industry are stigmatised, something they should never experience. But most of this stigma – and certainly the most dangerous forms of stigma (leading to sexual and physical assaults and even murder and suicide) - comes from sex buyers and pimps.

Women in the industry also invariably suffer high levels of internalised stigma and self blame. Because of this, many in the industry do not tell friends, family or any 'outsiders' they are in the sex trade. This might be rationalised as entirely due to stigma, but either way it means such individuals are very isolated, with no support network outside of prostitution, having to lead 'a double life' and feeling very 'othered'. This is partly why the idea of holding a 'protected characteristic' also plays out so strongly with those in prostitution.

Those in the sex industry typically experience denial and trauma bonding yet at the same time know they are experiencing considerable harm. If 'stigma' is proffered as the reason for that harm, it allows the harm to be recognised whilst still allowing for denial and trauma bonding.

These are some of the main reasons the 'stigma' narrative plays out so strongly with those still in the industry and is used to such effect by 'sex work' protagonists.

However, fully decriminalising the sex industry does nothing whatsoever to reduce stigma or abuse either by the public or by buyers and profiteers. It actually makes both stigma and abuse infinitely worse. And it does nothing to reduce the internalised stigma those in the industry carry.

We do not seek to destigmatise any other form of deeply harmful – and wholly unnecessary - enterprise by turning it into 'work'. We do not call children in sweat shops 'workers doing a normal job' and when we call out this abuse no one claims human rights campaigners are 'anti child'. But when anyone stands against the sex trade they are immediately slammed as 'anti sex worker'. **It is the sex industry that is anti-sex worker, not those who stand against it.**

The reality is, that the only people who are stigmatised when prostitution is recognised as abuse are sex buyers and pimps.

What Law Enforcement *Should* be Doing

The pictograms below are fairly self explanatory as to what the NPCC and others should be doing to truly protect the majority, indeed all, in the sex trade and to abide by equality duties:

Next Steps

Years of 'Sex Work' Lobby to be Countered

NPCC Key Leads:

Ongoing meetings/webinars/information/newsletters
via Survivors/Survivor Groups

Wider Police Partnership- with Survivors/Survivor Groups

What the NPCC *should* Be Doing

Recognise Sex Trade as VAWG

Work with Survivor/Exiting Groups

Enforce Existing legislation vs Pimps/Brothels

Lobby for Exiting Support

Call for Ban on ALL (on/offline) Pimping/Profiteering/Enabling

Call For Sex Selling to be Decriminalised/Convictions Wiped

Call For Sex Buying to be Criminalised