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Dear Rt Hon Frank Field MP and members of the Joint Committee on the Draft Modern Slavery Bill

We are the CLASH (Central London Action on Sexual Health) Team. CLASH is an NHS service based in Soho with a long history of providing sexual health services, information and support to sex workers.

We ask that you consider the following serious concerns with the proposed amendment to the Modern Slavery Bill that seeks to criminalise paying for sex.

The CLASH Team is concerned about the amendment and two clauses to the Modern Slavery Bill which aim to make the purchase of sex illegal. We are worried that the criminalisation of the clients would move sex workers to provide hurried and potentially more unsafe services due to potential repercussions for the client in receiving a criminal sentence/caution. It is also concerning that this amendment does not consider the purchase of sex between two consenting adults as completely different to clients who are violent and/or scenarios where trafficking or coercion may be present.

The CLASH Team completely agrees that the law should help and support individuals that have been trafficked or coerced and we agree that the police and projects such as ours need to have very clear and defined guidelines on what to do if a sex worker reports having been coerced or trafficked. However, this amendment does not take into account the number of sex workers who make an independent choice to work in the sex industry. Evidence of this can be found in the Economic and Social Research Council (ESRC) Project: *Migrant Workers in the UK Sex Industry* by Dr. Nick Mai (<https://metranet.londonmet.ac.uk/research-units/iset/projects/esrc-migrant-workers.cfm>).

The CLASH Team does not agree with the statement that “prostitution is a form of violence against women and girls”. We are in agreement that it is essential to allocate appropriate resources to protect sex workers from coercion, trafficking and violence. However, the idea that choice is removed completely from sex work is very worrying and goes against the experience that CLASH and other similar projects have where the vast majority of sex workers seen are choosing to enter sex work as a temporary measure to support their lifestyle, their studies and their family

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situations. It is also quite worrying to consider sex work as violence only against women and girls with no considerations for male and transgender sex workers. Protection from violence should therefore not be based on gender but on the needs/circumstances of the individual sex worker.

We believe there is insufficient evidence to suggest that the proposed changes in criminalising the purchase of sex, line with the Swedish model, will improve the safety of sex workers. Rather than reducing the demand, we are concerned that the industry will be forced underground leading to increased violence and further stigmatisation and have a negative effect on health.

Yours Sincerely,

**The CLASH team**

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