

Conservative Party Human Rights Commission Inquiry into the Reform of Prostitution Law

Submission from the English Collective of Prostitutes
020 7482 2496 • ecp@prostitutescollective.net • www.prostitutescollective.net

The ECP is a self-help organisation of sex workers, working both on the street and in premises, with a national network throughout the UK. Since 1975, we have campaigned for the decriminalisation of prostitution, for sex workers' rights and safety, and for resources to enable people to get out of prostitution if they want to.

1. Have you lived in a jurisdiction which has passed laws following either the full decriminalisation or Nordic models relating to prostitution? If so, please describe your experience.

We are based in London with a national network throughout the UK, but our international network includes sex workers and sex worker-led organisations located in those jurisdictions.

We urge the inquiry to pay close attention to [evidence](#) from New Zealand which successfully decriminalised sex work in 2003. We have visited New Zealand and seen first-hand the verifiable improvements in sex workers' rights and safety.

In all the countries which have introduced laws criminalising clients there is strong opposition from sex workers and sex worker organisations backed by academics, health professionals, NGOs and community organisations because of the risk of increased violence, stigma and discrimination.

We object to the focus of the Commission "on global attempts to criminalise the purchase of sexual services". How can the Commission's Inquiry have legitimacy if it exhibits obvious bias in this way?

2. How do you think these two models- which have received the most attention in recent years - impact;

(a) The safety of those in prostitution;

1. Decriminalisation promotes safety as sex workers can collectively assert their rights to better working conditions.

- **New Zealand** – introduced the Prostitution Reform Act to decriminalise sex work in 2003.

Over 90% of sex workers said decriminalisation gave them additional employment, legal, health and safety rights.¹ 70% said that since decriminalisation they were more likely to report incidents of violence to the police.² Police take reports of violence more seriously³ and have moved from "the role of prosecutor to that of protector".⁴ Removing the fear of arrest has meant that sex workers, particularly street based workers, feel more able to work during the day and in well lit, safer locations. NB: This is unlikely to be true if clients were still criminalised.

2. Criminalisation, whether of sex workers or clients, drives sex workers further underground, making it more dangerous and stigmatising to work.

Attacks on sex workers doubled in Scotland after kerb-crawling laws were introduced which criminalised clients.⁵ A 2014 survey from National Ugly Mugs found that where arrests of sex workers and clients were high, only 5% of sex workers who were victims of a crime reported it. This compared to 46% of victims in areas where police adopted a harm reduction approach.⁶

Claims that violence, particularly trafficking, can be reduced by criminalising clients are disproven by a 2014 Vancouver study which found that "criminalisation and policing strategies that target clients...profoundly impacted the safety strategies sex workers employed."⁷

- **Ireland** -- Criminal Law (Sexual Offences) Bill to criminalise clients introduced in 2017. Attacks on sex workers have increased dramatically since the law change. Reported incidences of violent crime against sex workers, from threats to assaults with weapons, have risen by almost 50%

from 900 in the year preceding the change, and more than 1,300 since.⁸ Sex workers are now less likely to report dangerous clients to Gardaí.⁹

- **Norway** – introduced a law to criminalise clients in 2009. Amnesty International conducted thorough and comprehensive research¹⁰ into the impact of this law in 2016. It found that sex workers are still criminalised, including for working together for safety; forced evictions, investigations, surveillance, prosecutions and increased stigma are prevalent with migrant workers particularly targeted; “police are using sex workers’ reports of violence and crimes against them as evidence to facilitate their eviction and/or deportation”; “sex workers were routinely evicted from their homes under so-called ‘pimping laws’”. One woman commented to the press:
*“Before we did not go far with the customer: we would go to a car park nearby. But now the customer wants to go somewhere isolated because they are afraid,” she said. “I don’t like it. There is more risk that something bad happens.”*¹¹
- **France** – introduced law criminalising clients in 2016. In April 2018, Medecins du Monde published a two-year evaluation report¹² of the law penalising clients which found that since the law was introduced 63% of sex workers have experienced deterioration of their living conditions, more isolation and greater stress; 42% of sex workers are more exposed to violence (with all kinds of violence on the increase: insults in the street, physical violence, sexual violence, theft, and armed robbery in the work place) 38% of sex workers have found it increasingly hard to demand use of condom; 70% of sex workers observe no improvement or a deterioration in their relations with the police.
- **Sweden** – introduced the Sexköpslagen law which criminalised the buying of sex in 1999. Lawmakers stressed that the 1999 Swedish law criminalising clients was not to have a detrimental effect on people in prostitution,¹³ yet evidence shows that since the law change, sex workers face increased stigma, are more at risk of violence, and are less able to call on the protection of the police and the authorities¹⁴ as this can lead to police harassment, the loss of custody over children, or deportation. Likewise, clients are less willing to report any violence or coercion they have witnessed, since this would require them to incriminate themselves.

In a 2014 survey, 63% of sex workers said the sex purchase law had created more prejudice from the authorities; over a quarter (29%) had reported violent attacks from clients but only two said they would report an attack in the future.¹⁵

Incredibly, the Swedish government’s 2010 official evaluation argued that the increased stigmatisation and risks faced by sex workers was a positive result of the Sex Purchase Act; in other words, endangering sex workers helps ‘fight’ prostitution.

Comprehensive field work and research¹⁶ over three years, reported that there is “no convincing empirical evidence that the law has resulted in a decline in sex work in Sweden, which was the law’s principal ambition. It also countered the claim that sex workers have been decriminalised: sex workers can be prosecuted under procuring laws when they band together for safety. Landlords have been pressured by police to evict sex worker tenants under threat of being prosecuted themselves.

Harm reduction initiatives have been undermined. Giving out rape alarms, condoms and a safer sex-selling guide are now opposed by the authorities on the grounds that they encourage prostitution and are futile because sex work is considered to be immutably dangerous.¹⁷

Research from **Canada**¹⁸ found that the criminalisation of clients: “impacted the safety strategies sex workers employed. Sex workers continued to mistrust police, had to rush screening clients and were displaced to outlying areas with increased risks of violence, including being forced to engage in unprotected sex.”

(b) Exploitation of foreign migrants and trafficked persons;

Trafficking is distinct from prostitution, which is the consensual exchange of sexual services between adults for money.¹⁹ The most reliable recent research found less than 6% of *migrant* sex workers been trafficked, many said they prefer working in the sex industry rather than the “unrewarding and

sometimes exploitative conditions they meet in non-sexual jobs".²⁰ Figures that claimed to show that over 80% of sex workers are trafficked or pimped have been proved to be false.²¹

Trafficking is forced or bonded labour, abduction, kidnapping, false imprisonment, rape, grievous bodily harm, extortion. Existing laws cover all these offences and should be used to prosecute the assailants of women and children, whatever work they are being forced into.

The trafficking of men, women and children for labour exploitation is far more widespread than sex trafficking. For every trafficking victim subjected to forced prostitution, nine people are forced to work" in other fields.²² Trafficking is fuelled by poverty and the difficulties of migrating legally. Women from poorer countries want to come to work in the UK in the hope of improving their and their children's lives. Begging or working illegally, including in prostitution are some of the few options for people left destitute. Whether in the sex industry, agricultural, domestic or other service work, exploitation is rife.²³

Anti-poverty measures and an end to the discredited "hostile environment" are needed to address the exploitation of migrants. The Windrush scandal exposed the cruel, callous and racist immigration policy which for decades has also been inflicted on immigrants and asylum seekers.²⁴ This policy must be abolished. Over 11/4 people are officially destitute in the UK including over 300,000 children -- no wonder so many women, particularly mothers, go into prostitution to survive.²⁵

Trafficking law also claims to target violent exploiters, **but the law is more often used to target immigrant women for deportation.**²⁶ A Brazilian woman in the ECP who ran a flat where other migrant women worked was convicted and imprisoned for three years for trafficking even though there was no evidence of coercion and the judge acknowledged that "*none of these women were, in fact, coerced by you into acting as a prostitute . . . you treated them in a kindly and hospitable way*". All her possessions, built up over many years of hard work, were confiscated under the 2002 Proceeds of Crime Act. Her ex-husband tried to get custody of her youngest child and despite living in the UK for 25 years, her British citizenship was withdrawn.²⁷

Sex workers have good reason to fear reporting to the police. One woman in our group was robbed at knife point yet when she called the police they threatened her with arrest and deportation.²⁸

Decriminalisation would allow migrant sex workers to unionize, insist on their labour rights and counter exploitation as has happened in other jobs.²⁹ EU migrant sex workers in the ECP have been given deportation notices on the grounds that sex work is "not a legitimate job".³⁰

Research from the Global Alliance Against Traffic in Women found that "*criminalising sex workers' clients does not reduce sex work or trafficking. Instead, it infringes on sex workers' rights and obstructs anti-trafficking efforts.*"³¹

There is no evidence that criminalising clients in Sweden has reduced trafficking.³²

Women in Norway who reported serious violence and torture to the police had their passports confiscated and were deported, even though some had not overstayed their visa.³³

(c) Exiting services.

If the Commission has an interest in helping sex workers exit prostitution and reducing levels of prostitution in the UK it has to address government policies which promote prostitution. 86% of austerity cuts since 2010 have fallen on women³⁴ As poverty rises, more women, particularly single mothers, are turning to sex work to survive and feed their families. In some cities massive rises in prostitution are being directly attributed to policies such as benefit sanctions.³⁵

Measures that would help women exit prostitution that the Commission could recommend include: repealing universal credit, benefit sanctions, the benefit cap and bedroom tax; reinstate Income Support for single mothers.

Other measures include: provision of refuges; cash payments to cover the transitional period until women are able to get benefits or another form of employment; housing priority for sex workers who are

“vulnerable” because of homelessness or violence, financial help to cover childcare costs and to clear debts; immediate and appropriate drug rehabilitation services for those who want them.

Decriminalisation would allow women to more easily exit sex work. In New Zealand, a provision to allow people to apply for historical convictions to be removed from their record had made it easier for sex workers to leave prostitution.³⁶

Sex workers in countries where clients have been criminalised are denied meaningful and effective exiting services:

France

A recent study³⁷ showed: *“Difficulty accessing housing, obstacles to applying for a residency permit, insufficient financial aid prevent most people from applying and including those who are most in need of support...”*

Sweden

There is "no convincing empirical evidence that the law has resulted in a decline in sex work in Sweden, which was the law's principal ambition."³⁸

No investment was made by the Swedish government in social care for exiting services when the law criminalising clients was introduced.³⁹ Outside of the three cities where there are prostitution units – which existed before the sex purchase ban was introduced – there are no other services for sex workers in Sweden (and no specific services provided by the government to sex workers who are not cisgender women).

3. What legislative change would you like to see? How would it affect the daily reality of those in prostitution?

We urge the government to immediately implement the Home Affairs Select Committee recommendations⁴⁰ that sex workers on the street and working together in premises be decriminalised.

Specifically:

- Repeal section 1, Street Offences Act 1959 “Loitering or soliciting for the purposes of prostitution” to prevent women being trapped in prostitution by fines and criminal records.
- Repeal section 33, Sexual Offences Act 1956 “Keeping a brothel” to allow women to work together more safely from premises.
- Amend section 53, Sexual Offences Act 2003 “Controlling prostitution for gain” to ensure that people are prosecuted only where evidence of *threats, force or other forms of coercion* exists. This would ensure that the law targets abuse and violence rather than women working consensually and collectively.

In its 2016 report, the Committee recommended that:

*“... the Home Office change existing legislation so that **soliciting is no longer an offence and so that brothel-keeping provisions allow sex workers to share premises.**”*

The Committee’s report also recommended legislation to provide for the **“deletion of previous convictions and cautions for prostitution from the record of sex workers”**

The HAC inquiry found that decriminalisation as introduced in New Zealand in 2003 had *“resulted in a number of benefits, including a clear policy message, better conditions for sex workers, improved cooperation between sex workers and the police, and no detectable increase in the size of the sex industry or exploitation of sex workers”*.

It also addresses other legal models specifically the law introduced in Sweden in 1999 to criminalise clients. It acknowledges that this law is *“a fundamentally different legislative approach to prostitution from that which is currently in place in England and Wales. It is based on the premise that prostitution is morally wrong and should therefore be illegal, whereas at present the law makes no such moral judgement”*. It also cites evidence that the law has been used to harass and victimise sex workers.

On trafficking the report is equally clear: ". . . trafficking for the purposes of sexual exploitation is an important and separate issue from prostitution between consenting adults".

The Government must also give serious consideration to the New Zealand Prostitution Reform Act (PRA) 2003 as a model for decriminalising prostitution in the UK and ensure that sex workers and sex workers' organisations are centrally involved in the research and process of changing the law. The 5-year review⁴¹ of the implementation of the PRA clearly states in its conclusions that *"On the whole, the PRA has been effective in achieving its purpose, and the Committee is confident that the vast majority of people involved in the sex industry are better off under the PRA than they were previously."*

Decriminalisation would improve sex workers' safety and welfare. In the UK, police crackdowns break up safety networks.⁴² Sex workers on the street are running from the police fearing arrest and have little time to check out clients. It is 10 times safer to work inside with others,⁴³ but the brothel-keeping law expressly forbids this. Fear of arrest, and for immigrant sex workers, fear of deportation,⁴⁴ are the biggest obstacles to reporting rape and other violence. Violent men take advantage of the legal vulnerability of sex workers and deliberately target them.

Thousands of sex workers each year are raided, arrested, cautioned, and even imprisoned every year.⁴⁵ Criminal records are a major obstacle to sex workers being able to leave prostitution if they want to and get another job. Violence is increasing and as HAC reports only 25% of sex workers report violence to the police. Police who gave evidence to the Inquiry acknowledged that "simple enforcement does not produce sustainable outcomes and can actually increase the vulnerability of sex workers to violent attack".

4. At what point does prostitution become exploitation?

Exploitation should be defined and tackled in prostitution in the same way as it is in other industries by strengthening trade union rights, empowering workers and prosecuting abusive employers.

- a) force and coercion should be prosecuted under the criminal law;
- b) "severe" exploitation (e.g. withholding of wages, not paying the minimum wage) should be prosecuted under gang masters legislation;
- c) exploitation e.g. employer taking a too big a cut of a worker's wages, should be addressed at employment tribunal – but prohibitive fees must be abolished.

None of these remedies are possible in a criminalised system, making decriminalisation an imperative to tackling exploitation.

Sex workers reject the sexist assumption that we are inherently more exploited or vulnerable than other workers. A recent report⁴⁶ found construction, recycling, nail bars and car washes were among the top sectors where the Gangmasters and Labour Abuse Authority (GLAA) said there was slavery. Six million people are earning less than the living wage in the UK.⁴⁷ Our soon to be published research shows that levels of exploitation in other jobs traditionally done by women are often higher than in sex work. One woman commented: *"I can earn £240 for four hours. Worse case, I walk out with £60 and that's still more than I would earn in a day job at £6 an hour."*

Those who get labelled as "exploiters" under brothel-keeping and controlling law are primarily sex workers working with others for safety. The laws and the current policing policy of widespread closures of premises is exacerbating exploitation. Every raid, closure and displacement make it more dangerous to work, and harder for sex workers to resist exploitation and fight for better working conditions.

The ILO defines forced labour as where persons are coerced to work through menace or penalty for example the use of violence or intimidation, manipulated debt, retention of identity papers. . .⁴⁸ Poverty and the need for an income is not coercion in prostitution any more than in other jobs. If the Commission considers that it is then we expect the government to be put on trial for coercing women into sex work by its economic policies which have impoverished women.

Decriminalisation is a major step in reducing exploitation. The New Zealand Prostitution Reform Act has improved sex workers' working conditions and made it easier for those who want to get out, to do so.⁴⁹ Over 90% of sex workers said they had additional employment, legal, health and safety rights (**including 64.8% who said they found it easier to refuse clients – a key marker of exploitation**). In 2014 a woman took her boss to the Human Rights Review Tribunal for sexual harassment. She was awarded NZ\$25,000.⁵⁰ Sex workers in the UK want access to that kind of justice.

5. Additional comments.

We urge the CHRC to recommend that current sex workers and sex workers' organisations are centrally involved in the process of setting policy and changing the law.

We urge the CHRC to follow the recommendations of the cross-party Home Affairs Committee as it is the most prestigious parliamentary body to have scrutinised the prostitution laws in recent times. The APPG on Prostitution is partisan and was biased from the start.⁵¹ It has never made the findings of its "inquiry" public, despite MPs asking for the data.

We recommend to the CHRC the [report](#) from the 2015 parliamentary Symposium which brought together sex workers from over 10 countries, academics and other experts and provides a definitive source of statistical evidence for parliamentarians on decriminalisation.

Please see further [information](#) on sex work to counter misinformation.

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